PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

October 30, 2023 CA2023-1087

Maegan Murphy
Crown Castle Communications
Utility Relations Manager for California
200 Spectrum Center Drive, Ste. 1700
Irvine, CA 92618

Subject: Audit of Crown Castle Communications Santa Barbara County District

Ms. Murphy:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Mily Vaidya and Norvik Ohanian of my staff conducted a Communication Infrastructure Provider (CIP) audit of Crown Castle Communications' Santa Barbara County District from September 5, 2023 to September 8, 2023. The audit included a review of Crown Castle Communications' inspection and maintenance records and a field inspection of Crown Castle Communications' 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 November 30, 2023, by electronic or hard copy, of all corrective measures taken by Crown Castle Communications to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Mily Vaidya at 213-999-8528 or Mily.Vaidya@cpuc.ca.gov.

Sincerely,

Fadi Daye

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

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC
Mily Vaidya, Utilities Engineer, ESRB, SED, CPUC
Norvik Ohanian, Utilities Engineer, ESRB, SED, CPUC

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
- Crown Castle Communications' Intrusive Inspection of Wood Poles
- Crown Castle Communications' Overhead Lines Maintenance Plan
- Crown Castle Communications' Visual Inspections of Overhead Lines

II. Field Inspection

My staff inspected the following facilities during the field inspection:

No.	Structure ID	Type of Structure	Location
1	1523404E	Pole	Santa Barbara
2	4797578E	Pole	Santa Barbara
3	4797579E	Pole	Santa Barbara
4	1481587E	Pole	Santa Barbara
5	1081714E	Pole	Santa Barbara
6	1665049E	Pole	Santa Barbara
7	X7156E	Pole	Santa Barbara
8	2108977E	Pole	Santa Barbara
9	1828984E	Pole	Santa Barbara
10	1828982E	Pole	Santa Barbara
11	1828983E	Pole	Santa Barbara
12	1256011E	Pole	Santa Barbara
13	Adjacent to Pole 1256011E	Handhole	Santa Barbara
14	1256012E	Pole	Santa Barbara
15	4371458E	Pole	Santa Barbara
16	1256014E	Pole	Santa Barbara
17	1256015E	Pole	Santa Barbara
18	1413703E	Pole	Santa Barbara
19	1413704E	Pole	Santa Barbara
20	1413705E	Pole	Santa Barbara
21	1413706E	Pole	Santa Barbara
22	4379175E	Pole	Santa Barbara
23	4495632E	Pole	Santa Barbara
24	1081518E	Pole	Santa Barbara
25	1522851E	Pole	Santa Barbara
26	In front of 125 Cremona Dr	Handhole	Goleta
27	In front of 175 Cremona Dr	Handhole	Goleta
28	Corner of Cremona Dr & Los Carneros Rd	Handhole	Goleta
29	At Los Carneros Rd Across the Calle Koral	Handhole	Goleta
30	In front of 135 Los Carneros Rd	Handhole	Goleta
31	In front of 135 Los Carneros Rd	Handhole	Goleta
32	1345780E	Pole	Goleta
33	1256053E	Pole	Goleta
34	1256052E	Pole	Goleta
35	1345769E	Pole	Goleta
36	1188579E	Pole	Goleta
37	1188582E	Pole	Goleta
38	1413487E	Pole	Goleta
39	4419378E	Pole	Goleta

40	1345790E	Pole	Goleta
41	1524382E	Pole	Goleta
42	1345788E	Pole	Goleta
43	4722501E	Pole	Goleta
44	1256346E	Pole	Goleta
45	S19749Y	Pole	Goleta
46	4365337E	Pole	Goleta
47	1256818E	Pole	Goleta
48	One Pole East of 1256818E	Pole	Goleta
49	1345333E	Pole	Goleta
50	1256807E	Pole	Goleta
51	1346188E	Pole	Goleta
52	1189315E	Pole	Goleta
53	1345334E	Pole	Goleta
54	1188962E	Pole	Goleta
55	1188961E	Pole	Goleta
56	1188960E	Pole	Goleta
57	1188675E	Pole	Goleta
58	644931E	Pole	Goleta
59	S18368Y	Pole	Goleta
60	1188674E	Pole	Goleta
61	S18921Y	Pole	Goleta
62	4604862E	Pole	Goleta
63	4863759E	Pole	Goleta
64	S18919Y	Pole	Goleta
65	GT120435	Pole	Goleta
66	S29049Y	Pole	Goleta
67	644939E	Pole	Goleta
68	1481683E	Pole	Goleta
69	1345347E	Pole	Goleta
70	GT22419	Pole	Goleta
71	1523091E	Pole	Goleta
72	712148E	Pole	Goleta
73	1256930E	Pole	Goleta
74	4599507E	Pole	Goleta
75	4495004E	Pole	Goleta
76	1256932E	Pole	Goleta
77	4892657E	Pole	Goleta
78	4604895E	Pole	Goleta
79	GT302011	Pole	Goleta
80	1372458E	Pole	Goleta

III. Field Inspection – Violations List

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

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.*

Crown Castle's facilities on the following poles required maintenance:

- Pole 1413703E – A Crown Castle lashing wire was broken.
- Pole S18921Y – A Crown Castle splice box was loose and not secured to the pole.
- Pole 2108977E – The "eye" of the Crown Castle down guy anchor supporting the pole was buried.
- Pole GT126393 – Crown Castle needs to transfer its facilities from the buddy pole to the new pole.

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).*

A Crown Castle communication conductor supported on each of the following poles was strained by vegetation:

- Pole 4371458E
- Pole 4863759E

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Case 8, Column C, requires the minimum vertical separation between communications conductors on separate crossarms or other supports at different levels on the same pole and in adjoining midspans to be 12 inches.

On each of the following poles, the vertical separation between a Crown Castle communications conductor and a third-party communications conductor was less than 12 inches:

- Pole 4797579E – a Crown Castle communications conductor had less than 12 inches of vertical separation from a third-party communications conductor.

- Pole 1481587E – a Crown Castle communications conductor had less than 12 inches of vertical separation from a third-party communications conductor.
- Pole 4495632E – a Crown Castle communications conductor had less than 12 inches of vertical separation from a third-party communications conductor.
- Pole 644931E – a Crown Castle communications conductor had less than 12 inches of vertical separation from a third-party communications conductor.
- Pole 1345769E – a Crown Castle communications conductor was touching a third-party communications conductor.
- Pole 1372458E – a Crown Castle communications conductor was touching a third-party communications conductor.
- Pole 1665049E – a Crown Castle communications conductor splice box was touching a third-party communications conductor.
- Pole S29049Y – a Crown Castle communications conductor was touching a third-party communications conductor.
- Pole 1188675E – a Crown Castle communications conductor was touching a third-party communications service drop.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Case 19, Column C, requires a minimum of 3 inches radial separation between communication cables and guy wires.

A Crown Castle communications conductor supported on Pole number 1081714E was touching a third-party communication down guy wire.

GO 95, Rule 54.6-B - Ground Wires, states in part:

> *That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).*

The ground moulding attached to each of the following poles was damaged:

- Pole 1256015E
- Pole 2108977E
- Pole 1188582E

GO 95, Rule 56.2 - Overhead Guys, Anchor Guys and Span Wires, Use, 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.*

The Crown Castle down guy wire supporting Pole 1256346E was not taut.

GO 95, Rule 86.9 - Guy Marker (Guy Guard), states in part:

> *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.*

The outer most down guy wire supporting Pole number 1372458E did not have a guy marker.