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

November 18, 2026 CA2026-1477

Marco Montoya
Senior Legal Counsel
Extenet Systems
3030 Warrenville Rd., Suite 340
Lisle, IL 60532

SUBJECT: Audit of Extenet Systems Orange County

Mr. Montoya:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Norvik Ohanian of my staff conducted a Communication Infrastructure Provider (CIP) audit of Extenet Systems' Orange County District on October 12-16, 2026. The audit included a review of Extenet Systems' inspection and maintenance records, and a field inspection of Extenet Systems' facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than December 18, 2026, by electronic or hard copy, of all corrective measures taken by Extenet Systems 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 Norvik Ohanian at (213) 660-5528 or Norvik.Ohanian@cpuc.ca.gov.

Sincerely,

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

Enclosures: Audit Findings

Cc: Koko Tomassian, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Saimon Islam, Senior Utilities Engineer (Supervisor), ESRB, CPUC
Norvik Ohanian, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Inspection records – were not available for review
- Inspection / maintenance program – was not available for review
- Pole loading calculations – were not available for review
- Repair work order records – were not available for review
- Third-party notification records – were not available for review

II. Records Review – Violations List

My staff observed the following violations during the field inspections portion of the audit:

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.*

Extenet Systems' staff were unable to provide CPUC with any records demonstrating that its overhead facilities were frequently and thoroughly inspected, as required by the rule.

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*

Extenet Systems' staff were unable to provide CPUC with any records demonstrating that it had performed patrol or detailed inspections of its joint-use poles in the high fire-threat districts in compliance with the inspection cycles required by the rule.

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.*

Extenet Systems' staff were unable to provide CPUC with any records demonstrating that its underground facilities were frequently and thoroughly inspected, as required by the rule.

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.*

GO 95, Rule 18-B requires communications companies to establish and implement an auditable maintenance and inspection program for their facilities and lines. Extenet Systems' staff were unable to provide CPUC with records demonstrating that such an auditable maintenance and inspection program had been established and implemented, as required by the rule.

GO 95, Rule 44.1 - Installation and Reconstruction, states in part:

> *Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.*
> *The entity responsible for performing the loading calculation(s) for an installation or reconstruction shall maintain records of these calculations for the service life of the pole or other structure for which a loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.*

Extenet Systems' staff were unable to provide CPUC with any records demonstrating that the required loading calculations were performed for its overhead facilities upon installation or reconstruction, as required by the rule.

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

> *(1) Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.*
> *Upon completion of the corrective action, the company's records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years.*

Extenet Systems' staff were unable to provide CPUC with any records demonstrating that appropriate corrective action was taken to remedy potential violations or safety hazards, as required by the rule.

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 GO 95.*
> *(5) A company receiving a notification under (2), (3), or (4) above shall take appropriate corrective action consistent with the provisions of this rule. For at least ten (10) years, the documentation of the notice shall be maintained by both*

the notifying and receiving parties and documentation of the correction shall be maintained by the receiving party.

Extenet Systems' staff were unable to provide CPUC with any records demonstrating that the required third-party notification was transmitted to and received by the appropriate company upon discovery of potential GO 95 violations or safety hazards, as required by the rule.

III. Field Inspection

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

No.	Structure ID.	Type of Structure	Location	Latitude	Longitude
1	10683D	Pole	Anaheim	33.86142936	-117.8462345
2	31676D	Pole	Anaheim	33.86152641	-117.8458481
3	28923D	Pole	Anaheim	33.8617876	-117.8447157
4	33345D	Pole	Anaheim	33.86192792	-117.8441965
5	30763D	Pole	Anaheim	33.86199643	-117.8439237
6	27041D	Pole	Anaheim	33.86213131	-117.8433914
7	27048D	Pole	Anaheim	33.86224504	-117.8429461
8	17263D	Pole	Anaheim	33.86242002	-117.84231
9	33352D	Pole	Anaheim	33.86262039	-117.8415003
10	19224D	Pole	Anaheim	33.86263713	-117.8407994
11	30022D	Pole	Anaheim	33.86263136	-117.8402002
12	4838701E	Pole	Modjeska	33.70975191	-117.6227551
13	X10613E	Pole	Modjeska	33.71014021	-117.6222717
14	X10614E	Pole	Modjeska	33.71051136	-117.6217421
15	X10615E	Pole	Modjeska	33.71042848	-117.621185
16	4884007E	Pole	Modjeska	33.7104231	-117.6207222
17	4550040E	Pole	Modjeska	33.71042448	-117.6201689
18	4925775E	Pole	Modjeska	33.71040011	-117.6196647
19	4938502E	Pole	Modjeska	33.71042239	-117.6190653
20	4883821E	Pole	Modjeska	33.71031173	-117.6185165
21	4624478E	Pole	Irvine	33.64216514	-117.7618588
22	4624477E	Pole	Irvine	33.64156376	-117.7617061
23	4385740E	Pole	Irvine	33.6415727	-117.761648
24	4385739E	Pole	Irvine	33.64086222	-117.7614238
25	4385737E	Pole	Irvine	33.63945161	-117.760966
26	4829657E	Pole	Newport Beach	33.61433848	-117.9286273
27	1040245H	Pole	Newport Beach	33.61457915	-117.9286425
28	1303370E	Pole	Newport Beach	33.61502638	-117.9286668
29	7890892H	Pole	Newport Beach	33.61536078	-117.9286587
30	719420H	Pole	Newport Beach	33.61557252	-117.9286353
31	1303138	Pole	Newport Beach	33.61562757	-117.9285571
32	1303137E	Pole	Newport Beach	33.61568107	-117.928841
33	543138E	Pole	Newport Beach	33.61569995	-117.9291659
34	4370789E	Pole	Newport Beach	33.61568409	-117.9295826
35	2295282E	Pole	Newport Beach	33.61566527	-117.9297374
36	1303136E	Pole	Newport Beach	33.61565202	-117.929925
37	724906E	Pole	Newport Beach	33.61585449	-117.9299357
38	1303369E	Pole	Newport Beach	33.61503311	-117.9282625
39	1303368	Pole	Newport Beach	33.61503614	-117.9277771
40	822542E	Pole	Newport Beach	33.61597243	-117.9313794
41	4338568E	Pole	Newport Beach	33.61619957	-117.93158

