

March 6, 2025

Mr. Dustin Hubbard
Director, Western Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue
Suite 110, Lakewood, CO 80228

Re: Response of the Los Angeles Department of Water and Power to Warning Letter,
CPF No. 5-2024-018-WL

Dear Mr. Hubbard,

On May 13, 2024, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a warning letter to the Los Angeles Department of Water and Power (LADWP) alleging a probable violation of §§ 60108(a)(2)(D) and (E) of the Pipeline Safety Act.¹

The Warning Letter alleges that LADWP's Operation and Maintenance (O&M) Manual does not "identify processes or procedures for minimizing releases of natural gas from pipeline facilities" and does not "address the replacement or remediation of pipelines that are known to leak based on the material (including cast iron, unprotected steel, wrought iron, and historic plastics with known issues), design, or past operating and maintenance history of the pipeline."²

LADWP is committed to public safety and operating its pipeline in accordance with PHMSA's regulations. LADWP understands that PHMSA does not permit the adjudication of warning letters but is providing notification to PHMSA that LADWP amended its O&M Manual. The new version addresses the requirements of §§ 60108(a)(2)(D) & (E) and the issues raised by the Warning Letter.

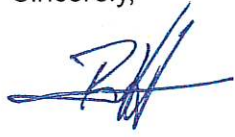
¹ 49 U.S.C. § 60108(a)(2) (2018), as amended by the Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2020, Pub. L. No. 116-260, div. R, title I, § 114, 134 Stat. 2221, 2230-31 (Dec. 27, 2020).

² Warning Letter at 2.

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If you have any questions, or should require additional information, please contact Donald Treinen at donald.treinen@ladwp.com.

Sincerely,

A handwritten signature in blue ink, appearing to be 'RPG', with a long horizontal stroke extending to the left.

Robert P. Gonzalez
Director of Power Supply Operations

/vb
By Email Only
c: Donald Treinen