

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 6, 2022

CA2022-1005

John Gutierrez
Senior Director- Government Affairs
Comcast

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Comcast's North Valley Region

Dear Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Charles Mee and Dmitriy Lysak of ESRB staff conducted an CIP audit of Comcast North Valley Region from May 23, 2022 through May 27, 2022. During the audit, ESRB staff conducted field inspections of Comcast'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 August 3, 2022, via electronic copy of all corrective actions and preventive measures taken by Comcast to correct the identified violations and prevent the recurrence of such violations and observations. The response should indicate the date of each remedial action and preventive measure taken for the violations and observations. For any outstanding items not addressed, please provide the projected completion dates of Comcast's corrective actions.

If you have any questions concerning this audit, please contact Charles Mee at (415) 730-7012 or charles.mee@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Banu Acimis".

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

Enclosure: CPUC Audit Findings of Comcast North Valley Region

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CPUC AUDIT FINDINGS OF COMCAST NORTH VALLEY REGION

I. Records Review

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

- The U-Safe Program, GO 95/128 Repair and Reporting Documentation
- Procedure for Visual Inspections of Overhead Lines
- North Valley Region Facility Statistics
- North Valley Region Fire Tier Maps
- North Valley Region Work Orders
- North Valley Region Inspection Data
- Safety Hazards Notifications Comcast Received from Third Parties
- Safety Hazard Notifications Comcast Sent to Third Parties
- North Valley Region Pole Loading Analysis Projects List
- Comcast's Pole Loading Analysis and Safety Factor Calculation Samples
- Comcast Employee Statistics, Training Schedules, and Training Materials

II. Records Violations

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

1. General Order (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.”

Comcast provided documentation of their U-Safe Program. The document describes how workers identify and document GO 95/128 issues during their work. Issues are either repaired on the spot or a ticket is created for future repairs. While Comcast was able to verbally describe its inspection program and further elaborated in the response to DR Set

2, Questions 1; the lack of formal documentation makes it difficult to ensure that the inspection program is in compliance. Comcast must establish procedures that describe its inspection program that ensures compliance with the requirements of GO 95 and GO 128.

2. General Order (GO) 95, Rule 18-B(1)(a) states in part:

“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 subject to the exception specified below.”*

Comcast’s definition of nonconformance priority levels is based on General Order 95, Rule 18. The Compliance Manager reviews the results of detailed inspections weekly and assigns an appropriate repair level based on Rule 18 repair intervals as well as Comcast’s internal repair standards. The internal repair standard is more stringent than Rule 18. If an immediate safety hazard is found, the technician will immediately report it and stay on site, if required for public safety.

Comcast’s records showed the following Repair Categories:

- **Repair Category 1:** 6 months from inspection date.
- **Repair Category 2:** 36 months from inspection date.
- **Repair Category 2.5:** 6 months from inspection date. This category is used for both

High Fire Thread District Tier 2 and Tier 3 locations.

- **Repair Category 3:** 60 months from inspection date.

ESRB’s review of Comcast’s work orders submitted for the period from May 15, 2018 through March 24, 2022 found that Comcast had a total of 200 late work orders, including 27 late-closed work orders and 173 late-pending work orders in the North Valley Region.

Table 1 below lists the late work orders in the North Valley Region by different hazard levels.

Table 1: Late Work Orders in North Valley Region

Repair Category	Late-Closed Work Orders	Late-Pending Work Orders	Total
1	2	-	2
2	-	156	156
2.5	25	17	42
3	-	-	-
Total	27	173	200

Late-closed work orders are those completed past their assigned due dates based on their repair categories, and late-pending work orders are those had not been completed, as of April 21, 2022, by their assigned due dates based on their repair categories. Comcast is required to mitigate late work order issues, including completing any late-pending work orders.

III. Field Inspection

During the field inspection from May 23 through 27, 2022, ESRB staff inspected Comcast’s communications facilities in the locations listed in Table 2:

Table 2: Field Inspection Locations

Location #	Location	Structure Type
L1	3149 Rogue River Dr., Chico	Pedestal
L2	3161 Rogue River Dr., Chico	Pedestal - Amplifier
L3	3177 Rogue River Dr., Chico	Pedestal
L4	3193 Rogue River Dr., Chico	Pedestal
L5	623 Windham Way, Chico	Power Supply
L6	627 Windham Way, Chico	Pedestal - Node
L7	644 Burnt Ranch Way, Chico	Pedestal
L8	636 Burnt Ranch Way, Chico	Pedestal
L9	628 Burnt Ranch Way, Chico	Pedestal

