

**ATTACHMENT 3
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PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 5, 2025

CA2025-1421

Domenic Pacini
Race Communications
VP, Construction & OSP
1325 Howard Avenue, Unit 604
Burlingame, CA 94010

SUBJECT: Audit of Race Communications Kern County Area

Mr. Pacini:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Sultan Tipu of my staff conducted a Communication Infrastructure Provider (CIP) audit of Race Communications' Kern County Area on October 20-24, 2025. The audit included a review of Race Communications' inspection and maintenance records, and a field inspection of Race Communications' facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings detailing the violations is enclosed. Please advise me no later than January 5, 2026, by electronic or hard copy, of all corrective measures taken by Race Communications to remedy and prevent such violations.

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

If you have any questions concerning this audit, please contact Sultan Tipu at (213) 660-5524 or Sultan.Tipu@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: Audit Findings

Cc: Leslie Palmer, Deputy Executive Director for Safety Enforcement, Safety Policy and Water, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Majed Ibrahim, Senior Utilities Engineer, ESRB, CPUC
Sultan Tipu, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Patrol and Detailed Inspection Records
- Repair Work Order Records
- Inspection and Maintenance Program Procedures
- Visual Inspections of Overhead Lines
- Pole Loading Calculations

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 95, Rule 18-B1, Maintenance Programs, states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...

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.

Race Communications' records indicated that from October 2024 to October 2025, Race Communications completed 8 overhead work orders past Race Communications' due date for corrective action. Additionally, as of the date of the audit, Race Communications had 20 open overhead work orders that were past Race Communications scheduled due date for corrective action.

III. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure ID	Type of Structure	Location
1		Pole	
2		Pole	
3		Pole	
4		Pole	
5		Pole	
6		Pole	
7		Pole	
8		Pole	
9		Pole	
10		Pole	
11		Pole	
12		Pole	
13		Pole	
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		Pole	
29		Pole	
30		Pole	
31		Pole	
32		Pole	
33		Pole	
34		Pole	
35		Pole	
36		Pole	
37		Pole	
38		Pole	
39		Pole	
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41		Pole	

42			Pole	
43			Pole	
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51			Pole	
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	
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86			Pole	
87			Pole	
88			Pole	

89				Pole	
90				Pole	
91				Pole	
92				Pole	
93				Pole	
94				Pole	
95				Pole	
96				Pole	
97				Pole	
98				Pole	
99				Vault	
100				Vault	
101				Flowerpot	
102				Vault	
103				Vault	
104				Vault	
105				Vault	
106				Vault	
107				Vault	
108				Vault	
109				Vault	
110				Flowerpot	
111				Pole	
112				Pole	
113				Pole	
114				Vault	
115				Vault	
116				Vault	
117				Vault	
118				Vault	
119				Vault	
120				Vault	
121				Vault	
122				Vault	
123				Vault	
124				Vault	
125				Vault	
126				Vault	
127				Vault	
128				Vault	
129				Vault	
130				Vault	

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections 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.

The Race Communications’ facilities on each of the following poles required maintenance:

- Pole No. [REDACTED] – The Race Communications cables were not secured to the pole.
- Pole No. [REDACTED] – The Race Communications cables were not transferred to the new pole in place.
- Pole No. [REDACTED] – The Race Communications service drop was not secured to the pole and contacting third party conductor.
- Pole No. [REDACTED] – The Race Communications cables were not secured to the pole.
- Pole No. [REDACTED] – The Race Communications cables were loose and not secured by tie wrap.
- Pole No. [REDACTED] – The lashing wire of Race Communications cables attached to pole was loose or broken.

GO 95, Rule 84.7-A, Climbing Space, states in part:

Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c, 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.

The climbing space on Pole number [REDACTED] was obstructed by vegetation.

GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8, requires the minimum vertical separation between “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Communication Conductors and Supply Drops” on the same pole and in adjoining midspans to be 12 inches.

Race Communications conductors or service drops supported on each of the following poles had less than 12 inches of vertical clearance from a third-party communications conductors or service drops supported on the same pole:

- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor at midspan.
- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor at midspan.
- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor.
- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor.

- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor.
- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor.
- Pole No. [REDACTED] – a Race Communications service drop was in contact with a third-party communications conductor at midspan.
- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor.
- Pole No. [REDACTED] – a Race Communications conductor was too close or in contact with a third-party communications conductor.
- Pole No. [REDACTED] – a Race Communications conductor and a node box was in contact with a third-party communications conductor.
- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor.
- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor.
- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor at midspan.
- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor at midspan.
- Pole No. [REDACTED] – a Race Communications splicer box was in contact with a third-party communications conductor.
- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications service drop.
- Pole No. [REDACTED] – a Race Communications conductor was in contact with a third-party communications conductor.

GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19, requires the minimum radial separation between “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Guys and span wires passing conductors supported on the same poles” to be 3 inches.

A Race Communications service drop supported by pole number [REDACTED] was less than 3 inches from span wire and in contact with a third-party conductor attached to the same pole.

GO 95, Rule 56.2 – Overhead Guys, Anchor Guys and Span Wire 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 Race Communications down guy wires attached to poles numbered [REDACTED] and [REDACTED] were loose and not taut.

General Order 95, Rule 86.9, Guy Marker (Guy Guard), states:

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.

A Race Communications down guy wire attached to pole number [REDACTED] did not have a marker.

GO 128, Rule 17.1 – 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 [the] communication or supply lines and equipment.

The following underground handholes were filled with a large amount of dirt:

- The handhole in front of the residence at [REDACTED].
- The handhole in front of the residence at [REDACTED].
- The handhole in front of the residence at [REDACTED].