

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 20, 2025

CA2025-1330

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

**SUBJECT:** Audit of COX Communications Santa Barbara District

Ms. Camuglia:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Norvik Ohanian of my staff conducted a Communication Infrastructure Provider (CIP) audit of COX Communications' Santa Barbara District on October 6-10, 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 December 22, 2025, 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, please contact Norvik Ohanian at (213) 660-5528 or [Norvik.Ohanian@cpuc.ca.gov](mailto:Norvik.Ohanian@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, Electric Safety and Reliability Branch, CPUC  
Norvik Ohanian, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

## AUDIT FINDINGS

### I. Records Review

During the audit, my staff reviewed the following records:

- Patrol and Detailed Inspection Records
- Repair Work Order Records
- Cox's inspection/maintenance overhead and underground program procedures
- Third-Party Safety Hazard Notifications
- Pole Loading Calculations

**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.*

COX's records indicated that from January 2024 through September 2025, COX completed 175 overhead work orders past COX's due date for corrective action. Additionally, as of the date of the audit, COX had 455 open overhead work orders that were past COX's scheduled due date for corrective action.

## II. Field Inspection

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

No.	Structure ID	Type of Structure	Location
1	1133974E	Pole	Goleta
2	1482345E	Pole	Goleta
3	1482346E	Pole	Goleta
4	1665014E	Pole	Goleta
5	4881914E	Pole	Goleta
6	1675852E	Pole	Goleta
7	1134050E	Pole	Goleta
8	1412987E	Pole	Goleta
9	1412988E	Pole	Goleta
10	1482349E	Pole	Goleta
11	1453468E	Pole	Goleta
12	4927675E	Pole	Goleta
13	1016000E	Pole	Goleta
14	807474E	Pole	Goleta
15	1482350E	Pole	Goleta
16	1217524E	Pole	Goleta
17	1256265E	Pole	Isla Vista
18	1345646E	Pole	Isla Vista
19	1345647E	Pole	Isla Vista
20	1345648E	Pole	Isla Vista
21	1015457E	Pole	Isla Vista
22	1345649E	Pole	Isla Vista
23	1524076E	Pole	Isla Vista
24	1524077E	Pole	Isla Vista
25	1524075E	Pole	Isla Vista
26	1413486E	Pole	Isla Vista
27	1453461E	Pole	Isla Vista
28	1453462E	Pole	Isla Vista
29	1523388E	Pole	Isla Vista
30	1345770E	Pole	Isla Vista
31	1522988E	Pole	Goleta
32	2144040E	Pole	Goleta
33	GT113174	Pole	Goleta
34	1346232E	Pole	Eastern Goleta Valley
35	4339702E	Pole	Eastern Goleta Valley
36	1217762E	Pole	Eastern Goleta Valley
37	1523939E	Pole	Eastern Goleta Valley
38	4891705E	Pole	Eastern Goleta Valley
39	1346233E	Pole	Eastern Goleta Valley
40	1609060E	Pole	Eastern Goleta Valley
41	Adjacent to Pole 1609060E	Handhole	Eastern Goleta Valley
42	1609061E	Pole	Eastern Goleta Valley

43	In front of 545 Calle Mastil	Pedestal	Santa Barbara
44	In front of 577 Calle Mastil	Pedestal	Santa Barbara
45	In front of 5296 Vista Bahia	Pedestal	Santa Barbara
46	In front of 5248 Vista Bahia	Pedestal	Santa Barbara
47	1453775E	Pole	Eastern Goleta Valley
48	1453776E	Pole	Eastern Goleta Valley
49	949310E	Pole	Eastern Goleta Valley
50	1453774E	Pole	Eastern Goleta Valley
51	4953268E	Pole	Santa Barbara
52	4608018E	Pole	Santa Barbara
53	In front of 1526 Anacapia St	Pole	Santa Barbara
54	4785T	Pole	Santa Barbara
55	1523172E	Pole	Santa Barbara
56	S29676Y	Pole	Santa Barbara
57	In front of 111 E Arrellaga St	Pole	Santa Barbara
58	1345599E	Pole	Santa Barbara
59	6542T	Pole	Santa Barbara
60	1946909E	Pole	Santa Barbara
61	6543T	Pole	Santa Barbara
62	1286318E	Pole	Santa Barbara
63	S350Y	Pole	Santa Barbara
64	In front of 227 E Arrellaga St	Pole	Santa Barbara
65	In front of 227 E Arrellaga St	Pole	Santa Barbara
66	1256070E	Pole	Santa Barbara
67	In front of 1603 Garden St	Pole	Santa Barbara
68	1372101E	Pole	Santa Barbara
69	In front of 817 Lowena Dr	Pedestal	Santa Barbara
70	4551997E	Pole	Santa Barbara
71	In front of 836 E Anapamu St	Handhole	Santa Barbara
72	In front of 836 E Anapamu St	Pedestal	Santa Barbara
73	In front of 1111 N Milpas St	Handhole	Santa Barbara
74	In front of 1105 N Milpas St	Handhole	Santa Barbara
75	In front of 1033 N Milpas St	Cabinet	Santa Barbara
76	In front of 1015 N Milpas St	Cabinet	Santa Barbara
77	In front of 1003 N Milpas St	Handhole	Santa Barbara
78	In front of 932 N Milpas St	Cabinet	Santa Barbara
79	1675122E	Pole	Santa Barbara
80	4156947E	Pole	Santa Barbara
81	4538599E	Pole	Santa Barbara
82	1675042E	Pole	Santa Barbara
83	1675019E	Pole	Santa Barbara
84	1675018E	Pole	Santa Barbara
85	1675017E	Pole	Santa Barbara
86	1675021E	Pole	Santa Barbara
87	1675022E	Pole	Santa Barbara
88	1675110E	Pole	Santa Barbara
89	In front of 200 E Constance Ave	Pole	Santa Barbara

