

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 21, 2025

CA2025-1216

Lisa Ludovici
Director, Government Affairs Sierra Nevada
270 Bridge Street
San Luis Obispo, CA 93401

Subject: Audit of Charter's Southern California Management District

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), James Miller of my staff conducted a communications infrastructure provider audit of Charter's Southern California Management District from June 2, 2025 to June 6, 2025. The audit included a review of Charter's records and field inspections of Charter's 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 September 22, 2025, by electronic or hard copy, of all corrective measures taken by Charter 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 James Miller at (213) 660-8898 or James.Miller@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- Inspection records
- Work Order and notification records
- Third Party Notifications
- Pole Loading Calculation Records
- Inspection and Maintenance Procedures

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 95, Rule 18-B1, Maintenance Programs, states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...

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

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.

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.

Charter's records indicated that during the twelve months prior to the audit, Charter completed 39 overhead and underground work orders past Charter's due date for corrective action. Additionally, as of the audit, Charter had 434 overhead and underground open work orders that were past Charter's scheduled due date for corrective action.

III. Field Inspections

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

No.	Facility Identification	Facility Type	Location
1	101 N. Lima Street	Pole	Sierra Madre
2	GT143423	Pole	Sierra Madre
3	29 N. Lima Street	Pole	Sierra Madre
4	CWT57005	Pole	Sierra Madre
5	922478E	Pole	Sierra Madre
6	57004CWT	Pole	Sierra Madre
7	769251E	Pole	Monrovia
8	575625E	Pole	Monrovia
9	Next Pole S/O 575625E	Pole	Monrovia
10	589295E	Pole	Monrovia
11	GT3697	Pole	Monrovia
12	340712E	Pole	Monrovia
13	340711E	Pole	Monrovia
14	340710E	Pole	Monrovia
15	1814397E	Pole	Baldwin Park
16	1739838E	Pole	Baldwin Park
17	GT58724	Pole	Baldwin Park
18	4757959E	Pole	Baldwin Park
19	4156473E	Pole	Baldwin Park
20	1456961E	Pole	Baldwin Park
21	4757953E	Pole	Baldwin Park
22	986337E	Pole	Baldwin Park
23	822542E	Pole	Newport
24	931780E	Pole	Newport
25	750668E	Pole	Newport
26	750667E	Pole	Newport
27	4443024E	Pole	Newport
28	4338568E	Pole	Newport
29	822543E	Pole	Newport
30	524234E	Pole	Newport
31	822544E	Pole	Newport
32	4569963E	Pole	Newport
33	4569998E	Pole	Newport
34	457384E	Pole	Newport
35	1816176E	Pole	Newport
36	4569994E	Pole	Newport
37	3711 Lake Avenue	Vault	Newport

38	312 38th Street	Vault	Newport
39	400 38th Street	Vault	Newport
40	404 38th Street	Vault	Newport
41	38th Street & Finley Avenue	Vault	Newport
42	506 38th Street	Vault	Newport
43	1520463E	Pole	Costa Mesa
44	1520464E	Pole	Costa Mesa
45	1503534E	Pole	Costa Mesa
46	777020H	Pole	Costa Mesa
47	1503535E	Pole	Costa Mesa
48	1461369E	Pole	Costa Mesa
49	1461368E	Pole	Costa Mesa
50	1461367E	Pole	Costa Mesa
51	21150 Sunwood Drive	Vault	Walnut
52	782 Lincoln Avenue	Doghouse	Walnut
53	21241 Lycoming Street	Vault	Walnut
54	21272 Lycoming Street	Vault	Walnut
55	21236 Lycoming Street	Vault	Walnut
56	21170 Lycoming Street	Vault	Walnut
57	21152 Lycoming Street	Vault	Walnut
58	Dryander Drive & Lycoming Street	Vault	Walnut
59	814 Dryander Drive	Vault	Walnut
60	820 Dryander Drive	Vault	Walnut
61	830 Dryander Drive	Doghouse	Walnut
62	848 Dryander Drive	Vault	Walnut
63	1304331E	Pole	Rowland Heights
64	1304330E	Pole	Rowland Heights
65	1304329E	Pole	Rowland Heights
66	1304328E	Pole	Rowland Heights
67	1304327E	Pole	Rowland Heights
68	1304326E	Pole	Rowland Heights
69	1304332E	Pole	Rowland Heights
70	1304333E	Pole	Rowland Heights
71	1304334E	Pole	Rowland Heights
72	1304335E	Pole	Rowland Heights
73	4576127E	Pole	Rowland Heights
74	1304337E	Pole	Rowland Heights
75	1304338E	Pole	Rowland Heights
76	1304339E	Pole	Rowland Heights
77	1304340E	Pole	Rowland Heights
78	1304341E	Pole	Rowland Heights
79	1292229E	Pole	Diamond Bar
80	1292230E	Pole	Diamond Bar

