

May 5, 2026

Mr. Majed Ibrahim, 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. Ibrahim,

Subject: Audit of LADWP's West Los Angeles Distribution District

In response to your letter dated April 6, 2026, regarding alleged violations of General Orders (GOs) at the Los Angeles Department of Water and Power's (LADWP) West Los Angeles Distribution District during December 1 through 5, 2025, LADWP respectfully submits the following information. While not admitting to the violations as alleged, LADWP has worked diligently to address each cited infraction and offers the following responses to both the records review and field inspection findings.

II. Records Review – Violations List

GO 165, Section III-B, Distribution Facilities, 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 to conform with these rules.

LADWP's inspection records indicated that from July 2024 to September 2025, LADWP had 3,677 patrol overhead inspections and 6,932 detailed overhead inspections that were completed, pending completion, or pending then removed past LADWP's assigned due date.

GO 165, Section III-B, Distribution Facilities, 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's inspection records indicated that from July 2024 to September 2025, LADWP had 1,207 underground patrol inspections and 1,233 underground detailed inspections that were completed or pending completion past the 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's records indicated that from July 2024 to September 2025, LADWP had 5,772 overhead work orders that 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's records indicated that from July 2024 to September 2025, LADWP had 187 underground work orders that were completed, pending completion, or cancelled after LADWP's assigned due date for corrective action.

GO 95, Rule 44.1, Installation and Reconstruction, states in part:

Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.

The following LADWP pole loading records contained errors:

- Pole No. 297536M - The pole loading calculation report had several field verified discrepancies. First, the pole was classified as a Class 3 pole in the report but was marked as a class 4 pole in the field. Second, the record displayed a ground line circumference (GLC) of 41 inches but in the field the pole was measured to have a GLC of 37 inches. Third, the pole loading records stated primary conductors, but the pole did not support primary conductors.
- Pole No. 297539M - The pole loading calculation report had several field verified discrepancies. First, the pole was classified as a Class 3 pole in the report but was marked as a class 4 pole in the field. Second, the record displayed a ground line circumference (GLC) of 40 inches but in the field the pole was measured to have a GLC of 37 inches.

LADWP Response:

LADWP has identified these overdue inspections and corrective work orders as a high priority in alignment with its Inspection and Maintenance Program. The Department has accelerated its efforts to address these issues, with marked improvements in meeting inspection targets in the most recent fiscal year. Regarding late pending inspections, LADWP has the following remaining as of April 15, 2026: 270 patrol overhead, 33 detailed overhead, 236 patrol underground (including padmount), and 206 detailed underground (including padmount). These late pending inspections are anticipated to be completed by the end of September 2026. Regarding work orders, LADWP is streamlining its recordkeeping processes to ensure work orders are completed efficiently, eliminate redundant records, and reduce the number of late work orders.

Regarding the indicated pole loading record errors, LADWP has revised the pole loading records for Poles No. 297536M and 297539M with the corrected field conditions noted by the auditor. The corrected pole loading records comply with all required GO 95 safety factors.

IV. Field Inspection – Violations List

LADWP remains fully committed to ensuring the safety, reliability, and compliance of its electric infrastructure. As such, LADWP worked diligently to address all CPUC allegations

under “IV. Field Inspection – Violations List.” All CPUC-identified issues have been addressed as detailed below.

GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states:

(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 10 business days after the discovery.

The following safety hazards were not documented and reported to the third party responsible:

- Pole 442286M – A service drop supported by the pole was contacting a satellite dish attached to service location.
- Pole 72614M – A communications down guy wire attached to the pole not taut.

LADWP Response:

As of December 3, 2025, third-party reports of the communication asset infractions have been generated and sent to the associated communication utilities to address the allegations related to Poles 442286M and 72614M.

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 442286M – The ground wire was severed and protruding from the ground moulding a foot above the ground level.
- Pole 358748M - The ground wire was severed and protruding from the ground moulding a foot above the ground level.
- Pole 298214M – An insulator at the primary level was “squatting”, i.e., resting on the crossarm.
- Pole 298214M – The ground wire supported on the pole was damaged at the communications level.

