

PUBLIC UTILITIES COMMISSION

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July 21, 2020

CA2020-865

John A. Gutierrez
Senior Director – Government Affairs
Comcast
3055 Comcast Place
Livermore, CA 94551

Subject: Audit of Comcast's Santa Barbara region

Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Saimon Islam of my staff conducted the records review part of Comcast Santa Barbara Region's audit in June 2020. The field inspections part of the audit will be rescheduled to a future date.

The review of the Comcast Santa Barbara Region 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 Comcast to remediate and prevent such violations by the close of business day of August 21, 2020.

If you have any questions concerning this audit, you can contact Saimon Islam at (213) 266-4733 or saimon.islam@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 Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Saimon Islam, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground inspections records.
- Completed and pending corrective action (i.e. work orders).
- Pole loading calculations.
- Safety hazard notifications.
- Comcast's documented inspection program.

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:

- *Fire threat*
- *Proximity to overhead power line facilities*
- *Terrain*
- *Accessibility*
- *Location, including whether the Communications Lines are located in the High Fire-Threat District*

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.

Comcast's documented inspection program did not describe the methodology used to ensure that all Communication Lines are subject to the required inspections. Additionally, the program did not include a checklist of problems to be identified during patrol 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.

The above rule requires utilities to inspect all of their underground systems frequently and thoroughly. Comcast does not inspect all of its underground facilities frequently to ensure compliance with GO 128; instead, Comcast inspects its underground facilities in the course of other duty, including installation, repair, or while completing service request orders. Underground facilities that are not part of installation, repair, or service request orders are left uninspected. Therefore, Comcast is in violation of GO 128, Rule 17.2, for not ensuring that all of its underground facilities are inspected frequently and thoroughly.