

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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December 7, 2016

CA2016-018

Mr. Deane Leavenworth
Vice President, Government Affairs
Charter Communications
1127 11th Street, Suite 950
Sacramento, CA 95814

Subject: Audit of Charter's GLID 24703 – Porterville Area

Mr. Leavenworth:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Koko Tomassian of my staff conducted a Communication Infrastructure Provider (CIP) audit of Charter's GLID 24703 in the Porterville area from September 26, 2016 to September 30, 2016. The audit included a review of Charter's records and field inspections of Charter's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than January 9, 2017, by electronic or hard copy, of all corrective measures taken by Charter Communications to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Koko Tomassian at (213) 576-7099 or koko.tomassian@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: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC
Lee Palmer, Deputy Director, Office of Utility Safety, SED
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC
Tim Lindsay, Construction Manager, Central California Systems, Charter Communications

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.
- Charter'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 31.1, Design, Construction and Maintenance, states in part:

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 communication or supply lines and equipment.

Charter's records indicated that from 2012 to 2016, 61 work orders were completed past their scheduled date of corrective action.

GO 95, Rule 18.B, Notification of Safety Hazard, states in part:

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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery. To the extent the inspecting company cannot determine the facility owner/operator; it shall contact the pole owner(s), who shall be responsible for promptly notifying the company owning/operating the facility with the safety hazard(s), normally not to exceed five business days after being notified of the safety hazard. The notification shall be documented and such documentation must be preserved by all parties for at least ten years.

A third party communication company service drop on each of the following poles was cut and dangling, Charter did not notify the third party of this safety hazard:

- 4696398E
- 673260E
- 1595T

A third party communication conductor lashing wire supported on pole number 4621762E was broken, Charter did not notify the third party of this safety hazard.

A third party communication company terminal box supported on pole number 4781751E was not secured to the pole, Charter did not notify the third party of this safety hazard.

A third party down guy wire supported on pole number 1051216E did not have a guy guard installed, Charter did not notify the third party of this safety hazard.

III. Field Inspection

My staff inspected the following facilities during the field inspection:

No.	Structure ID.	Type of Structure	Location
1	1855227E	Pole	Porterville
2	4194569E	Pole	Porterville
3	4387324E	Pole	Porterville
4	4388336E	Pole	Porterville
5	4663997E	Pole	Porterville
6	1209586E	Pole	Porterville
7	4696398E	Pole	Porterville
8	4597456E	Pole	Porterville
9	1824021E	Pole	Porterville
10	2081095E	Pole	Porterville
11	4781751E	Pole	Porterville
12	1981274E	Pole	Porterville
13	821095E	Pole	Porterville
14	4659786E	Pole	Porterville
15	19 N. Wisconsin	Pole	Porterville
16	19 N. Wisconsin (2 nd pole north)	Pole	Porterville
17	1896532E	Pole	Porterville
18	1867T	Pole	Porterville
19	4320434E	Pole	Porterville
20	596824E	Pole	Porterville
21	12809T	Pole	Porterville
22	12808T	Pole	Porterville
23	S/E Corner of 108 Wisconsin	Pole	Porterville
24	4320426E	Pole	Porterville
25	4141110E	Pole	Porterville
26	1492T	Pole	Porterville
27	X16083E	Pole	Porterville
28	2174826E	Pole	Porterville
29	673260E	Pole	Porterville
30	S/W Corner of Wisconsin & Putnam	Pole	Porterville
31	185 N. Wisconsin	Pole	Porterville
32	1895771E	Pole	Porterville
33	1051216E	Pole	Porterville
34	1595T	Pole	Porterville
35	7822T	Pole	Porterville
36	1594T	Pole	Porterville
37	7823T	Pole	Porterville
38	1312883E	Pole	Porterville
39	1312884E	Pole	Porterville
40	4367919E	Pole	Porterville
41	1305940E	Pole	Porterville
42	GT131690	Pole	Lindsay

