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

June 1, 2026

CA2026-1414

Michael Montgomery
Operations Manager
Sierra Tel
40033 Sierra Way
Oakhurst, CA 93644

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Sierra Tel

Mr. Montgomery:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell and Brandon Vasquez of ESRB staff conducted a communication audit of Sierra Tel from March 23, 2026 through March 27, 2026. During the audit, ESRB staff conducted field inspections of Sierra Tel's communication facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than June 29, 2026, by electronic copy of all corrective actions and preventive measures taken by Sierra Tel to correct the identified violations and prevent the recurrence of 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 provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Samuel Mandell at (916) 217-8294 or samuel.mandell@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC Communication Audit Report for Sierra Tel

Cc:

Lee Palmer, Deputy Executive Director, Safety and Enforcement (SED), Safety Policy, and Water Division , CPUC
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Samuel Mandell, Utilities Engineer, ESRB, SED, CPUC
Brandon Vasquez, Utilities Engineer, ESRB, SED, CPUC

SIERRA TEL COMMUNICATIONS AUDIT FINDINGS
March 23 – March 27, 2026

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Sierra Tel:

- Facility statistics as of January 01, 2026, including miles of overhead (OH) lines, miles of underground (UG) lines, number of poles, number of vaults, and number of pedestals.
- Map of the Audit Area
- Sierra Tel *Joint Pole Inspection Procedure*
- List of active facility inspectors
- Inspection and patrol records containing data for the inspected facility type, facility location, high fire-threat district (HFTD) location, inspection date from January 2021 to January 2026.
- Records of OH and UG corrective actions completed from January 2021 January 2026.
- Records for intrusive pole inspections conducted from January 2021 to January 2026.
- Records for all outgoing Safety Hazard notifications, from January 2021 to January 2026.
- Records for all incoming Safety Hazard notifications, from January 2021 to January 2026.
- A list of all pole safety factor calculations completed from January 2021 to January 2026.
- A list of all new OH and UG construction projects completed from January 2025 to January 2026.

II. Records Violations

ESRB staff observed the following violations during the record review portion of the audit:

1. **General Order (GO) 95, Rule 31.2, Inspection of Lines** states in part:

> *"Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard."*

GO 95, Rule 80.1-A(1), Inspection Requirements for Joint-Use Poles in High-Fire-Threat District states in part:

"In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals for (i) Communication Lines located on Joint Use Poles (See Rule 21.8) that contain Supply Circuits (See Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table."

Inspection	*Tier 2*	*Tier 3*
Patrol	*2 Years*	*1 Year*
Detailed	*10 Years*	*5 Years*

GO 95, Rule 80.1-A(2), Statewide Inspection Requirements states in part:

> *"Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State. Consistent with Rule 31.2, the type, frequency and thoroughness of inspections shall be based upon the following factors:*
>
> - *Fire threat*
> - *Proximity to overhead power line facilities*
> - *Terrain*
> - *Accessibility*
> - *Location, including whether the Communications Lines are located in the High Fire-Threat District"*

GO 95, Rule 80.1-A(4), Record Keeping states:

> *"Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each*

correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a).”

ESRB reviewed Sierra Tel’s inspection records from January 2021 to January 2026 for overhead facilities in HFTDs. Sierra Tel provided inspections records for 483 poles marked as Tier 3 and no records for its poles in Tier 2.

Based on provided GIS data, Sierra Tel has only 22 poles in non-HFTD out of 1,059 poles. GO 95, Rule 80.1 requires the remaining 554 Tier 2 poles to have patrols every two years and detailed inspections every 10 years. In the five-year audit period, each Tier 2 pole should have received two patrols and approximately half should have been subject to detailed inspection.

Of the 483 records provided, 237 (49%) have late detailed inspections, and 391 (81%) have late patrols over the reviewed five-year timeframe. Table 1 lists the late inspections.

Table 1: Late Overhead Patrol and Detailed Inspections from January 2021 to January 2026

Inspection Type	Never Inspected	Late from Previous Inspection	Total
Detailed Inspection	134	103	237
Patrol Inspection	134	257	391

2. **GO 128, Rule 12.2, Maintenance** states in part:

“Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules.”

GO 128, Rule 17.2, Inspection states in part:

“Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules.”