81	4455890E	Pole	Diamond Bar
82	1292206E	Pole	Diamond Bar
83	1292348E	Pole	Diamond Bar
84	1820185E	Pole	Diamond Bar
85	1308218E	Pole	Diamond Bar
86	1308219E	Pole	Diamond Bar
87	1890423E	Pole	Diamond Bar
88	1308215E	Pole	Diamond Bar
89	4656176E	Pole	Diamond Bar
90	477 Rancheria Road	Doghouse	Diamond Bar
91	1308214E	Pole	Diamond Bar
92	4593699E	Pole	Pomona
93	1089969E	Pole	Pomona
94	1089970E	Pole	Pomona
95	1292509E	Pole	Pomona
96	45705E	Pole	Pomona
97	G21824Y	Pole	Pomona
98	G214075Y	Pole	Pomona
99	45701E	Pole	Pomona
100	35020E	Pole	Pomona
101	1089967E	Pole	Pomona
102	4462689E	Pole	Pomona
103	35017E	Pole	Pomona
104	1089965E	Pole	Pomona
105	G18834Y	Pole	La Verne
106	4613832E	Pole	La Verne
107	G18836Y	Pole	La Verne
108	49138E	Pole	La Verne
109	G18838Y	Pole	La Verne
110	4377070E	Pole	La Verne
111	4748611E	Pole	La Verne
112	1565514E	Pole	La Verne
113	1565515E	Pole	La Verne
114	4632687E	Pole	La Verne
115	1682946E	Pole	Claremont
116	522114E	Pole	Claremont
117	502324E	Pole	Claremont
118	331913E	Pole	Claremont
119	720530E	Pole	Claremont
120	776414E	Pole	Claremont
121	266509E	Pole	Claremont
122	266508E	Pole	Claremont
123	47402E	Pole	Claremont

124	2219987E	Pole	Rosemead
125	257659E	Pole	Rosemead
126	242366E	Pole	Rosemead
127	2219833E	Pole	Rosemead
128	225386E	Pole	Rosemead
129	742809E	Pole	Rosemead
130	225388E	Pole	Rosemead
131	2219824E	Pole	Rosemead

IV. Field Inspection Violations List

My staff observed the following violations during the field inspections portion of the audit:

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, Use, states in part:

Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44 .

A down guy wire attached to Pole No. 1520464E was not taut.

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 overhead facilities need maintenance:

- The lashing wire on a Charter conductor located north of Pole No. GT143423 was broken.
- The visibility strips on Pole No. 1503535E were damaged.
- The visibility strips on Pole No. 822542E were damaged.
- The ground molding on Pole No. 1304340E was damaged and a section at ground level was missing.
- The ground molding on Pole No. 1292229E was damaged and a section at ground level was missing.
- A section of lashing wire and messenger guy were both broken near Pole No. 1308219E.
- A down guy wire attached to Pole No. 1308219E was not attached to its guy anchor.
- A lashing wire south of Pole No. 4656176E was broken.
- A service drop attached to Pole No. 1089970E was damaged.
- A lashing wire south of Pole No. G18838Y was broken.

GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communications conductors supported on the same pole to be three inches.

A Charter communications conductor and a third-party down guy wire, both attached to Pole No. 266509E, were in contact.

GO 95, Rule 91.3, Stepping, Section B., Location of Steps, states in part:

The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.

The lowest pole step on Pole No. 457384E was located at a height of less than eight feet.

GO 95, Rule 34, Foreign Attachments, states in part:

Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.

