

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 19, 2022

CA2022-999

Lisa Ludovici
Charter Communications
Director, Government Affairs – Central and Northern California
270 Bridge Street
San Luis Obispo, CA 93401

SUBJECT: Audit of Spectrum Communications Bakersfield Marketing Area

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Eric Ujjiye, and Mily Vaidya of my staff conducted a CIP audit of Spectrum Communications' Bakersfield Marketing Area from February 7, 2022, to February 11, 2022. The audit included a review of Spectrum Communications' inspection and maintenance records and a field inspection of Spectrum Communications' facilities.

During the audit, my staff identified 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 advise me no later than September 19, 2022, by electronic or hard copy, of all corrective measures taken by Spectrum Communications to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Eric Ujjiye at (213) 620-2598 or eric.ujjiye@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
Eric Ujjiye, Utilities Engineer, ESRB, 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
- Spectrum Communications' Intrusive Inspection of Wood Poles
- Spectrum Communications' Overhead Lines Maintenance Plan
- Spectrum Communications' Visual Inspections of Overhead Lines

II. Field Inspection

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

No.	Structure Identification	Type of Structure	Location
1	1699705E	Pole	Tehachapi
2	1699704E	Pole	Tehachapi
3	1699703E	Pole	Tehachapi
4	1699702E	Pole	Tehachapi
5	61716T	Pole	Tehachapi
6	1721340E	Pole	Tehachapi
7	61694T	Pole	Tehachapi
8	1721338E	Pole	Tehachapi
9	4011418E	Pole	Tehachapi
10	4077417E	Pole	Tehachapi
11	4011416E	Pole	Tehachapi
12	4009795E	Pole	Tehachapi
13	4009796E	Pole	Tehachapi
14	2109567E	Pole	Tehachapi
15	4742838E	Pole	Tehachapi
16	4932592E	Pole	Tehachapi
17	2015517E	Pole	Tehachapi
18	4932593E	Pole	Tehachapi
19	2015518E	Pole	Tehachapi
20	2015520E	Pole	Tehachapi
21	2242142E	Pole	Tehachapi
22	4739677E	Pole	Tehachapi
23	2135060E	Pole	Tehachapi
24	2135059E	Pole	Tehachapi
25	4858927E	Pole	Tehachapi
26	4868370E	Pole	Tehachapi
27	4932596E	Pole	Tehachapi
28	4868369E	Pole	Tehachapi
29	4858928E	Pole	Tehachapi
30	12098878	Pole	Taft
31	CTC1200001	Pole	Taft
32	CTC1202327	Pole	Taft
33	CTC1200038	Pole	Taft
34	VZ108071	Pole	Taft

35	120370648	Pole	Taft
36	VZ93290	Pole	Taft
37	120370658	Pole	Taft
38	120370657	Pole	Taft
39	120370656	Pole	Taft
40	120370655	Pole	Taft
41	120370654	Pole	Taft
42	120370653	Pole	Taft
43	120370652	Pole	Taft
44	120370651	Pole	Taft
45	120370649	Pole	Taft
46	120370650	Pole	Taft
47	120370782	Pole	Taft
48	120370781	Pole	Taft
49	120370783	Pole	Taft
50	120988713	Pole	Taft
51	120988714	Pole	Taft
52	120988715	Pole	Taft
53	120988716	Pole	Taft
54	120988717	Pole	Taft
55	120988718	Pole	Taft
56	120988719	Pole	Taft
57	120988720	Pole	Taft
58	120988721	Pole	Taft
59	120988724	Pole	Taft
60	120988780	Pole	Taft
61	121060318	Pole	Taft
62	121060319	Pole	Taft
63	Next to pole 121060319	Pole	Taft
64	121060320	Pole	Taft
65	121060321	Pole	Taft
66	121012457	Pole	Taft
67	121060246	Pole	Taft
68	722 Sandy Creek	Pedestal	Taft
69	730 Sandy Creek	Pedestal	Taft
70	418 Diamond Street	Pedestal	Taft
71	410 Diamond Street	Pedestal	Taft
72	402 Diamond Street	Pedestal	Taft
73	726 Riverwalk Ave	Pedestal	Taft
74	730 Riverwalk Ave	Pedestal	Taft

