

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 9, 2026

CA2026-1460

Susana Jackson
Chief Financial Officer
Volcano Telephone Company (Volcano)
20000 E. Hwy 88, P. O. Box 1070
Pine Grove, CA 95665

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Volcano Telephone Company's Service Area

Ms. Jackson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Gordon Szeto of ESRB staff conducted a CIP audit of Volcano Telephone Company's (Volcano) Service Area from August 3, 2026, through August 7, 2026. The Service Area covered included Pine Grove, Kirkwood, Pioneer, Volcano, Red Corral, Glencoe, Jackson and Lone. During the audit, ESRB staff conducted field inspections of Volcano's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations and observations is enclosed.

Please provide a response no later than November 9, 2026, via electronic copy of all corrective actions and preventive measures taken by Volcano to correct the identified violations and prevent the recurrence of such violations and observations.

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 Gordon Szeto at (415) 603-9855 or gordon.szeto@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse".

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

California Public Utilities Commission

Enclosure: CPUC Audit Findings of Volcano Telephone Company Service Area

Cc: Lee Palmer, Deputy Executive Director, Safety Policy Division, Water Division, CPUC
Koko Tomassian, Director, Safety and Enforcement Division (SED), CPUC
Chihsien "Eric" Wu, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Program & Project Supervisor, ESRB, SED, CPUC
Yi (Rocky) Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Gordon Szeto, Utilities Engineer, ESRB, SED, CPUC
Yongling Sun, Public Utilities Regulatory Analyst V, ESRB, SED, CPUC
David Sachs, Engineering Manager, Volcano Telephone Company

**CPUC AUDIT FINDINGS OF
VOLCANO TELEPHONE COMPANY – SERVICE AREA INCLUDING PINE GROVE,
KIRKWOOD, PIONEER, VOLCANO, RED CORRAL, GLENCOE, JACKSON & IONE
AUGUST 3 – AUGUST 7, 2026**

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

- A description of Volcano Telephone Company’s (Volcano) Overhead and Underground maintenance program.
- Volcano’s Facility Statistics for its Service Area as of June 2026, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Volcano’s Service Area Maps as of June 2026.
- Volcano’s Service Area Inspection Data containing data for the inspected facility type, facility location, fire threat district location, and inspection date from May 2021 through May 21, 2026.
- Volcano’s overhead and underground work orders created between May 21, 2021 through May 21, 2026.
- Safety Hazards Notifications Volcano Received from Third Party Utilities from May 21, 2021 through May 21, 2026.
- Safety Hazard Notifications Volcano Sent to Third Party Utilities from May 21, 2021 through May 21, 2026.
- Safety factors and pole loading calculations completed from May 11, 2025 through May 11, 2026.
- Volcano Intrusive Inspections: Word document “2024 Intrusive Pole Inspection Report” and an Excel spreadsheet “Poles Needing intrusive Test”.
- Volcano’s New Construction Projects in the Service Area from May 11, 2025 through May 11, 2026.

II. Records Violations

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

1. 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.

Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate:

- *Type of facility or equipment;*
- *Location, including whether the Safety Hazard or potential violation is located in the High Fire-Threat District;*
- *Accessibility;*
- *Climate;*
- *Direct or potential impact on operations, customers, electrical company workers, communications workers, and the general public.*

(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 [...]"

Work Order Records

- a. Volcano Work Order Records indicated 11 Priority 1 items were completed late out of 242 Priority 1 Work Orders (4.5%) as shown in Table 1 below:

Table 1: GO 95, Rule 18-B Late Priority 1 Findings

Work Order#	Priority	HFTD Tier	Description	Opened Date	Due Date	Closed Date
V01-21-00416	1	3	Bad Copper Drop	7/3/2021	7/7/2021	11/30/2023
V01-21-00581	1	3	Bad Copper Drop	9/21/2021	12/21/2021	6/30/2022
V01-21-00593	1	3	Bad Copper Drop	9/27/2021	12/27/2021	5/31/2022
MV01-23-00190	1	3	Aerial Drop Down	4/3/2023	4/3/2023	11/30/2023
MV01-23-00214	1	3	Customer Cut Drop	4/24/2023	4/24/2023	11/30/2023
MV01-23-00303	1	3	Customer Damaged Drop	6/12/2023	6/12/2023	12/31/2023

MV01-23-00332	1	2	Customer Cut Drop	6/26/2023	6/26/2023	12/31/2023
MV01-23-00335	1	2	Customer Damaged Drop	6/27/2023	6/27/2023	12/31/2023
MV01-23-00336	1	3	Drop Damaged By PG&E Contractor	6/27/2023	6/27/2023	12/31/2023
V01-24-00438	1	3	Damaged Cable	11/21/2024	11/22/2024	11/21/2027 Check date
M02-25-00147	1	3	Two Way Tap Bad	4/1/2025	4/1/2025	12/31/2025

