PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

July 9, 2025 EA2025-1296

Hien K. Vuong, PE
Assistant General Manager – Electric Operations
Azusa Light & Water
City of Azusa
729 N. Azusa Avenue
Azusa, CA 91702

Subject: Audit of Azusa Light & Water

Mr. Vuong:

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 Azusa Light & Water's (ALW) service territory on June 16-20, 2025. The audit included a review of ALW's inspection and maintenance records and a field inspection of ALW'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 August 11, 2025, by electronic or hard copy, of all corrective measures taken by ALW 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,

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: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Kyle King, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Current Overhead and Underground Inspection Procedures
- Patrol and Detailed Inspection Records
- Work Orders Created from Inspections
- Completed, Late, and Canceled Work Orders
- Pole Loading Records
- Intrusive Testing Results
- Incoming and Outgoing Third-Party Notifications

II. Field Inspection

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

No.	Facility Identification	Facility Type	Location
1	4555MA	Pole	Azusa
2	5478MA	Pole	Azusa
3	5228MA	Pole	Azusa
4	2511MA	Pole	Azusa
5	2501MA	Pole	Azusa
6	2507MA	Pole	Azusa
7	2881MA	Pole	Azusa
8	2206MA	Pole	Azusa
9	2508MA	Pole	Azusa
10	2509MA	Pole	Azusa
11	2316MA	Pole	Azusa
12	2338MA	Pole	Azusa
13	4556MA	Pole	Azusa
14	2357MA	Pole	Azusa
15	4557MA	Pole	Azusa
16	4558MA	Pole	Azusa
17	4559MA	Pole	Azusa
18	5451MA	Pole	Azusa
19	3080	Underground Padmounted Transformer	Azusa
20	3157	Underground Padmounted Transformer	Azusa
21	3129	Underground Padmounted Transformer	Azusa
22	3944	Underground Padmounted Transformer	Azusa
23	3169	Underground Padmounted Transformer	Azusa
24	3159	Underground Padmounted Transformer	Azusa

25	4153	Underground Padmounted Transformer	Azusa
26	3153	Underground Padmounted Transformer	Azusa
27	4109	Underground Padmounted Transformer	Azusa
28	3150	Underground Padmounted Transformer	Azusa
29	3255	Underground Padmounted Transformer	Azusa
30	3207	Underground Padmounted Transformer	Azusa
31	3980	Underground Padmounted Transformer	Azusa
32	3154	Underground Padmounted Transformer	Azusa
33	3188	Underground Padmounted Transformer	Azusa
34	4043	Underground Padmounted Transformer	Azusa
35	3168	Underground Padmounted Transformer	Azusa
36	232	Underground Padmounted Transformer	Azusa
37	3161	Underground Padmounted Transformer	Azusa
38	234	Underground Padmounted Transformer	Azusa
39	3133	Underground Padmounted Transformer	Azusa
40	233	Underground Padmounted Transformer	Azusa
41	3190	Underground Padmounted Transformer	Azusa
42	185	Underground Padmounted Transformer	Azusa
43	3131	Underground Padmounted Transformer	Azusa
44	3110	Underground Padmounted Transformer	Azusa
45	3177	Underground Padmounted Transformer	Azusa
46	5551MA	Pole	Azusa
47	4791MA	Pole	Azusa
48	4790MA	Pole	Azusa
49	4926MA	Pole	Azusa
50	4788MA	Pole	Azusa
51	4787MA	Pole	Azusa
52	4817MA	Pole	Azusa
53	4824MA	Pole	Azusa
54	4825MA	Pole	Azusa
55	4826MA	Pole	Azusa
56	4827MA	Pole	Azusa
57	4828MA	Pole	Azusa
58	4829MA	Pole	Azusa
59	4830MA	Pole	Azusa
60	4698MA	Pole	Azusa
61	4697MA	Pole	Azusa
62	4696MA	Pole	Azusa
63	4695M	Pole	Azusa
64	4694MA	Pole	Azusa
65	4629MA	Pole	Azusa
66	4693MA	Pole	Azusa

67	4692MA	Pole	Azusa
68	4691MA	Pole	Azusa
69	4690MA	Pole	Azusa
70	4689MA	Pole	Azusa
71	GT10085	Pole	Azusa
72	4779MA	Pole	Azusa
73	5552MA	Pole	Azusa
74	4872MA	Pole	Azusa
75	4776MA	Pole	Azusa
76	5532MA	Pole	Azusa
77	4774MA	Pole	Azusa
78	4773MA	Pole	Azusa
79	4613MA	Pole	Azusa
80	3427MA	Pole	Azusa
81	3426MA	Pole	Azusa
82	4554MA	Pole	Azusa
83	5467MA	Pole	Azusa
84	5469MA	Pole	Azusa
85	5470MP	Pole	Azusa
86	5474MA	Pole	Azusa
87	3642MA	Pole	Azusa
88	3641MA	Pole	Azusa
89	3252MA	Pole	Azusa
90	3675MA	Pole	Azusa
91	3658MA	Pole	Azusa
92	3677MA	Pole	Azusa
93	5448MA	Pole	Azusa
94	4255MA	Pole	Azusa
95	3249MA	Pole	Azusa
96	4726MA	Pole	Azusa
97	3041MA	Pole	Azusa
98	3848MA	Pole	Azusa
99	3021MA	Pole	Azusa
100	3882MA	Pole	Azusa

III. Field Inspection – Violations List

My observed the following violations during the field inspections portion of the audit:

GO 95, Rule 51.6, 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.*

The "High Voltage" signs or bands on each of the following poles were damaged:

- 4555MA
- 5478MA
- 5228MA
- 2316MA
- 4557MA
- 5451MA
- 4629MA
- 4779MA
- 4774MA
- 3642MA
- 3658MA
- 2511MA
- 2501MA
- 2881MA
- 2338MA
- 4558MA
- 4790MA
- 4692MA
- 4872MA
- 4613MA
- 3641MA
- 4255MA
- GT10085
- 2206MA
- 2508MA
- 2509MA
- 4556MA
- 4559MA
- 4817MA
- 4691MA
- 4776MA
- 3426MA
- 3252MA
- 3882MA

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.*

Each of the following poles had damaged visibility strips:

- 5228MA
- 4788MA
- 4826MA
- 4828MA
- 4830MA
- 4695M
- 4692MA

- Pole number 4558MA had an ALW riser that was damaged:

GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, 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 down guy wire supporting Pole 2881MA was loose.

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

> *Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light 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.*

Each of the following poles had unauthorized attachments:

- 2316MA
- 2338MA
- 3641MA
- 3041MA
- 3882MA

GO 95, Rule 37, Table 1, Column E, Case 13 requires the minimum "radial clearance of bare line conductors from tree branches or foliage" to be 18 inches.

A primary conductor supported on ALW pole number 2501MA had a radial clearance from a palm tree of only 12 inches.

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 Pole number 4689MA was damaged.

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.*

Each of the following underground structures required maintenance:

- Padmounted Transformer 234 was corroded
- Padmounted Transformer 233 was corroded
- Padmounted Transformer 185 was corroded
- Underground Padmounted Transformer 3154 had dirt inside the padmount.
- Underground Padmounted Transformer 3150 had vegetation obstructing padmount opening.