No.	Structure ID.	Type of Structure	Location
43	L14597Y	Pole	Lindsay
44	2162938E	Pole	Lindsay
45	2162937E	Pole	Lindsay
46	L14599Y	Pole	Lindsay
47	L14600Y	Pole	Lindsay
48	183565E	Pole	Lindsay
49	4401140E	Pole	Lindsay
50	1823246E	Pole	Lindsay
51	1209829E	Pole	Lindsay
52	4621762E	Pole	Lindsay
53	1209838E	Pole	Lindsay
54	4368841E	Pole	Lindsay
55	4621763E	Pole	Lindsay
56	4680218E	Pole	Lindsay
57	1209842E	Pole	Lindsay
58	313 W. Bellview	Pole	Porterville
59	299 W. Bellview	Pole	Porterville
60	209093E	Pole	Porterville
61	821085E	Pole	Porterville
62	4702551E	Pole	Porterville
63	193906E	Pole	Porterville
64	4695465E	Pole	Porterville
65	4275217E	Pole	Porterville
66	193578E	Pole	Porterville
67	375 N. Main St.	Pedestal	Porterville
68	14680 Walker	Pedestal	Poplar
69	245 W. Cherry	Pedestal	Porterville
70	240 W. Cherry	Pedestal	Porterville
71	229 W. Cherry	Cat Box	Porterville
72	240 W. Cherry	Power Supply	Porterville
73	240 W. Cherry	Cat Box	Porterville
74	250 W. Putnam	Pedestal	Porterville
75	262 W. Putnam	Cat Box	Porterville
76	277 W. Putnam	Pedestal	Porterville
77	277 W. Putnam Parking Lot	Pedestal	Porterville
78	282 W. Putnam	Vault	Porterville
79	290 W. Putnam	Vault	Porterville
80	301 W. Putnam	Pedestal	Porterville
81	320 W. Putnam	Cat Box	Porterville
82	394 W. Putnam	Cat Box	Porterville

No.	Structure ID.	Type of Structure	Location
83	396 W. Putnam	Cat Box	Porterville
84	448 W. Putnam	Pedestal	Porterville
85	462 W. Putnam	Pedestal	Porterville
86	472 W. Putnam	Pedestal	Porterville
87	500 W. Putnam	Pedestal	Porterville
88	NW Corner of Pearson & Putnam	Vault	Porterville

IV. Field Inspection Violations List

My staff observed the following violations during the field inspection:

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.

A Charter conductor lashing wire supported on poles numbered 2081095E and 4781751E was broken.

A pole step supported on pole number 1981274E was bent.

A Charter service drop supported on pole number 183565E was cut.

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). Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities.

A Charter conductor supported on the pole located at 19 N. Wisconsin in Porterville, CA was strained by vegetation.

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

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...

GO 95, Table 1, Case 6, Column C requires the minimum vertical clearance of communication conductors above walkable surfaces on buildings to be 8 feet.

A Charter conductor supported on pole number 1209586E had less than the minimum required vertical clearance of 8 feet above a walkable roof on a commercial building.

GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:

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

GO 95, Table 2, Case 8, Column C requires the minimum vertical separation of communication conductors from other communication conductors – supported at different levels on the same pole – to be 12 inches.

A Charter conductor and a third party communication conductor on the following poles did not have at least a 12 inch vertical separation:

- 4696398E
- 1981274E
- S/W Corner of Wisconsin & Putnam
- 1824021E
- 1492T
- 1823246E

GO 95, Table 2, Case 16, Column C requires the minimum radial clearance between communication conductors of different circuits on the same crossarm, pole, or structure to be 3 inches.

A Charter service drop and a third party communication service drop supported on poles numbered 1305940E and 2162938E did not have the minimum required radial separation of 3 inches.

Charter incidental wiring and a third party communication conductor supported on pole number 12808T did not have the minimum required radial separation of 3 inches.

GO 95, Table 2, Case 19, Column C requires the minimum radial separation of guy and span wires from communication conductors supported on the same pole to be 3 inches.

A Charter conductor and a supply down guy wire supported on pole number 4401140E was in contact.

GO 95, Rule 56.2, 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.

A Charter down guy wire and anchor on pole number L14597Y were broken.

GO 95, Rule 91.3.A.1 Stepping, Use of Steps, Pole with Vertical Runs and Risers, states in part:

All jointly used poles which support supply conductors shall be provided with pole steps if vertical runs or risers are attached to the surface of such poles.

Poles numbered 1896532E and 1867T did not have pole steps.

GO 95, Rule 93, Climbing space, states in part:

Climbing space shall be provided on all jointly used poles which support conductors and the provisions of Rules 54.7 and 84.7 are directly applicable to such poles. Climbing space on jointly used poles shall be so correlated between conductor levels that its position in relation to the pole is not changed by more than 90 degrees in a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level.

Vegetation growing around the following poles encroached upon the climbing space:

- 4194569E
- 4597456E
- 1209829E

Charter conductors supported on pole number L14600Y encroached upon the climbing space.

GO 128, Rule 32.3, Materials and Strength, states:

The materials, design and construction of manholes, handholes, subsurface equipment enclosures, and other underground boxes shall be such as to provide sufficient strength to sustain, with a suitable margin of safety, the loads which may reasonably be imposed on them.

The “cat box” located at 262 W. Putnam in Porterville, CA had a warped enclosure.

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.

The Charter underground structures at the following locations were not secured in such a manner that a tool or appliance would be required to open them:

- “Cat Box” at 262 W. Putnam in Porterville, CA
- Pedestal located in the parking lot of 277 W. Putnam in Porterville, CA
- Vault at 290 W. Putnam in Porterville, CA