

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

EA2012-009

SUBJECT: Electric Audit of LADWP's Van Nuys District

Dear Mr. Siewert:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Derek Fong, Koko Tomassian, and Richard Kyo of my staff conducted an audit of the Los Angeles Department of Water and Power (LADWP) Van Nuys District on from May 21, 2012 to May 25, 2012. 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. 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, you can contact Derek Fong at (213) 576-6850 or derek.fong@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Stepanian", with a long horizontal stroke extending to the right.

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

AUDIT SUMMARY

1.	Location:	LADWP – Van Nuys District
	Date of CPUC Inspection:	May 21, 2012
Explanation of Violation(s):		
<p><u>Records Review and Inspections</u></p> <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>		

2.	Location:	Pole No. 123750M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<p data-bbox="191 562 591 594"><u>Missing High Voltage Sign</u></p> <p data-bbox="191 636 1003 667">GO 95, Rule 51.6-A, High Voltage Marking, states in part:</p> <p data-bbox="326 709 1468 779"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i></p> <p data-bbox="191 821 1459 890">The High Voltage sign was missing. This violation was not documented when LADWP last visited the pole.</p> <p data-bbox="191 932 451 963"><u>Sunken Insulator</u></p> <p data-bbox="191 1005 1214 1037">GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="326 1115 1468 1255"><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 1297 1435 1367">There was a sunken insulator on the crossarm. This violation was not documented when LADWP last visited the pole.</p>		

3.	Location:	Pole No. 77129M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<p><u>Damaged High Voltage Sign</u> GO 95, Rule 51.6-A, High Voltage Marking, states in part:</p> <p style="text-align: center;"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i></p> <p>The High Voltage sign was damaged. This violation was not documented when LADWP last visited the pole.</p> <p><u>LADWP Service Drop Touching Communication Service Drop</u> GO 95, Rule 54.8-C4 , From Communication Service Drops, States:</p> <p style="text-align: center;"><i>“The radial clearance between communication service drop conductors and supply 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.”</i></p> <p>An LADWP electric service drop and a communication service drop were touching less than 15 feet from the point of attachment of either service drop. This violation was not documented when LADWP last visited the pole.</p> <p><u>LADWP Service Drop Touching Carport</u> GO 95, Rule 54.8-B, Table 10: Minimum Allowable Clearance of Service Drops 0 – 750 Volts from Buildings, requires:</p> <p style="text-align: center;"><i>The “Minimum [Vertical] Clearance from Buildings” of “Weather Resistant Covered Conductors 0 – 750 Volts” from “Metallic or non-metallic non-walkable overhang, patio cover or other structure” to be 8 feet.</i></p> <p>An LADWP weather-resistant electric service drop was touching a carport. This violation was not documented when LADWP last visited the pole.</p>		

4.	Location:	Pole No. 227316M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<u>Missing High Sign</u>		
GO 95, Rule 51.6-A, High Voltage Marking, states in part:		
<p style="text-align: center;"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i></p>		
The “High” sign was missing. This violation was not documented when LADWP last visited the pole.		

5.	Location:	Pole No. 410355H
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<u>Damaged Ground Molding</u>		
GO 95, Rule 54.6-B, Ground Wires, states in part:		
<p style="text-align: center;"><i>“That portion of the ground wire 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.”</i></p>		
The ground molding covering the ground wire on the pole was damaged. This violation was not documented when LADWP last visited the pole.		

6.	Location:	Pole No. 224269M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<p data-bbox="191 562 493 594"><u>Damaged High Sign</u></p> <p data-bbox="191 636 1003 667">GO 95, Rule 51.6-A, High Voltage Marking, states in part:</p> <p data-bbox="326 709 1468 779"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i></p> <p data-bbox="191 821 1386 890">The “High” sign was damaged. This violation was not documented when LADWP last visited the pole.</p> <p data-bbox="191 932 591 963"><u>Damaged Ground Molding</u></p> <p data-bbox="191 1005 894 1037">GO 95, Rule 54.6-B, Ground Wires, states in part:</p> <p data-bbox="326 1079 1458 1184"><i>“That portion of the ground wire 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.”</i></p> <p data-bbox="191 1226 1474 1295">The ground molding covering the ground wire on the pole was damaged. This violation was not documented when LADWP last visited the pole.</p> <p data-bbox="191 1337 1430 1407"><u>Inadequate Clearance between LADWP Service Drop and Communication Service Drop</u></p> <p data-bbox="191 1449 1149 1480">GO 95, Rule 54.8-C4 , From Communication Service Drops, States:</p> <p data-bbox="326 1522 1479 1732"><i>“The radial clearance between communication service drop conductors and supply 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.”</i></p> <p data-bbox="191 1774 1455 1879">An LADWP electric service drop and a communication service drop had less than a 1 foot radial clearance within 15 feet of the point of attachment of either service drop. This violation was not documented when LADWP last visited the pole.</p>		

