

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 12, 2012

Federico Langit
Assistant Director – Electronic Operations
Azusa Light & Water
1020 W. 10th Street
Azusa, California 91702

EA2012-028

SUBJECT: Audit of Azusa Light & Water

Dear Mr. Langit:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Koko Tomassian and Richard Kyo of my staff conducted an audit of Azusa Light & Water (AL&W) from August 27, 2012 to August 30, 2012. The audit included a review of AL&W's records and field inspections of AL&W'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 November 16, 2012, by electronic or hard copy, of all corrective measures taken by AL&W to remedy and prevent such violations.

If you have any questions, you can contact Koko Tomassian at (213) 576-7099 or koko.tomassian@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Stepanian", with a long horizontal flourish 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

Company: Azusa Light & Water

Electric Audit Date: August 27 to August 30, 2012

1.	Location:	Azusa
	Date of CPUC Inspection:	08/27/12
Explanation of Violation(s):		
<u>Inspection & Maintenance Program Deficiencies</u>		
<p>GO 165, Inspection Requirements for Electric Distribution and Transmission Facilities, defines detailed inspections as:</p> <p style="padding-left: 40px;"><i>Individual pieces of equipment and structures are carefully examined, visually and through use of routine diagnostic test, as appropriate, and (if practical and if useful information can be so gathered) opened, and the condition of each rated and recorded.</i></p> <p>Although AL&W's <i>Inspection & Maintenance Program</i> explicitly defines detailed inspections and the record keeping associated with these inspections, AL&W currently does not perform detailed inspections, as defined in AL&W internal procedures or 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>AL&W must document all violations of GOs 95 and 128. A violation is a "problem" because it is a condition that should not exist. Rule 12.2 of GO 95 states in part "lines ... shall be kept in conformity with the requirements of this Order" and Rule 12.1 of GO 128 states in part "Systems and portions thereof ... shall be kept in conformity with the requirement of these rules". AL&W's Inspection & Maintenance Program does not require inspectors to identify and document all GO 95 and GO 128 violations, as required by GO 165, thus, allowing violations to exist and creating potential safety hazards.</p>		

2.	Location:	Pole No.: 4833MA
	Previous AL&W Visit Details:	2011 – Overhead (OH) Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<u>Jointly Used Pole Not Stepped</u>		
<p>GO 95, Rule 91.3-A1, Poles with Vertical Runs or Risers, states in part:</p> <p style="text-align: center;"><i>All jointly used poles which support supply conductors shall be provided with pole steps if vertical runs or risers are attached to the surface of such poles...</i></p> <p>The jointly used pole which contained an attached riser was not stepped. This violation was not documented when AL&W inspected the pole.</p>		

3.	Location:	Pole No.: 4834MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<u>Damaged/Missing High Voltage Sign</u>		
<p>GO 95, Rule 56.1-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 on the crossarm was damaged. This violation was not documented when AL&W inspected the pole.</p>		

4.	Location:	Pole No.: 4835MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<u>Damaged/Missing High Voltage Sign</u>		
<p>GO 95, Rule 56.1-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 on the crossarm was damaged. This violation was not documented when AL&W inspected the pole.</p>		

5.	Location:	Pole No.: 4836MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<u>Damaged/Missing High Voltage Sign</u>		
<p>GO 95, Rule 56.1-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 on the crossarm was damaged. This violation was not documented when AL&W inspected the pole.</p>		

6.	Location:	Pole No.: 4837MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<p data-bbox="188 562 695 596"><u>Damaged/Missing High Voltage Sign</u></p> <p data-bbox="188 636 943 669">GO 95, Rule 56.1-A, High Voltage Marking, states in part:</p> <p data-bbox="282 709 1325 781"><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 1417 888">The High Voltage sign on the crossarm was damaged. This violation was not documented when AL&W inspected the pole.</p>		

