PUBLIC UTILITIES COMMISSION
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April 6, 2026 EA2025-1391

Jordi Burbano, P.E.
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Regulatory Standards and Compliance Section
City of Los Angeles, Department of Water and Power (LADWP)
111 North Hope Street, Room 1246
Los Angeles, CA 90012

SUBJECT: Audit of LADWP's West Los Angeles District

Mr. Burbano:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Eric Ujiiye of my staff conducted an electric distribution audit of LADWP's West Los Angeles District from December 1-5, 2025. The audit included a review of LADWP's inspection and maintenance records and a field inspection of LADWP'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 May 7, 2026, by electronic or hard copy, of all corrective measures taken by LADWP to remediate 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 Eric Ujiiye at (213) 620-2598 or eric.ujiiye@cpuc.ca.gov.

Sincerely,

Majed Ibrahim

Majed Ibrahim, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosures: Audit Findings

Cc: Lee Palmer, Deputy Executive Director, Safety Enforcement, Safety Policy, and Water, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

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.
- LADWP's visual inspection program.
- ESRB's interview of LADWP inspectors.

II. Records Review – Violations List

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

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 so as 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 the 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 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.

III. Field Inspection

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

No.	Structure ID.	Structure	Location	Latitude	Longitude
1	378025M	Pole	Mar Vista	34;0;21.44000000	118;26;47.5499999
2	378024M	Pole	Mar Vista	34;0;21.99999999	118;26;48.1799999
3	442284M	Pole	Mar Vista	34;0;23.02000000	118;26;48.8699999
4	442285M	Pole	Mar Vista	34;0;24.27000000	118;26;49.6300000
5	442286M	Pole	Mar Vista	34;0;25.22999999	118;26;50.4000000
6	442287M	Pole	Mar Vista	34;0;25.32000000	118;26;50.5999999
7	442288M	Pole	Mar Vista	34;0;26.91999999	118;26;51.6099999
8	442308M	Pole	Mar Vista	34;0;22.52000000	118;26;46.6699999
9	375932M	Pole	Mar Vista	34;0;24.00999999	118;26;44.7999999
10	208193M	Pole	Mar Vista	34;0;24.92999999	118;26;45.4600000
11	442310M	Pole	Mar Vista	34;0;25.86000000	118;26;46.7499999
12	442311M	Pole	Mar Vista	34;0;25.96000000	118;26;47.3499999
13	442312M	Pole	Mar Vista	34;0;27.85000000	118;26;48.2899999
14	442313M	Pole	Mar Vista	34;0;29.22000000	118;26;48.6699999
15	466847M	Pole	Mar Vista	34;0;20.7606	118;26;46.9998
16	466843M	Pole	Mar Vista	34;0;16.47999999	118;26;43.8900000
17	358748M	Pole	Mar Vista	33;59;38.4299999	118;26;59.9600000
18	297536M	Pole	Marina Del Rey	33;59;11.1499999	118;27;3.03999999
19	297539M	Pole	Marina Del Rey	33;59;11.4100000	118;27;0.70000000
20	527990M	Pole	Marina Del Rey	33;59;11.4499999	118;27;2.04999999
21	527991M	Pole	Marina Del Rey	33;59;11.9199999	118;27;0.72999999
22	527992M	Pole	Marina Del Rey	33;59;12.6100000	118;26;59.4099999
23	527993M	Pole	Marina Del Rey	33;59;14.1600000	118;26;57.9299999
24	133337GT	Pole	Marina Del Rey	33;59;13.6799999	118;26;57.9600000
25	133338GT	Pole	Marina Del Rey	33;59;12.4299999	118;26;56.4999999
26	425925M	Pole	Marina Del Rey	33;59;11.8500000	118;26;57.7399999
27	72614M	Pole	Sawtelle	34;2;25.05999999	118;27;8.53000000
28	395571M	Pole	Sawtelle	34;2;24.10000000	118;27;7.76000000
29	434615M	Pole	Sawtelle	34;2;23.11999999	118;27;6.69000000
30	344616M	Pole	Sawtelle	34;2;21.96000000	118;27;5.66999999
31	440797M	Pole	Sawtelle	34;2;21.66999999	118;27;5.55999999
32	520654M	Pole	Sawtelle	34;2;21.27000000	118;27;5.02000000
33	238821M	Pole	Sawtelle	34;2;20.83000000	118;27;2.71000000
34	408653M	Pole	Sawtelle	34;2;22.39999999	118;27;0.32000000
35	238825M	Pole	Sawtelle	34;2;23.61999999	118;26;58.6699999
36	350107M	Pole	Sawtelle	34;2;22.85000000	118;26;59.0599999
37	27566Y	Pole	Sawtelle	34;2;24.02000000	118;26;57.3499999
38	238826M	Pole	Sawtelle	34;2;23.99000000	118;26;57.2399999
39	264939M	Pole	Sawtelle	34;2;25.07000000	118;26;57.9799999

