#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



November 23, 2015 CA2015-001

Ms. Karen Flemion San Simeon Community Cable, Inc. Post Office Box 96 San Simeon, CA 93452-0096

**SUBJECT**: Audit of San Simeon Community Cable

Dear Ms. Flemion:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Raymond Cho of my staff conducted a Communication Infrastructure Provider (CIP) audit of San Simeon Community Cable on October 12-13, 2015. The audit included a review of San Simeon's records and field inspections of San Simeon's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than December 23, 2015 by electronic or hard copy, of all corrective measures taken by San Simeon Community Cable to remedy and prevent such violations.

If you have any questions concerning this audit please contact Raymond Cho at (415) 703-2236 or raymond.cho@cpuc.ca.gov.

Sincerely.

Fadi Daye, P.E.

Program and Project Supervisor Electric Safety and Reliability Branch Safety and Enforcement Division California Public Utilities Commission

Enclosure: Audit Findings

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC Charlotte TerKeurst, Program Manager, Safety and Enforcement Division, CPUC Alok Kumar, Senior Utilities Engineer (Supervisor), ESRB, CPUC

### **AUDIT FINDINGS**

#### I. Records Review

My staff reviewed the following records during the audit:

- a. 2015 GO 95 and Fire Hazard Inspections Record
- b. 2015 GO 128 Inspections Record
- c. A system map and detailed locations list.
- d. Invoices for work orders completed between 2005 and October 2015.

## **II. Records Review - Violations**

### GO 95, Rule 80.1A-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

Each company that discovers a safety hazard on or near a communications facility or electric facility involving another company while performing inspections of its own facilities pursuant to this rule shall notify the other company and/or facility owner of such safety hazard in accordance with Rule 18(B).

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.

San Simeon Community Cable did not have a procedure for conducting patrol or detailed inspections.

# 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 these rules.

Prior to 2015, San Simeon Community Cable did not inspect its underground facilities frequently and thoroughly.

# **III. Field Inspection**

My staff inspected the following facilities:

Structure Number	Type of Structure	Approximate Address (in San Simeon)
1	Pole	685 Pico Ave.
2	Pole	685 Pico Ave.
3	Pole	14 Pen Way
4	Pole	14 Pen Way
5	Pole	9391 Jasper Ave.
6	Pole	9349 Jasper Ave.
7	Pole	9349 Jasper Ave.
8	Pole	545 Casa Del Mar Dr.
9	Pole	9180 Avonne Ave.
10	Pole	9086 Avonne Ave.
11	Pole	9054 Avonne Ave.
12	Pole	9070 Castillo Dr.
13	Pole	9026 Avonne Ave.
16	Pole	111 Pico Ave.
17	Pole	540 Pico Ave.
18	Pole	540 Pico Ave.
19	Pole	540 Pico Ave.
20	Pole	235 Pico Ave.
25	Pole	9520 Castillo Dr.
26	Pole	9450 Castillo Dr.
27	Pole	9390 Castillo Dr.
28	Pole	Avonne Ave. and Otter Way
29	Pole	9001 Avonne Ave.
30	Pole	9194 Avonne Ave.
31	Pole	9150 Avonne Ave.
38	Underground Vault	Hwy 1 and Hearst Dr.
42	Pedestal	9055 Balboa Ave.
43	Pedestal	9111 Balboa Ave.

### IV. Field Inspection – Undocumented Violations List

We observed the following violations during the field inspection. These violations were not documented and/or addressed by San Simeon Community Cable during its last inspections:

<u>GO 95, Rule 87.7D – Risers</u>, requires riser cables to be covered from ground level to 8 feet above ground level.

A San Simeon riser cable attached to pole #27 was exposed at the ground level.

<u>GO 95, Rule 84.8D(4) – Clearances between Conductors</u>, requires a minimum 12 inches of radial clearance between communication service drops and supply service drops within 15 feet of attachment to a building.

A San Simeon service drop attached to 9210 Avonne Ave. was less than 6 inches from a PG&E service drop.

<u>GO 128, Rule 33.4C(1) – Clearances and Depths</u>, requires supply cables to be buried at a depth of least 18 inches.

Two conductors exited out of the rear surface of pedestal #43 and were left on the surface of the ground. The conductors were originally installed aboveground.

## V. Field Inspection – Documented Violations List

We observed the following violations during the field inspection. These violations were documented and/or addressed by San Simeon Community Cable during its last inspection:

GO 95, Rule 84.6-B - Ground Wires, requires ground wires to be suitably covered.

An exposed ground wire was found on pole #1.

GO 95, Rule 31.6 – Abandoned Lines, requires abandoned lines to be removed.

An abandoned line was found attached to pole #16.

## 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.

GO 95, Rule 86.2 – Use, requires that guys shall be maintained taut.

An anchor guy attached to pole #17 was buried in the ground and the guy was not taught.