

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 Van Nuys Distribution District

In response to your letter dated April 10, 2026, regarding alleged violations of General Orders (GOs) at the Los Angeles Department of Water and Power's (LADWP) Van Nuys Distribution District during February 9 through 13, 2026, 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, 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 January 1, 2022, to December 31, 2025, a total of 4,998 overhead patrol inspections and 49,995 detailed inspections were completed or pending completion past LADWP's assigned due date.

GO 165, Section III-B, 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 inspection records indicated that from January 1, 2022, to December 31, 2025, a total of 6,736 underground patrol inspections and 6,385 underground detailed inspections were completed or pending completion past 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 records indicated that from January 1, 2022 to December 31, 2025, a total of 22,186 overhead work orders 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 records indicated that from January 1, 2022 to December 31, 2025, a total of 2,065 underground work orders were completed, pending completion, or cancelled after LADWP's assigned due date for corrective action.

LADWP Response:

LADWP has identified 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: 588 patrol overhead, 524 detailed overhead, 477 patrol underground (including padmount), and 307 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 late work orders cited by CPUC, CPUC indicated that the cited values included completed, pending, and cancelled work orders. However, the cited counts of 22,186 late overhead work orders and 2,065 late underground work orders do not appear to include work orders that were cancelled after their assigned due dates. When these work orders are cancelled after their assigned due dates are included, the totals increase to 31,369 late overhead work orders and 2,286 late underground work orders.

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 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 670919M – A section of ground wire was missing two feet above ground.
- Pole 385612M – A section of ground wire was missing two feet above ground.
- Pole 258038M – A section of ground wire was missing three feet above ground.
- Pole 399209M – A section of ground wire was missing two feet above ground.
- Pole 399208M – A section of ground wire was missing three feet above ground.
- Pole 399207M – A section of ground wire was missing three feet above ground.

LADWP Response:

LADWP did not note Pole 670919M as one of the distribution assets observed during the audit. Pole 670919H, however, was observed during the audit and noted as having a cut ground wire.

As of February 18, 2026, corrective work at all poles listed above, excluding Pole 670919M but including Pole 670919H, has been completed to address the deficiency allegations.

General Order 95, Rule 54.8, Service Drops, 0-750 Volts, Table 10: Minimum Allowable Clearance of Service Drops of 0-750 Volts from Buildings requires the minimum clearance between “Insulated Conductors (Rule 20.9-G) 0-750 Volts” and “All portions of building including metallic or non-metallic cornice, decorative appendage, eaves, roof or parapet wall of the building served” to be 0.5 inches.

- Pole 110920M: A LADWP service drop supported on the pole was contacting the roof of the home being serviced.

LADWP Response:

As of February 25, 2026, corrective work has been completed to address the deficiency allegation.

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.

Each of the following LADWP poles supported “HIGH VOLTAGE” signs that were damaged or missing:

- Pole 359224M
- Pole 359217M
- Pole 82857M
- Pole 358836M
- Pole 38235M
- Pole 315351M
- Pole 104973M
- Pole 43601M
- Pole 43602M
- Pole 359199M
- Pole 315352M
- Pole 315355M
- Pole 315356M
- Pole 122367M
- Pole 119933M
- Pole 43603M
- Pole 388415M
- Pole 384205M
- Pole 468234M
- Pole 119934M
- Pole 360919M
- Pole 359565M
- Pole 117843M
- Pole 43599M

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- Pole 43606M

LADWP Response:

LADWP did not note Pole 359199M as one of the distribution assets observed during the audit. Pole 369199M, however, was observed during the audit and noted as having damaged “HIGH VOLTAGE” signs.

LADWP did not note Pole 359565M as having a damaged “HIGH VOLTAGE” sign during the audit, but this pole was noted as having a damaged communications ground molding. As of February 10, 2026, a third-party report of the communication asset has been generated and sent to the associated communication utility to address the observed damaged ground molding.

As of March 5, 2026, corrective work at all poles listed above, excluding Poles 359199M and 359565M but including Pole 369199M, 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 molding on each of the following LADWP poles was damaged:

- Pole 258038M
- Pole 399209M
- Pole 399208M
- Pole 399207M
- Pole 359216M
- Pole 358839M

LADWP Response:

As of February 19, 2026, corrective work at all poles listed above has been completed to address the deficiency allegations.

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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

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
Sultan Tipu, Utilities Engineer, Electric Safety and Reliability Branch, CPUC
Francisco Fernandez, LADWP
Jordi Burbano, LADWP
Eric Goss, LADWP