

# **CPUC Summary Report - Response to CIP Audit Report CA2026-1459**

## **Race Communications North Sacramento Service Area**

Date: September 17, 2026

To:

Charles Mee, Senior Utilities Engineer (Specialist)  
Electric Safety and Reliability Branch, Safety and Enforcement Division  
California Public Utilities Commission, 505 Van Ness Avenue  
San Francisco, CA 94102-3298

## **Re Response to CIP Audit Report CA2026 1459 Race Communications North Sacramento Service Area**

Dear Mr. Mee:

Race Telecommunications, LLC d/b/a Race Communications submits this response to the Communication Infrastructure Provider audit report for the North Sacramento service area, transmitted by ESRB on August 19, 2026. ESRB identified 75 field findings across 90 inspected locations, including third-party notification items, missing facility identification, visibility markings, guying, clearance conditions, ground wire protection, and vegetation management. As of our response date, Race has completed corrective action on all 75 field findings. Race organized this response to track the findings from the records review and field inspection in the audit report. Attachment A provides the location-level corrective action tracker for these findings.

Race provides this response to describe corrective actions taken or initiated, and preventive measures being executed. When a finding concerns facilities owned or controlled by another entity, Race provides documented notice to the responsible owner and retains the notice in its records. For Race-owned facilities, Race documents the corrective work in its maintenance records.

## **Records Review Findings**

### **GO 95 Rule 18(A)(1) - Corrective Action Recordkeeping**

**ESRB Finding:** Race provided third-party permit records but did not provide Race work-order records documenting corrective actions with sufficient detail.

**Race Response:** Race acknowledges that the records produced during the audit did not present the corrective work order history in the form ESRB requested.

**Corrective Action:** Race is associating audit-related corrective actions with work records for RCNS and confirming that the records identify the nature of the work, completion date, and the personnel or crew responsible.

**Preventive Measure:** Race will require these record fields before closing GO 95 corrective action records and will retain the records for the period required by GO 95 Rule 18.

### **GO 95 Rule 18(A)(2-5) - Third-Party Notification Process**

**ESRB Finding:** Race did not issue formal written Safety Hazard Notifications to third parties during the audit period and acknowledges that it is required to establish a formal written third-party notification program to ensure compliance and proper communication.

**Race Response:** Race is implementing a formal written notification process for third parties concerning conditions affecting facilities owned by other entities, and is applying that process to the conditions identified by ESRB.

**Corrective Action:** Race is transmitting and validating documented notices related to third-party conditions identified by ESRB. Each notice record includes details such as the responsible owner, location, observed condition, notice date, and delivery method, so that each notice is traceable in Race's records.

**Preventive Measure:** Race will use a written third-party notification process for future observations involving other facility owners and will maintain records of notices and transmittals for the mandated retention period.

### **GO 95 Rule 18(B) - Auditable Maintenance and Inspection Program**

**ESRB Finding:** Race did not provide formal patrol or detailed inspection records for RCNS and is required to update the status of its inspection schedule, inspection records, and corrective-action records.

**Race Response:** Race is implementing an auditable maintenance and inspection program for RCNS.

**Corrective Action:** Race is finalizing the inspection schedule, forms, inspector qualification criteria, and record workflow for RCNS inspections and related corrective actions. Race expects the inspection program, including the inspection schedule, forms, inspector qualification criteria, and record workflow described above, to be implemented by 12/31/2026.

**Preventive Measure:** Race will conduct RCNS inspections under the formal program and will not rely on attachment surveys or pre-construction walkthroughs as substitutes for GO 95 inspection records.

### **GO 95 Rule 18(B)(1)(a) - Deficiency Prioritization and Due Dates**

**ESRB Finding:** Race did not provide records showing priority levels or corrective action due dates for deficiencies found through inspections.

**Race Response:** Race is adding priority level, HFTD tier, safety-hazard flag, and corrective-action due date fields to its deficiency records.

**Corrective Action:** Race is applying the prioritization framework to the audit findings and confirming the assigned priority and due date for each finding through qualified personnel review.

**Preventive Measure:** Race will require priority level and due date fields when deficiencies are logged, and will review those fields before closing corrective action records.

