

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 16, 2020

CA2020-861

Ross Johnson
AT&T Director of Regulatory Relations
430 Bush Street, 5th Floor
San Francisco, CA 94108

SUBJECT: Audit of AT&T Kern County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Eric Ujiiye of my staff conducted the records review part of AT&T Kern County District's audit in June 2020. The field inspections part of the audit will be rescheduled to a future date.

The review of the AT&T Kern County District records identified multiple violations of one or more General Orders (GOs). An itemized copy of the audit findings violations identified by staff is enclosed along with this letter. Please provide an electronic or hard copy of all corrective measures performed by AT&T to remediate and prevent such violations by the close of business day of August 17, 2020.

If you have any questions concerning this audit, please contact Eric Ujiiye at (213) 620-2598 or Eric.Ujiiye@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjetsli, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, CPUC

RECORD REVIEW AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead detailed and patrol inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- AT&T's Intrusive Inspection of Wood Poles
- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines

II. Records Review – Violations List

My staff observed the following violations during the records review 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.

GO 95, Rule 80.1-A2, 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...

AT&T divides and identifies its inspection area by routes rather than poles. Inspections for the following routes were not completed by the due date as required by AT&T procedures:

- Detailed inspections in 27 routes in a Tier 2 High Fire Threat Area.
- Patrol inspections in 74 routes in a Tier 2 High Fire Threat Area.
- Detailed inspections in 70 routes in a Tier 3 High Fire Threat Area.
- Patrol inspections in 160 routes in a Tier 3 High Fire Threat Area.

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 these rules.

AT&T failed to provide us with any records indicating that AT&T inspects its underground facilities frequently and thoroughly to ensure that they are in compliance with GO 128.

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 18, requires communications companies to document hazardous conditions and schedule a corrective action date for each condition.

AT&T failed to complete 114 work orders by AT&T's own scheduled due date for corrective action (based on AT&T's "Overhead Lines Maintenance Plan"):

- Level 1 (required 72 hours) – six completed late
- Level 2 (required 36 months) – three completed late
- Level 2a (required 12 months) – two completed late
- Level 2b (High Fire Tier 3 requiring 6 months completion) – four completed late
- Level 3 (required 60 months) – 99 completed late