

January 15, 2025

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 Palms Distribution District

In response to your letter dated December 10, 2024, which alleged violations of General Orders (GOs) at the Los Angeles Department of Water and Power (LADWP) Palms District audit during November 18 through 22, 2024 (Audit), without admitting such violations, LADWP worked diligently to address all specific alleged infractions. Furthermore, a response to the CPUC's records review allegations is provided.

## **I. Records Review**

During the audit, CPUC staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Pole load calculations
- Intrusive test records
- Safety hazard notifications
- LADWP's documented inspection program.
- Vegetation Management Records

## **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 records indicated that from January 2021 through August 2024, LADWP completed 26,054 overhead detailed inspections and 18,923 overhead patrol inspections past LADWP's scheduled 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's records indicated that from January 2021 through August 2024, LADWP completed 1421 underground inspections and 6579 underground patrol inspections past LADWP's scheduled 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 January 2021 to August 2024, LADWP completed 406 overhead work orders past LADWP's due date for corrective action. Additionally, as of the date of the audit, LADWP had 6104 open overhead work orders that were past LADWP's scheduled 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 January 2021 to August 2024, LADWP completed 34 underground work orders past LADWP’s due date for corrective action. Additionally, as of the date of the audit, LADWP had 847 open underground work orders that were past LADWP’s scheduled due date for corrective action.

**LADWP Response:**

In response to the above, LADWP highlights that the per Sultan Tipu’s latest email dated 11/1/2024, for the Audit, CPUC requested and reviewed records from January 2022 to August 2024 rather than the January 2021 to August 2024 dates indicated by CPUC in the allege allegations. Based on the records reviewed during the Audit, 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.

**III. Field Inspection**

CPUC inspected the following facilities during the field inspection portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	363930M	Pole	East Hollywood
2	324232M	Pole	East Hollywood
3	41428G	Pole	East Hollywood
4	769197H	Pole	East Hollywood
5	436942M	Pole	East Hollywood
6	9001677MO	Pole	East Hollywood
7	437213M	Pole	East Hollywood
8	324234M	Pole	East Hollywood
9	434452M	Pole	East Hollywood
10	434970M	Pole	East Hollywood
11	324233M	Pole	East Hollywood
12	407588M	Pole	East Hollywood
13	419313M	Pole	East Hollywood
14	6585M	Pole	East Hollywood
15	6586M	Pole	East Hollywood
16	433381M	Pole	East Hollywood
17	392542M	Pole	East Hollywood
18	06590M	Pole	East Hollywood
19	6591M	Pole	East Hollywood
20	461781M	Pole	East Hollywood

21	461780M	Pole	East Hollywood
22	461783M	Pole	East Hollywood
23	36626M	Pole	East Hollywood
24	461782M	Pole	East Hollywood
25	6582M	Pole	East Hollywood
26	6581M	Pole	East Hollywood
27	366674M	Pole	East Hollywood
28	366675M	Pole	East Hollywood
29	366676M	Pole	East Hollywood
30	6578M	Pole	East Hollywood
31	386466M	Pole	Hancock Park
32	337589M	Pole	Hancock Park
33	280004M	Pole	Hancock Park
34	386467M	Pole	Hancock Park
35	154353M	Pole	Hancock Park
36	735346H	Pole	Hancock Park
37	569801H	Pole	Hancock Park
38	121592M	Pole	Hancock Park
39	121591M	Pole	Hancock Park
40	154352M	Pole	Hancock Park
41	531683M	Pole	Arlington Heights
42	528683M	Pole	Arlington Heights
43	24460M	Pole	Arlington Heights
44	43382M	Pole	Arlington Heights
45	255464M	Pole	Arlington Heights
46	321672M	Pole	Arlington Heights
47	527737M	Pole	Arlington Heights
48	166603M	Pole	Arlington Heights
49	166602M	Pole	Arlington Heights
50	166601M	Pole	Arlington Heights
51	58570M	Pole	Hollywood
52	371916M	Pole	Hollywood
53	372604M	Pole	Hollywood
54	371917M	Pole	Hollywood
55	381631M	Pole	Hollywood
56	371915M	Pole	Hollywood
57	236810M	Pole	Hollywood

58	90019M	Pole	Hollywood
59	90018M	Pole	Hollywood
60	90017M	Pole	Hollywood
61	58978M	Pole	Hollywood Hills
62	71798H	Pole	Hollywood Hills
63	53868M	Pole	Hollywood Hills
64	348666M	Pole	Hollywood Hills
65	58947M	Pole	Hollywood Hills
66	58946M	Pole	Hollywood Hills
67	384119M	Pole	Hollywood Hills
68	482230H	Pole	Hollywood Hills
69	419245M	Pole	Hollywood Hills
70	555323H	Pole	Hollywood Hills
71	43201M	Pole	Pico Union
72	54007M	Pole	Pico Union
73	54008M	Pole	Pico Union
74	54009M	Pole	Pico Union
75	54010M	Pole	Pico Union
76	54004M	Pole	Pico Union
77	54006M	Pole	Pico Union
78	829434H	Pole	Pico Union
79	360505M	Pole	Pico Union
80	43202M	Pole	Pico Union
81	391042M	Pole	USC
82	401763M	Pole	USC
83	482754H	Pole	USC
84	434949M	Pole	USC
85	434948M	Pole	USC
86	434947M	Pole	USC
87	399878M	Pole	USC
88	111129M	Pole	USC
89	532543M	Pole	USC
90	406821M	Pole	USC
91	127928M	Pole	Mid-City
92	127929M	Pole	Mid-City
93	275175M	Pole	Mid-City
94	275174M	Pole	Mid-City