75	722 Riverwalk Ave	Pedestal	Taft
76	722 Riverwalk Ave	Hand Hole	Taft
77	402 Palm Street	Pedestal	Taft
78	406 Palm Street	Pedestal	Taft
79	410 Palm Street	Pedestal	Taft
80	414 Palm Street	Pedestal	Taft
81	422 Palm Street	Pedestal	Taft
82	South 10 th St. & North St.	Pedestal	Taft
83	28121 Cosworth Ave.	Pedestal	Dustin Acres
84	744752E	Pole	Delano
85	744753E	Pole	Delano
86	744754E	Pole	Delano
87	123 Dover St.	Pole	Delano
88	133 Dover St.	Pole	Delano
89	1991777E	Pole	Delano
90	4573924E	Pole	Delano
91	313 Dover St.	Pole	Delano
92	1991763E	Pole	Delano
93	1991762E	Pole	Delano
94	818685E	Pole	Delano
95	4701822E	Pole	Delano
96	4701821E	Pole	Delano
97	1887 Pepper Tree Close	Pole	Wasco
98	2513 Krista St.	Hand Hole	Wasco
99	2521 Krista St.	Hand Hole	Wasco
100	1021 Via Vargas Blvd.	Pedestal	Wasco

III. Field Inspection - Violations List

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

GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states:

(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 10 business days after the discovery.

Safety hazards on the following poles were not documented and reported to the responsible third parties during Charter Spectrum's latest inspections:

- Pole 2109567E supports an SCE down guy wire that was not maintained taut.
- Pole 4739677E supports an SCE down guy wire that was not maintained taut.
- Pole 2135060E supports an AT&T down guy that was not maintained taut. Additionally, the pole supported a detached AT&T service drop accessible at the public level.
- Pole CTC 1200001 supports ground molding that was damaged.
- Pole 120370651 supports multiple detached AT&T's service drops accessible to the public.
- Pole 120370649 supports a communications down guy wire that was not maintained taut.
- An untagged pole located at the rear of 123 Dover Street in the City of Delano supported a third-party service drop that was wrapped around an electric supply riser.

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.

- Pole 61694T (a "buddy pole") – Spectrum needs to complete the transfer of conductor span that is contacting a cross arm on the newly set Pole 1721339E.
- Pole 4011418E supports a Spectrum riser that is attached to a supply riser at the public level.
- Pole 4009796E supports a Spectrum cable/riser that ran along the pole unattached to the surface of the pole.
- Pole 2015520E supports a Spectrum cable/riser that ran along the pole unattached to the surface of the pole
- Pole 2135059E supports a Spectrum cable/riser that ran along the pole partially unattached to the surface of the pole
- Pole 4858928E supports a Spectrum ground wire that ran along the pole partially unattached to the surface of the pole
- Pole 120370781 supports a Spectrum down guy wire that is buried above the down guy wire attachment point at the anchor.
- Pole 121060319 supports a Spectrum cable/riser that ran along the pole partially unattached to the surface of the pole

- Pole 1991763E supports a Spectrum down guy wire that runs through a chain link fence.
- Pole 818685E supports a Spectrum riser covering that was damaged.

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.

- Pole 120370651 supports a Spectrum service drop that was detached from the customer and contacting the ground.
- Pole 120370649 supports a Spectrum service drop that was detached from the customer and left supported on a chain link fence.
- Pole 120370650 supports a Spectrum service drop that was detached from the customer and left supported on a tree.
- Pole 120370783 supports a Spectrum service drop that was detached from the customer and wound left on a pole step at the communication level.

GO 95, Rule 34, Foreign Attachments, states in part:

Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.

- Pole CTC 1202327 has a metal spike driven into the pole near the base.
- Pole 120370655 has a rope that wraps around the pole and is tied to a pole step.
- Pole 120370653 has a metal spike driven into the pole near the base.

