

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 3, 2015

Thomas Scanlan  
Senior Manager of Construction  
Time Warner Cable  
8949 Ware Court  
San Diego, CA 92121

CPUC ID: CA2014-006

**SUBJECT:** Audit of Time Warner Cable – Orange County

Dear Mr. Scanlan:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Richard Kyo of my staff conducted a Communication Infrastructure Provider (CIP) audit of Time Warner Cable (TWC) – Orange County from December 8, 2014 to December 12, 2014. The audit included a review of TWC's records and field inspections of TWC'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 April 3, 2015, by electronic or hard copy, of all corrective measures taken by TWC to remedy and prevent such violations.

If you have any questions, you can contact Richard Kyo at (213) 576-7081 or [richard.kyo@cpuc.ca.gov](mailto:richard.kyo@cpuc.ca.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Fadi Daye".

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

Enclosure: Audit Findings

CC: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC  
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC  
Richard Kyo, Utilities Engineer, CPUC – LA

## AUDIT FINDINGS

The following violations were not documented and/or addressed by TWC during its last detailed inspection as required by General Order 95:

1.	<b>Location:</b>	Pole No. 4457570E, Near Bishop St. and Moody St., Cypress
	<b>Previous TWC Visit Details:</b>	August 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
<b>Explanation of Violation(s):</b>		
<b><u>Inadequate Clearance Between TWC Cable and Telephone Cable</u></b>		
<p>GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <p style="text-align: center;"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p>Table 2, Column C, Case 8, requires the minimum vertical clearance between two communication conductors on the same pole and in adjoining midspans to be 12 inches. A TWC cable and a telephone cable had less than 12 inches of separation at the pole attachment.</p>		

2.	<b>Location:</b>	Pole No. 11628754E, Near 5272 Bishop St., Cypress
	<b>Previous TWC Visit Details:</b>	August 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
<b>Explanation of Violation(s):</b>		
<p data-bbox="193 520 987 552"><b><u>Abandoned TWC “Half Loop” Touching Telephone Cable</u></b></p> <p data-bbox="193 585 857 617">GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p data-bbox="289 653 1352 751"><i>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....</i></p> <p data-bbox="193 787 898 819">There was an abandoned TWC “half loop” at this pole.</p> <p data-bbox="193 854 1224 886">GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <p data-bbox="289 921 1300 987"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p data-bbox="193 1022 1458 1119">Table 2, Column C, Case 8, requires the minimum vertical clearance between two communication conductors on the same pole and in adjoining midspans to be 12 inches. The aforementioned abandoned “half loop” was touching a telephone cable at the pole attachment.</p>		

3.	<b>Location:</b>	Pole No. 935514E, Near 5281 Bishop St., Cypress
	<b>Previous TWC Visit Details:</b>	August 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
<b>Explanation of Violation(s):</b>		
<p data-bbox="196 520 954 552"><b><u>Inadequate Clearance Between TWC and Third Parties</u></b></p> <p data-bbox="196 583 1230 615">GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <p data-bbox="293 653 1308 716"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p data-bbox="196 751 1474 945">Table 2, Column C, Case 8, requires the minimum vertical clearance between two communication conductors on the same pole and in adjoining midspans to be 12 inches. Table 2, Column C, Case 16, requires the minimum incidental pole wiring radial separation between two communication conductors on the same pole to be 3 inches. A TWC service drop was contacting a third party CIP cable at approximately midspan. Additionally, multiple TWC drip loops were touching third party CIP facilities below at the pole attachment.</p>		

4.	<b>Location:</b>	Pole No. 2255915E, Near 5331 Bishop St., Cypress
	<b>Previous TWC Visit Details:</b>	August 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
<b>Explanation of Violation(s):</b>		
<p data-bbox="196 520 1000 552"><b><u>Inadequate Clearance Between TWC and Third Party CIPs</u></b></p> <p data-bbox="196 585 1227 617">GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <p data-bbox="293 653 1305 716"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p data-bbox="196 751 1468 852">Table 2, Column C, Case 16, requires the minimum incidental pole wiring radial separation between two communication conductors on the same pole to be 3 inches. Multiple TWC drip loops were touching third party CIP facilities below at the pole attachment.</p> <p data-bbox="196 888 1208 919"><b><u>Inadequate Clearance Between TWC Service Drop and SCE Service Drop</u></b></p> <p data-bbox="196 955 1089 987">GO 95, Rule 84.8-D4, Above Or Below Supply Service Drops, states:</p> <p data-bbox="293 1022 1357 1085"><i>Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches. ...</i></p> <p data-bbox="196 1121 1395 1184">The radial clearance of a TWC service drop and an SCE service drop was approximately 1-2 inches.</p>		

5.	<b>Location:</b>	Pole No. 656880E, Near 5352 Bishop St., Cypress
	<b>Previous TWC Visit Details:</b>	August 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
	<b>Explanation of Violation(s):</b>	
	<p><b><u>TWC Cable Touching SCE Down Guy Wire</u></b></p> <p>GO 95, Rule 86.4-C4, Passing on Same Poles, states in part:</p> <p style="text-align: center;"><i>The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall be not less than as specified in Table 2, Case 19 ...</i></p> <p>Table 2, Column C, Case 19, requires the minimum radial clearance between a communication conductor and a guy wire supported on the same pole to be 3 inches. A TWC cable was touching an SCE down guy wire.</p>	

6.	<b>Location:</b>	Pole No. 886497E, Near 312 Raitt St., Santa Ana
	<b>Previous TWC Visit Details:</b>	August 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Broken Lashing Wire</u></b></p> <p>GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:</p> <p style="text-align: center;"><i>Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use...</i></p> <p>There was a broken lashing wire at this pole.</p>	

