

August 19, 2024

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 Fadi Daye:

Subject: Transmission Audit of LADWP's Northridge Metro District

In your letter dated July 19, 2024, the Los Angeles Department of Water and Power (LADWP) was requested to advise you of actions taken to address alleged violations of General Order (GO) 95 identified during the transmission audit of LADWP's Northridge Metro District from June 17, 2024, to June 21, 2024. Without admitting such violations, LADWP confirms that the alleged infractions have been addressed.

California Public Utilities Commission (CPUC) Findings

III. Field Inspection – Violations List

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.

The following LADWP transmission facilities required maintenance:

- Tower 77/3 (Circuit: Adelanto / Rinaldi L1) – the top edge of a concrete support footing was damaged.
- Tower 219 – there was a bent structural member near one of the tower footings.

- Tower M29/T6 (Circuit: Castaic / Northridge L1, Sylmar / Northridge L1) – there was a bent structural member near one of the tower footings.
- Tower 320 – there was a bent structural member near one of the tower footings.

LADWP Response

LADWP has determined that the alleged violation for Tower 77/3 is not detrimental to the footer, tower, or safety and is still maintained in accordance with GO 95 Rule 31.1. The alleged violation on Tower 77/3 was a small piece of concrete chipped off of the surface of the footer and did not permeate the overall foundation of the structure. Additionally, LADWP conducts annual inspections of its structures. If LADWP notices any degradation to the tower, LADWP will remedy the issue. As of July 24, 2024, work is in progress to address the alleged violations for Towers 219, M29/T6, and 320. Additionally, the members of the towers are redundant members and are not essential to the structural integrity of the tower.

GO 95, Rule 61.6, Marking, states in part:

All towers shall be equipped with signs designed to warn the public of the danger of climbing same. Additionally, such signs shall include a graphic depiction of the dangers of falling or electrocution associated with climbing the towers. Such signs shall be placed and arranged so that they may be read from the four corners of the tower.

Warning signs attached to each of the following LADWP transmission towers could not be read from all four corners of the tower:

- Tower 214
- Tower 459
- Tower 213
- Tower 218
- Tower 464
- Tower 463
- Tower 217
- Tower 465
- Tower 466
- Tower 220
- Tower 227

LADWP Response

As of July 24, 2024, work is in progress to address the alleged violations as listed above. LADWP aims to address the alleged violations by September 1, 2024.

GO 95, Rule 61.6-B, Guarding, states in part:

Where a tower of a design which can be easily climbed supports supply conductors and is located in urban districts, or in rural areas adjacent to schools, dwellings, permanent or seasonal camps, or in orchards, or near roads or trails which are frequently traveled, a suitable barrier shall be installed on or around such towers, or other provisions shall be made to prevent easy climbing.

Tower 321, located in a plant nursery, did not have a barrier to prevent climbing.

LADWP Response

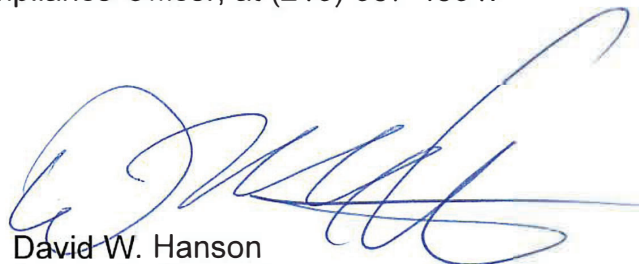
Tower 321 is in a fenced area leased to a private entity with private access that is locked when the business is closed. This does not allow for public access, so the tower has a suitable barrier within the fenced area. When the nursery is open for business, nursery personnel are present to monitor any unpermitted access to Tower 321.

If you have any questions or need additional information, please contact Mr. Bassam R. Abou-Chakra, LADWP Chief Compliance Officer, at (213) 367-4631.

Sincerely,

Bassam R. Abou-Chakra
Digitally signed by Bassam R. Abou-Chakra
Date: 2024.08.19 13:19:07 -07'00'

Bassam R. Abou-Chakra
Chief Compliance Officer



David W. Hanson
Senior Assistant General Manager – Power System

BRAC:so/ps

c: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Kyle King, Utilities Engineer, ESRB, SED, CPUC