## Field Inspection Findings

Attachment A contains one row for each field finding and identifies the cited rule, location, finding description, response category, corrective action, preventive measure, and status. It is included with this response and documents, in writing, the corrective work performed for each finding. The summary below addresses each rule category.

### GO 95 Rule 18 - Third-Party Notifications and Facility Identification

**ESRB Finding:** ESRB identified 53 findings involving third-party notification items and missing facility identification.

**Race Response:** Race has separated these findings into third-party conditions and Race facility identification items.

**Corrective Action:** For third-party conditions, Race has transmitted notices to the responsible facility owner and recorded the notice date and delivery method in Attachment A. For Race facility identification items, Race has installed, replaced, or verified facility identification and documented the work record.

**Preventive Measure:** Race will use its third-party notification procedure and inspection checklist to identify and document future third-party conditions and facility identification issues.

### GO 95 Rule 31.1 - Design, Construction, and Maintenance

**ESRB Finding:** ESRB identified 10 findings involving visibility markings, guying, splice case attachment, service drops, or similar maintenance conditions.

**Race Response:** Race has completed corrective action for the Rule 31.1 items as reflected in Attachment A.

**Corrective Action:** Race documented the corrective work in applicable work records, including the completion date and correction, as recorded in Attachment A.

**Preventive Measure:** Race will include visibility markings, guying, splice case attachment, service drop condition, and related closeout checks in inspection forms and post-construction review.

### GO 95 Rule 35 - Vegetation Management

**ESRB Finding:** ESRB identified one finding involving vegetation strain on a guy wire.

**Race Response:** Race has addressed the vegetation condition reflected in Attachment A.

**Corrective Action:** Race documented the field review and corrective work in applicable work records.

**Preventive Measure:** Race will include vegetation contact, strain, and abrasion indicators in its inspection process and will refer conditions outside Race control through the third-party notification process.

### **GO 95 Rule 38 - Minimum Clearances**

**ESRB Finding:** ESRB identified six findings involving guy wire, service span, or service drop clearance conditions.

**Race Response:** Race has completed the correction of the clearance items reflected in Attachment A.

**Corrective Action:** Race documented the method of correction and the resulting clearance in applicable work records and in Attachment A.

**Preventive Measure:** Race will include clearance verification for service drops, service spans, and guy wires in inspection forms and post-work closeout checks.

### **GO 95 Rule 54.6(B) - Ground Wires**

**ESRB Finding:** ESRB identified two findings involving exposed ground wires.

**Race Response:** Race has completed the correction of the ground wire covering items reflected in Attachment A.

**Corrective Action:** Race repaired or replaced the ground wire covering and recorded the completion date and method of correction in applicable work records and in Attachment A.

**Preventive Measure:** Race will include ground-wire protection and covering conditions in inspection forms and construction closeout checks.

### **GO 95 Rule 54.6(I) - Attachment of Protective Covering**

**ESRB Finding:** ESRB identified one finding involving an unattached riser protective covering.

**Race Response:** Race has completed the correction of the riser attachment item reflected in Attachment A.

**Corrective Action:** Race re-secured the protective covering and recorded the completion date and method of correction in applicable work records and in Attachment A.

**Preventive Measure:** Race will include riser and protective covering attachment in inspection forms and construction closeout checks.

### **GO 95 Rule 91.3(B) - Stepping**

**ESRB Finding:** ESRB identified two instances of pole steps being lower than the required minimum height.

**Race Response:** Race has completed the correction of the pole step items reflected in Attachment A.

**Corrective Action:** Race removed or relocated the non-compliant steps and completion date in applicable work records and in Attachment A.

**Preventive Measure:** Race will include step placement in inspections and construction closeout, including measured height documented where corrective work is performed.

Race appreciates the ESRB Staff's review and will provide additional information upon request. For follow-up questions regarding this audit summary response, please contact:

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Sincerely,

Kory Borzoni

Corporate Compliance Specialist

Race Communications

**Attachment A: CA2026-1459 RCNS Corrective Action Tracker**  
**(Public and Confidential versions provided)**