Mr. Majed Ibrahim

Page 5

May 5, 2026

LADWP Response:

LADWP did not note Pole 298214M as having a damaged insulator at the primary level during the audit, but Pole 72612M was noted as having a damaged insulator at the primary level.

LADWP did not note Pole 298214M as having a damaged ground wire, but it was noted as having a damaged ground molding.

As of January 20, 2026, corrective work at all poles requiring maintenance listed above and at Pole 72612M has been completed.

GO 95, Rule 34, Foreign Attachments, states in part:

Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.

Pole 425925M supported two unauthorized solar video cameras.

LADWP Response:

As of December 4, 2025, corrective work at the pole requiring maintenance listed above has been completed.

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

When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidence abrasions from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).

A service drop supported on Pole 264939M was strained and deflected at midspan by a tree located on the property being served.

LADWP Response:

As of January 23, 2026, corrective work at the pole requiring maintenance listed above has been completed.

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.

The following LADWP poles supported "HIGH VOLTAGE" signs that were damaged or missing:

- Pole 378024M – A "HIGH VOLTAGE" sign was missing from the pole.
- Pole 375932M - The "HIGH VOLTAGE" signage was damaged.
- Pole 72614M - The "HIGH VOLTAGE" signage was damaged.
- Pole 335729M - A "HIGH VOLTAGE" sign was missing from the pole.
- Pole 380218M - The "HIGH VOLTAGE" signage was damaged.
- Pole 298243M - A "HIGH VOLTAGE" sign was missing from the pole.

LADWP Response:

As of January 20, 2026, corrective work at all poles listed above has been completed to address the deficiency allegations.

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

- Pole 442285M – The ground wire protective covering was damaged, exposing the ground wire near the base of the pole.
- Pole 208193M – The ground wire protective covering was damaged, exposing the ground wire a foot from the ground level.
- Pole 238825M - The ground wire protective covering was damaged, exposing the ground wire at the public level.
- Pole 291046M – The ground wire protective covering was damaged, exposing the ground wire at the base and at 12 feet from ground level.
- Pole 206702M – The ground wire protective covering was damaged, exposing the ground wire at 8 feet from ground level.

LADWP Response:

LADWP did not note Poles 442285M and 208193M as having damaged ground wire protective coverings, but they were noted as having cut ground wires.

As of January 20, 2026, corrective work at all poles listed above has been completed to address the deficiency allegations.

GO 95, Rule 54.6-E1, Encased from Ground Level to 8 Feet above the Ground, states in part:

Risers from underground cables or other conductors shall be encased from the ground level to a level not less than 8 feet above the ground...

Risers installed on the following poles were not encased from ground level to a level not less than 8 feet above the ground:

- Pole 335729M – A riser conduit coupling was broken, allowing partial access to the contained conductor.
- Pole 387031M - A riser conduit coupling was broken, allowing partial access to the contained conductor.

LADWP Response:

As of January 20, 2026, corrective work at all poles listed above has been completed to address the deficiency allegations.

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.

Padmount Transformer 1466218 had oil leakage near the rear of the transformer.

LADWP Response:

As of March 16, 2026, corrective work at the padmount transformer listed above has been completed to address the deficiency allegations.

Mr. Majed Ibrahim

Page 8

May 5, 2026

If you have any questions or need additional information, please contact me at (213) 367-1426 or Jordi Burbano at (213) 367-0343.

Sincerely,

Daniel Baker
Digitally signed by Daniel
Baker
Date: 2026.05.05
12:41:25 -0700'

Daniel Baker
Interim Director of Regulatory Compliance
Los Angeles Department of Water and Power

EG:rm

Attachment:

c/att: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, Electric Safety and Reliability Branch, CPUC
Francisco Fernandez, LADWP
Jordi Burbano, LADWP
Eric Goss, LADWP