Unauthorized foreign attachments were attached on each of the following poles:

- Pole No. 1520464E supported an unauthorized “Cash 4 Junk Cars” sign.
- Pole No. 1503534E supported an unauthorized “Cash 4 Junk Cars” sign.
- Pole No. 1461368E supported an unauthorized “Caution – Kid Zone” sign.
- Pole No. 1461367EE supported an unauthorized “Cash 4 Junk Cars” sign as well as a second sign reading “We Buy Junk Cars.”
- Pole No. 1304329EE supported an unauthorized “Lost Dog” sign.
- Pole No. 11304326E supported an unauthorized “We Buy Junk Cars” sign.
- Pole No. 1304333E supported an unauthorized “Lost Dog” sign.
- Pole No. 1520464E supported an unauthorized “Cash 4 Junk Cars” sign.
- Pole No. 1304334E supported an unauthorized “I Buy Houses” sign.
- Pole No. 1304335E supported an unauthorized “Junk Removal” sign.
- Pole No. 4593699E supported an unauthorized “Lost Cat” sign.
- Pole No. 1292509E supported an unauthorized “Missing Cat” sign.
- Pole No. 45705E supported an unauthorized “We Buy Junk Cars” sign.
- Pole No. 45701E supported an unauthorized “Lost Cat” sign.
- Pole No. 4613832E supported an unauthorized “Lost Cat” sign.
- Pole No. 2219824E supported an unauthorized “Missing dog” sign.

GO 95, Rule 31.6, Abandoned Lines, states:

Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.

A Charter service drop attached to Pole No. G214075Y was permanently abandoned and not reoved.

GO 95, Rule 92.4-D1 – Exposed Cables and Messengers states in part:

The exposed communications conductors and messengers shall be grounded: At all deadend poles and at intervals not greater than every one-quarter of a mile (1320 feet).

The Charter messenger wire attached to a deadend Pole No. 1503534E was not grounded.

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.

Charter communications conductors were in contact with third-party communications conductors on or near each of the following poles:

- | | |
|---|------------|
| • The pole at 101 Lima Street in Sierra Madre | • 1461367E |
| • GT143423 | • 1304330E |
| • The pole at 29 Lima Street in Sierra Madre | • 1304327E |
| • CWT57005 | • 1304326E |
| • 57004CWT | • 1304334E |
| • 769251E | • 1304339E |
| • 575625E | • 1304341E |
| • The pole south of 575625E | • 1292230E |
| • 589295E | • 1292206E |
| • GT3697 | • 1292348E |
| • GT58724 | • 1308218E |
| • 4757959E | • 1308219E |
| • 822542E | • 1308215E |
| • 931780E | • 4656176E |
| • 750668E | • 4593699E |
| • 750667E | • 1089969E |
| • 4338568E | • 1089970E |
| • 822543E | • 1292509E |
| • 524234E | • G214075Y |
| • 822544E | • 35020E |
| • 4569998E | • 4462689E |
| • 457384E | • 35017E |
| • 1816176E | • G18836Y |
| • 4569994E | • 49138E |
| • 1503534E | • 4377070E |
| • 1503535E | • 1565514E |
| | • 720530E |

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

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.

The following underground facilities need maintenance:

- The lid to the vault at 3711 Lake Avenue was damaged.
- The ground wire for the power inserter in the vault at 3711 Lake Avenue was detached.
- The lid and enclosure of the vault at 21241 Lycoming Street were both damaged.
- The lid of the vault at 21272 Lycoming Street was damaged.
- The lid of the vault at the intersection of Dryander Drive and Lycoming Street was damaged.
- The lid of the vault at 820 Dryander Drive was damaged.
- The ground wire for the amplifier in the doghouse at 830 Dryander Drive was detached.

GO 128 Rule 34.3, Self-contained Surface-mounted Equipment, states in part:

Equipment installed partially or completely above the ground surface and not enclosed by a vault, room or fence shall conform to the following:

C. Locking Compartments and enclosures shall be made secure against entry by unauthorized persons by means of locks or other suitable means.

The following above-ground enclosures were not secured against entry by unauthorized persons by means of locks or other suitable means:

- The doghouse at 782 Lincoln Avenue
- The doghouse at 830 Dryander Drive

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.

Covers of the following underground facilities were not secured:

- The vault at 21150 Sunwood Drive
- The vault at 21241 Lycoming Street
- The vault at 21272 Lycoming Street
- The vault at 21236 Lycoming Street
- The vault at 21170 Lycoming Street

- The vault at 21152 Lycoming Street
- The vault at the intersection of Lycoming Street and Dryander Drive
- The vault at 820 Dryander Drive
- The vault at 848 Dryander Drive