

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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March 25, 2026

CA2025-1331

Kristen Camuglia
Cox Communications
Director of Regulatory Affairs
27422 Portola Parkway, Suite 100
Foothill Ranch, CA 92610

SUBJECT: CIP Audit of Cox Communications North San Diego District

Ms. Camuglia:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Eric Ujiiye of my staff conducted a Communication Infrastructure Provider (CIP) audit of Cox Communications' North San Diego District from October 27 to 31, 2025. The audit included a review of Cox Communications' inspection and maintenance records, and a field inspection of Cox Communications' facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than April 21, 2026, by electronic or hard copy, of all corrective measures taken by Cox Communications to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Eric Ujiiye at (213) 620-2598 or eric.ujiiye@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Majed Ibrahim".

Majed Ibrahim, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosures: CPUC Audit Findings

Cc: Leslie Palmer, Deputy Executive Director, Safety Enforcement, Safety Policy, and Water
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead detailed and patrolled inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Cox Communications' Intrusive Inspection of Wood Poles
- Cox Communications' Overhead Lines Maintenance Plan
- Cox Communications' Visual Inspections of Overhead Lines

II. Records Review – Violations List

Staff observed the following violations during the records review portion of the audit:

GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

A work order for facility Asset ID 166926839 with Pole number P32866 was completed on September 23, 2025, two months past Cox Communications' scheduled due date of July 22, 2025.

III. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure ID	Structure Type	Location
1	P122651	Pole	Oceanside
2	P12300	Pole	Oceanside
3	P29729	Pole	Oceanside
4	P21168	Pole	Oceanside
5	P26309	Pole	Oceanside
6	P128673	Pole	Oceanside
7	P26310	Pole	Oceanside
8	P26311J	Pole	Oceanside
9	P26312J	Pole	Oceanside
10	P109385	Pole	Escondido
11	P517484	Pole	Escondido
12	1234569255	Pole	Escondido
13	P715845	Pole	Escondido
14	P715844	Pole	Escondido
15	P217386	Pole	Escondido
16	P715843J	Pole	Escondido
17	P715842	Pole	Escondido
18	P510778	Pole	Escondido
19	P31570	Pole	Escondido
20	P14584	Pole	Ramona
21	P116466	Pole	Ramona
22	P245096	Pole	Ramona
23	P13121	Pole	Ramona
24	P716251	Pole	Ramona
25	P312624	Pole	Ramona
26	P715131	Pole	Ramona
27	312625	Pole	Ramona
28	312626	Pole	Ramona
29	616391	Pole	Ramona
30	P312627	Pole	Ramona
31	P312628	Pole	Ramona
32	P617462	Pole	Ramona
33	P617463	Pole	Ramona
34	P419046	Pole	Escondido
35	172429918	Pole	Ramona
36	P419045	Pole	Ramona

37	P419499	Pole	Ramona
38	P314565	Pole	Ramona
39	177430709	Pole	Ramona
40	P248914	Pole	Vista
41	P16411	Pole	Vista
42	P1997745S	Pole	Vista
43	P316700	Pole	Vista
44	P319346	Pole	Vista
45	P312410	Pole	Vista
46	P16409	Pole	Vista
47	P414231	Pole	Vista
48	P16408	Pole	Vista
49	P166362	Pole	Vista
50	P16412	Pole	Vista
51	P416425	Pole	Vista
52	P16413	Pole	Vista
53	P16414	Pole	Vista
54	P16415	Pole	Vista
55	P245329	Pole	Vista
56	P22502	Pole	Encinitas
57	P245778S	Pole	Vista
58	P22503J	Pole	Vista
59	P127747	Pole	Vista
60	P27889	Pole	Vista
61	P229533	Pole	Vista
62	P127743J	Pole	Vista
63	P123482	Pole	Vista
64	P123481	Pole	Vista
65	P120536	Pole	Vista
66	P24988	Pole	Vista
67	P25101	Pole	Vista
68	P20763J	Pole	Vista
69	P25147	Pole	Vista
70	P20540	Pole	Vista
71	P23604	Pole	Vista
72	P20545	Pole	Vista
73	P228464	Pole	Vista
74	P22387	Pole	Vista
75	P122094	Pole	Vista
76	P24347J	Pole	Vista
77	P24348	Pole	Vista