7.	<b>Location:</b>	Near 1806 West Pine St., Santa Ana
	<b>Previous TWC Visit Details:</b>	August 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
	<b>Explanation of Violation(s):</b>	
	<p><b><u>TWC Drip Loops Touching Third Party CIPs</u></b></p> <p>GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <p><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p>Table 2, Column C, Case 16, requires the minimum incidental pole wiring radial separation between two communication conductors on the same pole to be 3 inches. Multiple TWC drip loops were touching third party CIP facilities at the pole attachment.</p>	

8.	<b>Location:</b>	Pole No. 211103E, Near West Pine St. and Franklin St, Santa Ana
	<b>Previous TWC Visit Details:</b>	August 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Abandoned TWC Cable Touching Third Party CIP</u></b></p> <p>GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p><i>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....</i></p> <p>An abandoned TWC cable was dangling at approximately midspan.</p> <p>GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <p><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p>Table 2, Column C, Case 8, requires the minimum vertical clearance between two communication conductors on the same pole and in adjoining midspans to be 12 inches. The aforementioned abandoned TWC cable was touching various CIP cables.</p>	

9.	<b>Location:</b>	Pole No. 4663801E, Near West Walnut St. and Franklin St., Santa Ana
	<b>Previous TWC Visit Details:</b>	August 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Abandoned TWC Cable</u></b></p> <p>GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p style="padding-left: 40px;"><i>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....</i></p> <p>There was an abandoned TWC cable at approximately midspan.</p>	

10.	<b>Location:</b>	Pole No. 690612H, Near 1868 Santa Ana Ave., Costa Mesa
	<b>Previous TWC Visit Details:</b>	October 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Abandoned TWC Service Drop</u></b></p> <p>GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p style="padding-left: 40px;"><i>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....</i></p> <p>There was an abandoned TWC service drop at the pole.</p>	



11.	<b>Location:</b>	Pole No. 622142H
	<b>Previous TWC Visit Details:</b>	October 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
<b>Explanation of Violation(s):</b>		
<p><b><u>Abandoned TWC Service Drops</u></b></p> <p>GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p style="padding-left: 40px;"><i>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....</i></p> <p>There were abandoned TWC service drops at the pole.</p> <p><b><u>Damaged TWC Ground Moulding</u></b></p> <p>GO 95, Rule 84.6-B, Ground Wires, states in part:</p> <p style="padding-left: 40px;"><i>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...</i></p> <p>GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:</p> <p style="padding-left: 40px;"><i>Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use...</i></p> <p>TWC's ground moulding at this pole was damaged.</p>		

<b>12.</b>	<b>Location:</b>	Pole No. 790928E
	<b>Previous TWC Visit Details:</b>	October 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
<b>Explanation of Violation(s):</b>		
<b><u>Abandoned TWC Service Drop</u></b>		
GO 95, Rule 31.6, Abandoned Lines, states in part:  <i>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....</i>		
There was an abandoned TWC service drop at the pole.		

<b>13.</b>	<b>Location:</b>	Pole No. 822504E, Near East 18 <sup>th</sup> St., Costa Mesa
	<b>Previous TWC Visit Details:</b>	October 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
<b>Explanation of Violation(s):</b>		
<b><u>Abandoned TWC Service Drop</u></b>		
GO 95, Rule 31.6, Abandoned Lines, states in part:  <i>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....</i>		
There was an abandoned TWC service drop at approximately midspan.		

14.	<b>Location:</b>	Pole No. 1454709E, Near 1801 Westminster Ave., Costa Mesa
	<b>Previous TWC Visit Details:</b>	October 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
<b>Explanation of Violation(s):</b>		
<b><u>Broken Lashing Wire</u></b>		
GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:		
<i>Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use...</i>		
There was a broken lashing wire at this pole.		

15.	<b>Location:</b>	Pole No. 624338H, Near 1904 Orange Ave., Costa Mesa
	<b>Previous TWC Visit Details:</b>	October 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
<b>Explanation of Violation(s):</b>		
<b><u>Low TWC Service Drop</u></b>		
GO 95, Rule 84.8-C4b, Residential Premises, states in part:		
<i>Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet. <b>EXCEPTION:</b> If the building served does not permit an attachment which will provide this 10 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible but in no case less than 8 feet 6 inches. ...</i>		
A TWC service drop had a ground clearance of 6 feet, 5 inches in a pedestrian accessible area.		

16.	<b>Location:</b>	Pole No. 1347187E
	<b>Previous TWC Visit Details:</b>	October 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
<b>Explanation of Violation(s):</b>		
<b><u>Third Party Telco Wrapped Around TWC Messenger Wire</u></b>		
GO 95, Rule 18-A1c, Resolution of Safety Hazards and General Order 95 Nonconformances, states in part:		
<p style="text-align: center;"><i>Where a communications company's or an electric utility's actions result in GO nonconformances for another entity, that entity's remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.</i></p>		
GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:		
<p style="text-align: center;"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p>		
Table 2, Column C, Case 8, requires the minimum vertical clearance between two communication conductors on the same pole and in adjoining midspans to be 12 inches. A telephone cable was wrapped around a TWC cable at the pole.		

17.	<b>Location:</b>	Pole No. 624335H, Near 1940 Orange Ave., Costa Mesa
	<b>Previous TWC Visit Details:</b>	October 2014
	<b>Date of CPUC Inspection:</b>	12/09/2014
<b>Explanation of Violation(s):</b>		
<b><u>Abandoned TWC Service Drop</u></b>		
GO 95, Rule 31.6, Abandoned Lines, states in part:		
<p style="text-align: center;"><i>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....</i></p>		
There was an abandoned TWC service drop at the pole.		