95	270963M	Pole	Mid-City
96	270962M	Pole	Mid-City
97	407802M	Pole	Mid-City
98	407795M	Pole	Mid-City
99	138206M	Pole	Mid-City
100	768214H	Pole	Mid-City
101	382560M	Pole	Country Club Park
102	416365M	Pole	Country Club Park
103	376434M	Pole	Country Club Park
104	405113M	Pole	Oxford Square
105	591285H	Pole	Oxford Square
106	255496M	Pole	Oxford Square
107	283461M	Pole	Oxford Square
108	283462M	Pole	Oxford Square
109	283463M	Pole	Oxford Square
110	421577M	Pole	Oxford Square
111	1201409	Padmount Transformer	1200 W. Jefferson Bl, USC
112	1549856	Padmount Transformer	1023 MLK Bl, USC
113	1394683	Padmount Transformer	101 MLK Bl, Exposition Park
114	1497981	Vault	3986 Bill Robertson Ln
115	1497973	Handhole	3968 Bill Robertson Ln
116	1485184	Padmount	3970 Bill Robertson Ln
117	1497965	Vault	3970 Bill Robertson Ln
118	1498757	Padmount Transformer	4004 S. Vermont Square
119	1498740	Padmount Transformer	400 S. Vermont Ave
120	1508019	Padmount Transformer	3925 Vermont Ave

#### IV. Field Inspection – Violations List

CPUC staff observed the below violations during the field inspections portion of the audit.

#### LADWP Response:

LADWP is fully committed to addressing any issues identified in the field. As such, LADWP worked diligently to address all CPUC allegations under “IV. Field Inspection – Violations List”. 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 the following poles required maintenance:

- Pole 06590M: a primary crossarm was damaged.
- Pole 54006M: the pole tag was damaged or not legible.

The visibility strips attached to each of the following poles were missing or damaged:

- 58570M
- 90018M
- 54010M
- 371916M
- 90017M
- 54004M
- 372604M
- 555323H
- 54006M
- 371915M
- 43201M
- 829434H
- 236810M
- 90019M
- 54007M
- 360505M

The ground moulding on each of the following poles was damaged:

- 366676M
- 434949M
- 127929M
- 283462M

### **LADWP Response:**

As of January 3, 2025, work has been completed to address all allegations related to the following facilities listed above:

- Pole 06590M
- Pole 54006M
- Pole 58570M: Pole 58570M was misreported as a visibility strip infraction. Pole 58570M had all required visibility strips in proper condition and was a work order verification.
- Pole 90018M
- Pole 54010M

- Pole 371916M
- Pole 90017M
- Pole 54004M
- Pole 372604M
- Pole 555323H
- Pole 54006M
- Pole 371915M
- Pole 43201M
- Pole 829434H
- Pole 236810M
- Pole 90019M
- Pole 54007M
- Pole 360505M
- Pole 366676M
- Pole 434949M
- Pole 127929M
- Pole 283462M

**GO 95, Rule 56.2, Uses (Guy 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.*

LADWP down guy wire attached to the pole 436924M was not taut.

**LADWP Response:**

As of January 3, 2025, work has been completed to address all allegations related to the following facilities listed above:

- Pole 436924M

**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 attached to each of the following LADWP poles were damaged or missing:

- 41428G
- 371916M
- 54007M



- 324234M
- 372604M
- 54010M
- 324233M
- 371917M
- 54006M
- 280004M
- 371915M
- 43202M
- 735346H
- 569801H
- 121592M
- 121591M
- 283461M
- 90019M
- 90018M
- 90017M
- 43201M
- 382560M
- 111129M
- 275175M
- 275174M

**LADWP Response:**

As of January 3, 2025, work has been completed to address all allegations related to the following facilities listed above:

- Pole 41428G
- Pole 371916M
- Pole 54007M
- Pole 324234M
- Pole 372604M
- Pole 54010M
- Pole 324233M
- Pole 371917M
- Pole 54006M
- Pole 280004M
- Pole 371915M
- Pole 43202M
- Pole 735346H
- Pole 569801H
- Pole 121592M
- Pole 121591M
- Pole 283461M
- Pole 90019M
- Pole 90018M

- Pole 90017M
- Pole 43201M
- Pole 382560M
- Pole 111129M
- Pole 275175M
- Pole 275174M

**GO 95, Rule 84.7-A, Climbing Space**, states in part:

*Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c, 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.*

The climbing space on each of the following poles was obstructed by vegetation:

- 6585M
- 121591M
- 283461M

**LADWP Response:**

As of December 22, 2024, work has been completed to address all allegations related to the following facilities listed above:

- Pole 6585M
- Pole 121591M
- Pole 283461M

**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.*

Padmounted transformer 1394683 had corrosion on the front and back of the padmount cover.

**LADWP Response:**

As of December 4, 2024, padmounted transformer 1394683 had corrosion on the front and back of the padmount cover repaired.

If you have any questions or need additional information, please contact me at (213) 367-0787 or Andrew Ta at (213) 367-8654.

Sincerely,

Silvia Lozano  
Chief Compliance Officer  
Los Angeles Department of Water and Power

cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjetsli, Program Manager, ESRB, CPUC  
Sultan Tipu, Utilities Engineer, ESRB, CPUC  
Andrew Ta, LADWP  
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