

PUBLIC UTILITIES COMMISSION

05 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 5, 2009

Mitchell Christopher, VP Tech Ops
Time Warner Cable, Metro Division
550 North Continental Blvd.
El Segundo, CA 90245

SUBJECT: General Order 95 and 128 Audit of Time Warner Cable's Metro Division

Dear Mr. Christopher:

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission, Derek Fong and I conducted an audit of Time Warner Cable's (TWC) Metro Division from December 2 – 5, 2008. The audit included a review of TWC Metro Division's maintenance programs for compliance with General Order (GO) 95 and 128.

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."

We 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.

GO 128, Rule 17.2 Inspection of Lines states:

"Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules."

We found that TWC does not frequently and thoroughly inspect its underground system for the purpose of ensuring that it is in good condition so as to conform with GO 128.

Also, TWC did not document all GOs 95 and 128 violations when it inspected its facilities. A copy of the inspection summary itemizing the field violations is enclosed. Please advise me no later than July 6, 2009, by electronic or hard copy of all corrective measures taken, or planned to be taken by TWC regarding the violations and the date they were or will be corrected.

If you have any questions, please contact me at (213) 576-5719.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Palo Jr.", with a long horizontal flourish extending to the right.

Jerry Palo Jr.
Utilities Engineer
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Audit Summary
Observations and Recommendations

AUDIT SUMMARY

Company: TWC, Metro Division
GO 95 & 128 Audit
Date: December 2 – 5, 2008

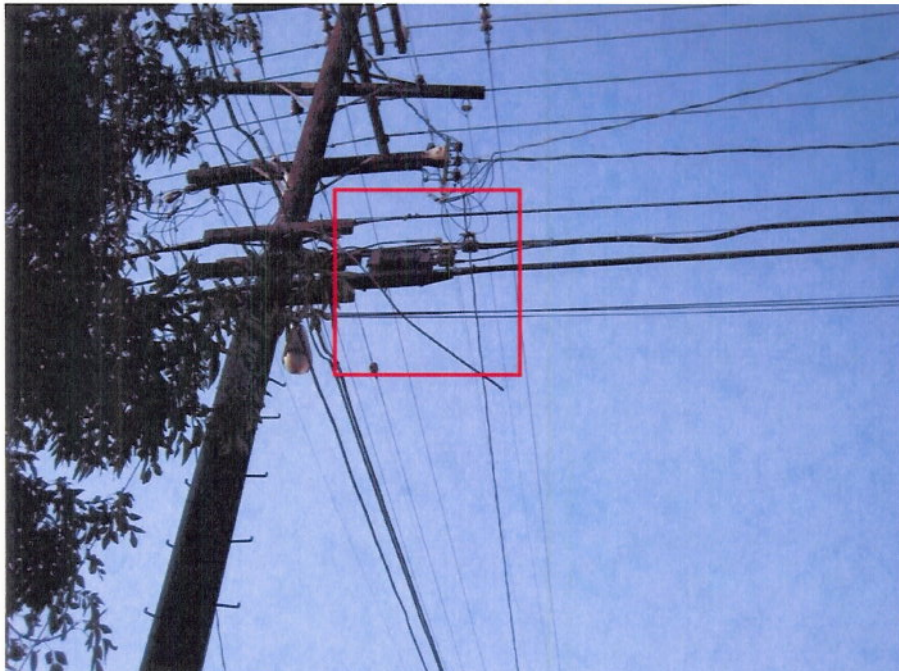
The following violations were observed:

1. 14014 Shoup Ave., Hawthorne
Pole No. 1495702E

While verifying recently inspected facilities at the above address we discovered the following violation. The violation was not noted by TWC staff on August 13, 2008, while they were inspecting these facilities. A picture of the violation can be seen in Picture #1, titled *14014 Shoup Ave.*

GO 95, Rule 31.6: Abandoned Lines

“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 that are determined by their owner to have no foreseeable future use.”



Picture #1
14014 Shoup Ave.

The conductor shown in Picture #1, highlighted in the red box, was abandoned and no longer in use.

3. 115 Velasco St., Los Angeles

While verifying recently inspected facilities at the above address we discovered the following violation. The violation was not noted by TWC staff on March 10, 2008, while they were inspecting these facilities. A picture of the violation is shown in Picture #2, titled *115 Velasco St.*

GO 95, Rule 38: Minimum Clearances of Wires from other Wires

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

Table 2: Basic Minimum Allowable Clearance of Wires from Other Wires at Crossings, in Midspans and at Supports

Case 19: This case, under the category “Radial separation between guys and conductors” shows that the distance between “guys and span wires passing conductors supported on the same poles” and “communication conductors (including open wire, cables, and service drops)” must be at least 3 inches.



