

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 30, 2025

EA2025-1227

Jordi Burbano, P.E.
Electrical Engineering Associate
Regulatory Standards and Compliance Section
City of Los Angeles, Department of Water and Power (LADWP)
111 North Hope Street, Room 1246
Los Angeles, CA 90012

SUBJECT: Audit of LADWP's Wilmington District

Mr. Burbano:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Eric Ujiiye of my staff conducted an electric distribution audit of the LADWP Wilmington District from April 21-25, 2025. The audit included a review of the district's inspection and maintenance records and a field inspection of LADWP's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). Included with this letter is a copy of the audit findings that itemize the violations discovered during the audit. Please advise me no later than June 30, 2025, by electronic or hard copy, of all corrective measures taken by LADWP to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Eric Ujiiye at (213) 620-2598 or eric.ujiiye@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
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, ESRB

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Intrusive test records.
- LADWP's visual inspection program.
- ESRB's interview of LADWP inspectors.

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 165, Section III-B, 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.

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

GO 165, Section III-B, 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 inspection records indicated that from January 2022 to December 2024, LADWP had 1,578 underground patrol inspections and 160 underground detailed inspections that were completed or pending completion past LADWP's the 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.

LADWP's records indicated that from January 2022 to December 2024, LADWP had 293 overhead work orders that were completed, not completed, or cancelled after LADWP's assigned 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 December 2024, LADWP had 57 underground work orders that were completed, pending completion, or cancelled after LADWP's assigned due date for corrective action.

III. Field Inspection

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

No.	Structure ID.	Type of Structure	Location
1	534528M	Pole	San Pedro
2	280597M	Pole	San Pedro
3	727175H	Pole	San Pedro
4	531286M	Pole	San Pedro
5	532966M	Pole	San Pedro
6	381437M	Pole	San Pedro
7	173819M	Pole	San Pedro
8	123002M	Pole	San Pedro
9	526025H	Pole	San Pedro
10	526024H	Pole	San Pedro
11	57984M	Pole	San Pedro
12	307856M	Pole	San Pedro
13	307855M	Pole	San Pedro
14	307854M	Pole	San Pedro
15	307853M	Pole	San Pedro
16	387249M	Pole	San Pedro
17	302842M	Pole	Wilmington
18	351680M	Pole	Harbor City
19	444059M	Pole	Harbor City
20	444046M	Pole	Harbor City
21	366236M	Pole	Harbor City
22	366237M	Pole	Harbor City
23	365358M	Pole	Harbor City
24	175473M	Pole	Harbor City
25	175474M	Pole	Harbor City
26	175475M	Pole	Harbor City
27	443741H	Pole	Harbor City
28	364599M	Pole	Harbor City
29	522085H	Pole	Harbor City
30	533416M	Pole	Harbor City
31	417205H	Pole	Harbor City
32	178693M	Pole	Harbor City
33	374089M	Pole	Harbor City
34	379955M	Pole	Harbor City
35	31060M	Pole	Harbor City
36	283009M	Pole	Gardena
37	321991M	Pole	Gardena
38	321990M	Pole	Gardena
39	321989M	Pole	Gardena

40	321988M	Pole	Gardena
41	321987M	Pole	Gardena
42	321986M	Pole	Gardena
43	321985M	Pole	Gardena
44	334863M	Pole	Gardena
45	343421M	Pole	Gardena
46	343443M	Pole	Gardena
47	83488M	Pole	Gardena
48	221873M	Pole	Gardena
49	410865M	Pole	Gardena
50	410864M	Pole	Gardena
51	767742H	Pole	Gardena
52	390846M	Pole	Gardena
53	390847M	Pole	Gardena
54	390848M	Pole	Gardena
55	115077M	Pole	Gardena
56	390849M	Pole	Gardena
57	390850M	Pole	Gardena
58	314534M	Pole	Gardena
59	103578M	Pole	Gardena
60	103577M	Pole	Gardena
61	214600M	Pole	Gardena
62	365516M	Pole	Gardena
63	103575M	Pole	Gardena
64	100410M	Pole	Gardena
65	417681M	Pole	Gardena
66	39849M	Pole	Gardena
67	579973H	Pole	Gardena
68	1563998	Vault	San Pedro
69	1294156	Vault	San Pedro
70	1293364	Pull Box	San Pedro
71	1565963	Pad Mount Transformer	San Pedro
72	1483908	Pad Mount Transformer	San Pedro
73	1291103	Vault	San Pedro
74	1300763	Pull Box	San Pedro
75	1300748	Pad Mount Transformer	San Pedro
76	1301696	Pad Mount Transformer	San Pedro
77	1301720	Pad Mount Transformer	San Pedro
78	1300284	Pad Mount Transformer	San Pedro
79	1300334	Pad Mount Transformer	San Pedro

IV. Field Inspection – Violations List

We observed the following violations during the field inspections portion of the audit:

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.

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.

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.

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.

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.

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 Pole 531286M was slack and not maintained taut.