

**ATTACHMENT 5
PUBLIC**



FILED

09/03/26

04:59 PM

A2605012

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 19, 2026

CA2026-1459

Kory Borzoni, Corporate Compliance Specialist
Race Communications
961 Rocca Way
Yuba City, CA 95991

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Race Communications'
(Race) North Sacramento (RCNS) Service Area

Ms. Borzoni:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Charles Mee and Javier Reyes of ESRB Staff conducted a CIP audit of RCNS service area from June 15 to June 19, 2026. During the audit, ESRB Staff conducted field inspections of RCNS facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB Staff identified violations of one or more General Orders (GOs). A copy of the audit findings detailing the violations is enclosed. Please provide a response no later than September 17, 2026, by electronic copy of all corrective actions and preventive measures taken by Race to correct the identified violations and prevent the recurrence of such violations.

Please note that ESRB will be posting the audit report and your response on the CPUC website. If there is any information in your response that you want us to consider as confidential, we request that in addition to your confidential response, you provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Charles Mee at (415) 730-7012 or Charles.Mee@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse".

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch

Safety and Enforcement Division
California Public Utilities Commission

Enclosure: CPUC CIP Audit Report for Race Communications North Sacramento Service Area

Cc:

Lee Palmer, Deputy Executive Director, Safety Policy Division, Water Division, CPUC

Koko Tomassian, Director, Safety Enforcement Division (SED), CPUC

Chihsien "Eric" Wu, Program Manager, ESRB, SED, CPUC

Majed Ibrahim, Program and Project Supervisor, ESRB, SED, CPUC

Yi (Rocky) Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC

Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC

Charles Mee, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC

Javier Reyes, Utilities Engineer, ESRB, SED, CPUC

Yongling Sun, Public Utilities Regulatory Analyst V, ESRB, SED, CPUC

Carlos Alcantar, Chief Technology Officer, Race

Domenic Pacini, Chief Development Officer, Race

Ariel Pacini, VP of Outside Plant, Race

**CPUC CIP AUDIT REPORT FOR
RACE COMMUNICATIONS NORTH SACRAMENTO SERVICE AREA
JUNE 15 – 19, 2026**

I. Records Review

During the audit, ESRB Staff reviewed the following records:

- RCNS Pre-Audit Data Request CA2026-1459
- Race Telecommunications-Inspection & Maintenance Program
- Race Telecommunications-OSP Inspection Checklist, Basic Inspection (Patrol)
- Race Telecommunications-OSP Inspection Checklist, Detailed Inspection
- RCNS Facility Maps,
- RCNS Safety Hazards Received,
- RCNS-Permits (April 1, 2025-March 31, 2026)
- RCNS-Maintenance Tickets
- RCNS-Inspectors & Training Program

II. Records Violations

ESRB observed the following violations during the record review portion of the audit:

1. GO 95, Rule 18.A Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

(1) “Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

Upon completion of the corrective action, the company’s records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years.

(2) Where a communications company’s or an electric utility’s (Company A’s) actions result in potential violations of GO 95 for another entity (Company B), that entity’s (Company B’s) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not

to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.

(3) 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 entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95.

(5) A company receiving a notification under (2), (3), or (4) above shall take appropriate corrective action consistent with the provisions of this rule. For at least ten (10) years, the documentation of the notice shall be maintained by both the notifying and receiving parties and documentation of the correction shall be maintained by the receiving party."

ESRB's findings related to the above rule are as follows:

- 1) Regarding Item (1) above, Race merely provided some third-party permit records but did not provide any records for its work orders correcting the deficiencies.

Race is required to establish and keep its maintenance records with enough details.

- 2) Regarding third party notifications prescribed in Item (2) - (5), Race stated that:

"During the audit period of April 1, 2025 through March 31, 2026, Race did not issue formal written Safety Hazard Notifications to third parties pursuant to GO 95 Rule 18-B. Race acknowledges that formal written notification is best practice."

Race is required to establish formal written third-party notification program for issuing notifications to other utility companies for potential violations of GO 95 and safety hazards.

2. GO 95, Rule 18.B, Maintenance Programs states in part:

“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.

The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company’s facilities.”