- b. Volcano Work Order Records for Priority 1 items were missing closing dates on 21 out of 242 Priority 1 Work Orders (8.7%) as shown in Table 2 below:

Table 2: GO 95, Rule 18-B Priority 1 Work Orders Missing Closing Date Findings

Work Order#	Priority	HFTD Tier	Description	Opened Date	Due Date	Closed Date
M02-25-00426	1	N/A	Car Pole Accident Damaged Fiber	11/21/2025	11/21/2025	Missing
V02-26-00015	1	3	Replace Aerial Coax Drop	1/2/2026	1/5/2026	Missing
M01-26-00056	1	2	Equipment Failed	2/4/2026	2/4/2026	Missing
V01-26-00061	1	3	Broken Fiber Enclosure	2/6/2026	5/6/2026	Missing
M01-26-00080	1	3	Cable Damaged Storm	2/23/2026	2/23/2026	Missing
M01-26-00081	1	3	Cable Damaged Storm	2/23/2026	2/23/2026	Missing
M01-26-00079	1	3	Cable Damaged Storm	2/23/2026	2/23/2026	Missing
M01-26-00078	1	3	Cable Damaged Storm	2/23/2026	2/23/2026	Missing
M01-26-00083	1	3	Cable Down Storm	2/24/2026	2/24/2026	Missing
M01-26-00082	1	3	Drop Damage Storm	2/24/2026	2/24/2026	Missing
M01-26-00096	1	3	Fallen Tree Damage Drops	2/26/2026	2/26/2026	Missing
M01-26-00103	1	3	Buried Cable Went Bad	3/2/2026	3/2/2026	Missing

M01-26-00104	1	3	Hand Hole Hit by Snow Plow	3/2/2026	3/2/2026	Missing
M01-26-00109	1	3	Gopher Chew	3/5/2026	3/5/2026	Missing
V01-26-00115	1	2	Broken Pole	3/10/2026	3/12/2026	Missing
V01-26-00120	1	3	Down Service Drop	46094 (bad date?)	46186 (bad date?)	Missing
M01-26-00125	1	3	Damaged Fiber Drop and Conduit	3/17/2026	3/17/2026	Missing
M01-26-00166	1	2	Aerial Cable Downed by Tree	4/10/2026	4/9/2026	Missing
M02-26-00180	1	2	BLE Module Went Bad	4/15/2026	4/15/2026	Missing
M02-26-00178	1	3	BT Module Went Bad	4/15/2026	4/15/2026	Missing
M02-26-00179	1	2	MB Dual Module Went Bad	4/15/2026	4/15/2026	Missing

- c. Volcano assigned Due Dates for seven Priority 1 Work Orders that were 3 or 4 years as listed in Table 3, which does not meet the requirements of Rule 18-B for Priority 1 items:

Table 3: GO 95, Rule 18-B Assigned Due Date Findings

Work Order#	Priority	HFTD Tier	Description	Opened Date	<u>Due Date</u>	<u>Closed Date</u>
MV01-21-00538	1	3	Customer Cut Drop	8/28/2021	<u>8/28/2025</u> <u>4 years</u>	9/30/2021
MV01-22-00034	1	3	PG&E Contractor Cut Cable	1/12/2022	<u>1/12/2025</u> <u>3 years</u>	7/31/2022
MV01-22-00386	1	3	Property Owner Cut Cable	8/15/2022	<u>8/15/2026</u> <u>4 years</u>	8/31/2022
MV01-23-00046	1	2	Storm Knocked Down Line	1/13/2023	<u>1/13/2026</u> <u>3 years</u>	1/31/2023
V01-24-00470	1	3	Replace Old Cable	12/10/2024	<u>12/10/2027</u> <u>3 years</u>	9/19/2025
M01-25-00210	1	3	Cut Service Drop	5/22/2025	<u>5/30/2028</u> <u>3 years</u>	10/7/2025

M01-25-00335	1	2	Damaged Conduit and Drop	8/29/2025	<u>8/29/2028</u> <u>3 years</u>	12/2/2025
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2. GO 95, Rule 80.1-A.(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District and GO 95, Rule 80.1-A.(2), Statewide Inspection Requirements both state in part:

“Each company’s procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections.”

a. Volcano provided information on Patrol Inspections which included a checklist to look for obvious hazards. The checklist mentioned poles leaning greater than 15 degrees as an obvious hazard. Other utilities use 5 degrees or 10%, as a standard for a significantly leaning pole. Volcano should consider using the standard being used by other utilities for leaning poles.

b. Volcano described their training program for Patrols and Detailed Inspections. Patrol training for Overhead poles and Underground vaults and pedestals, is in the form of a safety meeting/tailgate at least once a year. Detailed Inspection training for Overhead poles is performed by a qualified instructor who discusses GO 95 separation and clearance requirements, how to test the pole to ensure it is safe, and cover proper use of measuring equipment (height stick) to determine cable heights over roadways. During the audit, Volcano stated that it did not use training presentation materials to conduct the training. Volcano should develop training materials so it can educate its inspectors about problems that should be identified during both Overhead and Underground inspections.