Location #	Location	Structure Type
L10	620 Burnt Ranch Way, Chico	Pedestal
L11	2667 Alamo Ave., Chico	Pole
L12	747 Hastings St., Chico	Pedestal - Amplifier
L13	729 Hastings St., Chico	Pedestal
L14	770 Henshaw Ave., Chico	Pole
L15	792 Henshaw Ave., Chico	Pole – Power Supply
L16	815 Henshaw Ave., Chico	Pole - Node
L17	835 Henshaw Ave., Chico	Pole
L18	Alynn Way & Morseman Ave., Chico	Pedestal - Amplifier
L19	819 Alynn Way, Chico	Pedestal
L20	2870 Jolyn Way, Chico	Pedestal - Amplifier
L21	2926 Jolyn Way, Chico	Pedestal - Amplifier
L22	2950 Jolyn Way	Pedestal
L23	2947 Joving	Pedestal
L24	1628 Sunset Ave., Chico	Pole
L25	1703 7th Ave., Chico	Pole
L26	1619 Sunset Ave., Chico	Pole
L27	1613 Sunset Ave., Chico	Pole
L28	1601 Sunset Ave., Chico	Pole
L29	1533 Sunset Ave., Chico	Pole
L30	1515 Sunset Ave., Chico	Pole
L31	1503 Sunset Ave., Chico	Pole
L32	865 E. 6th St., Chico	Pole
L33	887 E. 6th St., Chico	Pole
L34	620 Aldar St., Chico	Pole
L35	510 Aldar St., Chico	Pole
L36	866 E. 6th St., Chico	Pole
L37	853 E. 5th St., Chico	Service Drop
L38	133 Hammon Park Dr., Oroville	Pedestal
L39	132 Hammon Park Dr., Oroville	Pedestal - Amplifier
L40	124 Hammon Park Dr., Oroville	Pedestal
L41	117 Hammon Park Dr., Oroville	Pedestal
L42	150 Mono Ave, Oroville	Pole
L43	2240 Del Oro Ave. Apt 1, Oroville	Pole
L44	2243 Del Oro Ave., Oroville	Pole
L45	2240 Del Oro Ave., Oroville	Pole
L46	2227 Del Oro Ave., Oroville	Pole
L47	Del Oro Ave. and Nelson Ave., Oroville	Pole
L48	144 Nelson Ave., Oroville	Pole

Location #	Location	Structure Type
L49	867 Robinson Street, Oroville	Pole – Power Supply
L50	890 Robinson Street, Oroville	Pole
L51	1550 5th Ave., Oroville	Pole
L52	1586 5th Ave., Oroville	Pole
L53	1616 5th Ave., Oroville	Pole
L54	845 High St., Oroville	Pole
L55	1611 6th Ave., Oroville	Pole
L56	780 Robinson St., Oroville	Pole
L57	1199 Nadene Dr., Marysville	Pedestal
L58	1215 Nadene Dr., Marysville	Pedestal - Amplifier
L59	1233 Nadene Dr., Marysville	Pedestal
L60	1245 Nadene Dr., Marysville	Vault
L61	1269 Nadene Dr., Marysville	Pedestal - Amplifier
L62	1281 Nadene Dr., Marysville	Vault
L63	2502 Cheim Blvd., Marysville	Pedestal - Amplifier
L64	2456 Cheim Blvd., Marysville	Vault
L65	1179 Johnson Ave., Marysville	Vault - Node
L66	1261 Johnson Ave., Marysville	Pedestal
L67	1249 Johnson Ave., Marysville	Vault
L68	1237 Johnson Ave., Marysville	Vault
L69	714 Pine St., Marysville	Pole
L70	721 Pine St., Marysville	Pole
L71	727 Pine St., Marysville	Pole
L72	1001 8th St., Marysville	Pole
L73	1610 Corsica Dr., Yuba City	Vault
L74	1610B Corsica Dr., Yuba City	Vault
L75	1620 Corsica Dr., Yuba City	Pedestal
L76	1650 Corsica Dr., Yuba City	Vault
L77	1671 Corsica Dr., Yuba City	Vault
L78	1691 Corsica Dr., Yuba City	Pedestal
L79	1577 Corsica Dr., Yuba City	Vault
L80	1750 Stabler Ln., Yuba City	Pole
L81	1760 Stabler Ln., Yuba City	Pole
L82	1597 Portofino Dr., Yuba City	Pole
L83	3885 Stabler Ln., Yuba City	Pole
L84	335A Samual Dr., Yuba City	Pole
L85	379 Garden Highway, Yuba City	Pole
L86	463 Teegarden Ave., Yuba City	Pole
L87	445 Rockholt Way, Yuba City	Pole
L88	439 Teegarden Ave., Yuba City	Pole
L89	425 Teegarden Ave., Yuba City	Pole
L90	727 Francis Way, Yuba City	Pole