ESRB’s findings related to the above rule are as follows:

Race did not provide its inspection records. In its response, Race stated the following:

“Race Communications (“Race”) physically observed the RCNS plant during the audit period in connection with initial attachment surveys and pre-construction assessment walkthroughs, which involved direct evaluation of infrastructure conditions in the field. These observations were not, however, captured as formal patrol or detailed inspection records under GO 95 Rule 18. Race recognizes this documentation gap and is addressing it: a formal inspection schedule for the service area is currently in development, and Race is committed to full compliance with GO 95 Rule 18 inspection and recordkeeping obligations going forward.”

Race is required to update the status of its commitment in compliance with GO 95, Rule 18, including a formal inspection schedule, detailed inspection records, and corrective action records for each service area.

3. GO 95, Rule 18-B. (1).(a), Maintenance Programs states in part:

“The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

(i) Level 1 -- An immediate risk of high potential impact to safety or reliability:

- *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*

(ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:

- *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period*

for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.

(iii) Level 3 -- Any risk of low potential impact to safety or reliability:

- *Take corrective action within 60 months subject to the exception specified below.”*

ESRB’s findings related to the above rule are as follows:

RCNS did not provide any inspection records and did not show any prioritization records for deficiencies found through inspections.

Race is required to establish records of prioritizing the deficiencies, including but no limited to priority levels and corrective action due dates, in order to comply with GO 95, Rule 18.B.(1).a.

III. Field Inspection

During the field inspection from June 15 to 19, 2026, ESRB staff inspected Race’s Communications facilities locations listed in Table 1 below:

Table 1: Field Inspection Locations

Location #	Latitude	Longitude	Structure Type	Facility ID
1			Pole	
2			Pole	
3			Pole	
4			Pole	
5			Pole	
6			UG Vault	
7			UG Vault	
8			Pole	
9			UG Vault	
10			Pole	
11			Pole	
12			Pole	
13			UG Vault	

Location #	Latitude	Longitude	Structure Type	Facility ID
14			Pole	
15			Pole	
16			Pole	
17			Pole	
18			Pole	
19			Pole	
20			Pole	
21			Pole	
22			Pole	
23			Pole	
24			Pole	
25			Pole	
26			Pole	
27			Pole	
28			UG Vault	
29			UG Vault	
30			Pole	
31			Pole	
32			Pole	
33			Pole	
34			Pole	
35			Pole	
36			Pole	
37			Pole	
38			Pole	
39			Pole	
40			Pole	
41			Pole	
42			Pole	
43			Pole	
44			Pole	
45			Pole	
46			Pole	
47			Pole	
48			Pole	
49			Pole	
50			Pole	
51			Pole	

Location #	Latitude	Longitude	Structure Type	Facility ID
52			Pole	
53			Pole	
54			Pole	
55			Pole	
56			Pole	
57			Pole	
58			Pole	
59			Pole	
60			Pole	
61			Pole	
62			Pole	
63			Pole	
64			Pole	
65			Pole	
66			Pole	
67			Pole	
68			Pole	
69			Pole	
70			Pole	
71			Pole	
72			Pole	
73			Pole	
74			Pole	
75			Pole	
76			Pole	
77			Pole	
78			Pole	
79			Pole	
80			Pole	
81			Pole	
82			Pole	
83			Pole	
84			Pole	
85			Pole	
86			Pole	
87			Pole	
88			Pole	
89			Pole	

Location #	Latitude	Longitude	Structure Type	Facility ID
90			Pole	

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. GO 95, Rule 18, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

(1) “Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

Upon completion of the corrective action, the company’s records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years.

(2) Where a communications company’s or an electric utility’s (Company A’s) actions result in potential violations of GO 95 for another entity (Company B), that entity’s (Company B’s) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.

(3) 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 entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95.

(5) A company receiving a notification under (2), (3), or (4) above shall take appropriate corrective action consistent with the provisions of this rule. For at least ten (10) years, the documentation of the notice shall be maintained by both the notifying and receiving parties and documentation of the correction shall be maintained by the receiving party.”