3. 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*

Volcano did not provide a procedure for conducting Patrols and Detailed Inspections on all communication lines throughout the state. The procedure was missing information on the periodicity of performing Patrols for Non-Tier 2 and 3 locations.

4. 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).”

Inspection Records

a. Volcano patrol records did not identify the personnel who performed each inspection.

b. Volcano provided Patrol and Detailed Inspection records that had findings but did not identify the date and description of the corrective actions. A table of the inspection results is provided in Table 4 below. Volcano should assign Work Orders for the inspection findings.

Table 4: GO 95, Rule 80.1.A.(4) Records Missing Corrective Action Data

Pole ID	HFTD Tier	Patrol Date	Detailed Inspection Date	Inspection Results
20008	TIER 2	3/15/2026	1/17/2013	POLE NEEDS TO BE REPLACED
20035	TIER 2	3/15/2026	9/29/2023	FOUND LINE DOWN
20086	TIER 2	3/15/2026	10/2/2023	FOUND CUT CATV DROP
20272	TIER 2	3/4/2026	7/31/2018	ABANDONED FACILITIES ON POLE
300029	TIER 2	3/15/2026	12/30/2015	POLE TRANSFER NEEDED
300044	TIER 2	3/15/2026	12/30/2015	POLE IS BAD
300406	TIER 2	3/15/2026	6/20/2018	POLE TRANSFER NEEDED
300408	TIER 2	3/15/2026	6/20/2018	POLE TRANSFER NEEDED
301133	TIER 2	3/15/2026	4/12/2016	POLE TRANSFER NEEDED
301137	TIER 2	3/15/2026	5/10/2016	POLE TRANSFER NEEDED
301186	NULL	3/15/2026	6/28/2018	POLE TRANSFER NEEDED
301193	TIER 2	3/15/2026	5/3/2019	POLE IS BAD
301263	TIER 2	3/15/2026	5/11/2016	POLE TRANSFER NEEDED
301270	TIER 2	3/15/2026	5/11/2016	POLE TRANSFER NEEDED
301290	TIER 2	3/15/2026	4/27/2016	LOOSE WIND SPOILER
301294	TIER 2	3/15/2026	4/27/2016	POLE TRANSFER NEEDED

301295	TIER 2	3/15/2026	5/9/2016	CABLE NOT ATTACHED TO POLE
301296	TIER 2	3/15/2026	5/9/2016	POLE TRANSFER NEEDED
301299	TIER 2	3/15/2026	5/9/2016	NEED RISER REPAIRED
302087	NULL	3/15/2026	5/23/2018	POLE TRANSFER NEEDED
302143	TIER 2	3/15/2026	1/30/2015	POLE TRANSFER NEEDED
303201	TIER 2	3/15/2026	11/12/2015	POLE TRANSFER NEEDED
303626	TIER 2	3/15/2026	2/1/2016	POLE SPLITTING LOOSE LASHING WIRE
305012	TIER 2	3/15/2026	11/13/2014	POLE TRANSFER NEEDED
305039	TIER 2	3/15/2026	11/21/2023	BAD SPLICE ON POLE
305411	TIER 2	3/15/2026		TEMP LINE
305426	TIER 2	3/15/2026	11/4/2024	MISSING RISER LOOSE DROP
304934	TIER 3	1/31/2025		VERY LOW REFER TO CONST TO REMOVE DROP
20001	TIER 3	1/31/2025		VERY LOW REFER TO CONST TO REMOVE DROP
20426	TIER 3	1/24/2025		DEBRIS ON LINE REFER TO CONSTRUCTION
20135	TIER 3	2/4/2025		DEAD DROP LAYING ON GROUND REFER TO CONST
300702	TIER 3	2/11/2025		TEMP LINE ON GROUND
300795	TIER 3	1/28/2024		LASHING WIRE DISCONNECTED

Volcano used a contractor, Osmos to perform Detailed Inspections in 2025. Volcano provided records of Detailed Inspections performed by Osmos in 2025 that had 5 findings but no work orders were assigned for the findings. Work orders should be assigned for the Osmos inspection findings.

c. Volcano Patrol Records performed in 2025 in Calaveras County were missing the Patrol date for Pole IDs 300693, 300695, 300696, 300697, 300735, 305097, 301099, 301101, 301121, 301122, 304936, 305250, 300578, 300580, 300581, 300987, 301061, 301063, 301064, 301065, 301066, 301067, 4, 305418, 305436, 300989, and 301060.

5. GO 95 Rule 80.1. B. Intrusive Inspections in the High Fire-Threat District states in part:

Wood poles in Tier 3 of the High Fire-Threat District that support only Communication Lines or equipment shall be intrusively inspected in accordance with the schedule established in General Order 165 if they are: [...]