90	1675127E	Pole	Santa Barbara
91	1675126E	Pole	Santa Barbara
92	4828963E	Pole	Santa Barbara
93	S17209Y	Pole	Santa Barbara
94	4921511E	Pole	Santa Barbara
95	2383673E	Pole	Santa Barbara
96	1675124E	Pole	Santa Barbara
97	1133329E	Pole	Santa Barbara
98	1133328E	Pole	Santa Barbara
99	4458399E	Pole	Montecito
100	4881929E	Pole	Montecito
101	4452167E	Pole	Montecito
102	4981996E	Pole	Montecito
103	1324839E	Pole	Montecito
104	4574534E	Pole	Montecito
105	4305341E	Pole	Montecito
106	4340213E	Pole	Montecito
107	4452166E	Pole	Montecito
108	4660871E	Pole	Montecito
109	4129694E	Pole	Montecito
110	4574198E	Pole	Montecito
111	1372765E	Pole	Summerland
112	1413338E	Pole	Summerland
113	1372764E	Pole	Summerland
114	In front of 2188 Hardinge Ave	Handhole	Summerland
115	In front of 2196 Hardinge Ave	Pedestal	Summerland
116	In front of 2192 Ortega Hill Rd	Handhole	Summerland
117	In front of 2192 Ortega Hill Rd	Handhole	Summerland
118	2320776E	Pole	Summerland
119	4041861E	Pole	Summerland
120	4041862E	Pole	Summerland
121	In front of 1488 Eucalyptus St	Handhole	Carpinteria
122	In front of 1478 Eucalyptus St	Handhole	Carpinteria
123	In front of 4605 El Carro Ln	Pedestal	Carpinteria
124	In front of 4605 El Carro Ln	Handhole	Carpinteria
125	In front of 4635 El Carro Ln	Handhole	Carpinteria
126	In front of 4685 El Carro Ln	Pedestal	Carpinteria
127	S29322Y	Pole	Carpinteria
128	S29145Y	Pole	Carpinteria
129	207295E	Pole	Carpinteria
130	S29323Y	Pole	Carpinteria
131	S27964Y	Pole	Carpinteria
132	S29324Y	Pole	Carpinteria
133	4890880E	Pole	Carpinteria
134	GT23882	Pole	Carpinteria
135	NG103518	Pole	Carpinteria
136	S29140Y	Pole	Carpinteria

137	489696E	Pole	Carpinteria
138	4538874E	Pole	Carpinteria
139	S18374Y	Pole	Carpinteria
140	4830349E	Pole	Carpinteria
141	GT107101	Pole	Carpinteria
142	2244962E	Pole	Carpinteria
143	4989567E	Pole	Carpinteria
144	S17171Y	Pole	Carpinteria

### III. Field Inspection – Violations List

My observed the following violations during the field inspections 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.*

The Cox Communications' facilities on each of the following poles required maintenance:

- 1524075E – The support hardware/cable for COX Communications service drop attached to the pole was detached from the building its serving.
- 1286318E – The COX Communications service drop cable was damaged.
- 4041861E – The COX Communications cables were supported by improper hardware (SCE insulator) to the new pole in place. Additionally, the lashing wire of COX Communications cables attached to pole was damaged.
- GT23882 – The COX Communications down guy anchor was buried.

**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.*

The COX Communications spliced cable attached to pole 1524077E was cut and not removed.

**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 evidences abrasion 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).*

The COX Communications conductors attached to each of the following poles were strained by vegetation:

- 4881914E
- Pole located in front of 1526 Anacapia St
- 4574534E

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

The COX Communications conductors/service drops supported on each of the following poles had less than 12 inches of vertical clearance from a third-party communications conductors or service drops supported on the same pole:

- Pole 1413486E – a COX Communications splice case was in contact with a third-party communications conductor.
- Pole GT107101 – a COX Communications conductor was in contact with a third-party communications conductor.

**GO 95, Rule 54.6B - Ground Wires**, states in part:

*That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).*

The COX communications ground wire moulding attached to each of the following poles was damaged:

- 1413486E
- 1523388E

**GO 95, Rule 56.2 – Overhead Guys, Anchor Guys and Span Wire Use**, states in part:

*Guy wires 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.*

The COX Communications down guy wire attached to pole 1346232E was loose and not taut.

**GO 95, Rule 87.7-D(1) – Risers, 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 by ...*

The COX Communications risers attached to each of the following poles were not protected by a covering properly:

- 1453461E
- 949310E
- 1256070E
- 1675019E
- 1675021E

- 1675127E
- 1133328E
- 2320776E
- S29145Y
- S29323Y
- S29140Y
- 4830349E
- S17171Y

**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 facilities required maintenance:

- The base of the pedestal located in front of 577 Calle Mastil was not properly secured to the ground.
- The locking mechanism of the pedestal cover located in front of 5296 Vista Bahia was damaged and the cover could not be opened.
- The pedestal located in front of 5248 Vista Bahia was filled with dirt.
- The cover of the handhole located in front of 1488 Eucalyptus St was damaged.