PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

December 5, 2025 CA2025-1421

Domenic Pacini
Race Communications
VP, Construction & OSP
1325 Howard Avenue, Unit 604
Burlingame, CA 94010

SUBJECT: Audit of Race Communications Kern County Area

Mr. Pacini:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Sultan Tipu of my staff conducted a Communication Infrastructure Provider (CIP) audit of Race Communications' Kern County Area on October 20-24, 2025. The audit included a review of Race Communications' inspection and maintenance records, and a field inspection of Race Communications' facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings detailing the violations is enclosed. Please advise me no later than January 5, 2026, by electronic or hard copy, of all corrective measures taken by Race 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 Sultan Tipu at (213) 660-5524 or Sultan.Tipu@cpuc.ca.gov.

Sincerely,

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: Leslie Palmer, Deputy Executive Director for Safety Enforcement, Safety Policy and Water, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Majed Ibrahim, Senior Utilities Engineer, ESRB, CPUC
Sultan Tipu, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Patrol and Detailed Inspection Records
- Repair Work Order Records
- Inspection and Maintenance Program Procedures
- Visual Inspections of Overhead Lines
- Pole Loading Calculations

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.*

Race Communications' records indicated that from October 2024 to October 2025, Race Communications completed 8 overhead work orders past Race Communications' due date for corrective action. Additionally, as of the date of the audit, Race Communications had 20 open overhead work orders that were past Race Communications scheduled due date for corrective action.

III. Field Inspection

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

No.	Structure ID	Type of Structure	Location
1	4261694E	Pole	Tehachapi
2	1897998E	Pole	Tehachapi
3	574949E	Pole	Tehachapi
4	574948E	Pole	Tehachapi
5	2059585E	Pole	Tehachapi
6	4180213E	Pole	Tehachapi
7	4696343E	Pole	Tehachapi
8	4180209E	Pole	Tehachapi
9	4180207E	Pole	Tehachapi
10	4956165E	Pole	Tehachapi
11	825396E	Pole	Tehachapi
12	825397E	Pole	Tehachapi
13	825398E	Pole	Tehachapi
14	4332783E	Pole	Tehachapi
15	4742822E	Pole	Tehachapi
16	825400E	Pole	Tehachapi
17	825751E	Pole	Tehachapi
18	825752E	Pole	Tehachapi
19	4975955E	Pole	Tehachapi
20	4511366E	Pole	Tehachapi
21	4498406E	Pole	Golden Hills
22	462422E	Pole	Golden Hills
23	2288292E	Pole	Golden Hills
24	4332874E	Pole	Golden Hills
25	2301354E	Pole	Golden Hills
26	462398E	Pole	Golden Hills
27	294279E	Pole	Golden Hills
28	2301353E	Pole	Golden Hills
29	4205538E	Pole	Golden Hills
30	4491761E	Pole	Golden Hills
31	2163852E	Pole	Golden Hills
32	2163851E	Pole	Golden Hills
33	2139468E	Pole	Golden Hills
34	1964059E	Pole	Golden Hills
35	4313114E	Pole	Golden Hills
36	2365583E	Pole	Golden Hills
37	4107653E	Pole	Golden Hills
38	4409642E	Pole	Golden Hills
39	1964056E	Pole	Golden Hills
40	1964052E	Pole	Golden Hills
41	4240619	Pole	Boron

42	RC015513	Pole	Boron
43	1744365	Pole	Boron
44	1744364	Pole	Boron
45	1744363	Pole	Boron
46	1924453E	Pole	Boron
47	4587970E	Pole	Boron
48	1924455E	Pole	Boron
49	1900035E	Pole	Boron
50	525406S	Pole	Boron
51	525405S	Pole	Boron
52	51455CTC	Pole	Boron
53	525404S	Pole	Boron
54	RC015516	Pole	Boron
55	4838644E	Pole	Boron
56	RC015517	Pole	Boron
57	4739168E	Pole	Boron
58	RC15518	Pole	Boron
59	525413	Pole	Boron
60	RC015519	Pole	Boron
61	4747042E	Pole	Mojave
62	1021580E	Pole	Mojave
63	1021581E	Pole	Mojave
64	1021582E	Pole	Mojave
65	1021583E	Pole	Mojave
66	1341544E	Pole	Mojave
67	1069831E	Pole	Mojave
68	1021901E	Pole	Mojave
69	1069832E	Pole	Mojave
70	1021907E	Pole	Mojave
71	1876073E	Pole	Backus
72	1876074E	Pole	Backus
73	1876075E	Pole	Backus
74	1986709E	Pole	Backus
75	1986708E	Pole	Backus
76	1986707E	Pole	Backus
77	1986706E	Pole	Backus
78	1986705E	Pole	Backus
79	1986703E	Pole	Backus
80	1986704E	Pole	Backus
81	1963761E	Pole	Stallion Springs
82	1450986E	Pole	Stallion Springs
83	706861E	Pole	Stallion Springs
84	4901905E	Pole	Stallion Springs
85	706860E	Pole	Stallion Springs
86	4180171E	Pole	Stallion Springs
87	4205558E	Pole	Stallion Springs
88	4205557E	Pole	Stallion Springs