7.	Location:	Pole No. 410354H
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<p data-bbox="191 600 467 632"><u>Missing High Sign</u></p> <p data-bbox="191 674 1003 705">GO 95, Rule 51.6-A, High Voltage Marking, states in part:</p> <p data-bbox="326 747 1468 814"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i></p> <p data-bbox="191 856 1463 924">The “High” sign was missing. This violation was not documented when LADWP last visited the pole.</p> <p data-bbox="191 966 467 997"><u>Sunken Insulators</u></p> <p data-bbox="191 1039 1214 1071">GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="326 1113 1468 1255"><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 1297 1409 1365">There were two sunken insulators on the crossarm. This violation was not documented when LADWP last visited the pole.</p> <p data-bbox="191 1407 1198 1438"><u>LADWP Down Guy Wire Touching Communication Span Guy Wire</u></p> <p data-bbox="191 1480 980 1512">GO 95, Rule 56.4-D2, From Guys or Span Wires, states</p> <p data-bbox="326 1554 1474 1663"><i>“Passing and Attached to Same Pole: The radial clearance between different guys, different span wires, or different guys and span wires, attached to the same pole shall not be less than 3 inches.”</i></p> <p data-bbox="191 1705 1419 1772">An LADWP down guy wire was touching a communication span guy wire. This violation was not documented when LADWP last visited the pole.</p>		

8.	Location:	Pole No. 382377M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<p data-bbox="188 562 493 596"><u>Damaged High Sign</u></p> <p data-bbox="188 674 1468 779">GO 95, Rule 51.6-A, High Voltage Marking, states in part: <i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i></p> <p data-bbox="188 821 1386 884">The “High” sign was damaged. This violation was not documented when LADWP last visited the pole.</p> <p data-bbox="188 926 493 959"><u>Missing Guy Marker</u></p> <p data-bbox="188 1001 922 1035">GO 95, Rule 56.9, Guy Marker (Guy Guard), states:</p> <p data-bbox="321 1077 1414 1182"><i>“A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys.”</i></p> <p data-bbox="188 1224 1451 1287">An LADWP down guy wire was missing a guy marker. This violation was not documented when LADWP last visited the pole.</p>		

9.	Location:	Pole No. 244976M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<p data-bbox="191 562 467 596"><u>Missing High Sign</u></p> <p data-bbox="191 634 1003 667">GO 95, Rule 51.6-A, High Voltage Marking, states in part:</p> <p data-bbox="324 709 1468 781"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i></p> <p data-bbox="191 823 1468 894">The “High” sign was missing. This violation was not documented when LADWP last visited the pole.</p> <p data-bbox="191 932 695 966"><u>Vegetation in the Climbing Space</u></p> <p data-bbox="191 1003 1078 1037">GO 95, Rule 54.7, Climbing and Working Space, states in part:</p> <p data-bbox="324 1079 1166 1108"><i>“Climbing space shall be maintained from the ground level.”</i></p> <p data-bbox="191 1150 1442 1222">There was vegetation obstructing the climbing space. This violation was not documented when LADWP last visited the pole.</p>		

10.	Location:	Pole No. 193827M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<p data-bbox="204 575 607 611"><u>Damaged Ground Molding</u></p> <p data-bbox="204 648 911 684">GO 95, Rule 54.6-B, Ground Wires, states in part:</p> <p data-bbox="339 722 1474 831"><i>“That portion of the ground wire 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.”</i></p> <p data-bbox="204 869 1425 936">The ground molding covering the ground wire on the pole was damaged. This violation was not documented when LADWP last visited the pole.</p>		

