

February 26, 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: Substation Audit of LADWP's Metro District

In response to your letter dated February 9, 2026, regarding alleged violations of General Orders (GOs) at the Los Angeles Department of Water and Power's (LADWP) Metro District during October 13 through 17, 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 the field inspection findings.

III. 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 "III. Field Inspection – Violations List". All CPUC-identified issues have been addressed as detailed below.

GO 174, Rule 12, General, states in part:

Substations shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to promote the safety of workers and the public and enable adequacy of service.

Design, construction, and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.

Facilities at the following substations were not maintained for their intended use:

DS-144 Substation

- Warning labels on circuit breakers 8-12 and 22-26 were deteriorated and illegible.

LADWP Response:

As of November 25, 2025, corrective work has been completed to address the deficiency allegations.

DS-93 Substation

- The Bank 1 transformer had oil seepage at the oil level gauge.

LADWP Response:

As of December 5, 2025, corrective work has been completed to address the deficiency allegation.

DS-2 Substation

- The Transfer Bus East Section supported a pot-head riser that was corroded near the grounding cable.

LADWP Response:

As of December 15, 2025, corrective work has been completed to address the deficiency allegation.

DS-36 Substation

- Oil seepage was observed at the Atwater-Marmion Line 2 Oil Switch Circuit Breaker No. 7 oil level sight glass.
- The Bank 2 transformer was observed to have oil seepage near the fill hole.

LADWP Response:

As of December 5, 2025, corrective work has been completed to address the deficiency allegations.

DS-54 Substation

- At the Atwater-Los Felix Cable C, a ground wire was secured closely to the ground creating a tripping hazard.
- A ground cable supported on Bank No. 2 breakers was missing a bracket causing the cable to be loosely secured.
- An auxiliary riser junction box on Bus 2 Atwater-Los Felix Cable B supported a deteriorated concrete base.

LADWP Response:

As of December 9, 2025, corrective work has been completed to address the deficiency allegations.

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DS-15 Substation

- Bank 1B 34.5kV/4.8 kV was leaking oil near the bottom of the radiator.

LADWP Response:

As of December 15, 2025, corrective work has been completed to address the deficiency allegation.

DS-26 Substation

- A fire extinguisher located in the control room displayed the last annual inspection date on the inspection tag of April 16, 2024.

LADWP Response:

As of November 7, 2025, corrective work has been completed to address the deficiency allegation.

DS-75 Substation

- A grounding cable on the L-6 Market-Beacon Cable B oil breaker was missing attachment brackets, thereby creating a tripping hazard.

LADWP Response:

As of November 13, 2025, corrective work has been completed to address the deficiency allegation.

If you have any questions or need additional information, please contact me at (213) 367- 4886 or Jordi Burbano at (213) 367-0343.

Sincerely,

Arash Saidi

Arash Saidi
Director of Regulatory Compliance
Los Angeles Department of Water and Power

AS:rm

c: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
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