89	4901925E	Pole	Stallion Springs
90	706858E	Pole	Stallion Springs
91	1559438E	Pole	Tehachapi
92	583030E	Pole	Tehachapi
93	4136978E	Pole	Golden Hills
94	4723394E	Pole	Golden Hills
95	1898075E	Pole	Golden Hills
96	1898076E	Pole	Golden Hills
97	1898077E	Pole	Golden Hills
98	1898078E	Pole	Golden Hills
99	406 Masquit Dr.	Vault	Tehachapi
100	502 Masquit Dr.	Vault	Tehachapi
101	505 Masquit Dr.	Flowerpot	Tehachapi
102	502 Masquit Dr.	Vault	Tehachapi
103	509 Masquit Dr.	Vault	Tehachapi
104	1301 Victoria Rose Ln	Vault	Tehachapi
105	1307 Victoria Rose Ln	Vault	Tehachapi
106	1319 Victoria Rose Ln	Vault	Tehachapi
107	1325 Victoria Rose Ln	Vault	Tehachapi
108	1331 Victoria Rose Ln	Vault	Tehachapi
109	406 Savanna Pl	Vault	Tehachapi
110	407 Savanna Pl	Flowerpot	Tehachapi
111	411825E	Pole	Mojave
112	1162682E	Pole	Mojave
113	6184 Serrano St.	Pole	Mojave
114	2874 Encin Ave	Vault	Mojave
115	2854 Encin Ave	Vault	Mojave
116	2834 Encin Ave	Vault	Mojave
117	2788 Encin Ave	Vault	Mojave
118	2738 Encin Ave	Vault	Mojave
119	2528 Backus Rd	Vault	Backus
120	3301 Backus Rd	Vault	Backus
121	3543 Backus Rd	Vault	Backus
122	3585 Backus Rd	Vault	Backus
123	3683 Backus Rd	Vault	Backus
124	3080 Backus Rd	Vault	Backus
125	3639 Backus Rd	Vault	Backus
126	3636 Backus Rd	Vault	Backus
127	21808 Valley Vista	Vault	Golden Hills
128	21812 Valley Vista	Vault	Golden Hills
129	21810 Chesnutt Ln	Vault	Golden Hills
130	21808 Chesnutt Ln	Vault	Golden Hills

IV. Field Inspection – Violations List

My staff 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 Race Communications' facilities on each of the following poles required maintenance:

- Pole No. 4742822E – The Race Communications cables were not secured to the pole.
- Pole No. 1924453E – The Race Communications cables were not transferred to the new pole in place.
- Pole No. 4332874E – The Race Communications service drop was not secured to the pole and contacting third party conductor.
- Pole No. 294279E – The Race Communications cables were not secured to the pole.
- Pole No. 706861E – The Race Communications cables were loose and not secured by tie wrap.
- Pole No. 825396E – The lashing wire of Race Communications cables attached to pole was loose or broken.

GO 95, Rule 84.7-A, Climbing Space, states in part:

> *Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c*, *84.4–D1* and *87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.*

The climbing space on Pole number 525406S was obstructed by vegetation.

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.

Race Communications conductors or 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 No. 574948E – a Race Communications conductor was in contact with a third-party communications conductor at midspan.
- Pole No. 2059585E – a Race Communications conductor was in contact with a third-party communications conductor at midspan.
- Pole No. 825398E – a Race Communications conductor was in contact with a third-party communications conductor.
- Pole No. 4332783E – a Race Communications conductor was in contact with a third-party communications conductor.

- Pole No. 4498406 – a Race Communications conductor was in contact with a third-party communications conductor.
- Pole No. 462422E – a Race Communications conductor was in contact with a third-party communications conductor.
- Pole No. 4332784E – a Race Communications service drop was in contact with a third-party communications conductor at midspan.
- Pole No. 4205538E – a Race Communications conductor was in contact with a third-party communications conductor.
- Pole No. 4491761 – a Race Communications conductor was too close or in contact with a third-party communications conductor.
- Pole No. 4313114E – a Race Communications conductor and a node box was in contact with a third-party communications conductor.
- Pole No. 2365583E – a Race Communications conductor was in contact with a third-party communications conductor.

- Pole No. 4107653E – a Race Communications conductor was in contact with a third-party communications conductor.
- Pole No. 45879700E – a Race Communications conductor was in contact with a third-party communications conductor at midspan.
- Pole No. 1924455E – – a Race Communications conductor was in contact with a third-party communications conductor at midspan.
- Pole No. 1900035E – a Race Communications splicer box was in contact with a third-party communications conductor.
- Pole No. 4739168E – a Race Communications conductor was in contact with a third-party communications service drop.
- Pole No. 1898077E – a Race Communications conductor was in contact with a third-party communications conductor.

GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19, requires the minimum radial separation between "Communication Conductors (Including Open Wire, Cables and Service Drops)" from "Guys and span wires passing conductors supported on the same poles" to be 3 inches.

A Race Communications service drop supported by pole number 4332874E was less than 3 inches from span wire and in contact with a third-party conductor attached to the same pole.

GO 95, Rule 56.2 – Overhead Guys, Anchor Guys and Span Wire 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.*

The Race Communications down guy wires attached to poles numbered 1450986E and 706858E were loose and not taut.

General Order 95, Rule 86.9, Guy Marker (Guy Guard), states:

> *A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.*

A Race Communications down guy wire attached to pole number 4587970 did not have a marker.

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 handholes were filled with a large amount of dirt:

- The handhole in front of the residence at 1307 Victoria Lane.
- The handhole in front of the residence at 2528 Backus Road.
- The handhole in front of the residence at 21812 Valley Vista Drive.