

June 27, 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 Wilmington Distribution District

In response to your letter dated May 30, 2025, regarding alleged violations of General Orders (GOs) at the Los Angeles Department of Water and Power's (LADWP) Wilmington District during April 21 through 25, 2025, LADWP respectfully submits the following information. While not admitting to the violations as alleged, LADWP has worked diligently to address each cited infraction and offers the following responses to both the records review and field inspection findings.

## II. Records Review – Violations List

**GO 165, Section III-B, Distribution Facilities, 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 to conform with these rules.*

From January 2022 to December 2024, LADWP recorded 16,249 overhead patrol inspections and 14,350 overhead detailed inspections that were completed or pending completion past LADWP's assigned due date.

**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.*

During the same period, LADWP documented 1,578 underground patrol inspections and 160 underground detailed inspections that were completed or pending beyond LADWP's assigned 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.*

During the same period, LADWP records indicated 293 overhead work orders that were completed, not completed, or cancelled after LADWP's scheduled due dates.

**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.*

Additionally, 57 underground work orders were either completed, pending completion, or cancelled after LADWP's assigned due dates.

**LADWP Response:**

LADWP has identified these overdue inspections and corrective work orders as a high priority in alignment with its Inspection and Maintenance Program. The Department has accelerated its efforts to address these issues, with marked improvements in meeting inspection targets in the most recent fiscal year.

#### **IV. Field Inspection – Violations List**

LADWP remains fully committed to ensuring the safety, reliability, and compliance of its electric infrastructure. As such, LADWP worked diligently to address all CPUC allegations under “IV. Field Inspection – Violations List”. All CPUC-identified issues have been addressed as detailed below.

#### **GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states:**

*(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such safety hazard(s) no later than 10 business days after the discovery.*

The following safety hazards were not documented and reported to the third-party responsible:

- Pole 390848M – The third-party transfer of facilities from the preexisting “Buddy Pole” with a severely deteriorated base was not completed.
- Pole 390850M – A third-party riser and riser covering on the pole was detached from the surface of the pole at the public level.
- Pole 390850M – The third-party transfer of facilities from the 4-foot section of the preexisting “Buddy Pole” attached at the communication level was not completed.

#### **LADWP Response:**

As of April 23, 2025, a third-party report of the communication asset infraction has been generated and sent to the associated communication utility in order to address all allegations related to the following facilities listed above:

- 390848M
- 390850M

#### **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 abrasion 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). Scuffing or polishing of the insulation or covering is not considered abrasion.*

A service drop supported on Pole 390847M was strained and deflected by a tree located at 16618 South Hoover Street.

**LADWP Response:**

As of May 6, 2025, corrective work at Pole 390847M has been completed.

**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" signage on each of the following LADWP poles was either damaged or missing:

- Pole 381437M – The "HIGH VOLTAGE" signage on the pole was missing.
- Pole 123002M – The "VOLTAGE" of the signage on the pole was missing.
- Pole 57984M - The "HIGH VOLTAGE" signage on the pole was missing.
- Pole 175475M - The "HIGH VOLTAGE" signage on the pole was missing.
- Pole 364599M - The "HIGH VOLTAGE" signage on the pole was missing.
- Pole 343443M – The "HIGH" of the signage on the pole was missing.
- Pole 390846M - The "HIGH VOLTAGE" signage on the pole was illegible.
- Pole 390847M - The "HIGH VOLTAGE" signage on the pole was illegible.
- Pole 103578M - The "HIGH VOLTAGE" signage on the pole was illegible.
- Pole 103577M - The "HIGH VOLTAGE" signage on the pole was illegible.
- Pole 214600M - The "HIGH VOLTAGE" signage on the pole was illegible.

**LADWP Response:**

As of May 1, 2025, signage at all poles listed below has been repaired or replaced to address deficiency allegations:

- 381437M
- 123002M
- 57984M
- 175475M
- 364599M
- 343443M
- 390846M

- 390847M
- 103578M
- 103577M
- 214600M

**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 following poles had damaged ground molding:

- Pole 381437M– A 2-foot section of ground molding at ground level was damaged, exposing the ground wire.
- Pole 417205H – Sections of ground molding at the base and at 10-feet aboveground were missing, exposing the ground wire.

**LADWP Response:**

As of May 1, 2025, all work has been completed to address deficiency allegations related to the following facilities listed below:

- 381437M
- 417205H

**General Order 95, Rule 54.8, Service Drops, 0 – 750 Volts, Table 10: Minimum Allowable Clearance of Service Drops of 0-750 Volts from Buildings** requires the minimum clearance between “Insulated Conductors (Rule 20.9-G) 0-750 Volts” and “All portions of building including metallic or non-metallic cornice, decorative appendage, eaves, roof or parapet wall of the building served” to be 0.5 inches.

A service drop supported on Pole 321986M was touching the roof of the serviced residential building at 16708 S. Denver Ave.

**LADWP Response:**

As of May 1, 2025, all work has been completed to address deficiency allegations related to Pole 321986M.

**GO 95, Rule 56.2, Use**, 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.*

Mr. Fadi Daye  
Page 6  
June 27, 2025

The down guy wire supporting Pole 531286M was slack and not maintained taut.

**LADWP Response:**

As of May 1, 2025, all work has been completed to address deficiency allegations related to Pole 531286M.

If you have any questions or need additional information, please contact Arash Saidi (213) 367-4886 or Silvia Lozano at (213) 367-0787.

Sincerely,

A handwritten signature in cursive script that reads "Joanne Martin".

Joanne Martin  
Chief Risk & Compliance Officer  
Los Angeles Department of Water and Power

c: Mr. Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Mr. Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC  
Mr. Eric Wu, Program Manager, Safety and Enforcement Division, CPUC  
Mr. Jordi Burbano, LADWP