

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



July 29, 2013

CPUCID: EA2013-009

David Siewert
Transmission and Distribution District Supervisor
Los Angeles Department of Water and Power (LADWP)
City of Los Angeles
P.O. Box 51111
Los Angeles, CA 90051-5700

SUBJECT: Electric Audit of LADWP's Wilmington District

Dear Mr. Siewert:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Derek Fong and Zelalem Ewnetu of my staff conducted an audit of LADWP's Wilmington District from July 8, 2013 to July 12, 2013. The audit included a review of LADWP's records and field inspections of LADWP's facilities.

During the audit, we identified violations of General Orders 95 and 165. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than September 6, 2013, by electronic or hard copy, of all corrective measures taken by LADWP to remedy and prevent such violations.

If you have any questions, you can contact Derek Fong at (213) 576-6850 or derek.fong@cpuc.ca.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Raymond Fugere".

Raymond Fugere, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Audit Summary

AUDIT SUMMARY

| | | |
|---|---------------------------------|---------------------|
| 1. | Location: | Wilmington District |
| | Date of CPUC Inspection: | 7/8/2013 |
| Explanation of Violation(s): | | |
| <u>Late Work Orders</u> | | |
| <p>GO 165, Section IV, Standards for Inspection, Record-keeping, and Reporting, States in part:</p> <p style="text-align: center;"><i>For all inspections, within a reasonable period, company records shall specify the circuit, area, or equipment inspected, the name of the inspector, the date of the inspection, and any problems identified during each inspection, as well as the scheduled date of corrective action.</i></p> <p>Your records indicated that from 2012 – 2013, there were three late Priority 1 underground work orders (padmounted structures included) and seven late Priority 1 overhead work orders.</p> | | |

The following violations were not documented and/or addressed by LADWP during its last detailed inspection as required by General Order 165:

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|---|--------------------------------------|-----------------|
| 2. | Location: | Pole No. 57775M |
| | Previous LADWP Visit Details: | 09/12/2012 |
| | Date of CPUC Inspection: | n/a |
| Explanation of Violation(s): | | |
| <p><u>Pole Replacement Incorrectly Prioritized</u></p> <p>GO 95, Rule 18-A2a, Resolution of Safety Hazards and GO 95 Nonconformances, States in part:</p> <p style="text-align: center;"><i>All companies must include a timeline for corrective actions to be taken following the identification of a Safety Hazard or nonconformances with General Order 95 on the company's facilities. The auditable maintenance program shall prioritize corrective actions consistent with the priority levels set forth below and based on the following factors.</i></p> <p>Pole No. 57775M was intrusively tested on September 12, 2012, and found to have a remaining strength of 25% (which would produce a Priority 1 work order for pole replacement, as per LADWP procedures). LADWP incorrectly created a Priority 2 work order for pole replacement.</p> | | |

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| 3. | Location: | Pole No. 293342M |
| | Previous LADWP Visit Details: | 12/14/2012 |
| | Date of CPUC Inspection: | 7/9/2013 |
| Explanation of Violation(s): | | |
| <p data-bbox="240 537 1027 573"><u>Communication Cable in the Climbing Space</u></p> <p data-bbox="240 615 1227 688">GO 95, Rule 18-A1c, Resolution of Safety Hazards and GO 95 Nonconformances, States:</p> <p data-bbox="375 730 1422 919"><i>Where a communications company's or an electric utility' actions result in GO nonconformances for another entity, that entity's remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.</i></p> <p data-bbox="240 961 1471 1077">A communication cable was obstructing the climbing space. LADWP did not notify the communications company of this GO nonconformance when it last inspected the pole.</p> | | |

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|---|--------------------------------------|------------------|
| 4. | Location: | Pole No. 394755M |
| | Previous LADWP Visit Details: | 12/6/2012 |
| | Date of CPUC Inspection: | 7/9/2013 |
| Explanation of Violation(s): | | |
| <p data-bbox="245 1476 678 1512"><u>Span Guy Wire Not Taut</u></p> <p data-bbox="245 1554 776 1589">GO 95, Rule 56.2, States in part:</p> <p data-bbox="380 1631 1536 1736"><i>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.</i></p> <p data-bbox="245 1778 1523 1858">A span guy wire was not taut. This violation was not documented when LADWP last inspected the pole.</p> | | |