

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 28, 2022

EA2022-981

Thomas Wilke  
Manager of Electric Distribution  
Burbank Water and Power  
164 W. Magnolia Blvd  
Burbank, CA 91502

Subject: Audit of Burbank Water and Power

Mr. Wilke:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Stacey Ocampo of my staff conducted an electric distribution audit of Burbank Water and Power (BWP) service territory from September 19, 2022 to September 23, 2022. The audit included a review of BWP's inspection and maintenance records and a field inspection of BWP's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than December 28, 2022, by electronic or hard copy, of all corrective measures taken by BWP to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Stacey Ocampo at (213) 266-4712 or [Stacey.Ocampo@cpuc.ca.gov](mailto:Stacey.Ocampo@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, ESRB, SED, CPUC  
Majed Ibrahim, Senior Utilities Engineer, ESRB, SED, CPUC  
Stacey Ocampo, Utilities Engineer, ESRB, SED, CPUC

## Audit Findings

### I. Records Review

During the audit, my 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
- BWP's documented inspection program.
- Vegetation Management Records

### II. Records Review – Violations List

We observed the following violations during the records review portion of the audit.

**GO 165, Section III-C, Record Keeping**, states in part:

*For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.*

BWP does not have formal repair work order records associated with its inspections. BWP's inspectors and maintenance crews communicate informally, e.g. via e-mail, to resolve discovered issues. The communications that take the place of formal work order records do not always contain a scheduled date of corrective action, as required by the above rule.

**GO95, Rule 18-A2a, Resolution of Safety Hazards and General Order 95 Nonconformances**, states in part:

*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.*

BWP has priority levels in its inspection manual for issues discovered during inspections, however, BWP does not consistently document and track timeline for corrective action based on its priority system.

## II. Field Inspection

My staff inspected the following facilities during the field inspection portion of the audit:

<b>No.</b>	<b>Structure ID</b>	<b>Type of Structure</b>	<b>City</b>
1	21707B	Pole	Burbank
2	30210B	Pole	Burbank
3	21708B	Pole	Burbank
4	21709B	Pole	Burbank
5	21710B	Pole	Burbank
6	21711B	Pole	Burbank
7	21712B	Pole	Burbank
8	23217B	Pole	Burbank
9	30209B	Pole	Burbank
10	30208B	Pole	Burbank
11	30207B	Pole	Burbank
12	25007B	Pole	Burbank
13	25006B	Pole	Burbank
14	30673B	Pole	Burbank
15	30206B	Pole	Burbank
16	30205B	Pole	Burbank
17	30204B	Pole	Burbank
18	30203B	Pole	Burbank
19	30201B	Pole	Burbank
20	30477B	Pole	Burbank
21	31340B	Pole	Burbank
22	31299B	Pole	Burbank
23	31339B	Pole	Burbank
24	31338B	Pole	Burbank
25	31297B	Pole	Burbank
26	31490B	Pole	Burbank
27	31337B	Pole	Burbank
28	31298B	Pole	Burbank
29	18053B	Pole	Burbank
30	31336B	Pole	Burbank
31	31335B	Pole	Burbank
32	27781B	Pole	Burbank
33	23034B	Pole	Burbank
34	27783B	Pole	Burbank
35	30726B	Pole	Burbank
36	27786B	Pole	Burbank
37	27785B	Pole	Burbank
38	27784B	Pole	Burbank
39	31399B	Pole	Burbank

