

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

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December 5, 2025

EA2025-1354

Jordi Burbano, P.E.  
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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: Electric distribution audit of the LADWP Palms District

Mr. Burbano:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Jose Lastra of my staff conducted an electric distribution audit of LADWP's Palms District on August 11-15, 2025. The audit included a review of LADWP's records and field inspections 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 January 5, 2026, 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 Jose Lastra (213) 507-1438 or [jose.lastr@cpuc.ca.gov](mailto:jose.lastr@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

Enclosures: Audit Findings

Cc: Leslie Palmer, Deputy Executive Director, Safety Enforcement, Safety Policy, and Water  
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC  
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC  
Jose Lastra, Utilities Engineer, ESRB, SED, CPUC

## Audit Findings

### I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Pole load calculations
- Intrusive test records
- Safety hazard notifications
- LADWP's documented inspection program.
- Vegetation Records

### II. Records Review – Violations List

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

**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.*

LADWP's records indicated that from January 2022 through December 2024, LADWP completed 859 patrol inspections past LADWP's scheduled due date. Additionally, as of the date of the audit, LADWP had 589 pending patrol inspections that were past LADWP's scheduled due date.

LADWP's records indicated that from January 2022 through December 2024, LADWP completed 26,612 detailed inspections past LADWP's scheduled due date. Additionally, as of the date of the audit, LADWP had 4,176 pending detailed inspections that were 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 through December 2024, LADWP completed 4,074 patrol underground (including padmount) inspections past LADWP's scheduled due date. Additionally, as of the date of the audit, LADWP had 631 pending patrol underground (including padmount) inspections that were past LADWP's scheduled due date.

LADWP's records indicated that from January 2022 through December 2024, LADWP completed 4,272 detail underground (including padmount) inspections past LADWP's scheduled due date. Additionally, as of the date of the audit, LADWP had 831 pending detailed underground (including padmount) inspections that were past LADWP's scheduled due date.

**GO 95, 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 through December 2024, LADWP completed 435 overhead work orders past LADWP's due date for corrective action. Additionally, as of the date of the audit, LADWP had 9,010 open overhead work orders that were past LADWP's scheduled 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 through December 2024, LADWP completed 94 underground (including padmount) work orders past LADWP's due date for corrective action. Additionally, as of the date of the audit, LADWP had 1,185 open underground (including padmount) work orders that were past LADWP's scheduled due date for corrective action.

### III. Field Inspections

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

No.	Structure ID	Type of Structure	Location
1	442229M	Wood Pole	Los Angeles (Pico-Robertson)
2	442236M	Wood Pole	LA (Pico-Robertson)
3	524611M	Wood Pole	LA (Pico-Robertson)
4	422327M	Wood Pole	LA (Pico-Robertson)
5	422601M	Wood Pole	LA (Pico-Robertson)
6	422600M	Wood Pole	LA (Pico-Robertson)
7	565649H	Wood Pole	LA (Pico-Robertson)
8	67491M	Wood Pole	LA (Pico-Robertson)
9	284907M	Wood Pole	LA (Pico-Robertson)
10	159817M	Wood Pole	LA (Pico-Robertson)
11	22947M	Wood Pole	LA (Pico-Robertson)
12	172716M	Wood Pole	LA (Pico-Robertson)
13	427950M	Wood Pole	LA (Pico-Robertson)
14	67490M	Wood Pole	LA (Pico-Robertson)
15	67489M	Wood Pole	LA (Pico-Robertson)
16	67488M	Wood Pole	LA (Pico-Robertson)
17	432431M	Wood Pole	LA (Pico-Robertson)
18	461821H	Wood Pole	LA (Pico-Robertson)
19	120459M	Wood Pole	LA (Pico-Robertson)
20	232352M	Wood Pole	LA (Pico-Robertson)
21	232351M	Wood Pole	LA (Pico-Robertson)
22	422328M	Wood Pole	LA (Pico-Robertson)
23	444696M	Wood Pole	LA (Pico-Robertson)
24	444695M	Wood Pole	LA (Pico-Robertson)
25	100739M	Wood Pole	LA (Pico-Robertson)
26	402206H	Wood Pole	LA (Pico-Robertson)
27	172917M	Wood Pole	LA (Baldwin Hills)
28	172916M	Wood Pole	LA (Baldwin Hills)
29	172915M	Wood Pole	LA (Baldwin Hills)
30	494165H	Wood Pole	LA (Baldwin Hills)
31	494167H	Wood Pole	LA (Baldwin Hills)
32	546986H	Wood Pole	LA (Baldwin Hills)
33	411344M	Wood Pole	LA (Baldwin Hills)
34	500806H	Wood Pole	LA (Baldwin Hills)
35	500808H	Wood Pole	LA (Baldwin Hills)
36	406971M	Wood Pole	LA (Baldwin Hills)
37	500810H	Wood Pole	LA (Baldwin Hills)
38	494156H	Wood Pole	LA (Baldwin Hills)
39	494157H	Wood Pole	LA (Baldwin Hills)
40	500811H	Wood Pole	LA (Baldwin Hills)
41	500812H	Wood Pole	LA (Baldwin Hills)
42	172912M	Wood Pole	LA (Baldwin Hills)