40	297989M	Pole	Sawtelle	34;2;25.97000000	118;26;58.4500000
41	311126M	Pole	Sawtelle	34;2;25.5078	118;26;58.5738
42	297988M	Pole	Sawtelle	34;2;26.63999999	118;26;59.1400000
43	525070M	Pole	Sawtelle	34;2;27.36999999	118;27;0.03999999
44	525069M	Pole	Sawtelle	34;2;27.78999999	118;27;0.47999999
45	335729M	Pole	Sawtelle	34;2;28.1600000	118;27;1.20000000
46	380218M	Pole	Sawtelle	34;2;29.24999999	118;27;1.54999999
47	298243M	Pole	Sawtelle	34;2;29.85000000	118;27;1.90999999
48	380219M	Pole	Sawtelle	34;2;28.28999999	118;27;3.17999999
49	88619M	Pole	Sawtelle	34;2;28.02999999	118;27;3.66999999
50	12612M	Pole	Sawtelle	34;2;27.22000000	118;27;4.92999999
51	298214M	Pole	Sawtelle	34;2;27.00999999	118;27;4.77000000
52	289762M	Pole	Sawtelle	34;2;26.53999999	118;27;6.09000000
53	534257M	Pole	Playa Del Ray	33;57;20.7499999	118;26;6.53999999
54	534258M	Pole	Playa Del Ray	33;57;21.6600000	118;26;7.5
55	534259M	Pole	Playa Del Ray	33;57;22.3200000	118;26;8.54999999
56	291046M	Pole	Playa Del Ray	33;57;21.8899999	118;26;9.72999999
57	291047M	Pole	Playa Del Ray	33;57;20.7299999	118;26;11.5700000
58	291048M	Pole	Playa Del Ray	33;57;20.3800000	118;26;12.8599999
59	291049M	Pole	Playa Del Ray	33;57;19.6300000	118;26;14.1199999
60	291050M	Pole	Playa Del Ray	33;57;18.7299999	118;26;16.0200000
61	291051M	Pole	Playa Del Ray	33;57;18.3600000	118;26;17;5000000
62	291052M	Pole	Playa Del Ray	33;57;17.3500000	118;26;19.3099999
63	387031M	Pole	Playa Del Ray	33;57;16.6699999	118;26;20.9099999
64	387032M	Pole	Playa Del Ray	33;57;16.0399999	118;26;21.9500000
65	1314939	Vault	Marina Del Rey	33;59;9.91999999	118;26;20.2999999
66	1315761	Vault	Marina Del Rey	33;59;16.4900000	118;26;20.0800000
67	1469295	Padmount Trans	Marina Del Rey	33;59;16.8500000	118;26;19.8300000
68	1466218	Padmount Trans	Marina Del Rey	33;59;16.6199999	118;26;19.3400000
69	1227073	Handhole	Marina Del Rey	33;59;17.1799999	118;26;18.5399999
70	401441M	Pole	Marina Del Rey	33;59;11.6900000	118;26;36.4500000
71	85338M	Pole	Marina Del Rey	33;59;12.2799999	118;26;36.9500000
72	206702M	Pole	Marina Del Rey	33;59;11.2899999	118;26;37.4899999
73	1567676	Padmount Trans	Marina Del Rey	33;59;12.5500000	118;26;36.5599999
74	1314715	Vault	Marina Del Rey	33;59;11.6100000	118;26;36.6699999
75	1314418	Padmount Trans	Marina Del Rey	33;58;51.6199999	118;26;7.25000000
76	1315415	Padmount Trans	Marina Del Rey	33;58;53.0399999	118;26;9.09000000
77	1315399	Padmount Trans	Marina Del Rey	33;58;53.4799999	118;26;7.90999999
78	1315365	Padmount	Marina Del Rey	33;58;54.0399999	118;26;11.1799999

		Trans			
79	1315373	Padmount Trans	Marina Del Rey	33;58;53.7700000	118;26;11.4000000
80	1315407	Padmount Trans	Marina Del Rey	33;58;53.6600000	118;26;10.9600000
81	1342682	Pad mount Trans	Marina Del Rey	33;58.52.7500000	118;26;21.4299999

IV. Field Inspection – Violations List

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.

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.

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.

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.

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.

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.

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.

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.