Sierra Tel does not have a written inspection program for its underground facilities and does not actively inspect its underground facilities. Instead, Sierra Tel employees are expected to report or complete repairs during normal work. Sierra Tel provided no records of inspections for its underground assets.

3. **GO 95, Rule 18-B, Maintenance Programs** states in part:

“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its

facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.

The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company's facilities."

(1) "Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.

a. The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

i. Level 1 -- An immediate risk of high potential impact to safety or reliability:

- *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*

ii. Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:

- *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

iii. Level 3 -- Any risk of low potential impact to safety or reliability:

- *Take corrective action within 60 months subject to the exception specified below."*

Sierra Tel does not possess a written and auditable maintenance program that includes the minimum requirements listed in GO 95, Rule 18-B. Sierra Tel tracks open maintenance tasks but does not assign priorities or required completion dates as necessary.

III. Field Inspection

During the field audit, ESRB inspected the following facilities:

Table 2. Locations Inspected

Location	Asset Type	Asset ID	Longitude	Latitude
1	Vault		-119.6262046	37.33019003
2	Remote cabinet	40025 OTF1	-119.6260656	37.33012274
3	SAI Cross Connect	40025 OTF11	-119.6260706	37.33014691
4	Pedestal	TF1a1	-119.6262401	37.33036018
5	SAI Cross Connect	OSY11	-119.6101717	37.30331227
6	Battery Building	38196 OSY 1	-119.6102446	37.30325737
7	Vault	OKBL 101	-119.6101452	37.30334767
8	Pedestal	SR1B1	-119.6100528	37.30407021
9	Pedestal	SR1c1	-119.6100448	37.30436412
10	Pedestal	SR1	-119.6100226	37.30417349
11	Pole	120222656	-119.9081239	37.21965081
12	Pole	121362010	-119.9077668	37.21958819
13	Pedestal		-119.9086048	37.21931843
14	Pedestal	DA2	-119.9080034	37.21643211
15	Pedestal		-119.9079874	37.21650422
16	Vault	RCOB22	-119.9079628	37.21649378
17	Pedestal		-119.9073332	37.21636277
18	Vault		-119.907326	37.21635264
19	Pedestal	CC21	-119.9057918	37.21291011
20	Pedestal	cc22	-119.9057708	37.21277094
21	Pedestal	cc23	-119.9057451	37.21273214
22	Central Office	30350 YMLP	-119.7736992	37.18856576
23	Vault	YLSL1	-119.7736119	37.18853814
24	Pedestal	AA1	-119.7731381	37.18825662
25	Pedestal	BA1	-119.773269	37.18814778
26	Pedestal	BG1	-119.7731537	37.18807097
27	Vault	YL1	-119.7731636	37.1880802
28	Pole	120052700	-119.6909347	37.2639786
29	Pole		-119.6909483	37.26390534
30	Pedestal	Kk1r1	-119.6909755	37.26394008
31	Pole		-119.6909302	37.2632085
32	Pole		-119.6913673	37.26310103
33	Pole		-119.6696569	37.27918941

Location	Asset Type	Asset ID	Longitude	Latitude
34	Pole		-119.6697944	37.278547
35	Pedestal	HG6	-119.640324	37.47783021
36	Pedestal		-119.6397835	37.47808913
37	Pedestal	HG8	-119.639633	37.47848763
38	Pedestal	Ha101	-119.6364702	37.48074642
39	Pole	120842842	-119.6371303	37.48085988
40	Pedestal	HA9	-119.6372035	37.48089309
41	Pole		-119.636759	37.45264138
42	Pedestal	G1B8	-119.6367312	37.45264801
43	Pole		-119.63679	37.45266722
44	Pole		-119.6376497	37.45279276
45	Pedestal	G1B4	-119.6332361	37.4420839
46	Pedestal	G1B3	-119.6324891	37.44192697
47	Pedestal	MW11	-119.7311722	37.40636143
48	Pedestal	MW12	-119.7301604	37.40673515
49	Pedestal	NJ2	-119.7395793	37.37744165
50	Pole		-119.7415181	37.37885401
51	Pole		-119.742273	37.37922357
52	Vault	TRJD10	-119.8521734	37.58219887
53	Pedestal	BZ7	-119.8521871	37.58220943
54	Pedestal	BC1	-119.8520001	37.58214897
55	Pedestal	BZ6	-119.8521574	37.58191495
56	Pole	110428230	-119.8465524	37.59043616
57	Vault	TRJD113	-119.8465473	37.59042403
58	Pedestal	B1Z214	-119.8465323	37.59043444
59	Pole	120105593	-119.8464171	37.59066455
60	Pole	121596911	-119.8437339	37.50929369
61	Pole		-119.8435682	37.50941072
62	Pedestal	BAA1	-119.8439448	37.50852273
63	Vault	BJDR61	-119.8437202	37.50844864
64	Remote Cabinet	MBA3	-119.8436982	37.50845626
65	Cross Connect	MBA31	-119.843669	37.50844653
66	Pedestal	D1Q911	-119.9230458	37.44191674
67	Pedestal	D1Q91	-119.9230006	37.44202135
68	Other	D1Q9	-119.9229058	37.44295936
69	Pedestal	D1Q8	-119.9229594	37.44333377
70	Pole	120589403	-119.8697211	37.44522172
71	Pedestal	CC1Q10	-119.8698519	37.44523856
72	Pole	120589408	-119.8694521	37.44522351
73	Padmount	CO24	-119.7792305	37.45998641