40	30778B	Pole	Burbank
41	30780B	Pole	Burbank
42	496375H	Pole	Burbank
43	20839B	Pole	Burbank
44	27882B	Pole	Burbank
45	31117B	Pole	Burbank
46	31398B	Pole	Burbank
47	30473B	Pole	Burbank
48	30836B	Pole	Burbank
49	521242H	Pole	Burbank
50	521244H	Pole	Burbank
51	31569B	Pole	Burbank
52	19811B	Pole	Burbank
53	28174B	Pole	Burbank
54	31510B	Pole	Burbank
55	31511B	Pole	Burbank
56	31507B	Pole	Burbank
57	31506B	Pole	Burbank
58	31505B	Pole	Burbank
59	31509B	Pole	Burbank
60	31508B	Pole	Burbank
61	31512B	Pole	Burbank
62	31513B	Pole	Burbank
63	31519B	Pole	Burbank
64	30438B	Pole	Burbank
65	31520B	Pole	Burbank
66	31525B	Pole	Burbank
67	31532B	Pole	Burbank
68	31533B	Pole	Burbank
69	31534B	Pole	Burbank
70	31535B	Pole	Burbank
71	20408B	Pole	Burbank
72	20402B	Pole	Burbank
73	31962B	Pole	Burbank
74	29852B	Pole	Burbank
75	29851B	Pole	Burbank
76	29850B	Pole	Burbank
77	29849B	Pole	Burbank
78	29848B	Pole	Burbank
79	29847B	Pole	Burbank
80	29846B	Pole	Burbank
81	29845B	Pole	Burbank
82	29468B	Pole	Burbank
83	29844B	Pole	Burbank
84	29843B	Pole	Burbank

85	29842B	Pole	Burbank
86	29841B	Pole	Burbank
87	29840B	Pole	Burbank
88	29839B	Pole	Burbank
89	29838B	Pole	Burbank
90	29837B	Pole	Burbank
91	29836B	Pole	Burbank
92	29861B	Pole	Burbank
93	29862B	Pole	Burbank
94	29863B	Pole	Burbank
95	29864B	Pole	Burbank
96	29865B	Pole	Burbank
97	29866B	Pole	Burbank
98	29867B	Pole	Burbank
99	29868B	Pole	Burbank
100	29869B	Pole	Burbank
101	31503B	Pole	Burbank
102	31327B	Pole	Burbank
103	31262B	Pole	Burbank
104	31256B	Pole	Burbank
105	27064B	Pole	Burbank
106	27063B	Pole	Burbank
107	27062B	Pole	Burbank
108	28965B	Pole	Burbank
109	28966B	Pole	Burbank
110	28967B	Pole	Burbank
111	28968B	Pole	Burbank
112	28969B	Pole	Burbank
113	28970B	Pole	Burbank
114	28009B	Pole	Burbank
115	28971B	Pole	Burbank
116	25176B	Pole	Burbank
117	25275B	Pole	Burbank
118	24349B	Pole	Burbank
119	30463B	Pole	Burbank
120	13699B	Pole	Burbank
121	30468B	Pole	Burbank
122	24350B	Pole	Burbank
123	431	Pull Box	Burbank
124	432	Pull Box	Burbank
125	V5	Vault	Burbank
126	3154 N Lamer St	Pull Box	Burbank
127	PMS-8	Pad-mounted Switch	Burbank
128	P-1232	Pad-mounted Transformer	Burbank
129	P-1072	Pad-mounted Transformer	Burbank

130	P-1224	Pad-mounted Transformer	Burbank
131	P-445	Pad-mounted Transformer	Burbank
132	P-1079	Pad-mounted Transformer	Burbank
133	PED 3	Pedestal	Burbank
134	PMS-141	Pad-mounted Switch	Burbank
135	PMS-84	Pad-mounted Switch	Burbank
136	31029B	Pole	Burbank

### III. Field Inspection – Violations List

My staff observed the following violations during the field inspections portion of the audit:

**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.*

BWP facilities on the following poles required maintenance:

- 21707B: the visibility strip was damaged.
- 31532B: the visibility strip was missing.

Insulators on the following BWP poles were “sunken”:

- 496375H
- 521244H

The “eye” of the BWP down guy anchor attached the following poles was buried:

- 20839B
- 30836B

**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 moulding attached to each of the following poles was damaged:

- 521242H
- 29865B

**General Order 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19** requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be 3 inches.

- The span guy wire on Pole 31506B was contacting a communication conductor attached to the same pole.
- The down guy wire on Pole 31256B was contacting a communication conductor attached to the same pole.

**GO 95, Rule 34, Foreign Attachments**, states in part:

*Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*

An unauthorized “24 Hour Video Surveillance” sign was attached to Pole 27882B.

**GO 95, Rule 51.6, 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 on each of the following BWP poles were either missing or damaged:

- 30477B
- 23034B
- 496375H
- 521244H
- 19811B
- 27064B
- 27063B
- 27062B
- 25176B
- 13699B

**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 P-445 was leaking fluid.
- Padmounted transformer P-1079 was leaking fluid.