

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 7, 2012

David Brian Siewert
District Superintendent
Los Angeles Department of Water and Power
3101 Artesian Street
Los Angeles, CA 90031

EA2012-007

SUBJECT: Electric Audit of LADWP's Lincoln Heights District

Dear Mr. Siewert:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Mahmoud Intably of my staff conducted an audit of the Los Angeles Department of Water and Power (LADWP) facilities in the Lincoln Heights District from April 30, 2012 to May 4, 2012. The audit included a review of LADWP's maintenance records and inspections of LADWP's facilities.

During the audit, my staff identified violations of one or more General Orders. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than September 11, 2012, by electronic or hard copy, of all corrective measures taken by LADWP to remedy and prevent such violations.

If you have any questions concerning this audit you can contact Mahmoud Intably at (213) 576-7016 or mahmoud.intably@cpuc.ca.gov.

Sincerely,

Raffy Stepanian, P.E.
Program Manager
Electric Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Audit Summary

CC: Raymond Fugere, Program and Project Supervisor, CPUC
Mahmoud Intably, Utilities Engineer, CPUC

Audit Summary

1.	Location:	Lincoln Heights District
	Date of CPUC Inspection:	April 30, 2012
Explanation of Violation(s):		
<u>Records Review and Inspections</u>		
<p>GO 165, Section III-B: Standards for Inspection, states in part:</p> <p style="padding-left: 40px;"><i>“Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to assure 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.”</i></p> <p>LADWP inspection records showed that its distribution facilities were not inspected as specified in Table 1 of GO 165.</p> <p>GO 165, Section III-C: Record keeping, states in part:</p> <p style="padding-left: 40px;"><i>“For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.”</i></p> <p>When performing inspections, LADWP does not document all GOs 95 and 128 violations. Additionally, upon completion of corrective actions, LADWP does not record the date the work was performed.</p> <p>GO 165, Section III-D: Reporting, states in part:</p> <p style="padding-left: 40px;"><i>“By July 1st each utility subject to this General Order shall submit an annual report for the previous year under penalty of perjury.</i></p> <p>LADWP does not submit an annual report to the Commission detailing its compliance with General Order 165.</p> <p>GO 95, Rule 18-B Notification of Safety Hazards states in part:</p> <p style="padding-left: 40px;"><i>“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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.”</i></p> <p>At the time of the audit, LADWP staff stated that during LADWP’s inspections, if a safety hazard(s) caused by another utility or communication company is discovered, LADWP does not notify the involved company of such safety hazard(s) within 10 business days after the discovery.</p>		

2.	Structure ID / Location:	UG-1213958
	Date of LADWP last Underground detailed inspection:	June 15, 2011
	Date of CPUC Inspection:	May 3, 2012
Explanation of Violation(s):		
<p><u>Inoperable blower</u></p> <p>GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p><i>“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...”</i></p> <p>The underground structure contained an inoperable blower. This violation was not documented when LADWP last visited the underground structure.</p>		

3.	Structure ID / Location:	PM-1151331
	Date of LADWP last Underground detailed inspection:	June 23, 2011
	Date of CPUC Inspection:	May 3, 2012
Explanation of Violation(s):		
<p><u>Not bolted</u></p> <p>GO 128, Rule 34.3-A, Strength, states in part:</p> <p><i>“The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damaged to the equipment by unauthorized persons.”</i></p> <p>The pad-mounted transformer was not secured in place (bolted down). This violation was not documented when LADWP last visited the structure.</p>		

4.	Structure ID / Location:	PM-1122258
Date of LADWP last Underground detailed inspection:		June 23, 2011
Date of CPUC Inspection:		May 3, 2012
Explanation of Violation(s):		
<p data-bbox="191 625 1015 659"><u>Corrosion at the base of the pad-mounted transformer</u></p> <p data-bbox="191 699 1234 732">GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="289 772 1458 911"><i>“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...”</i></p> <p data-bbox="191 953 1416 1024">The pad-mounted transformer was corroded. This violation was not documented when LADWP last visited the structure.</p> <p data-bbox="191 1066 992 1100"><u>Opening at the base of the pad-mounted transformer</u></p> <p data-bbox="191 1140 998 1173">GO 128, Rule 34.3-B, Guarding Live Parts, states in part:</p> <p data-bbox="289 1213 1474 1352"><i>“Pad-mounted equipment that contains exposed live parts shall be installed to resist the passing of a wire the equivalent of a bare number 18AWG from the outside between the pad and the housing of the equipment, into the compartment which contains live parts when it is closed.”</i></p> <p data-bbox="191 1394 1416 1499">The pad-mounted transformer had an opening that would allow the passing of a wire from the outside into the compartment which contains live parts. This violation was not documented when LADWP last visited the structure.</p>		

5.	Structure ID / Location:	PM-1128909
	Date of LADWP last Underground detailed inspection:	June 15, 2011
	Date of CPUC Inspection:	May 3, 2012
Explanation of Violation(s):		
<p data-bbox="191 625 1015 657"><u>Corrosion at the base of the pad-mounted transformer</u></p> <p data-bbox="191 699 1234 730">GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="289 772 1458 909"><i>“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...”</i></p> <p data-bbox="191 951 1417 1018">The pad-mounted transformer was corroded. This violation was not documented when LADWP last visited the structure.</p>		