

May 23, 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 Los Angeles Department of Water and Power Northridge  
Distribution District

In response to your letter dated April 24, 2025, which alleged violations of General Orders (GOs) at the Los Angeles Department of Water and Power (LADWP) Northridge District during February 10 through 14, 2025, without admitting such violations, LADWP worked diligently to address all specific alleged infractions. Furthermore, a response to the CPUC's records review allegations is provided.

## **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 so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such a condition as not to create a hazard.*

LADWP's inspection records indicated that from January 2022 to October 2024, LADWP completed 57,433 overhead detailed inspections and 37,825 overhead patrol inspections past LADWP's scheduled due date.

**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 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.*

LADWP's records indicated that from January 2022 to October 2024, LADWP completed 12,655 underground inspections and 12,168 underground patrol inspections past LADWP's scheduled 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.*

LADWP's records indicated that from January 2022 to October 2024, LADWP completed 5,202 overhead work orders past LADWP's due date for corrective action.

**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.*

LADWP's records indicated that from January 2022 to October 2024, LADWP completed 170 underground work orders past LADWP's due date for corrective action.

**LADWP Response:**

In response to the above, LADWP has identified the overdue inspections as a high priority consistent with its Inspection and Maintenance Program and is continuing to perform the necessary inspections as quickly as possible, with substantial improvements in attaining inspection targets as of the latest fiscal year.

**IV. Field Inspection – Violations List**

LADWP is fully committed to addressing any issues identified in the field. As such, LADWP worked diligently to address all CPUC allegations under “IV. Field Inspection – Violations List”. Further detail is provided below.

**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.*

LADWP facilities on the following poles required maintenance:

- Pole 259608M – the eye of the down guy anchor was buried

The ground moulding supported on each of the following poles was damaged:

- 245833M
- 276740M
- 74220M

**LADWP Response:**

As of April 22, 2025, work has been completed to address all allegations related to the following facilities listed above:

- 259608M
- 245833M
- 276740M
- 74220M

**GO 95, Rule 84.7-A, Climbing Space**, states in part:

*Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c, 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.*

The climbing space on each of the following poles was obstructed or not maintained:

- 240448M
- 259608M

**LADWP Response:**

As of April 22, 2025, work has been completed to address all allegations related to the following facilities listed above: The alleged infraction for these poles were bent pole steps in the climbing space.

- 240448M
- 259608M

**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” signs attached to each of the following LADWP poles were damaged:

- 240448M
- 239025M
- GT202270
- 245833M

- 276737M
- 276740M
- 91740M
- 91741M
- 240000M

**LADWP Response:**

As of April 22, 2025, work has been completed to address all allegations related to the following facilities listed above:

- 240448M
- 239025M
- GT202270
- 245833M
- 276737M
- 276740M
- 91740M
- 91741M
- 240000M

**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 LADWP underground facilities required maintenance:

- Padmount transformer 1024561: vegetation obstructed the door from opening.

**LADWP Response:**

As of April 22, 2025, vegetation has been cleared away to allow access to padmount transformer 1024561.

Mr. Fadi Daye  
Page 6  
May 23, 2025

If you have any questions or need additional information, please contact me at (213) 367-0787 or Jordi Burbano at (213) 367-0343.

Sincerely,

*Silvia Lozano*

[Silvia Lozano \(May 27, 2025 17:34 PDT\)](#)

Silvia Lozano  
Chief Compliance Officer

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