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

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).

Pole 1991777E supports a Spectrum conductor span that is strained by a palm tree at midspan.

GO 95, Rule 37, Table 1, Column B, Case 5, requires the minimum above-ground clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops), Supply Service Drops of 0 – 750 Volts” in areas accessible to pedestrians only to be 10 feet.

Pole 1991763E supported a Spectrum conductor span that sagged to approximately 8 feet above the ground through two residential backyards accessible to pedestrians only.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8, requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops),” and “Communication Conductors and Supply Drops” supported on the same pole to be 12 inches.

- Pole 4009795E supports a Spectrum service drop that is contacting the lower-level communication conductor span near the pole.
- Pole 2015518E supports a Spectrum conductor span that is making contact and zip tied to the underbuilt communication conductor span at midspan.
- Pole 2015520E supports a Spectrum service drop that is contacting the underbuilt communication conductor junction near the pole.
- Pole 4739677E supports a Spectrum span that is intertwined and contacting the underbuilt communication conductor span.
- Pole 120370648 supports a Spectrum span that is crossing levels at midspan, causing it to contact another communication conductor span.
- Pole 120370657 supports a Spectrum service drop that is contacting the underbuilt communication span near the pole.
- Pole 120370655 supports a Spectrum service drop that is contacting the lower-level communication span near the pole.
- Pole 120988716 supports a Spectrum service drop that is contacting the underbuilt communication span near the pole.
- Pole 120988780 supports a Spectrum conductor that is wrapped around a telephone conductor.
- Pole 7447554E supports a Spectrum amplifier that is sagging and contacting the underbuilt communication conductor.
- Pole 4573924E supports a Spectrum service drop that is contacting the underbuilt communication span near the pole.
- Pole 4701822E supports a Spectrum multiple service drops that are contacting the underbuilt communication span near the pole.
- Pole 4701821E supports a Spectrum service drop that is contacting the underbuilt communication span near the pole.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 18, requires the minimum radial clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops),” and “Guys passing conductors supported on other poles, or guys approximately parallel to conductors supported on the same poles”, to be 3 inches.

Pole 744752E supports a Spectrum conductor that is contacting and being deflected by a down guy wire attached at the primary supply level.

GO 95, Rule 84.6-B, Ground Wires, states in part:

Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A...

The Spectrum ground molding on the following poles were damaged, exposing the ground wire:

- Pole 4742838E
- Pole 2242142E
- Pole CTC1153478
- Pole 120370657
- Pole 120370652
- Pole 120370649
- Pole 120370650
- Pole 120988713
- Pole 120988714
- Pole 120988715
- Pole 120988720
- Pole 120988724
- Pole 121060318

GO 95, Rule 84.7-A, Climbing Space, states in part:

Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c, 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.

Pole 120370655 had vegetation near the public level that obstructed the climbing space.

GO 95, Rule 87.7-D1, Covered from Ground Level to 8 Feet above the Ground, states in part:

Risers shall be protected from the ground level to a level not less than 8 feet above the ground...

Pole 744754E supports a Spectrum riser the was covered and protected from the ground level to 8 feet.

GO 95, Rule 86.2, Uses (Guy Wires), states in part:

Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.

Pole 120370781 supported a Spectrum down guy wire that was not maintained taut.

GO 95, Rule 91.3-B, Location of Steps, states in part:

The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step.

The following poles supported a pole step that is less than 8 feet from the ground:

- Pole 120370655
- Pole 120370654
- Pole 120370651
- Pole 120370649
- Pole 120988724
- Pole 1991762E

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 located at each of the following locations was not locked or fastened; therefore, no tool was required to access the structures:

- Handhole located adjacent to Pole 121060319
- Pedestal located at 406 Palm Street
- Pedestal located at 410 Palm Street
- Pedestal located at 422 Palm Street

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.

The lock securing the pedestal cover at each of the following locations were inoperable or damaged:

- Pedestal located at 722 Sandy Creek
- Pedestal located at 402 Diamond Street
- Pedestal located at 710 Riverwalk Ave.