

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 30, 2025

EA2025-1294

Brian Dease
Assistant General Manager of Power Delivery
Pasadena Water and Power (PWP)
1055 East Colorado Blvd., Suite 350
Pasadena, CA 91106

SUBJECT: Audit of PWP's Electrical Distribution Facilities

Mr. Dease:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Kyle King of my staff conducted an electric distribution audit of PWP from May 5, 2025 through May 9, 2025. The audit included a review of PWP's inspection and maintenance records and a field inspection of PWP'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 June 30, 2025, by electronic or hard copy, of all corrective measures taken by PWP 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, you can contact Kyle King at (213) 222-3260 or Kyle.King@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

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Kyle King, Utilities Engineer, ESRB

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Intrusive test records.
- PWP's visual inspection program.

II. Field Inspection

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

No.	Structure ID.	Type of Structure	Location
1	22181MP	Pole	Pasadena
2	22180MP	Pole	Pasadena
3	22179MP	Pole	Pasadena
4	22107MP	Pole	Pasadena
5	22178MP	Pole	Pasadena
6	22177MP	Pole	Pasadena
7	22176MP	Pole	Pasadena
8	22175MP	Pole	Pasadena
9	22147MP	Pole	Pasadena
10	22146MP	Pole	Pasadena
11	22145MP	Pole	Pasadena
12	22143MP	Pole	Pasadena
13	22142MP	Pole	Pasadena
14	22292MP	Pole	Pasadena
15	6638MP	Pole	Pasadena
16	16576MP	Pole	Pasadena
17	20444MP	Pole	Pasadena
18	16596MP	Pole	Pasadena
19	16471MP	Pole	Pasadena
20	21531MP	Pole	Pasadena
21	8271MP	Pole	Pasadena
22	16595MP	Pole	Pasadena
23	14729MP	Pole	Pasadena
24	534651H	Pole	Pasadena
25	22122MP	Pole	Pasadena
26	22123MP	Pole	Pasadena
27	22124MP	Pole	Pasadena

28	22125MP	Pole	Pasadena
29	22126MP	Pole	Pasadena
30	22127MP	Pole	Pasadena
31	21644MP	Pole	Pasadena
32	21645MP	Pole	Pasadena
33	21646MP	Pole	Pasadena
34	19578MP	Pole	Pasadena
35	21647MP	Pole	Pasadena
36	2942MP	Pole	Pasadena
37	21648MP	Pole	Pasadena
38	21649MP	Pole	Pasadena
39	21650MP	Pole	Pasadena
40	19577MP	Pole	Pasadena
41	21486MP	Pole	Pasadena
42	21487MP	Pole	Pasadena
43	21488MP	Pole	Pasadena
44	19471MP	Pole	Pasadena
45	21489MP	Pole	Pasadena
46	21651MP	Pole	Pasadena
47	21417MP	Pole	Pasadena
48	21416MP	Pole	Pasadena
49	19584MP	Pole	Pasadena
50	19585MP	Pole	Pasadena
51	21412MP	Pole	Pasadena
52	1861MP	Pole	Pasadena
53	21411MP	Pole	Pasadena
54	10125MP	Pole	Pasadena
55	19603MP	Pole	Pasadena
56	21410MP	Pole	Pasadena
57	21409MP	Pole	Pasadena
58	1013MP	Pole	Pasadena
59	21408MP	Pole	Pasadena
60	21407MP	Pole	Pasadena
61	21406MP	Pole	Pasadena
62	10129MP	Pole	Pasadena
63	10134MP	Pole	Pasadena
64	21414MP	Pole	Pasadena
65	21415MP	Pole	Pasadena
66	19585MP	Pole	Pasadena
67	6515MP	Pole	Pasadena
68	21312MP	Pole	Pasadena
69	21311MP	Pole	Pasadena
70	474727H	Pole	Pasadena
71	6442MP	Pole	Pasadena
72	21683MP	Pole	Pasadena

73	21684MP	Pole	Pasadena
74	21685MP	Pole	Pasadena
75	21686MP	Pole	Pasadena
76	21687MP	Pole	Pasadena
77	21688MP	Pole	Pasadena
78	21643MP	Pole	Pasadena
79	9581MP	Pole	Pasadena
80	21283MP	Pole	Pasadena
81	10128MP	Pole	Pasadena
82	21458MP	Pole	Pasadena
83	21457MP	Pole	Pasadena
84	21456MP	Pole	Pasadena
85	21455MP	Pole	Pasadena
86	21454MP	Pole	Pasadena
87	21453MP	Pole	Pasadena
88	2686MP	Pole	Pasadena
89	17325MP	Pole	Pasadena
90	12822MP	Pole	Pasadena
91	PM185	Padmounted Transformer	Pasadena
92	B11617	Handhole	Pasadena
93	V9389	BURD Transformer	Pasadena
94	PM213	Padmounted Transformer	Pasadena
95	B11809	Handhole	Pasadena
96	V6952	BURD Transformer	Pasadena
97	B11613	Handhole	Pasadena
98	B11612	Handhole	Pasadena
99	V9457	BURD Transformer	Pasadena
100	V9098	BURD Transformer	Pasadena
101	V6100	Vault	Pasadena
102	B11424	Handhole	Pasadena
103	V9661	Vault	Pasadena
104	B11657	Handhole	Pasadena
105	V9273	Vault	Pasadena
106	V9795	Vault	Pasadena
107	B11659	Handhole	Pasadena
108	B11660	Handhole	Pasadena
109	V9872	Vault	Pasadena
110	B12208	Handhole	Pasadena
111	21937MP	Pole	Pasadena
112	21938MP	Pole	Pasadena
113	19553MP	Pole	Pasadena
114	21959MP	Pole	Pasadena
115	21958MP	Pole	Pasadena

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection portion of the audit:

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.

High voltage signs attached to each of the following PWP poles were damaged:

- | | | |
|-----------|-----------|-----------|
| • 22177MP | • 21406MP | • 21458MP |
| • 16576MP | • 10134MP | • 21457MP |
| • 20444MP | • 6515MP | • 21455MP |
| • 16471MP | • 21311MP | • 21453MP |
| • 21531MP | • 474727H | |
| • 8271MP | • 6442MP | |
| • 14729MP | • 21686MP | |

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 moulding attached to each of the following poles was damaged:

- 16576MP
- 8271MP
- 10125MP
- 21408MP

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.

PWP facilities on the following poles required maintenance:

- Pole No. 22147MP: A PWP riser was damaged.
- Pole No. 21455MP: A PWP visibility strip was damaged.

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.

Handhole B11659 had shrubs and bushes on the outside of the enclosure, making it hard to open and inspect.