

September 2, 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 Central Distribution District

In response to your letter dated July 31, 2025, regarding alleged violations of General Orders (GOs) at the Los Angeles Department of Water and Power's (LADWP) Central District during June 2 through 6, 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 11,397 overhead patrol inspections and 44,610 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 10,501 underground patrol inspections and 8,300 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 25,526 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, 2,252 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. Regarding inspections, as of January 1st, 2025, LADWP has successfully completed all outstanding inspections. Regarding work orders, LADWP is currently working to streamline its recordkeeping processes to ensure

that work orders are completed more efficiently and thus decrease the total number of late work orders.

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 106480M – A third-party down guy wire supporting the communication level of the pole was not maintained taut.
- Pole 378272M – A third-party down guy wire was detached from the anchor and wrapped around the pole at the public level.

LADWP Response:

As of June 4, 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 Pole 106480M.

LADWP inspected Pole 378272M and did not observe any infractions. However, the surrounding poles were also inspected, and LADWP identified Pole 308089M, across the street from Pole 378272M, and observed a damaged down guy wire and a severed anchor at ground level. As of June 11, 2025, corrective work on Pole 308089M was completed.

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.

The overhead facilities on the following poles required maintenance:

- Pole 106480M – A pole step supported at the public level of the pole was bent and rotated.
- Pole 370187M – A 5-inch riser supported on the pole was damaged, exposing the contained insulated conductor near the base of the pole.

LADWP Response:

As of June 11, 2025, corrective work at Poles 106480M and 370187M 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 missing:

- Pole 379512M
- Pole 305407M

LADWP Response:

As of June 11, 2025, corrective work at Poles 379512M and 305407M has been completed to address deficiency allegations.

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 57988M – A 3-foot section of ground molding at 15 feet above the ground level was damaged, exposing the ground wire.
- Pole 367901M – A 4-foot section of ground molding from ground level was missing, exposing the ground wire.

LADWP Response:

The deficiency allegation related to Pole 367901M was repaired on-site with no further action needed. As of June 11, 2025, all work has been completed to address the deficiency allegation related to Pole 57988M.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 19 requires the radial clearance between “0-750 Volts (Including Service Drops) and Trolley Feeders” and “Guys and span wires passing conductors supported on the same poles” to have a minimum clearance of 3 inches.

A down guy wire supporting the primary supply level of Pole 219665M was contacting an electric service drop tap supported on a lower crossarm of the same pole.

LADWP Response:

As of June 11, 2025, all work has been completed to address deficiency allegations related to Pole 219665M.

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.

The down guy wire supporting the primary supply level of Pole 430814M was not taut.

LADWP Response:

As of June 11, 2025, all work has been completed to address deficiency allegations related to Pole 430814M.

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.

The following padmounted transformers had oil seepage surrounding the base and pad:

- Padmount 1490317
- Padmount 1490341

LADWP Response:

As of July 9, 2025, all work has been completed to address deficiency allegations related to Padmounts 1490317 and 1490341.

Mr. Fadi Daye
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If you have any questions or need additional information, please contact me at (213) 367-4886 or Jordi Burbano at (213) 367-0343.

Sincerely,

Arash Saidi


David Hanson (Sep 10, 2025 10:14:52 PDT)

Arash Saidi
Director of Regulatory Compliance
Los Angeles Department of Water and Power

Cc: Mr. Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Mr. Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
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Mr. Jordi Burbano, LADWP