43	172911M	Wood Pole	LA (Baldwin Hills)
44	172910M	Wood Pole	LA (Baldwin Hills)
45	172909M	Wood Pole	LA (Baldwin Hills)
46	262208M	Wood Pole	LA (Baldwin Hills)
47	319877M	Wood Pole	LA (Jefferson Park)
48	533581M	Wood Pole	LA (Jefferson Park)
49	319875M	Wood Pole	LA (Jefferson Park)
50	355504M	Wood Pole	LA (Jefferson Park)
51	319874M	Wood Pole	LA (Jefferson Park)
52	337221M	Wood Pole	LA (Jefferson Park)
53	319873M	Wood Pole	LA (Jefferson Park)
54	9146M	Wood Pole	LA (Jefferson Park)
55	444111M	Steel Pole	LA (Jefferson Park)
56	386026M	Wood Pole	LA (Jefferson Park)
57	461657M	Steel Pole	LA (Jefferson Park)
58	461656M	Steel Pole	LA (Jefferson Park)
59	461658M	Wood Pole	LA (Jefferson Park)
60	273836M	Wood Pole	LA (Jefferson Park)
61	185781M	Wood Pole	LA (Jefferson Park)
62	337553M	Wood Pole	LA (Jefferson Park)
63	255412M	Wood Pole	LA (Jefferson Park)
64	319605M	Wood Pole	LA (Jefferson Park)
65	187754M	Wood Pole	LA (Jefferson Park)
66	187717M	Wood Pole	LA (Jefferson Park)
67	341027M	Wood Pole	LA (Jefferson Park)
68	535843M	Steel Pole	LA (Hollywood/Fairfax)
69	204653M	Wood Pole	LA (Hollywood/Fairfax)
70	535842M	Steel Pole	LA (Hollywood/Fairfax)
71	277467M	Wood Pole	LA (Hollywood/Fairfax)
72	277438M	Wood Pole	LA (Hollywood/Fairfax)
73	341375M	Wood Pole	LA (Hollywood/Fairfax)
74	531383H	Wood Pole	LA (Hollywood/Fairfax)
75	397830M	Wood Pole	LA (Hollywood/Fairfax)
76	277463M	Wood Pole	LA (Hollywood/Fairfax)
77	290742M	Wood Pole	LA (Hollywood/Fairfax)
78	277462M	Wood Pole	LA (Hollywood/Fairfax)
79	277461M	Wood Pole	LA (Hollywood/Fairfax)
80	355877M	Wood Pole	LA (Hollywood/Fairfax)
81	277460M	Wood Pole	LA (Hollywood/Fairfax)
82	401819M	Wood Pole	LA (Hollywood/Fairfax)
83	1608561	Pad Transformer	LA (Crenshaw)
84	1612977	Pad Transformer	LA (Crenshaw)
85	1623800	Pad Transformer	LA (Crenshaw)
86	1623677	Pad Transformer	LA (Crenshaw)
87	1623669	Handhole	LA (Crenshaw)
88	1598218	Vault	LA (Crenshaw)
89	1547280	Vault	LA (Crenshaw)
90	1199884	Vault	LA (Crenshaw)

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

My staff 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.*

LADWP did not notify the responsible third-party of the following safety hazards:

- Pole 422600M: multiple third-party communication service drops were wrapped around the pole along with an incomplete pole transfer.
- Pole 432431M: a third-party communication service drop was wrapped and zip tied to the pole at the public level.
- Pole 494165H: multiple third-party communication service drops were hanging near the pole at the public level.
- Pole 187717M: a third-party down guy anchor was abandoned in proximity to the pole; there was also a third-party communication service drop wrapped around the pole at the public level.
- Pole 277463M: a third-party communication service drop was cut and hanging near the pole at the public level.

**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's facilities on each of the following poles required maintenance:

- Pole 442229M: an LADWP ground wire was cut at the public level.
- Pole 402206H: the combination crossarm had a large longitudinal crack, reaching multiple bolts.
- Pole 319873M: an LADWP sidewalk guy wire was contacting a crossarm, causing strain to the wire.
- Pole 9146M: an LADWP ground wire was cut at the public level.
- Pole 444111M: an LADWP span guy wire had a spool and rope left hanging midspan.
- Pole 461657M: an LADWP span guy wire was being strained by a nearby tree branch.
- Pole 355877M: a riser strap attached to the conduit riser was damaged.

**GO 95, Rule 51.6, 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 on each of the following LADWP poles were damaged:

• 284907M	• 67490M	• 67489M	• 67488M
• 100739M	• 402206H	• 494156H	• 172910M
• 319874M	• 319873M	• 187754M	• 187717M
• 290742M	• 355877M	• 277460M	
• 232351M	• 355504M	• 341027M	

**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 ground molding on each of the following poles was damaged:

- Pole 442229M
- Pole 159817M
- Pole 9146M

**GO 95, Rule 54.8-C4: Clearances between Supply Service Drops and Other Conductors, From Communication Service Drops, states in part:**

*The radial clearance between supply service drop conductors and communication service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.*

The LADWP service drop supported on the following poles had less than 12 inches of radial clearance from a communications service drop:

- Pole 319605M: an LADWP service drop was less than 12 inches from a third-party communications service drop within 15 feet of the point of attachment to a nearby home.
- Pole 277467M: an LADWP service drop was contacting a third-party communications service drop within 15 feet of the point of attachment to a nearby home.

**GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, 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.*

An LADWP down guy wire on Pole 386026M was disconnected and wrapped around the pole at the public level.