

March 14, 2024

Mr. Fadi Daye, 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. Daye:

Subject: Audit of LADWP's Van Nuys Distribution District

In response to your letter dated February 8, 2024, which alleged violations of General Orders (GOs) at the Los Angeles Department of Water and Power (LADWP) Van Nuys District during December 4 through 8, 2023, without admitting such violations, LADWP is working diligently to address all specific alleged infractions. Furthermore, a response to the CPUC's records review allegations is provided.

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 so as to conform with these rules.

LADWP's inspection records indicated that from January 1, 2019, to December 31, 2022, the following number of overhead patrol and detailed inspections were either completed or pending completion past LADWP's assigned due dates:

- Late Overhead Patrols
 - 1,717 late overhead patrols in High Fire Threat Tier 3
 - 11,109 late overhead patrols in High Fire Threat Tier 2
 - 106,169 late overhead patrols in all other areas

- Late Overhead Detailed Inspections
 - 487 late overhead detailed inspections in High Fire Threat Tier 3
 - 7,401 late overhead detailed inspections in High Fire Threat Tier 3
 - 22,735 late overhead detailed inspections in all other areas

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 these rules.

LADWP inspection records indicated that from January 1, 2019, to December 31, 2022, the following number of underground patrol and detailed inspections were either completed or pending completion past the assigned due date:

- Late Underground Patrol Inspections
 - 326 late underground patrols in High Fire Threat Tier 3
 - 2,023 late underground patrols in High Fire Threat Tier 2
 - 6,768 late underground patrols in all other areas
- Late Underground Detailed Inspections
 - 90 late underground detailed inspections in High Fire Threat Tier 3
 - 1,064 late underground detailed inspections in High Fire Threat Tier 2
 - 4,452 late underground detailed inspections in all other areas

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.

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 pole load calculation for Pole number 528468M, dated November 27, 2023, contained an indicated an East facing span length of 100 feet. However, ESRB field measurements showed that the actual span length was 150 feet.

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, 2019 to December 31, 2022, a total of 13,002 overhead work orders were either completed late, not completed, or cancelled after LADWP's assigned due dates 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, 2019 to December 31, 2022, a total of 1,224 underground work orders were either completed late, pending completion, or cancelled after LADWP's assigned due dates for corrective action.

LADWP Response:

In response to the above, LADWP has identified the overdue inspections as a high priority consistent with its Inspection and Maintenance Program and is continuing to perform the necessary inspections as quickly as possible, with substantial improvements in attaining inspection targets as of the latest fiscal year.

As of February 20, 2024, the pole loading report for Pole 528468M, indicating the East facing span length, has been updated to reflect the actual span length of 150 feet.

IV. Field Inspection – Violations List

LADWP is fully committed to addressing any issues identified in the field. As such, LADWP is working diligently to address all CPUC allegations under "IV. Field Inspection". Further detail is provided 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 each of the following poles required maintenance:

- Pole 161794M – a 6-foot section of ground wire and ground moulding was missing at the public level.
- Pole 165281M – a pole step supported on the pole was rotated and bent downwards.
- Pole 343101M – a riser bracket 10 feet above the ground was partially attached and not securing the riser to the pole.
- Pole 347019M – an 8-foot section of ground wire and ground moulding was missing at the public level.
- Pole 270425M – the point where the down guy wire attaches to the down guy anchor was buried in the ground.
- Pole 270424M – One primary level cross arm of a double cross arm configuration was severely damaged from one side displaying deflection.
- Pole 258867M – a pole step supported on the pole was bent downwards.

LADWP Response:

As of January 5, 2024, work has been completed to address all allegations related to the following facilities listed above:

- Pole 343101M
- Pole 347019M
- Pole 270425M
- Pole 270424M
- Pole 258867M

As of February 26, 2024, work orders have been submitted to address all allegations related to Pole 161794M and 165281M as priority level 2C and priority level 3, respectively, as defined in LADWP's Inspection and Maintenance Programs (IMP). Consistent with the criteria and timeframes established in LADWP's IMP and GO 95, Rule 18-B, LADWP anticipates that these allegations will be fully addressed within 12 calendar months and 60 calendar months, respectively.

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 number 263149M was strained and deflected at midspan by a tree located on the property being served.

LADWP Response:

As of February 22, 2024, the alleged infraction for Pole 263149M was corrected by performing an internal inspection of the strained service drop and then pruning the vegetation located at 10962 Wescott Ave to remove the condition.