Location	Asset Type	Asset ID	Longitude	Latitude
74	Pedestal	CO24A2	-119.7799484	37.4595664
75	Pedestal	CO24A4	-119.7819681	37.4599638
76	Pedestal	CO24A1	-119.7796083	37.45974096
77	Pedestal	T1G8	-119.9620238	37.48671183
78	Vault		-119.9620263	37.48674269
79	Pole	120560442	-119.9619546	37.48668756
80	Pole	120560443	-119.9617925	37.48656044
81	Pedestal	T1D11	-119.9666386	37.48913938
82	Pedestal	T1D12	-119.9668135	37.48934043
83	Pedestal	T1D1	-119.9664461	37.48896641

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **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."

   ESRB's finding related to the above rule is listed in Table :

Table 3: GO 95, Rule 31.1 Finding

Location	Finding
44	Pole leaning significantly, soil at base of pole eroded away

2. **GO 95, Rule 37, Minimum Clearance of Wires above Railroads, Thoroughfares, Buildings, Etc.** states in part:

   "Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.

   The clearances specified in Table 1, Case 1, Columns A, B, D, E and F, shall in no case be reduced more than 5% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions. The clearances specified in Table 1, Cases 2 to 6 inclusive, shall in no case be reduced more than 10% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions […]

   When measuring the minimum allowable vertical conductor clearances in a span, the minimum clearance applies to the specific location under the span being measured and not for the entire span"

   ESRB's finding related to the above rule is listed in Table :

Table 4: GO 95, Rule 37 Finding

Location	Finding
44	Leaning pole causing low lines in pedestrian area

3. **GO 95, Rule 38, Minimum Clearance of Wires from Other Wires** states in part:

"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive."

Table 2, Case 8C: Vertical separation between conductors and/or cables, on separate crossarms or other supports at different levels (excepting on related line and buck arms) on the same pole and in adjoining midspans for communication conductors (including open wire, cables and service drops) must be at least 12 inches.

EXCEPTION (rr): Can be less than 12" for strand mounted terminals, splice cases and other equipment located 8" or more from the centerline of the pole, but not less than 1" with mutual agreement between affected owners.

ESRB's finding related to the above rule is listed in Table :

Table 5: GO 95, Rule 38 Finding

Location	Finding
32	Insufficient clearance between Sierra Tel service and PG&E service

4. **GO 95, Rule 84.6-D, Vertical Runs** states:

"Vertical runs of communication wires or cables supported on the surface of wood poles or structures, shall be covered by a suitable protective covering (see Rule 22.8) where within a vertical distance of 3 feet above or 6 feet below unprotected supply conductors supported on the same pole or structure. Vertical runs of communication wires or cables on the surface of a wood pole shall be covered by a suitable protective covering where within a 6 foot radius of any other pole supporting supply conductors except that those portions of such runs which are more than 3 feet above or 6 feet

below the level of unprotected supply conductors need not be covered. Cable and drop wire runs to or from terminal boxes are exempted from these requirements for covering, under the following conditions:

Where guard arms are installed above messengers or longitudinal cables which are less than 6 feet below but not less than 4 feet below unprotected supply conductors of 0 - 750 volts, or where cables are supported on crossarms at not less than 15 inches from center line of pole, in which cases any portion of metal sheathed cable runs on the surface of pole below the guard arm and in the same quadrant as the longitudinal cable (see Appendix G, Figure 87), or below and on the same side of the pole with a crossarm which supports a longitudinal cable, need not be covered.