- *Within one span of a joint-use pole supporting supply lines in Northern California [...]*

CIPs shall maintain records for the life of the pole that provide the following information for each wood pole subject to this rule: The location of the pole, the date of each intrusive inspection, the results of each inspection, the personnel who performed each intrusive inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff may inspect records consistent with Public Utilities Code Section 314(a)."

Intrusive Inspections

Volcano provided the documents of "2024 Intrusive Pole Inspection Report" and "Poles Needing Intrusive Test".

- a. The Intrusive Pole Inspection Report was missing test results for Pole ID 300492 and 302752.
- b. The following Poles were listed as needing intrusive test, but no results were provided for them:

Pole ID	Pole Size	Class	PoleSet Date	Asset Type	Latitude	Longitude	Fire Tier	Intrusive Inspection Required
305072	30	5	2016	SO	38.42144	-120.6	3	YES
305075	25	5	2017	SO	38.437	-120.556	3	YES
305221	30	5	2019	SO	38.3395	-120.611	3	YES
305454	30	5	2025	SO	38.3707	-120.506	3	YES
305455	30	5	2025	SO	38.4002	-120.465	3	YES

6. GO 128, Rule 17.2, Inspection states:

"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 (See Rule 12.3)."

Volcano's procedure for inspecting its Underground assets does not specify the inspection frequency.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Site#	Equipment Type(s)	Approximate Latitude / Longitude	Approximate Address	City
1	• Pole	38.40154586, -120.67470952	18925 HWY 88	Pine Grove
2	• Pole	38.40206149, -120.6748795	18925 HWY 88	Pine Grove
3	• Pole	38.40062540, -120.67547535	18925 HWY 88	Pine Grove
4	• Pole	38.4000360, -120.67614415	Taves Rd and HWY 88	Pine Grove
5	• Pole	38.3993713, -120.67664650	13240 Ponderosa Way	Pine Grove
6	• Pedestal	38.3996385, -120.67709744	13240 Ponderosa Way	Pine Grove
7	• Pedestal	38.3996455, -120.67708431	13240 Ponderosa Way	Pine Grove
8	• Pole	38.3987626, -120.67670015	18935 HWY 88	Pine Grove
9	• Pole	38.3987423, -120.67717189	13218 Taves Rd	Pine Grove
10	• Pole	38.3988079, -120.67802994	13237 Taves Rd	Pine Grove
11	• Pedestal	38.3988185, -120.678015889	13237 Taves Rd	Pine Grove
12	• Pole	38.3971705, -120.678247444	18908 HWY 88	Pine Grove
13	• Pedestal	38.7036149, -120.051769707	1111 HWY 88	Kirkwood
14	• Pedestal	38.6975287, -120.071010617	475 Larkspur Dr	Kirkwood
15	• UGVault	38.6955471, -120.070702283	660 East Meadows Dr	Kirkwood
16	• UGVault	38.6852388, -120.064520612	Kirkwood Hospital Lid	Kirkwood
17	• UGVault	38.6843131, -120.067157052	Kirkwood Base Camp	Kirkwood
18	Battery	38.6844965, -120.067253391	1370KirkwdMeadowDr	Kirkwood
19	• Connection Box	38.6844965, -120.067253391	1370KirkwdMeadowDr	Kirkwood
20	• UGVault	38.6928878, -120.076468441	33766 Danburg Dr	Kirkwood
21	• UGVault	38.6946340, -120.079231648	34701 Danburg Dr	Kirkwood
22	• Connection Box	38.6902674, -120.073472508	33674 Loop Rd	Kirkwood
23	• UGVault	38.6938291, -120.074613231	33872 Hawkweed Way	Kirkwood
24	• UGVault	38.6964796, -120.075386286	34056 Yarrow St	Kirkwood
25	• UGVault	38.6964781, -120.075416877	34056 Yarrow St	Kirkwood
26	• UGVault	38.6987269, -120.078065582	34956 Yarrow St	Kirkwood
27	• Pedestal	38.7067058, -120.087473212	EntranceLakeKirkwood	Kirkwood
28	• Pedestal	38.7045246, -120.080114466	50758KirkwdLakeDr #4	Kirkwood
29	• Connection Box	38.6676353, -120.111019406	39121 Kit Carson#35	Kit Carson
30	• UGVault	38.6677883, -120.110801111	39121 Kit Carson#35	Kit Carson