11.	Location:	Pole No. 244972M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<p><u>Damaged High Sign</u> GO 95, Rule 51.6-A, High Voltage Marking, states in part: <i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i></p> <p>The “High” sign was damaged. This violation was not documented when LADWP last visited the pole.</p> <p><u>Communication Service Drops in the Climbing Space</u> GO 95, Rule 18-A1c, Resolution of Safety Hazards and GO 95 Nonconformances, states: <i>“Where a communications company’s or an electric utility’ actions result in GO nonconformances for another entity, that entity’s remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.”</i></p> <p>Communication service drops were obstructing the climbing space. LADWP did not notify the communication companies of this GO nonconformance when it last visited the pole.</p> <p><u>Vegetation in the Climbing Space</u> GO 95, Rule 54.7, Climbing and Working Space, states in part: <i>“Climbing space shall be maintained from the ground level.”</i></p> <p>Vegetation was obstructing the climbing space. This violation was not documented when LADWP last visited the pole.</p> <p><u>LADWP Service Drop Touching LADWP Span Guy Wire</u> GO 95, Rule 38, Table 2, Case 19, Column D, Minimum Clearances of Wires from Other Wires, requires: <i>The minimum radial separation between “guys and span wires passing conductors supported on the same poles” and “0 – 750 Volts (Including Service Drops)” to be 3 inches.</i></p> <p>There was an LADWP service drop touching an LADWP span guy wire. This violation was not documented when LADWP last visited the pole.</p>		

12.	Location:	Pole No. 341827M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<p><u>Damaged High Sign</u></p> <p>GO 95, Rule 51.6-A, High Voltage Marking, states in part:</p> <p style="text-align: center;"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i></p> <p>The “High” sign was damaged. This violation was not documented when LADWP last visited the pole.</p> <p><u>Damaged Ground Molding</u></p> <p>GO 95, Rule 54.6-B, Ground Wires, states in part:</p> <p style="text-align: center;"><i>“That portion of the ground wire 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.”</i></p> <p>The ground molding covering the ground wire on the pole was damaged. This violation was not documented when LADWP last visited the pole.</p>		

13.	Location:	Pole No. 244986M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<u>Missing High Voltage Sign</u>		
<p>GO 95, Rule 54.6-B, Ground Wires, states in part:</p> <p style="text-align: center;"><i>“That portion of the ground wire 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.”</i></p> <p>The High Voltage sign was missing. This violation was not documented when LADWP last visited the pole.</p>		

14.	Location:	Pole No. 208585M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<u>Damaged High Voltage Sign</u>		
<p>GO 95, Rule 54.6-B, Ground Wires, states in part:</p> <p style="text-align: center;"><i>“That portion of the ground wire 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.”</i></p> <p>The High Voltage sign on the pole was damaged. This violation was not documented when LADWP last visited the pole.</p>		

15.	Location:	Pole No. 208586M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<p data-bbox="204 575 1284 611"><u>Third Party Safety Hazard – Broken Ground Molding at the Public Level</u></p> <p data-bbox="204 648 1105 684">GO 95, Rule 18-B, Notification of Safety Hazards, states in part:</p> <p data-bbox="339 722 1474 905"><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 data-bbox="204 942 1425 1050">The ground molding covering a communication cable ground wire on the pole was damaged at the public level. LADWP did not notify the communication company of this GO nonconformance when it last visited the pole.</p>		

16.	Location:	Pole No. 193825M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<p><u>Damaged Ground Molding</u></p> <p>GO 95, Rule 54.6-B, Ground Wires, states in part:</p> <p style="padding-left: 40px;"><i>“That portion of the ground wire 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.”</i></p> <p>The ground molding covering the ground wire on the pole was damaged. This violation was not documented when LADWP last visited the pole.</p> <p><u>Broken Conduit Strap</u></p> <p>GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p style="padding-left: 40px;"><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>A conduit strap securing a conduit to the pole was broken. This violation was not documented when LADWP last visited the pole.</p>		

17.	Location:	Pole No. 205254M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<u>Inadequate Clearance between LADWP Service Drop and Communication Service Drop</u>		
<p>GO 95, Rule 54.8-C4 , From Communication Service Drops, states:</p> <p style="text-align: center;"><i>“The radial clearance between communication service drop conductors and supply 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.”</i></p> <p>An LADWP electric service drop and a communication service drop had less than a 2 foot radial clearance at over 15 feet from the point of attachment of either service drop. This violation was not documented when LADWP last visited the pole.</p>		

18.	Location:	Pole No. 350262M
	Previous LADWP Visit Details:	05/11/2012
	Date of CPUC Inspection:	05/21/2012
Explanation of Violation(s):		
<u>Damaged Ground Molding</u>		
<p>GO 95, Rule 54.6-B, Ground Wires, states in part:</p> <p style="text-align: center;"><i>“That portion of the ground wire 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.”</i></p> <p>The ground molding covering the ground wire on the pole was damaged. This violation was not documented when LADWP last visited the pole.</p>		