

December 23, 2024

Mr. Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear Mr. Daye,

Subject: Audit of LADWP's West LA Distribution District

In response to your letter dated November 22, 2024, which alleged violations of General Orders (GOs) at the Los Angeles Department of Water and Power (LADWP) West LA District during September 9 through 13, 2024, without admitting such violations, LADWP worked diligently to address all specific alleged infractions. Furthermore, a response to the CPUC's records review allegations is provided.

II. Records Review – Violations List

GO 165, Section III-B, Standards for Inspection, states:

Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1.

GO 95, Rule 31.2, Inspection of Lines, states in part:

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.

LADWP's inspection records indicated that from January 1, 2021 to June 30, 2024, a total of 42,385 overhead patrol inspections and 22,795 overhead detailed inspections were completed or pending completion past LADWP's assigned due date.

GO 165, Section III-B, Standards for Inspection, states:

Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1.

GO 128, Rule 17.2, Inspection, 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 of these rules.

LADWP inspection records indicated that from January 1, 2021 to June 30, 2024, a total of 14,593 underground patrol inspections and 6,691 underground detailed inspections were completed or pending completion past LADWP's assigned due date.

GO 95, Rule 18, 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.

LADWP records indicated that from January 1, 2021 to June 30, 2024, a total of 4,912 overhead work orders were completed, pending completion, or cancelled after LADWP's assigned due date for corrective action.

GO 128, Rule 17.1, 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.

LADWP records indicated that from January 1, 2021 to June 30, 2024, a total of 1,459 underground work orders were completed, pending completion, or cancelled after LADWP's assigned due date for corrective action.

LADWP Response:

In response to the above, LADWP has identified the overdue inspections as a high priority consistent with its Inspection and Maintenance Program and is continuing to perform the necessary inspections as quickly as possible, with substantial improvements in attaining inspection targets as of the latest fiscal year.

IV. Field Inspection – Violations List

LADWP is fully committed to addressing any issues identified in the field. As such, LADWP worked diligently to address all CPUC allegations under "IV. Field Inspection – Violations List". Further detail is provided below.

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.

LADWP facilities on the following poles required maintenance:

- Pole 376986M - a ground wire was cut at two feet above ground.
- Pole 466843M - a ground wire was cut at two feet above ground.
- Pole 466847M - a ground wire was cut at two feet above ground.
- Pole 378025M - a ground wire was cut at three feet above ground.
- Pole 302851M - a 6-foot section of ground wire and ground moulding was missing at ground level.

LADWP Response:

As of November 7, 2024, work has been completed to address all allegations related to the following facilities listed above:

- Pole 376986M
- Pole 466843M
- Pole 466847M
- Pole 378025M
- Pole 302851M

General Order 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 8 requires the vertical clearance between “0-750 Volts (Including Service Drops) and Trolley Feeders” and “Communication Conductors and Service Drops” supported on the same pole to have a minimum clearance of 12 inches.

On Pole 529361M, an LADWP service drop supported on the pole was touching a communications conductor.

LADWP Response:

As of September 16, 2024, LADWP has provided notifications to all applicable 3rd party communications utilities to address the issue identified in the audit relating to Pole 529361M.

GO 95, Rule 51.6-A, Marking and Guarding, High Voltage Marking of Poles, states in part:

Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words “HIGH VOLTAGE”, or pair of signs showing the words “HIGH” and “VOLTAGE”, not more than

six (6) inches in height with letters not less than 3 inches in height. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.

Each of the following LADWP poles supported “HIGH VOLTAGE” signs that were damaged or missing:

- Pole 122725M - the “HIGH VOLTAGE” sign was weathered, damaged, and illegible.
- Pole 378027M - the “HIGH VOLTAGE” sign was damaged with portions missing.
- Pole 378026M - the “HIGH VOLTAGE” sign was missing.
- Pole 376986M - the “HIGH VOLTAGE” sign was missing.
- Pole 291039M - the “HIGH VOLTAGE” sign was damaged with portions missing.
- Pole 129193M - the “HIGH VOLTAGE” sign was damaged with portions missing.
- Pole 129194M - the “HIGH VOLTAGE” sign was damaged with portions missing.

LADWP Response:

As of November 7, 2024, work has been completed to address all allegations related to the following facilities listed above:

- Pole 122725M
- Pole 378027M
- Pole 378026M
- Pole 291039M
- Pole 129193M
- Pole 129194M

GO 95, Rule 54.6-E3, Covering Joints, states in part:

Where two sections of suitable protective covering join together (at joints) they shall be covered to prevent exposing the underground cables or other conductors by: (a) The extension of either or such coverings; or (b) A coupling of equal material or (c) A strap of equal material.

On Pole 400605M, two sections of a primary riser supported on the pole were separated at an uppermost joint, exposing the conductors contained inside.

LADWP Response:

As of November 7, 2024, work has been completed to address the alleged issue regarding Pole 400605M.

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 wires on each of the following poles was not covered by a suitable protective covering:

- Pole 112724M – an 8-inch section and a 2-foot section of ground wire supported on the pole were exposed at 1 foot and 7 feet above the ground, respectively.
- Pole 302851M – an 8-foot section of ground wire supported on the pole was exposed at the communication level.
- Pole 299271M – a 4-inch section of ground wire supported on the pole was exposed at the public level.

LADWP Response:

As of November 7, 2024, work has been completed to address all allegations related to the following facilities listed above:

- Pole 112724M
- Pole 302851M
- Pole 299271M

GO 128, Rule 17.1, 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.

Padmounted transformer 1519974 was surrounded by vegetation, obstructing access by utility personnel.

LADWP Response:

As of September 17, 2024, vegetation has been cleared away to allow access to padmounted transformer 1519974.

If you have any questions or need additional information, please contact me at (213) 367-0787 or Andrew Ta at (213) 367-8654.

Sincerely,

Silvia Lozano
Chief Compliance Officer
Los Angeles Department of Water and Power

cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjetsli, Program Manager, ESRB, CPUC
Eric Ujjiye, Utilities Engineer, ESRB, CPUC
Andrew Ta, LADWP
Jordi Burbano, LADWP
Terrence Chau, LADWP