Site#	Equipment Type(s)	Approximate Latitude / Longitude	Approximate Address	City
31	• Pedestal	38.6679720, -120.110535747	31840 Kit Carson Rd	Kit Carson
32	• Pedestal	38.6642562, -120.107408847	31620 Kit Carson Rd	Kit Carson
33	• Connection Box	38.6640324, -120.107390501	31620 Kit Carson Rd	Kit Carson
34	• Pedestal	38.6619019, -120.108917323	31511 Kit Carson Rd	Kit Carson
35	• Pedestal	38.6365164, -120.140651222	47400 Tragedy Springs	Tragedy Springs
36	• Pole	38.4390170, -120.633180	15561 Pine Grove Volcano Rd	Volcano
37	• Pole	38.4276831, -120.617160022	15254 Quartz Rd	Pioneer
38	• Pedestal	38.4277549, -120.617211713	15254 Quartz Rd	Pioneer
39	• Pedestal	38.4277471, -120.617215531	15254 Quartz Rd	Pioneer
40	• UGVault	38.4277778, -120.617185529	15254 Quartz Rd	Pioneer
41	• Pole	38.4217350, -120.616189528	14893PioneerVolcanoRd	Pioneer
42	• Pole	38.4209717, -120.616658822	14725PioneerVolcanoRd	Pioneer
43	• Pole	38.4208433, -120.612523719	14706PioneerVolcano Rd	Pioneer
44	• PowerSupply	38.4195636, -120.612111757	14604PioneerVolcano Rd	Pioneer
45	• Pedestal	38.4195176, -120.612102935	14604PioneerVolcano Rd	Pioneer
46	• Pole	38.4182451, -120.613126321	14495PioneerVolcano Rd	Pioneer
47	• Pole	38.4153705, -120.612616478	14350PioneerVolcano Rd	Pioneer
48	• Pole	38.4153708, -120.612840461	14371PioneerVolcano Rd	Pioneer
49	• Pole	38.4158181, -120.610986045	14315PioneerVolcano Rd	Pioneer
50	• Pole	38.4162616, -120.610169118	14301PioneerVolcano Rd	Pioneer
51	• Pedestal	38.4162877, -120.610139354	14301PioneerVolcano Rd	Pioneer
52	• Pedestal	38.4150837, -120.610558290	22435 Alaire Lane	Pioneer
53	• Pedestal	38.4150904, -120.610538950	22479Carson Pass Hwy	Pioneer
54	• UGVault	38.4150856, -120.610540421	22435 Alaire Lane	Pioneer
55	• UGVault	38.4156047, -120.609558792	22391 Red Corral Rd	Pioneer
56	• UGVault	38.4157084, -120.609179489	22391 Red Corral Rd	Pioneer
57	• Pedestal	38.4156721, -120.609040145	22391 Red Corral Rd	Pioneer
58	• Pedestal	38.4156841, -120.609043235	22391 Red Corral Rd	Pioneer

Site#	Equipment Type(s)	Approximate Latitude / Longitude	Approximate Address	City
59	• Pole	38.4188705, -120.604788735	22641 Rocky Lane	Red Corral
60	• Pole	38.4180789, -120.6042697405	22656 Rocky Lane	Red Corral
61	• Pole	38.4180996, -120.6042447941	22656 Rocky Lane	Red Corral
62	• Pole	38.4185074, -120.6037204221	22690 Rocky Lane	Red Corral
63	• Connection Box	38.4183493, -120.6032981761	22690 Rocky Lane	Red Corral
64	• Pole	38.4187185, -120.6031376723	22690 Rocky Lane	Red Corral
65	• Pole	38.4189288, -120.6019836129	22715 Rocky Lane	Red Corral
66	• Pole	38.4190715, -120.6012090506	22715 Rocky Lane	Red Corral
67	• Pole	38.4190758, -120.6003786329	22797 Rocky Lane	Red Corral
68	• PowerSupply	38.4186079, -120.5992315108	22860 Rocky Lane	Red Corral
69	• Pedestal	38.4186252, -120.5992350625	22915 Rocky Lane	Red Corral
70	• Pedestal	38.4186503, -120.5991811076	22915 Rocky Lane	Red Corral
71	• Pole	38.3393909, -120.6111602629	13984StephenPTealeHwy	Glencoe
72	• Pedestal	38.3394146, -120.6111655809	13984StephenPTealeHwy	Glencoe
73	• Connection Box	38.3394132, -120.6111755167	13984StephenPTealeHwy	Glencoe
74	• Splice Box	38.3394195, -120.6111756765	13984StephenPTealeHwy	Glencoe
75	• Connection Box	38.3478637, -120.7734126517	1 Main Street	Jackson
76	• UGVault	38.3482853, -120.7736755725	22 Main Street	Jackson
77	• UGVault	38.3486002, -120.7739027712	27 Main Street	Jackson
78	• UGVault	38.3489886, -120.7741317207	41 and 48 Main Street	Jackson
79	• Connection Box	38.3490202, -120.7746979109	115 B Main Street	Jackson
80	• UGVault	38.3494942, -120.7745243190	145 Main Street	Jackson
81	• UGVault	38.3500141, -120.7747275960	161 Main Street	Jackson
82	• UGVault	38.3506954, -120.7751278513	215 Main Street	Jackson
83	• Pole	38.3507368, -120.7750402744	215 Main Street	Jackson
84	• Connection Box	38.3505233, -120.7745224831	204 Main Street	Jackson
85	• UGVault	38.3504833, -120.7743090866	204 Main Street	Jackson
86	• UGVault	38.3497515, -120.7729983030	108 Court Street	Jackson
87	• Connection Box	38.3490285, -120.7728198814	34 Summit St Suite C	Jackson
88	• Pole	38.3546797, -120.7758042849	630 North Main Street	Jackson

