



VIA ELECTRONIC MAIL

August 24, 2026

Majed Ibrahim, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Via Electronic Mail

**Re: Charter Communications, Inc. Response to SED San Bernardino County Rural
District Audit: CA2026-1351**

Dear Mr. Ibrahim:

This letter is in response to your May 5, 2026 Audit Report of Charter Communications, Inc.'s ("Charter") San Bernardino County Metro District.

Enclosed are (i) a CONFIDENTIAL Field Inspection Response spreadsheet; (ii) a redacted PUBLIC Field Inspection Response spreadsheet; (iii) a CONFIDENTIAL REVISED Work Orders spreadsheet; (iv) a PUBLIC REVISED Work Orders spreadsheet; and (v) a declaration supporting Charter's request for confidential treatment of the CONFIDENTIAL REVISED Work Orders and CONFIDENTIAL Field Inspection Response spreadsheets.

I. RECORDS REVIEW

Audit Finding:

Charter's records indicated that during the twelve months prior to the audit, Charter completed 143 work orders past Charter's due date for corrective action. Additionally, as of the audit, Charter had 45 open work orders that were past Charter's scheduled due date for corrective action.

Please see attached "CONFIDENTIAL Charter REVISED Pre-Audit Work Orders San Bernardino-Rural" and "PUBLIC Charter REVISED Pre-Audit Work Orders San Bernardino-Rural" indicating that all of the identified work orders were completed and closed prior to the applicable due dates under GO 95.

[BEGIN CONFIDENTIAL]

[REDACTED]

[END CONFIDENTIAL]

II. **FIELD INSPECTION RESPONSE**

Charter's responses to the Field Inspection section are attached in the documents titled "CONFIDENTIAL Charter Response to Field Inspection San Bernardino County Rural Audit;" and "PUBLIC Charter Response to Field Inspection San Bernardino County Rural Audit."

If you have questions regarding this response, please feel free to reach out to either Torry Somers (torry.somers@charter.com) or to myself (ryan.whaley@charter.com).

Sincerely,

/s/ Ryan Whaley

Ryan Whaley
Area Vice President, Field Operations

Enclosures: CONFIDENTIAL Revised Pre-Audit spreadsheet
CONFIDENTIAL Field Inspection Response spreadsheet
PUBLIC Revised Pre-Audit spreadsheet
PUBLIC Field Inspection Response spreadsheet
Declaration Seeking Confidential Treatment

cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC
Torry R. Somers, Vice President Regulatory Affairs, Charter
Lisa Ludovici, Director Government Affairs, Charter

**DECLARATION OF TORRY R. SOMERS
SEEKING CONFIDENTIAL TREATMENT**

I, Torry R. Somers, declare as follows:

1. I am Vice President, State Regulatory Affairs, of Charter Communications, Inc. ("Charter") and am authorized to make this declaration.
2. Charter is submitting its spreadsheet response ("Response") to the May 11th – 15th 2026 Safety and Enforcement Division Audit Report of San Bernardino County Rural District, with this request for confidential treatment made pursuant to Sections 3.2 of General Order ("GO") 66-D.
3. *Audit Information:* I am informed and believe that the Public Records Act including but not limited to California Government Code §§ 7923.600, 7929.215, and 7930.100 protects against disclosure of investigatory information, which includes the type of audit information set forth in the attached.
4. *Critical Infrastructure Information:* The Response contains sensitive information regarding Charter's network infrastructure. I am informed and believe that the California Public Records Act protects against disclosure of confidential "utility systems development" data, like the data contained herein. California Government Code § 7927.300. Moreover, I am informed and believe that state law protects against disclosure that is prohibited under federal law—federal law protects against the disclosure of information regarding critical infrastructure (6 U.S.C. § 673), which has been found to include communications network information like the information being submitted here. The information is not customarily in the public domain and is not solely related to the location of a particular physical structure that is visible with the naked eye. The enclosed infrastructure information is critical to our nation's communications networks, and disclosure of these records could harm public safety and network reliability by exposing to attack specific locations, operations, and functionalities of communications and utility infrastructure.
5. *Trade Secret:* The Response contains confidential network and operational information that is not disclosed to the public. This Response contains information that reveals unique planning, design and implementation efforts used to provide safe, reliable and competitive service to consumers in these areas. I am informed and believe that this information has significant value to Charter. This information would, if disclosed, provide access to information that would harm the private economic interests of Charter and could jeopardize the security of its network. I am informed and on this basis declare that the information provided constitutes a trade secret as defined by

California Civil Code § 3426.1 and California Evidence Code Section 1061 — California Government Code §§ 7927.605 and 7930.105 exempts from public disclosure competitively sensitive information that constitutes a trade secret.

6. *Public Interest Not to Disclose*: The Response contains competitively sensitive material, and critical information not available to the public, that would be harmful to Charter if publicly disclosed, which weighs in favor of non-disclosure under California Government Code § 7922.000. In contrast to the direct harm that Charter would suffer from disclosure — by losing its competitive advantage with respect to operations and network design and management and jeopardizing the safety of its network — there would be no apparent benefit to the public from disclosure of the responses. Further, a failure to preserve the confidentiality of the records would discourage compliance with disclosure requirements and undermine the Commission's ability to perform its duties.
7. To the extent that there is a need to make contact regarding potential release of information, such contact should be made to Torry Somers, torry.somers@charter.com or Charter's counsel, zzankel@jenner.com.

I affirm and declare under penalty of perjury under the laws of the State of California, including Rule 1.1 of the CPUC's Rules of Practice and Procedure, that, to the best of my knowledge, all of the statements and representations made in this declaration are true and correct.

Executed on this 24th day of August, 2026 at El Segundo, CA.



Torry R. Somers