Runs of bridled conductors, attached to surface of pole, need not be covered provided such runs are below the guard arm and in the same quadrant as the longitudinal cable, or where such runs are below and on the same side of pole with a cable arm and are not in the climbing space, or are connected to service drops which are placed in accordance with the provisions of Rule 84.8–B2b. Where bridled runs are not required to be covered by these rules, they shall be supported by bridle hooks or rings spaced at intervals of not more than 24 inches.

Vertical runs shall be treated as risers (see Rule 87.7–D) where within a distance of 8 feet from the ground line.

Runs which terminate in the top of enclosures which afford ample mechanical protection to the runs may extend within 8 feet of the ground but not less than 6 feet of the ground without being treated as risers."

ESRB's findings related to the above rule are listed in Table :

Table 6: GO 95, Rule 84.6-D Findings

Location	Findings
6	Riser not secured to pole
50	Riser not attached to pole every 24 inches
61	Riser not attached to pole every 24 inches

5. **GO 95, Rule 84.6-F, Protective Covering** states:

"Protective covering shall be attached to poles, crossarms and structures by means of corrosion–resistant straps, lags or staples which are adequate to maintain such covering in a fixed position.

Where such covering consists of hardwood or rigid plastic moulding, the distance between straps, lags or staples shall not exceed three feet on each side and due care shall be exercised to avoid the possibility of nails protruding through any inner surface.

When U–shaped moulding is utilized appropriate gaps between sections shall be provided to permit expansion due to temperature variations and such gaps shall be covered by corrosion resistant straps to prevent contact with conductors covered by moulding."

ESRB's findings related to the above rule are listed in Table :

Table 7: GO 95, Rule 84.6-F Findings

Location	Findings
11	Riser guard not secured to pole
28	Riser guard not secured to pole

6. **GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground** states:

"Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:

a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4-A, or

b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8"

ESRB's finding related to the above rule is listed in **Error! Reference source not found.**

Table 8: GO 95, Rule 87.7-D(1) Finding

Location	Finding
51	Riser guard is less than 8 feet

7. **GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures** states:

   "Manholes, handholes, subsurface and self-contained surface mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity."

   ESRB's findings related to above rule are listed in Table 9:

Table 9: GO 128, Rule 17.8 Findings

Location	Findings
1	Needs ownership label
4	Needs ownership label
8	Needs ownership label
9	Needs ownership label
10	Needs ownership label
13	Needs ownership label
14	Needs ownership label
15	Needs ownership label
17	Needs ownership label
19	Needs ownership label
20	Needs ownership label
21	Needs ownership label
23	Needs ownership label
24	Needs ownership label
25	Needs ownership label

Location	Findings
30	Needs ownership label
35	Needs ownership label
36	Needs ownership label
37	Needs ownership label
38	Needs ownership label
40	Needs ownership label
42	Needs ownership label
45	Needs ownership label
46	Needs ownership label
47	Needs ownership label
48	Needs ownership label
49	Needs ownership label
53	Needs ownership label
54	Needs ownership label
55	Needs ownership label
58	Needs ownership label
62	Needs ownership label
66	Needs ownership label
67	Needs ownership label
68	Needs ownership label
69	Needs ownership label
71	Needs ownership label
73	Needs ownership label
74	Needs ownership label
73	Needs ownership label
76	Needs ownership label

Location	Findings
77	Needs ownership label
81	Needs ownership label
82	Needs ownership label
83	Needs ownership label

V. Observations

1. **GO 95, Rule 18, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards** states in part:

   "For purposes of this rule, "Safety Hazard" means a condition that poses a significant threat to human life or property..."

   GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

   "(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.
   (4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95."

During the field inspection, ESRB noted the third-party safety concern listed in Table .

Table 10: Third-Party Observation

Location	Utility	Violation Description
79	PG&E	Significant woodpecker damage to the pole