7.	Location:	Pole No.: 4838MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<p data-bbox="188 564 602 596"><u>Jointly Used Pole Not Stepped</u></p> <p data-bbox="188 636 1105 667">GO 95, Rule 91.3-A1, Poles with Vertical Runs or Risers, states in part:</p> <p data-bbox="321 709 1317 783"><i>All jointly used poles which support supply conductors shall be provided with pole steps if vertical runs or risers are attached to the surface of such poles...</i></p> <p data-bbox="188 825 1409 898">The jointly used pole which contained an attached riser was not stepped. This violation was not documented when AL&W inspected the pole.</p> <p data-bbox="188 940 691 972"><u>Damaged/Missing High Voltage Sign</u></p> <p data-bbox="188 1014 943 1045">GO 95, Rule 56.1-A, High Voltage Marking, states in part:</p> <p data-bbox="285 1087 1325 1161"><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.</i></p> <p data-bbox="188 1203 1414 1266">The High Voltage sign on the crossarm was damaged. This violation was not documented when AL&W inspected the pole.</p>		

8.	Location:	Pole No.: 4839MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<u>Damaged/Missing High Voltage Sign</u>		
<p>GO 95, Rule 56.1-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 on the crossarm was damaged. This violation was not documented when AL&W inspected the pole.</p>		

9.	Location:	Pole No.: 3635MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<u>Damaged/Missing High Voltage Sign</u>		
<p>GO 95, Rule 56.1-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 on the crossarm was damaged. This violation was not documented when AL&W inspected the pole.</p>		

10.	Location:	Pole No.: 3701MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<u>Damaged/Missing High Voltage Sign</u>		
<p>GO 95, Rule 56.1-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 on the crossarm was damaged. This violation was not documented when AL&W last visited the pole.</p>		

11.	Location:	Pole No.: 4678MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<u>Broken/Damaged Visibility Strip</u>		
<p>GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p style="text-align: center;"><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 pole had a broken and/or damaged visibility strip. This violation was not documented when AL&W last visited the pole.</p>		

12.	Location:	Pole No.: 4680MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<u>Broken “Riser Strap”</u>		
<p>GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p style="text-align: center;"><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 pole had a broken and unsecured “riser strap.” This violation was not documented when AL&W last visited the pole.</p>		

13.	Location:	Pole No.: 4681MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<u>Damaged/Missing High Voltage Sign</u>		
<p>GO 95, Rule 56.1-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 on the crossarm was damaged. This violation was not documented when AL&W inspected the pole.</p>		

14.	Location:	Pole No.: 5011MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<p data-bbox="204 564 505 596"><u>Broken “Riser Strap”</u></p> <p data-bbox="204 638 1130 669">GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="337 711 1321 852"><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="204 894 1386 963">The pole had a broken and unsecured “riser strap.” This violation was not documented when AL&W inspected the pole.</p> <p data-bbox="204 1005 574 1037"><u>Damaged Ground Molding</u></p> <p data-bbox="204 1047 846 1079">GO 95, Rule 54.6-B, Ground Wires, states in part:</p> <p data-bbox="337 1121 1362 1226"><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 1268 1430 1337">The ground molding covering the ground wire on the pole was damaged. This violation was not documented when AL&W inspected the pole.</p>		

15.	Location:	Pole No.: 4677MA
	Previous AL&W Visit Details:	2011 – OH Patrol Inspection
	Date of CPUC Inspection:	August 28, 2012
Explanation of Violation(s):		
<p data-bbox="204 562 659 596"><u>Broken/Damaged Visibility Strip</u></p> <p data-bbox="204 634 1133 667">GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="337 709 1325 852"><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="204 894 1435 961">The pole had a broken and/or damaged visibility strip. This violation was not documented when AL&W inspected the pole.</p> <p data-bbox="204 1003 1250 1037"><u>Insufficient Clearance Between Secondary and Communications Conductors</u></p> <p data-bbox="204 1041 828 1075">GO 95, Rule 38, Table 2, Case 9C, requires that:</p> <p data-bbox="337 1117 1373 1260"><i>Supply conductors (0-750 V) on separate crossarms or other supports, at different levels, on the same pole as communication conductors, must maintain a 48 inch vertical separation, allowed to reduce 10 percent because of temperature and loading, at all times.</i></p> <p data-bbox="204 1302 1471 1407">The pole supported a secondary triplex conductor which had less than 43.2 inch vertical separation at midspan from the communication cable. This violation was not documented when AL&W inspected the pole.</p>		