

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 8, 2010

CPUC File No.: CIP2010-01

Mr. Scott Schrock
Director, Construction Services
Time Warner Cable, LA North Division
9260 Topanga Canyon Blvd.
Chatsworth, CA 91311

SUBJECT: Audit of Time Warner Cable's North Division

Dear Mr. Schrock:

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission (CPUC), I conducted an audit of Time Warner Cable's (TWC) North Division on February 1-5, 2010. The audit included a review of TWC North Division's inspection and maintenance programs for compliance with General Orders (GO) 95 and 128 as well as a field inspection of its facilities.

GO 95, Rule 18A, Resolution of Safety Hazards And General Order 95 Violations, states:

"Prior to the work being completed, the company shall document the current status of the safety hazard, including whether the safety hazard is located in an Extreme and Very High Fire Threat Zone in Southern California, and shall include a scheduled date of corrective action."

TWC did not indicate a scheduled date of corrective action for safety hazards posed by their facility.

GO 95, Rule 31.2 Inspection of Lines, states:

"Lines shall be inspected frequently and thoroughly for the purpose of insuring 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."

I found that TWC does not frequently and thoroughly inspect its overhead system for the purpose of ensuring that it is in good condition so as to conform with GO 95.

Also, TWC did not document all GOs 95 and 128 violations when it inspected its facilities. An Inspection Summary itemizing these findings is enclosed.

Within 30 days, provide a written response indicating the corrective measures taken by TWC regarding the violations noted, and the dates they were corrected. If you have any questions, you may contact me at (213) 620-2780.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia Lee".

Cynthia Lee
Utilities Engineer
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Inspection Summary

Inspection Summary

List of GOs 95 and 128 violations that were observed during the audit and were not documented in TWC North Division's inspection records.

1. GO 95, Rule 31.1 Design, Construction and Maintenance, states:

"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 number 74659M had a tree guard that was broken.

Pole number 4339123E had two (2) missing bolts on pole riser strap.

The following poles had a broken lashing wire:

- 2023685E
- 1735873E

The following poles had terminal lead wires not orderly arranged:

- 357765E
- 1735854E

The following poles had severed or broken conductors:

- 4604627E
- 1579934E
- 1848184E
- 1937217E

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."

The following poles had abandoned service drops:

- 4544981E
- 1235268E
- 1937217E

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

“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 utility has actual knowledge, obtained either through normal operating practices or notification to the utility, that any 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 tree and conductor. Scuffing or polishing of the insulating covering is not considered abrasion. Strain on a conductor is present when there is additional tension causing a deflection of the conductor beyond the slack of the span. Contact between vegetation and conductors, in and of itself, does not constitute a violation of the rule.”

The following poles had communication conductors, including their service drops, showing evidence of strain or abrasion from trees:

- 4154936E
- 956811E
- 1072630E
- 1072633E
- 1072636E
- 4179724E
- 173856E
- 1735857E
- 1866057E
- 461926E
- 370852M
- 182436M
- 169822M

4. GO 95, Rule 37 Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., states:

“Clearance between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also clearances between conductors, guys, structures, or other objects, shall not be less than those set forth in Table 1, at a Temperature of 60°F and no wind.”

Pole 1886052E had a low hanging service drop with vertical clearance lower than as specified in Table 1 over an alley accessible by vehicular traffic.

5. GO 95, Rule 38 Minimum Clearances of Wires from Other Wires, states:

“The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2...”

The following poles had communication conductors contacting other communication conductors:

- 805176H
- 4604627E
- T-2232B
- Pole at Everett Dr. and Powell Dr. in Santa Clarita. Pole number unknown.
- 74675M
- 397483M
- 377686M

5. GO 95, Rule 84.6B Ground Wires, states:

“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, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.”

The following poles had broken ground molding:

- 1998301E
- 1695557E
- 761989H

6. GO 95, Rule 84.7 Climbing Space, states:

“Climbing space shall be provided on one side or quadrant of all poles or structures supporting communications conductors...”

Pole 2023684E had climbing space obstructed by a tree.

7. GO 95, Rule 86.2 Use, states:

“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 .”

The following poles had loose guy wires:

- 2170089E
- 732565H
- T-2232B

8. GO 95, Rule 86.9 Guy Marker (Guy Guard), states:

“A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.”

Pole 8460Y at Bonhill Rd. and Kenter Ave. in Los Angeles was missing a guy guard.

9. GO 128, Rule 17.1 Design, Construction and Maintenance, states:

“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.”

Structure number 11548 had excessive dirt in the handhole.

10. GO 128, Rule 42.7 Covers, states:

“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 (Also See Rule 17.8 and Appendix B, Fig. 9).”

Handhole with structure number 19273 was not securely closed by a cover.