Picture #2
115 Velasco St.

The conductor and a guy wire are touching. Note that, although not shown here, a picture was taken standing below the wires and confirms that the wires are indeed touching, and not just giving the appearance of touching.

4. 83rd and Gulana, Los Angeles

While verifying recently inspected facilities at the above address we discovered the following violation. The violation was not noted by TWC staff on February 18, 2008, while they were inspecting these facilities. A picture of the violation can be seen in Picture #3, titled *83rd and Gulana*.

GO 95, Rule 38: Minimum Clearances of Wires from other Wires

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

Table 2: Basic Minimum Allowable Clearance of Wires from Other Wires at Crossings, in Midspans and at Supports

Case 8: This case, under the category “vertical separation between conductors and/or cables, on separate crossarms or other supports at different levels on the *same* pole and in adjoining midspans” shows that the distance between “communication conductors and service drops” and “communication conductors (including open wire, cables, and service drops)” must be at least 12 inches.



Picture #3
83rd and Gulana.

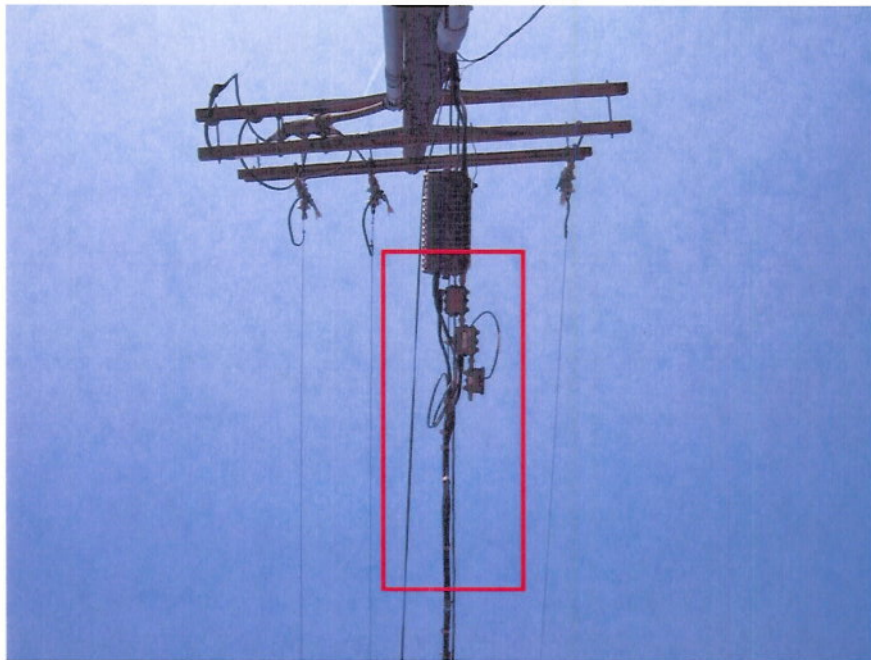
The TWC conductor and a telephone conductor are separated by less than 12 inches.

5. 8614 Saran Dr., Los Angeles

While verifying recently inspected facilities at the above address we discovered the following violation. The violation was not noted by TWC staff on September 19, 2008, while they were inspecting these facilities. A picture of the violation can be seen in Picture #4, titled *8614 Saran Dr.*

GO 95, Rule 38: Minimum Clearances of Wires from other Wires

Rule 38, Table 2, Case 8 requires a 12 inch separation between communication conductors supported on the same pole.



Picture #4
8614 Saran Dr.

The TWC conductor and a telephone conductor are separated by less than 12 inches.