General Order 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 3 requires supply conductors of 0-750 Volts (including service drops) and communications conductors “not supported on the same poles” to have a clearance of 48 inches “vertically at crossings in spans and radially where colinear or approaching crossings”.

The LADWP service drop supported on each of the following poles was touching a communications conductor not supported on the same pole:

- Pole 48853M
- Pole 161794M

LADWP Response:

As of February 27, 2024, LADWP has provided notifications to all applicable 3rd party communications utilities to address these issues identified in the audit relating to the specified poles.

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 high voltage signs supported on each of the following poles were damaged or missing:

- Pole 380207M – The “HIGH VOLTAGE” sign was missing letters or portions thereof.
- Pole 429436M – The “HIGH VOLTAGE” sign was missing letters or portions thereof.
- Pole 430087M – The “HIGH VOLTAGE” sign was missing letters or portions thereof.
- Pole 345145M – The “HIGH VOLTAGE” sign was missing letters or portions thereof.
- Pole 165281M – The “HIGH VOLTAGE” sign was missing.
- Pole 243594M – The “HIGH VOLTAGE” sign was missing letters or portions thereof.
- Pole 353735M – The “HIGH VOLTAGE” sign was missing letters or portions thereof.
- Pole 378278M – The “HIGH VOLTAGE” sign was missing letters or portions thereof.
- Pole 347019M – The “HIGH VOLTAGE” sign was missing letters or portions thereof.
- Pole 306658M – The “HIGH VOLTAGE” sign was missing.
- Pole 258867M – The “HIGH VOLTAGE” sign was missing letters or portions thereof.
- Pole 254294M – The “HIGH VOLTAGE” sign was missing letters or portions thereof.
- Pole 254202M – The “HIGH VOLTAGE” sign was missing letters or portions thereof.
- Pole 279104M – The “HIGH VOLTAGE” sign was missing.

LADWP Response:

As of January 11, 2024, work has been completed to address all allegations related to the following facilities listed above:

- Pole 380207M
- Pole 353735M
- Pole 378278M
- Pole 347019M
- Pole 306658M
- Pole 258867M
- Pole 254202M
- Pole 279104M

As of February 27, 2024, LADWP has verified that Pole 430087M is a new steel pole with High Voltage Signs and is therefore not in violation of GO 95, Rule 51.6-A.

As of February 29, 2024, work orders have been submitted to address all allegations related to the remaining 6 facilities listed above as priority level 3, as defined in LADWP's IMP. Consistent with the criteria and timeframes established in LADWP's IMP and GO 95, Rule 18-B, LADWP anticipates that these allegations will be fully addressed within 60 calendar months.

GO 95, Rule 54.7, Climbing and Working Space, states in part:

Climbing space shall be maintained from the ground level. Climbing space, measured from center line of pole, shall be provided on one side or in one quadrant of all poles or structures with dimensions as specified...

The climbing space on Pole 343101M was obstructed at the public level by a thorny bush.

LADWP Response:

As of February 27, 2024, LADWP performed an inspection of Pole 343101M located at 10534 Penrose Street. Vegetation was trimmed back to provide climbing space from ground level.

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).

A 6-inch section of ground wire attached to the surface of Pole number 254202M was not covered at the communications level.

LADWP Response:

Pole number 254202M does not have a ground wire on it. The actual pole with the damaged ground wire/molding is Pole 254204M, for which, as of January 11, 2024, work has been completed to address all allegations related to this facility.

GO 128, Rule 34.3-B, Guarding Live Parts, states in part:

Pad-mounted equipment that contains exposed live parts shall be installed to resist the passing of a wire the equivalent of a bare number 18 AWG from the outside between the pad and the housing of the equipment, into the compartment which contains live parts when it is closed.

On the outside enclosure of Padmount 1432269, there was a gap between the enclosure and the ground near the access door.

LADWP Response:

As of January 2, 2024, a work order has been submitted for Padmount 1432269 to address the gap between the enclosure and the ground near the access door as priority level 3, as defined in LADWP's IMP. Consistent with the criteria and timeframes established in LADWP's IMP and GO 95, Rule 18-B, LADWP anticipates that this allegation will be fully addressed within 60 calendar months.

If you have any questions or need additional information, please contact me at (213) 367-4631 or Rockeish Mckenzie at (213) 367-4341.

Sincerely,

Bassam Abou-Chakra
Chief Compliance Officer
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