

April 22, 2024

The Honorable City Council  
Office of the City Clerk  
Room 395, City Hall  
Mail Stop 160

Attention: Councilwoman Katy Yaroslavsky  
Chairperson, Energy and Environment Committee

Honorable Members:

Subject: Council File No. 23-1333 – Solar and Battery System/Installations/New  
Technologies/Meter Socket Adaptors/Commercial and Residential Properties

Enclosed is a response to the subject referenced motions that requests the Los Angeles  
Department of Water and Power report to the Energy and Environment Committee.

If you have any questions or if further information is required, please call me at  
(213) 367-1338, or have your staff contact Mr. Paul Habib, Director of Legislative and  
Intergovernmental Affairs, at (213) 367-3846.

Sincerely,



Martin L. Adams  
General Manager and Chief Engineer

PH:tf

Enclosure

c/enc: Councilmember Tim McOsker, Energy and Environment Committee  
Councilmember Nithya Raman, Energy and Environment Committee  
Councilmember Bob Blumenfield, Energy and Environment Committee  
Councilmember Eunisses Hernandez, Energy and Environment Committee  
Mr. Paul Habib

**Council File No. 23-1333 Solar and Battery System / Installations / New Technologies / Meter Socket Adaptors / Commercial and Residential Properties**

This is in a response to the subject referenced motion (Krekorian-McOsker and Yaroslavsky) that requests the Los Angeles Department of Water and Power (LADWP) report back to Council on our existing process for reviewing and adopting new technologies related to solar and battery system installations in commercial and residential properties, according a specific report back on meter socket adaptors, and provide recommendations to make this review process quicker and more transparent.

First and foremost, LADWP is committed to supporting the renewable energy goals set forth in the LA100 plan. We recognize the critical importance of transitioning to 100 percent carbon-free electricity by 2035, and we are dedicated to playing our part in achieving this milestone.

LADWP serves as the primary electric utility for the City of Los Angeles, providing reliable power to residential, commercial, and industrial customers across a vast jurisdiction. Our commitment to reliability is paramount, as the seamless operation of our electrical grid is essential for powering homes, businesses, and critical infrastructure throughout the city.

As part of our efforts to maintain reliability, LADWP is responsible for providing electricity at the service point, which resides in the utility sealed section and contains our metering equipment. This sealed area is essential for safety, security, and reliability of electricity distribution to our customers. From a safety perspective, the sealed utility section contains high voltage components that can be dangerous if tampered. Sealing these components prevents accidental contact and protects anyone working near or around the meter. Additionally, electrical sparks or faults could potentially ignite combustible materials near the metering area. Sealing the compartment helps contain any potential fire and minimizes the risk of damage to property or injury to people.

Additionally, the utility sealed area prevents tampering and unauthorized access. Tampering with meters to manipulate electricity usage is illegal and can lead to significant financial losses for LADWP. Sealing the meter section makes it more difficult to tamper with the meter and helps ensure accurate billing. The sealed sections typically contain sensitive equipment and wiring that should only be accessed by authorized and skilled personnel. Seals deter unauthorized individuals from accessing these components, protecting LADWP property and preventing potential theft, vandalism, or sabotage.

The service point in the utility sealed section also marks a point of demarcation between the utility service and the customer's electric panel. This clear demarcation point facilitates LADWP's ability to troubleshoot power outages, identify root causes of power outages, and restore power when needed. This is essential to our ability to provide reliable electric service, allowing LADWP to quickly diagnose the root cause and restore

electric service. Compromising where the utility service meets the customer's equipment and the utility sealed area, will create obstacles to quickly diagnose and efficiently restore electric services during an outage.

Regarding the motion's call for a reexamination of our approval process for new technologies, including meter socket adaptors, we appreciate the City Council's diligence in ensuring that innovative solutions align with our energy policy goals while also prioritizing consumer safety and reliability.

LADWP currently has robust protocols in place for reviewing and adopting new technologies related to solar and battery system installations. Our process involves thorough evaluation of each product's technical specifications, safety standards, and compatibility with existing infrastructure. Additionally, these processes prioritize our ability to provide reliable electric service directly to our customers.

While we acknowledge the importance of streamlining our review process to ensure efficiency and transparency, it is imperative to maintain stringent standards to safeguard the integrity of our electrical grid, protect our customers, and LADWP employees. Any modifications to our approval process will be carefully considered to strike the right balance between innovation and reliability, while respecting the boundaries of the utility sealed area.

In response to the motion, our new equipment evaluation process begins with the customer submittal. The customer shall provide technical documentation, the device's functional requirements, how it is planned to be used, any certifications from recognized agencies, and a sample of the equipment for evaluation. LADWP will review the submitted information, and depending on the device and the documentation, that could take anywhere from two to six weeks. After all documentation is received, we will then move into the screening process.

The screening process, which can take up to four weeks, is where we compare our existing requirements to the device. Our Electric Service Requirements Manual, which is available online, provides our customers with the most current information on our service equipment and installation requirements. We also review compliance with our interconnection agreements standards, rate ordinances, and the Rules Governing Water and Electric Service. If all standards are met, we will move the device into a more rigid evaluation and testing phase.

Depending on the type of device, the evaluation and testing phase can take anywhere from two weeks for a simple device or up to a year for something more complex. Subject matter experts (SME) across the LADWP are gathered to evaluate and test the device. The SME groups include planning, engineering, and technical personnel that regularly test products and devices used to provide reliable electric service. Once completed, an assessment will be produced providing test results, formal approval, or rejection of the device. This will also begin the formal introduction of the device to our staff that inspects our customer-built utility installations.

Today many devices are intelligent and include communication with cloud infrastructure as well as proprietary software. Companies invest in the development and integration of this software and consider them trade secrets. This creates concerns as LADWP may not be able to perform the necessary tests or identify the verified results. Additionally, as more networked devices become available, cyber security concerns arise as each networked device that is added becomes a potential point of intrusion and vulnerability and can have a wide range of customer impacts.

LADWP constantly explores options to pilot new technologies in our test labs, in controlled environments, and in real-life scenarios to help us determine the viability of using these new technologies. After our evaluation process is complete with positive results, we can begin identifying next steps to help advance these technologies to a point where they can be adopted.

We appreciate the City Council's continued support and collaboration as we work towards achieving our shared renewable energy goals. Together, we can ensure that Los Angeles remains at the forefront of the climate change fight and sets an example for other jurisdictions to follow.