Site#	Equipment Type(s)	Approximate Latitude / Longitude	Approximate Address	City
89	• Pole	38.3539961, -120.7774804648	530 Sutter Street	Jackson
90	• Pole	38.3654614, -120.79890702951	11212 Martell Rd	Jackson
91	• UGVault	38.3654669, -120.7989222731	11212 Martell Rd	Jackson
92	• Pole	38.3570701, -120.9343214448	432 Raymond Drive	Ione
93	• Pole	38.3564690, -120.9350876826	498 Raymond Drive	Ione
94	• Pole	38.3560653, -120.9347169334	393 Raymond Drive	Ione
95	• Pole	38.3559498, -120.9336635530	129 CA 124 HWY	Ione
96	• Pole	38.3561409, -120.9334711517	123 CA 124 HWY	Ione
97	• Pole	38.3554124, -120.9342125319	124 CA 124 HWY	Ione
98	• Pole	38.3552367, -120.9343738348	29 CA 124 HWY	Ione
99	• Pole	38.3555646, -120.9340381599	106 CA 124 HWY	Ione
100	• Pole	38.3549203, -120.9337944462	10 Welch Lane	Ione
101	• Pole	38.3547327, -120.9356561941	39 Preston Ave	Ione
102	• Pole	38.3537840, -120.9319501560	102 N Arroyo Seco St	Ione
103	• Pole	38.3535842, -120.9325955683	111 Clay St	Ione
104	• Pole	38.3533256, -120.9325585123	25 N Ione St	Ione
105	• Pole	38.3530345, -120.9316869159	116 East Main St	Ione
106	• Pole	38.3538902, -120.9303526660	15 Maple St	Ione
107	• Pole	38.3543383, -120.9306331051	33 Maple St	Ione
108	• Pole	38.3533252, -120.9303076147	314 East Main Street	Ione
109	• Pole	38.3537486, -120.9298513716	327 East Main Street	Ione
110	• Pole	38.3526687, -120.9298907887	316 East Jackson St	Ione
111	• Pole	38.3515399, -120.9288284082	316 Bacon Road	Ione
112	• Pole	38.3515582, -120.9287852364	317 Bacon Road	Ione
113	• Pole	38.3484731, -120.9240652075	217 Poplar St	Ione

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 findings are listed in Table 5:

Table 5: GO 95, Rule 31.1 Findings

Location #	Findings
5	Volcano has copper wire loop not properly stored near pole.
9	Volcano needs to complete pole transfer to support future fiber installation planned for 2 nd quarter of 2027.
43	Volcano needs to complete pole transfer.
65	Volcano has long bolt that needs trimming.
65	There is loose lashing wire near pole.

2. 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.”

ESRB’s findings are listed in Table 6:

Table 6: GO 95, Rule 31.6 Findings

Location #	Findings
1	Volcano has two abandoned drops.
49	PG&E did pole transfer but left abandoned underground (UG) coaxial cables with new pole. Volcano fixed in field and removed UG coaxial cables.
59	Volcano has an abandoned drop.
96	Volcano has an abandoned drop.
111	Volcano has an abandoned drop that is contacting AT&T.

3. GO 95, Rule 34, Foreign Attachments states in part:

“Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.”

ESRB Finding is listed in Table 7:

Table 7: GO 95, Rule 34 Foreign Attachments Finding

Location #	Findings
50	Unauthorized Sign was attached to pole. Volcano fixed in field and removed sign.

4. 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.”

Table 1 Case 3: Crossing or along thoroughfares in urban districts or crossing thoroughfares in rural districts must be at least 18 feet at road centerline and 16 feet at curb.

Table 1 Case 5: Above ground in areas accessible to pedestrians only 10 feet.

Table 1, Case 10B: Radial centerline clearance of conductor or cable (unattached) from non-climbable street lighting or traffic signal poles or standards, including mastarms, brackets and lighting fixtures, and from antennas that are not part of the overhead line system must be at least 1 foot.”

ESRB’s findings related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 37 Findings

Location #	Finding
2	Volcano has low cable clearance (7 feet) midspan between location 1 and 2 above ground in pedestrian area.
4	Volcano has low cable clearance (6 feet) midspan between location 3 and 4 above ground in pedestrian area.