ESRB's findings related to the above rule are listed in Error! Reference source not found.2:

Table 2: GO 95, Rule 18 Findings

Location #	Finding
1	TPN to Comcast for ground missing cover and not attached Missing Facility Identification
3	Missing Facility Identification
6	Missing Facility Identification
7	Missing Facility Identification
9	Missing Facility Identification
10	TPN to AT&T for clearance issue TPN to PG&E for slack secondary wire and slack guy wire
13	Missing Facility Identification
14	TPN to PGE for leaning pole
15	TPN to PGE for leaning pole and missing visibility strip on pole
18	TPN for Comcast for abandoned drop
19	TPN to AT&T for Abandoned service and loose raisers
21	TPN to PGE vegetation touching guy wires with no insulator TPN to Comcast for loose risers
22	TPN to AT&T for abandoned wire
23	TPN to PGE for leaning pole TPN to Comcast for riser covers unattached
24	TPN to Comcast for loose and uncovered ground and abandoned service wire touching Race wire
25	TPN to AT&T for telephone service drop too low
26	TPN to PGE for broken ground cover
27	Missing Facility Identification
28	Missing Facility Identification
29	Missing Facility Identification
31	Missing Facility Identification
32	Missing Facility Identification
33	Missing Facility Identification
34	Missing Facility Identification
35	TPN to AT&T for unattached riser and missing riser cover

Location #	Finding
35	Missing Facility Identification
44	TPN to PGE for its guywire touching AT&T cable
46	TPN to AT&T for incomplete pole transfer
47	TPN to AT&T for leaning pole and missing visibility strips
48	TPN to AT&T for loose cable riser
48	Missing Facility Identification
56	Missing Facility Identification
57	TPN to Comcast for broken ground molding and vegetation touching guy wire TPN to AT&T for vegetation touching guy wire above insulation bob TPN to PGE for leaning pole
59	Missing Facility Identification
71	Missing Facility Identification
73	Missing Facility Identification
77	TPN to Frontier for pole test or replacement
78	TPN to Frontier for vegetation management to mitigate abrasion
79	TPN to Frontier for pole foot damage
80	TPN to Frontier for damaged case and slack guy wire
82	TPN to Comcast for damaged ground cover
83	TPN to Comcast for missing riser cover and riser unattached TPN to AT&T for unattached riser cover
85	TPN to AT&T for riser unattached
88	TPN to Comcast from broken ground cover
89	TPN to Comcast for clearance issue at the north span
90	TPN to Comcast for unattached riser that obstructs power switch

2. 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.

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.

A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a

higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard... ”

ESRB’s findings related to the above rule are listed in Error! Reference source not found.3:

Table 3: GO 95, Rule 31.1 Findings

Location #	Finding
16	Visibility strips faded
17	Visibility strips faded
34	Guy wire installation not completed
44	Needs to transfer its guywire to its own anchor
45	Splice case not attached to messenger
59	Visibility strips missing one
60	Visibility strips falling
63	Visibility strips faded
64	Visibility strips faded, Service drop hanging
75	Service drop loose, third party attachment

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

“Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances, the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions shall be maintained. (Also see Appendix E for tree trimming guidelines.) These requirements apply to all overhead electrical supply and communication facilities that are covered by this General Order, including facilities on lands owned and maintained by California state and local agencies.”

ESRB’s findings related to the above rule are listed in Error! Reference source not found.4:

Table 4: GO 95, Rule 35 Findings

Location #	Finding
21	Guy wire strained by tree branch

4. 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 and are based on a temperature of 60° F. and no wind.”

ESRB’s findings related to the above rule are listed in Error! Reference source not found.5:

Table 5: GO 95, Rule 38 Findings

Location #	Finding
41	Guy wire clearance issue
43	Service span clearance issue
46	South side span clearance issue
49	Service drop clearance issue
59	Service drop clearance issue
80	Service drop clearance issue

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

ESRB’s findings related to the above rule are listed in Error! Reference source not found.6:

Table 6: GO 95, Rule 54.6.B Findings

Location #	Finding
4	Ground wires exposed
12	Ground wires exposed

6. GO 95, Rule 54.6-I Attachment of Protective Covering states in part:

“Protective covering shall be attached to poles, structures, crossarms, and other supports by means of corrosion-resistant materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) which are adequate to maintain such covering in a fixed position.”

ESRB's findings related to the above rule are listed in Error! Reference source not found.7:

Table 7: GO 95, Rule 54.6-I Findings

Location #	Finding
14	Riser unattached from pole

7. GO 95, Rule 91.3.B Stepping states in part:

“Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step.”

ESRB's findings related to the above rule are listed in Error! Reference source not found.8:

Table 8: GO 95, Rule 91.3.B Findings

Location #	Finding
2	Pole step lower than 8 feet
3	Pole step lower than 8 feet