

June 25, 2026

Mr. Majed Ibrahim, 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. Ibrahim,

Subject: Audit of LADWP's Northridge Distribution District

In response to your letter dated May 28, 2026, regarding alleged violations of General Orders (GOs) at the Los Angeles Department of Water and Power's (LADWP) Northridge Distribution District during March 16 through 20, 2026, 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, 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.

LADWP's inspection records indicated that from January 1, 2022, to December 31, 2025, a total of 15,851 overhead patrol inspections and 34,923 detailed inspections 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 1, 2022, to December 31, 2025, a total of 9,545 underground patrol inspections and 25,396 underground detailed inspections were completed or pending completion past 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.

LADWP records indicated that from January 1, 2022 to December 31, 2025, a total of 34,923 overhead work orders were completed, pending completion, 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 records indicated that from January 1, 2022 to December 31, 2025, a total of 28,983 underground work orders were completed, pending completion, or cancelled after LADWP's assigned due date for corrective action.

LADWP Response:

LADWP has identified 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.

LADWP has identified discrepancies between the late inspection and work order figures presented in CPUC's audit report and LADWP's internal inspection and corrective work order records for the Northridge Distribution District. LADWP respectfully submits the following verified figures for the period January 1, 2022, through December 31, 2025:

- 8,303 overhead patrol inspections and 37,151 overhead detailed inspections were completed or pending completion past LADWP's assigned due date
- 10,686 underground patrol inspections and 12,073 underground detailed inspections were completed or pending completion past LADWP's assigned due date
- 28,524 overhead work orders were completed, pending completion, or cancelled after LADWP's assigned due date for corrective action
- 7,451 underground work orders were completed, pending completion, or cancelled after LADWP's assigned due date for corrective action

LADWP remains available to provide any additional information the Commission may require.

Regarding the above verified late pending inspections, LADWP has the following remaining as of June 8, 2026: 158 patrol overhead, 777 detailed overhead, 364 patrol underground (including padmount), and 932 detailed underground (including padmount). These late pending inspections are anticipated to be completed by the end of 2026. Regarding work orders, LADWP is streamlining its recordkeeping processes to ensure work orders are completed efficiently, eliminate redundant records, and reduce the 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 has worked diligently to address all CPUC allegations under "IV. Field Inspection – Violations List". All alleged violations identified by CPUC have been addressed as detailed 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 No.199422M – A section of ground wire was damaged.
- Pole No. 322443M – A section of ground wire was damaged.

- Pole No. 299916M – A section of ground wire was damaged.
- Pole No. 88468M – A section of ground wire was damaged.
- Pole No. 391325M - the visibility strips on the pole were damaged.
- Pole No. 199425M - the pole tag was damaged.
- Pole No. 199423M - the pole tag was damaged.
- Pole No. 299916M - the pole tag was damaged.
- Pole No. 88468M - the pole tag was damaged.
- Pole No. 185805M - the pole tag was damaged.
- Pole No. 177945M - the pole tag was damaged.
- Pole No. 317105M - the pole tag was damaged.
- Pole No. 285024M - the pole tag was damaged.
- Pole No. 110948M - the pole tag was damaged.

LADWP Response:

As of April 15, 2026, corrective work at all poles listed above has been completed to address the deficiency allegations.

GO 95, Rule 34 – Foreign Attachments, states in part:

Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction

Unauthorized foreign attachments were attached to the following LADWP poles:

- Pole No. 370074M – Missing animal pet sign written “Missing Dog”
- Pole No. 391256M – Business advertisement sign written “Barber Shop”

LADWP Response:

As of March 18, 2026, corrective work has been completed to address the deficiency allegations.

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.

Each of the following LADWP poles supported "HIGH VOLTAGE" signs that were damaged or missing:

- Pole No. 199426M
- Pole No. 199424M
- Pole No. 316710M
- Pole No. 160252M
- Pole No. 333019M
- Pole No. 211177M
- Pole No. 211178M
- Pole No. 199558M
- Pole No. 346825M

LADWP Response:

As of March 27, 2026, corrective work at all poles listed above has been completed to address the 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 ground molding on each of the following LADWP poles was damaged:

- Pole No. 199422M
- Pole No. 322443M
- Pole No. 299916M
- Pole No. 88468M
- Pole No. 394309M

LADWP Response:

As of April 15, 2026, corrective work at all poles listed above has been completed to address the deficiency allegations.

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 the following poles was obstructed by vegetation:

- Pole No. 199416M
- Pole No. 88468M

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- Pole No. 233141M

LADWP Response:

As of March 20, 2026, corrective work at all poles listed above has been completed to address the deficiency allegations.

If you have any questions or need additional information, please contact me at (213) 367-1426 or Jordi Burbano at (213) 367-0343.

Sincerely,

Daniel Baker
Interim Director of Regulatory Compliance Division
Los Angeles Department of Water and Power

Cc: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Sultan Tipu, Utilities Engineer, Electric Safety and Reliability Branch, CPUC
Francisco Fernandez, LADWP
Jordi Burbano, LADWP
Eric Goss, LADWP