Location #	Finding
62	Volcano has two midspan large cable bundles (one on each side of pole) that has low clearance (16 feet and 15 feet) at road centerline.
62	Volcano has low CATV service drop (12 feet 2 inches) over road centerline.
62	Volcano has two low service drops (16 feet and 16 feet 3 inches) over road centerline.
64	Volcano has low service drop (17 feet 8 inches) over road centerline.
67	Volcano has low service drop (15 feet 4 inches) over road centerline.
92	Volcano has low service drop (17 feet 1 inches) over road centerline.
94	Volcano has low service drop (17 feet 1 inches) over road centerline.
102	Volcano has three low service drops (16 feet 1 inch, 16 feet 7 inches and 17 feet 1 inch) over road centerline.
104	Volcano has two low service drops (17 feet 6 inches and 17 feet 7 inches) over road centerline.
105	Volcano has two low service drops (15 feet 8 inches and 17 feet 2 inches) over road centerline.
106	Volcano has two low service drops (17 feet 6 inches and 17 feet 11 inches) over road centerline.

5. GO 95, Rule 38, Table 2, 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: 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.”

Table 2, Case 16C: The radial separation between conductors, taps or lead wires of different circuits and communication conductors (including open wire, cables, and service drops) supported on the same crossarm, pole or structure must be at least 3 inches.

Table 2, Case 18: Radial separation between guys and conductors. Guys passing conductors supported on other poles, or guys approximately parallel to conductors supported on the same poles must be at least 3 inches.

ESRB’s findings are listed in Table 9:

Table 9: GO 95, Rule 38, Table 2, Findings

Location #	Finding
83	Volcano cable is contacting ATT cable.
88	Volcano cable does not have 3-inch separation from down guy.
97	Volcano down guy is contacting AT&T down guy.
105	Volcano service drop is contacting PG&E service drop at 204 East Main Street.
110	Volcano does not have 12-inch clearance from AT&T attachment on pole.
111	Volcano cable at midspan is contacting ATT cable.

6. GO 95, Rule 84.6-B, Ground Wires states:

“Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.

Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8)."

ESRB's findings are listed in Table 10:

Table 10: GO 95, Rule 84.6-B Findings

Location #	Findings
102	Volcano has an exposed ground wire.
112	Volcano has an exposed ground wire.

7. GO 95, Rule 84.6-D, Vertical Runs states in part:

"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."

ESRB's findings are listed in Table 11:

Table 11: GO 95, Rule 84.6-D Findings

Location #	Finding
10	Riser cables were not attached to the pole every 24 inches.
62	Riser cables were not attached to the pole every 24 inches.

8. GO 95, Rule 86.2, 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."

ESRB's findings are listed in Table 12:

Table 12: GO 95, Rule 86.2 Findings

Location #	Findings
46	Volcano down guy is loose/not taut.
90	Volcano down guy is loose/not taut.
97	Volcano down guy is loose/not taut.

9. GO 95, Rule 86.7-B, Anchor Guys states in part:

“In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule 86.7–B.”

ESRB’s findings are listed in Table 13:

Table 13: GO 95, Rule 86.7-B Findings

Location #	Findings
42	Vegetation is contacting the anchor guy above the sectionalizing insulator.
92	Vegetation is contacting the anchor guy above the sectionalizing insulator.
96	Vegetation is contacting the anchor guy above the sectionalizing insulator.
101	Vegetation is contacting the anchor guy above the sectionalizing insulator.
103	Vegetation is contacting the anchor guy above the sectionalizing insulator.

10. GO 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.”

ESRB’s findings are listed in Table 14:

Table 14: GO 95, Rule 86.9 Findings

Location #	Findings
1	Volcano is missing guy guards on two guy wires.
3	Volcano is missing guy guard on two guy wires.
92	Volcano is missing guy guard on guy wire.

11. GO 95, Rule 87.7-D(1), Risers states:

“Covered from Ground Level to 8 Feet above the Ground:

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 findings are listed in Table 15:

Table 15: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
10	Volcano is missing protective covering for riser cables.
42	Riser cable is exposed and not covered.
62	Volcano is missing protective covering for riser cables.
64	Volcano protective covering for riser cables is only 6 feet 10 inches above ground.
67	Riser cable is exposed and not covered.
71	Riser cable is exposed and not covered.

12. GO 95, Rule 92.4-D(1), Grounding, Location of Grounds on Exposed Cables with Metallic Shields, Sheaths, or Messengers; states in part:

(1) *“The exposed communication cables and messengers shall be grounded: At all deadend poles and at intervals not greater than every one-quarter of a mile (1320 feet).”*

ESRB’s findings are listed in Table 16:

Table 16: GO 95, Rule 92.4-D(1) Findings

Location #	Finding
2	Volcano did not have ground at dead end pole.
42	Volcano did not have ground at dead end pole.
50	Volcano did not have ground at dead end pole.
59	Volcano did not have ground at dead end pole.
61	Volcano did not have ground at dead end pole.
67	Volcano did not have ground at dead end pole.