78	P121948	Pole	Vista
79	P120881	Pole	Vista
80	P24350J	Pole	Vista
81	P25079J	Pole	Vista
82	P25089	Pole	Vista
83	P25090	Pole	Vista
84	P25092	Pole	Vista
85	P20759J	Pole	Vista
86	P127923	Pole	Oceanside
87	P127822	Pole	Oceanside
88	P127921	Pole	Oceanside
89	P127920	Pole	Oceanside
90	P127919	Pole	Oceanside
91	P127918	Pole	Oceanside
92	P127916	Pole	Oceanside
93	P127914	Pole	Oceanside
94	P127913	Pole	Oceanside
95	P127903	Pole	Oceanside
96	P127902	Pole	Oceanside
97	P127900	Pole	Oceanside
98	P127899	Pole	Oceanside
99	P127898	Pole	Oceanside
100	P127895	Pole	Oceanside
101	811031031	Vault	Oceanside
102	811031042	Vault	Oceanside
103	1373793893	Pedestal	Oceanside
104	1373793898	Vault	Oceanside
105	141935941	Pedestal	Oceanside
106	141935962	Pedestal	Oceanside
107	141935969	Pedestal	Oceanside
108	141936347	Pedestal	Oceanside
109	141935948	Pedestal	Oceanside
110	141935976	Pedestal	Oceanside
111	141935983	Pedestal	Oceanside
112	141935990	Pedestal	Oceanside
113	141936354	Pedestal	Oceanside
114	141935997	Pedestal	Oceanside
115	141936004	Pedestal	Oceanside
116	141936011	Pedestal	Oceanside
117	141936018	Pedestal	Oceanside
118	141936046	Pedestal	Oceanside

119	141936032	Pedestal	Oceanside
120	811031134	Vault	Oceanside
121	811031102	Vault	Oceanside
122	811031102	Pedestal	Oceanside
123	604449396	Vault	Oceanside
124	604449389	Vault	Oceanside
125	579936573	Vault	Oceanside
126	1001998935	Pedestal	Oceanside
127	142182076	Pedestal	Oceanside
128	142182062	Vault	Oceanside
129	989136189	Pedestal	Oceanside
130	989136189	Vault	Oceanside
131	142181684	Pedestal	Oceanside
132	142182090	Pedestal	Oceanside
133	142181663	Pedestal	Oceanside
134	142182104	Pedestal	Oceanside
135	142181593	Pedestal	Oceanside
136	142182083	Pedestal	Oceanside
137	142181586	Pedestal	Oceanside
138	142181579	Pedestal	Oceanside
139	142181551	Pedestal	Oceanside
140	3100009224	Pedestal	Oceanside
141	142181572	Pedestal	Oceanside
142	142181600	Vault	Oceanside
143	30776633711949151027	Vault	Oceanside
144	142182006	Pedestal	Oceanside
145	142182027	Pedestal	Oceanside
147	142182020	Pedestal	Oceanside
148	142182020	Vault	Oceanside

IV. Field Inspection - Violations List

GO 95, Rule 18-A3, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards, A. Resolution of Potential Violations of General Order 95 and Safety Hazards, states in part:

(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such safety hazard(s) no later than 10 business days after the discovery.

Safety hazards on the following poles were not documented and reported to the responsible third parties during Cox's latest inspections:

- Pole P26312J – A third-party supply ground molding was damaged, exposing the ground wire at the public level.
- Pole P14584 – A section of the third-party ground molding was missing, exposing the ground wire at the public level.
- Pole P312627 – An AT&T down guy wire was pressing against a supply secondary riser supported on an adjacent pole.
- Pole P245329 – An SDG&E down guy wire was not trimmed at the anchor attachment point, leaving 4-feet of extra wire creating a potential pedestrian hazard.

GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

The following Cox facilities required maintenance:

- Pole P517484 – The protective ground molding was not secured to the pole near the base of the pole.
- Pole P419046 – The down guy anchor attachment eye was buried beneath the ground surface.
- Pole P228464 – The connection to the ground wire was damaged at the conductor span.
- Pole P127902 – The grounding rod was exposed and protruding from the ground.