42	822543E	Pole	Newport Beach	33.61646319	-117.9318249
43	524234E	Pole	Newport Beach	33.61677678	-117.9320901
44	822544E	Pole	Newport Beach	33.6169805	-117.9322688
45	524236E	Pole	Newport Beach	33.61720233	-117.9324945
46	822545E	Pole	Newport Beach	33.61746981	-117.9327404
47	457246E	Pole	Newport Beach	33.61772356	-117.932951
48	1249049E	Pole	Newport Beach	33.61765372	-117.9331007
49	1220144E	Pole	Newport Beach	33.61738922	-117.9335041
50	1267851E	Pole	Newport Beach	33.61724074	-117.9338251
51	Next to Pole 33362D	Handhole	Anaheim	33.8490162	-117.8654768
52	33362D	Pole	Anaheim	33.84896084	-117.8654178
53	10351D	Pole	Anaheim	33.84934599	-117.8639537
54	Next to Pole 10351D	Handhole	Anaheim	33.84934015	-117.8639215
55	10352D	Pole	Anaheim	33.84946422	-117.863434
56	15604D	Pole	Anaheim	33.84978929	-117.8637642
57	21503D	Pole	Anaheim	33.85002828	-117.8638586
58	15603D	Pole	Anaheim	33.85026678	-117.8639231
59	15602D	Pole	Anaheim	33.85068389	-117.8640877
60	21504D	Pole	Anaheim	33.85094504	-117.8641797
61	15601D	Pole	Anaheim	33.85122436	-117.8642857
62	18253D	Pole	Anaheim	33.85131417	-117.8641194
63	21599D	Pole	Anaheim	33.85164192	-117.8642511
64	21506D	Pole	Anaheim	33.85192762	-117.8643305
65	19936D	Pole	Anaheim	33.85219919	-117.8644416
66	21748D	Pole	Anaheim	33.85243639	-117.8645131
67	Next to Pole 21748D	Handhole	Anaheim	33.85245387	-117.8645256
68	28399D	Pole	Anaheim	33.84871545	-117.8648119
69	28398D	Pole	Anaheim	33.8485029	-117.864346
70	28397D	Pole	Anaheim	33.84820295	-117.8636964
71	28396D	Pole	Anaheim	33.84803206	-117.8633016
72	28395D	Pole	Anaheim	33.84783558	-117.8628662
73	28394D	Pole	Anaheim	33.8476006	-117.8623273
74	28393D	Pole	Anaheim	33.84740219	-117.8619343
75	31858D	Pole	Anaheim	33.84717289	-117.861443
76	24720D	Pole	Anaheim	33.84698461	-117.8609396
77	4209569E	Pole	Yorba Linda	33.90287333	-117.8286359
78	Next to Pole 4367031E	Handhole	Yorba Linda	33.90287017	-117.8286147
79	4367031E	Pole	Yorba Linda	33.90284537	-117.8286298
80	4506345E	Pole	Yorba Linda	33.90243867	-117.8286124
81	4415095E	Pole	Yorba Linda	33.90169151	-117.8286247
82	2140287E	Pole	Yorba Linda	33.90097091	-117.8286085
83	2140286E	Pole	Yorba Linda	33.90037115	-117.8286135
84	4292096E	Pole	Yorba Linda	33.89980298	-117.8286129
85	2140285E	Pole	Yorba Linda	33.89920475	-117.8286089
86	4697776E	Pole	Yorba Linda	33.89878504	-117.8285631
87	Next to Pole 2029507E	Handhole	Yorba Linda	33.89831292	-117.8285744
88	2029507E	Pole	Yorba Linda	33.89830782	-117.828574

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection 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.*

Extenet Systems' facilities on each of the following poles required maintenance:

- 4884007E – A cut tree branch was found hanging from the Extenet Systems' cable at midspan.
- 4925775E – An idle cable loop was attached to the Extenet Systems' splice box, resulting in noncompliance with required clearance from other third-party communication cables.
- 457246E – The Extenet Systems' splice box was not properly supported by the messenger cable, resulting in noncompliance with required clearance from other third-party communication cables.

Extenet Systems' facilities had not been transferred to the new pole in place at each of the following poles:

- Pole No. 17263D
- Pole No. 4925775E
- Pole No. 4624478E

Extenet Systems' cable lashing wire was damaged at each of the following poles:

- Pole No. 15603D
- Pole No. 18253D

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.

Extenet Systems' cable supported on Pole 15604D was in contact with a third-party communications cable supported on the same pole at midspan.

GO 128, Rule 42.7 – Covers, states in part:

> *Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal.*

The handhole cover at each of the following locations was not securely closed, allowing unauthorized access to the structures:

- Handhole next to Pole 33362D
- Handhole next to Pole 10351D
- Handhole next to Pole 21748D
- Handhole next to Pole 2029507E