13. GO 128, Rule 17.1, 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 findings are listed in Table 17:

Table 17: GO 128, Rule 17.1 Findings

Location #	Findings
20	UG Vault cover was not secured.
23	UG Vault cover was not secured.
24	UG Vault cover was not secured.
39	Amplifier did not have a ground installed.
57	UG Vault cover was not secured. Volcano fixed in field.

14. 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 are listed in Table 18:

Table 18: GO 128, Rule 17.8 Findings

Location #	Findings
6	Pedestal is missing Volcano ownership marking.
7	Pedestal is missing Volcano ownership marking.
11	Pedestal is missing Volcano ownership marking.
13	Pedestal is missing Volcano ownership marking.
15	Hand Hold is missing Volcano ownership marking.
21	Hand Hold is missing Volcano ownership marking.
23	Hand Hold is missing Volcano ownership marking.
24	Hand Hold is missing Volcano ownership marking.
26	Hand Hold is missing Volcano ownership marking.
28	Pedestal is missing Volcano ownership marking.
30	Hand Hold is missing Volcano ownership marking.
31	Pedestal is missing Volcano ownership marking.
32	Pedestal is missing Volcano ownership marking.
34	Pedestal is missing Volcano ownership marking.
35	Pedestal is missing Volcano ownership marking.
38	Pedestal is missing Volcano ownership marking.
40	Hand Hold is missing Volcano ownership marking.
44	Power supply cabinet is missing Volcano ownership marking.
45	Pedestal is missing Volcano ownership marking.

Location #	Findings
51	Pedestal is missing Volcano ownership marking.
52	Pedestal is missing Volcano ownership marking.
53	Pedestal is missing Volcano ownership marking.
54	Hand Hold is missing Volcano ownership marking.
55	Hand Hold is missing Volcano ownership marking.
68	Power supply cabinet is missing Volcano ownership marking.
69	Pedestal is missing Volcano ownership marking.
70	Pedestal is missing Volcano ownership marking.
72	Pedestal is missing Volcano ownership marking.
73	Connection Box is missing Volcano ownership marking.
74	Splice Cabinet is missing Volcano ownership marking.

15. GO 128, Rule 43.3-C(1), Depths states:

“Communication cables shall be installed at a minimum depth below the surface under which they are located as follows except as provided in Rule 43.3–D:

(1) Sidewalks, Parkways and Private Property: 12 inches.”

ESRB’s finding is listed in Table 19:

Table 19: GO 128, Rule 43.3-C(1) Finding

Location #	Finding
34	Volcano cables were not installed 12 inches below ground. The ground is made of granite. Volcano should address the Exceptions allowed by Rule 43.3-D(1) Mechanical Protection for using depths lower than Rule 43.3-C(1), and upgrade the installation to provide adequate protection for the cables. Rule 43.3-D(1) Mechanical Protection states “Lesser depth than those listed in Rule 43.3–C may be used where suitable mechanical protection is

Location #	Finding
	employed. Suitable mechanical protection shall consist of the following or their equivalents: (a) Steel conduit or plastic pipe made of unplasticised polyvinyl chloride having the properties and dimensions specified in Type II, High Impact, Normal Chemical Resistance in United States. Commercial Standard No. CS 207–60 with a minimum wall thickness of 0.15 inch, or (b) A layer of concrete at least 3 inches in thickness above the cable.”

V. Observations

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

- (2) *“Where a communications company’s or an electric utility’s (Company A’s) actions result in potential violations of GO 95 for another entity (Company B), that entity’s (Company B’s) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.*
- (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 GO95.”*

Table 20 includes all non-Volcano (third-party) findings that ESRB observed during the audit:

Table 20: Observations

Location #	Observations
1	PG&E ground wire is not covered with moulding and High Voltage sign is damaged.
8	PG&E to replace pole.
12	PG&E to replace pole.
68	PG&E has an exposed ground rod.
89	AT&T has an abandoned pole and down guy is missing insulator bob.
92	AT&T down guy is missing insulator bob.
94	AT&T has an exposed riser cable.
94	AT&T has a low service drop (16 feet) at road centerline.
94	PG&E has exposed riser cable.
96	AT&T has two down guys missing insulator bob.
97	AT&T down guy is missing insulator bob.
98	PG&E pole has pole top split and long check at upper pole.
100	AT&T has an abandoned service drop and down guy is missing insulator bob.
101	PG&E anchor guy has vegetation contacting above the sectionalizing insulator and tree is obstructing pole climbing space.
102	PG&E has exposed riser cable.
103	PG&E pole has pole top split.
103	AT&T has loose down guy/not taut and low service drop (17 feet 6 inches) over road centerline.
104	AT&T has low service drop (16 feet) over road centerline.
106	PG&E service drop has low clearance (17 feet 5 inches) over road centerline.
106	AT&T midspan on one side of pole has low service drop (16 feet 5 inches), and midspan on other side of pole has low service drop (17 feet 5 inches) over road centerline.
113	AT&T has pole top split.