GO 95, Rule 35, Vegetation Management, states in part:

When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidence abrasions from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).

Cox facilities supported on the following poles were strained by vegetation:

- Pole P319346 – A service drop supported on the pole was being deflected and strained by vegetation.
- Pole P22502 – The conductor span supported on the pole was being deflected by vegetation at midspan.

GO 95, Rule 37, Table 1, Column B, Case 3, requires the minimum above-ground clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops), Supply Service Drops of 0 – 750 Volts” in areas “Crossing or along thoroughfares in urban districts or crossing thoroughfares in rural districts” to have a minimum of 18 feet of clearance.

On Pole P127916, a service drop crossing a public street was measured to have a clearance of 12’10” above Cregar Street in the City of Oceanside.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8, requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops),” and “Communication Conductors and Supply Drops” supported on the same pole to be 12 inches.

The following Cox facilities had less than the required minimum clearance of 12 inches:

- Pole P26310 – A Cox fiber splice case on the conductor span was contacting the underbuilt communication span.
- Pole P312624 – The Cox conductor span supported on the pole was contacting the underbuilt communication conductor at midspan.
- Pole P16409 – A Cox service drop supported on the pole was entangled with a telephone service drop.
- Pole P22503J – The Cox conductor span supported on the pole had multiple drip loops that were contacting the underbuilt span.
- Pole P127747 – A node on the Cox conductor span was contacting the underbuilt conductor span.
- Pole P121948 – A splice case on the Cox conductor span was contacting the underbuilt communication span near the pole.

GO 95, Rule 84.6-B, Ground Wires, states in part:

Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8-A...

The Cox ground wire attached to each of the following poles lacked suitable covering:

- Pole P122651 – A 3-inch section of ground wire was exposed at the base of the pole.
- Pole P14584 – At 2 feet above ground level, the ground wire molding was damaged, exposing the ground wire.
- Pole P16415 – A 3-foot section of the ground molding near base of pole was damaged, exposing the ground wire.
- Pole P20540 – At 3-feet above ground level, a 1-foot section of ground molding was damaged, exposing the ground wire.
- Pole P127923 – At 6-feet above ground level, the ground molding was parting from the surface of the pole, exposing the ground wire.
- Pole P127902 – The ground molding did not fully extend to the base of the pole, exposing the ground wire.
- Pole P127895 - The ground molding was damaged at 3 feet above ground level.

GO 95, Rule 87.7-D1, Covered from Ground Level to 8 Feet above the Ground, states in part:

Risers shall be protected from the ground level to a level not less than 8 feet above the ground...

At the base of Pole number P517484, the riser was not fully covered, exposing the conductor.

GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

The following Cox facilities required maintenance:

- Pedestal 141935962 – The ground wire inside the pedestal was not attached to the equipment.
- Pedestal 141935983 – The pedestal structure brace was damaged
- Pedestal 141935990 - The pedestal structure brace was damaged in addition to being closely installed near a gas line.
- Pedestal 141936354 – A cable was exposed and protruding out the rear of the cabinet housing.
- Pedestal 141935997 – A service line was protruding out the side of the pedestal.

- Pedestal 141936011 – The pedestal was severely corroded and damaged, exposing the internal components.
- Pedestal 141936046 – The ground wire inside the pedestal was not attached to the equipment.
- Vault 604449396 – The equipment within the vault was not grounded.
- Pedestal 3100009224 – The equipment contained within the pedestal was not grounded.
- Pedestal 142182006 – The pedestal housing was damaged and unable to close properly.
- Pedestal 1001998935 – The pedestal housing was damaged.
- Pedestal 142182076 – The pedestal housing was damaged.

GO 128, Rule 42.7, Covers, states in part:

Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal.

The following Cox covers were not securely closed:

- Vault 811031031 – The vault was missing the bolts used to secure the lid.
- Vault 811031042 – The vault was missing the bolts used to secure the lid.
- Vault 1373793898 – The vault lid was loosely secured, allowing unauthorized access into the vault.
- Pedestal 141935976 – The pedestal lid could not lock, allowing unauthorized access into the pedestal.