Location #	Location	Structure Type
L91	729 Francis Way, Yuba City	Pole
L92	753 Francis Way, Yuba City	Pole
L93	731 Fremont St., Colusa	Pole
L94	730 E. Carson St., Colusa	Pole
L95	751 Fremont St., Colusa	Pole
L96	981 8th St., Colusa	Pole
L97	843 Fremont St., Colusa	Pole
L98	912 9th St., Colusa	Pole
L99	937 Fremont St., Colusa	Pole
L100	939 Fremont St., Colusa	Pole
L101	1017 Fremont St., Colusa	Pole
L102	854 10th St., Colusa	Pole
L103	854B 10th St., Colusa	Pole
L104	899 10th St., Colusa	Pole
L105	108 Country Club Dr., Colusa	Pedestal
L106	120 Country Club Dr., Colusa	Vault
L107	124 Country Club Dr., Colusa	Vault
L108	136 Country Club Dr., Colusa	Vault

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 3:

Table 3: GO 95, Rule 31.1 Findings

Location #	Findings	ESRB Staff Notes
L35	A cable is hanging	Pole # 1861
L41	The grounding wire is loose	There is a filter for one of the customers.
L49	Comcast cable is hanging from the tree in front of 841.	There is a power inserter
L53	Vertical grounding wire needs to be repaired.	

Location #	Findings	ESRB Staff Notes
L54	Lash wire is loose.	
L71	Cable drop touches messengers, Grounding wire is broken	
L80	A cable is hanging in the air	

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 finding is listed in Table 4:

Table 4: GO 95, Rule 31.6 Finding

Location #	Finding
L43	Abandoned cables need to be removed

3. GO 95, Rule 35, Vegetation Management states in part:

“Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule.”

ESRB’s findings are listed in Table 5:

Table 5: GO 95, Rule 35 Findings

Location #	Findings
L27	Comcast cable touched tree branches
L31	A tree branch section hanging on the Comcast cable
L33	Comcast cable interacts with vegetation
L34	Abrasion between the Comcast cable and the tree branches
L37	Comcast service drop interacts with vegetation
L50	Comcast cable interacts with vegetation
L53	Tree branch section hanging on Comcast cable, needs to be removed.
L55	Comcast cable interacts with vegetation
L90	Comcast cable interacts with vegetation
L96	Comcast cable interacts with vegetation

4. GO 95, Rule 37, Table 1 requires that:

Case No. 3, Column B: Vertical clearance of communication conductors above ground in areas accessible to pedestrians only must be at least 10 feet.

GO 95, Rule 38, Table 2 requires that:

Case No. 3, Column C: The clearance between communication conductors must be at least 24 inches.

ESRB’s findings are listed in Table 6:

Table 6: GO 95, Rule 37 and Rule 38 Findings

Location #	Findings	ESRB Staff Notes
L47	Clearance between AT&T messenger and Comcast cable less than 24",	Comcast could install a crossarm to relocate the cable horizontally to get the needed radio clearance
L91	Service drop is less than 10' above the ground, touching customer's structure.	Pole # 110316010
L99	Comcast's service drop touches Frontier's cable	

5. GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground states:

“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 7:

Table 7: GO 95, Rule 87.7-D(1) Findings

Location #	Findings	ESRB Staff Notes
L15	Molding for grounding wire is broken	Pole # 120920617, PG&E power supplies Comcast facility
L46	Molding for raiser is missing	
L49	Molding for grounding wire is partially broken	There is a power inserter.
L54	Molding for raiser needs to be repaired.	
L72	Molding for grounding wire is damaged	
L81	Molding for raiser is broken	
L86	Molding for grounding wire is broken	
L88	Molding for grounding wire is broken	
L89	Molding for grounding wire is loose	

6. 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.

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local

conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.”

ESRB’s findings are listed in Table 8:

Table 8: GO 128, Rule 17.1 Findings

Location #	Findings	ESRB Staff Notes
L6	The box wall is broken	Fiber optic transfer to coaxial cable
L8	The cap for the box cannot be opened	
L12	One service drop missing label	
L41	The grounding wire is loose	There is a filter for one of the customers.
L67	Vault lid chipped and cracking	
L73	Vault lid cannot be placed to cover the vault.	Customer complained about his TV quality.

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.

ESRB’s observations are listed in Table 9:

Table 9: Observations

Location #	Findings	ESRB Staff Notes
L27	AT&T has a broken lash wire	Comcast needs to issue a 3rd party notification to AT&T
L31	Tree sections hanging on PG&E's power lines	Comcast needs to issue a 3rd party notification to PG&E
L33	AT&T's cables interact with vegetation	Comcast needs to issue a 3rd party notification to AT&T
L35	There is a buddy pole	Comcast needs to issue a 3rd party notification to PG&E
L44	AT&T's cable span along the road has a clearance of 17’3” above the road surface	Comcast needs to issue a 3rd party notification to AT&T
L50	PG&E's secondary lines interact with vegetation	Comcast needs to issue a 3rd party notification to PG&E
L53	AT&T's phone box is damaged	Comcast needs to issue a 3rd party notification to AT&T
L81	There is a temporary sign on the pole	Comcast needs to issue a 3rd party notification to the customer
L96	PG&E's power lines interacts with vegetation	Comcast needs to issue a 3rd party notification to PG&E