6. 3559 El Sereno Ave., Los Angeles

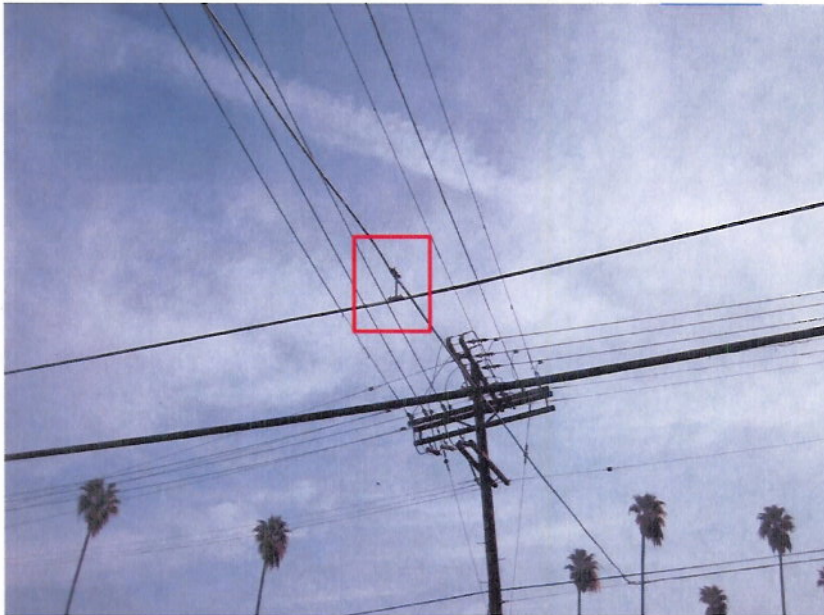
While verifying recently inspected facilities at the above address we discovered the following violation. The violation was not noted by TWC staff on April 11, 2008, while they were inspecting these facilities. A picture of the violation can be seen in Picture #5, titled *3559 El Sereno Ave.*

GO 95, Rule 38: Minimum Clearances of Wires from other Wires

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

Table 2: Basic Minimum Allowable Clearance of Wires from Other Wires at Crossings, in Midspans and at Supports

Case 3: This case, under the category “clearance between wires, cables and conductors *not* supported on the same poles, vertically at crossings in spans and radially where collinear or approaching crossings” shows that the distance between “communication conductors” and “communication conductors (including open wire, cables, and service drops)” must be at least 24 inches.



Picture #5
3559 El Sereno Ave

A TWC conductor had a vertical clearance of less than 24 inches from a fiber optics line. The “spacer” that is being used to separate the conductor and fiber optics line is less than 24 inches in length.

7. 7014 Ramsgate, Los Angeles

While conducting a field verification of TWC inspections and recent work, we discovered the following two violations. The pole was not included in the recent inspection sheet provided by TWC, or has an inspection record been provided for this location. A picture of the violations can be seen in Picture #6, titled *7014 Ramsgate #1* and Picture #7, titled *7014 Ramsgate #2*

GO 95, Rule 31.6: Abandoned Lines

“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 that are determined by their owner to have no foreseeable future use.”



Picture #6
7014 Ramsgate #1

The conductor shown in Picture #6, highlighted by the red arrow, was abandoned and no longer in use.

GO 95, Rule 35: Tree Trimming

“Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of limbs and foliage, 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 notifications to the utility, that any circuit energized at 750 volts or less shows strain or evidences abrasion from tree contact, the condition shall be corrected by slacking or rearranging the line, trimming the tree 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 limbs and these conductors, in and of itself, does not constitute a violation of the rule.”



Picture #7
7014 Ramsgate #2

The above conductor showed evidence of strain due to the tree.

8. 1277 Union Pacific Ave., Los Angeles

While conducting a field verification of TWC inspections and recent work, we discovered the following violation. The pole was not included in the recent inspection sheet provided by TWC, or has an inspection record been provided for this location. A picture of the violation can be seen in Picture #8, titled *1277 Union Pacific Ave.*

GO 95, Rule 31.1: Design, Construction and Maintenance

“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.”



Picture #8
1277 Union Pacific Ave.

A pole step, highlighted by the red box was broken.

9. 2029 New Jersey St., Los Angeles

While conducting a field verification of TWC inspections and recent work, we discovered the following violation. The pole was not included in the recent inspection sheet provided by TWC, or has an inspection record been provided for this location.

GO 95, Rule 84.6-B: Ground Wires

“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 ground moulding at this address was found to be broken.

10. TWC Installation Manual

GO 95 Rule 87.4-C: Clearances Between Conductors and Cables

TWC’s Installation Manual states that current construction practice allows for clearance between supply and communication levels to be set at 40 inches. However, GO 95, Rule 87.4-C requires a minimum clearance of 48 inches when installed below a guardarm or 72 inches. TWC’s current practice is in direct violation of GO 95. Please ensure that no further installations are installed in this manner, and that any previous installations that are in violation of this rule are corrected.