

PUBLIC UTILITIES COMMISSION

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July 31, 2025

EA2025-1228

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 the LADWP Central 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 Central District from June 2-6, 2025. The audit included a review of LADWP'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 September 1, 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: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

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 11,397 overhead patrol inspections and 44,610 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's inspection records indicated that from January 2022 to December 2024, LADWP had 10,501 underground patrol inspections and 8,300 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 25,526 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 2,252 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	428213M	Pole	Los Angeles
2	428212M	Pole	Los Angeles
3	366526M	Pole	Los Angeles
4	341248M	Pole	Los Angeles
5	57988M	Pole	Los Angeles
6	379512M	Pole	Los Angeles
7	57987M	Pole	Los Angeles
8	106480M	Pole	Los Angeles
9	1004883H	Pole	Los Angeles
10	305407M	Pole	Los Angeles
11	522558H	Pole	Los Angeles
12	53460M	Pole	Los Angeles
13	76198M	Pole	Los Angeles
14	272675M	Pole	Los Angeles
15	58844M	Pole	Los Angeles
16	58843M	Pole	Los Angeles
17	380486M	Pole	Los Angeles
18	380487M	Pole	Los Angeles
19	42608M	Pole	Los Angeles
20	78103M	Pole	Los Angeles
21	531803M	Pole	Los Angeles
22	86838H	Pole	Los Angeles
23	86839H	Pole	Los Angeles
24	86840H	Pole	Los Angeles
25	6123M	Pole	Los Angeles
26	6122M	Pole	Los Angeles
27	330615M	Pole	Los Angeles
28	6121M	Pole	Los Angeles
29	6120M	Pole	Los Angeles
30	6119M	Pole	Los Angeles
31	370187M	Pole	Los Angeles
32	427252M	Pole	Los Angeles
33	427251M	Pole	Los Angeles
34	427250M	Pole	Los Angeles
35	427248M	Pole	Los Angeles
36	473053M	Pole	Los Angeles
37	473054M	Pole	Los Angeles
38	378271M	Pole	Los Angeles
39	378272M	Pole	Los Angeles

40	189245M	Pole	Los Angeles
41	430814M	Pole	Los Angeles
42	486507H	Pole	Los Angeles
43	124855M	Pole	Los Angeles
44	614560H	Pole	Los Angeles
45	614561H	Pole	Los Angeles
46	614562H	Pole	Los Angeles
47	367901M	Pole	Los Angeles
48	800057H	Pole	Los Angeles
49	1022741H	Pole	Los Angeles
50	486514H	Pole	Los Angeles
51	309860M	Pole	Los Angeles
52	219665M	Pole	Los Angeles
53	531278M	Pole	Los Angeles
54	219602M	Pole	Los Angeles
55	531344M	Pole	Los Angeles
56	343438M	Pole	Los Angeles
57	219600M	Pole	Los Angeles
58	138099M	Pole	Los Angeles
59	407096M	Pole	Los Angeles
60	837255H	Pole	Los Angeles
61	1370915	Vault	Los Angeles
62	1458835	Vault	Los Angeles
63	1505312	Vault	Los Angeles
64	382646M	Pole	Los Angeles
65	1505296	Vault	Los Angeles
66	1496900	Pedestal	Los Angeles
67	1490317	Pedestal	Los Angeles
68	1490333	Vault	Los Angeles
69	1490341	Pedestal	Los Angeles
70	1494368	Vault	Los Angeles
71	1494350	Vault	Los Angeles
72	1453109	Vault	Los Angeles
73	1453091	Vault	Los Angeles
74	1453075	Vault	Los Angeles
75	1453059	Vault	Los Angeles

IV. Field Inspection – Violations List

We observed the following violations during the field inspection 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 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.

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.

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" sign on each of the following poles was missing:

- Pole 379512M
- Pole 305407M

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 moulding:

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

General Order 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.

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.

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