

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 12, 2023

TA2023-1047

Jamie Asbury
Manager, Energy Division
Imperial Irrigation District (IID)
333 E. Barioni Boulevard
Imperial, CA 92251

Subject: Transmission Audit of IID's Imperial Valley Service Area

Ms. Asbury:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), James Miller of my staff conducted an electric transmission audit of IID's Imperial Valley Service Area from March 6, 2023 to March 10, 2023. The audit included a review of IID's records and field inspections of IID's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than July 12, 2023, by electronic or hard copy, of all corrective measures taken by IID to remedy and prevent the recurrence of such violations.

If you have any questions concerning this audit, you can contact James Miller at (213) 660-8898 or James.Miller@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosures: Audit Findings

Cc: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, CPUC
Majed Ibrahim, Senior Utilities Engineer Supervisor, ESRB, CPUC
James Miller, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- IID's Standard Operating Procedure for Line Construction and Maintenance
- IID's Transmission and Distribution Inspection Plan
- Patrol and Detailed Inspection Records
- Work Order Records
- Intrusive Testing Records
- Structural Loading Records
- Insulator Wash Records

II. Field Inspections

My staff inspected the following facilities during the field inspection:

No.	Structure ID	Circuit	Structure	Location
1	T-12001	HL4	Pole	Rural Holtsville
2	T-12000	HL1	Pole	Rural Holtsville
3	1075012D	E	Pole	Rural Holtsville
4	1075013D	E	Pole	Rural Holtsville
5	T-12002	HL1	Pole	Rural Holtsville
6	T-12003	HL4	Pole	Rural Holtsville
7	1075014D	E	Pole	Rural Holtsville
8	T-12004	HL1	Pole	Rural Holtsville
9	T-12005	HL4	Pole	Rural Holtsville
10	1075015D	E	Pole	Rural Holtsville
11	T-12006	HL1	Pole	Rural Holtsville
12	T-12007	HL4	Pole	Rural Holtsville
13	8703	KS & KN	Pole	Rural Holtsville
14	8702	KS & KN	Pole	Rural Holtsville
15	8701	KS & KN	Pole	Rural Holtsville
16	A776	A	Pole	Winterhaven
17	1221567	A	Pole	Winterhaven
18	1209535	A	Pole	Winterhaven
19	Unmarked east of previous	A	H-Frame	Winterhaven
20	A-773	A	Pole	Winterhaven
21	A-777	A	Pole	Winterhaven
22	1189804 East	A	Pole	Winterhaven
23	1189804 West	A	Pole	Winterhaven
24	A-780	A	Pole	Winterhaven
25	1211449	MB	Pole	Calipatria
26	1211450	MB	Pole	Calipatria
27	1211451	MB	Pole	Calipatria
28	1211452	MB	Pole	Calipatria
29	1211453	MB	Pole	Calipatria
30	1211454	MB	Pole	Calipatria
31	1211455	MB	Pole	Calipatria
32	1211456	MB	Pole	Calipatria
33	1211457	MB	Pole	Calipatria
34	1211458	MB	Pole	Calipatria
35	1211459	MB	Pole	Calipatria
36	1211448	MB	Pole	Calipatria
37	1219896	MB	Pole	Calipatria
38	1211447	MB	Pole	Calipatria

39	1211446	MB	Pole	Calipatria
40	1211445	MB	Pole	Calipatria
41	M3103D	M	H-Frame	Calipatria
42	M3102D	M	H-Frame	Calipatria
43	M3101D	M	H-Frame	Calipatria
44	M3100D	M	H-Frame	Calipatria
45	M3007D	M	H-Frame	Calipatria
46	M3006D	M	H-Frame	Calipatria
47	M3005D	M	H-Frame	Calipatria
48	M3004D	M	H-Frame	Calipatria
49	5601	KS-KN	Pole	Niland
50	5602	KS-KN	Pole	Niland
51	5603	KS-KN	Pole	Niland
52	5604	KS-KN	Pole	Niland
53	5701	KS-KN	Pole	Niland
54	5702	KS-KN	Pole	Niland
55	5703	KS-KN	Pole	Niland
56	5704	KS-KN	Pole	Niland
57	5801	KS-KN	Pole	Niland
58	5802	KS-KN	Pole	Niland
59	5803	KS-KN	Pole	Niland
60	5804	KS-KN	Pole	Niland
61	T-12500	MW1	H-Frame	Niland
62	T-12501	MW1	Pole	Niland
63	1209171D	MW2	H-Frame	Niland
64	1209196	MW2	Pole	Niland
65	T-12616	MW3	H-Frame	Niland
66	T-12617	MW3	Pole	Niland
67	1209170D	MW4	H-Frame	Niland
68	1209168D	MW4	Pole	Niland
69	T-12618	MW3 & MW4	Pole	Niland
70	T-12502	MW1 & MW2	Pole	Niland
71	T-12619	MW3 & MW4	Pole	Niland
72	T-12503	MW1 & MW2	Pole	Niland
73	T-12620	MW3 & MW4	Pole	Niland
74	T-12504	MW1 & MW2	Pole	Niland
75	T-12621	MW3 & MW4	Pole	Niland
76	T-12505	MW1 & MW2	Pole	Niland
77	1056929	R	Pole	Salton City
78	L4808AD	R & L	H-Frame	Salton City
79	1244986	R	Pole	Salton City
80	1244987	R	Pole	Salton City
81	1244988	R	Pole	Salton City

82	1244989	R	Pole	Salton City
83	1244990	R	Pole	Salton City
84	1244991	R	Pole	Salton City
85	1244992	R	Pole	Salton City
86	1244993	R	Pole	Salton City
87	1244994	R	Pole	Salton City
88	1244995	R	Pole	Salton City
89	1244996	R	Pole	Salton City
90	L4901	L	H-Frame	Salton City
91	L4902D	L	H-Frame	Salton City
92	L4903D	L	H-Frame	Salton City
93	L4904D	L	H-Frame	Salton City
94	L4905	L	M-Frame	Salton City
95	L4906D	L	H-Frame	Salton City
96	L4907D	L	H-Frame	Salton City
97	M0208	M	H-Frame	El Centro
98	M0207	M	H-Frame	El Centro
99	M0206D	M	H-Frame	El Centro
100	M0205	M	H-Frame	El Centro
101	M0204D	M	H-Frame	El Centro
102	M0203D	M	H-Frame	El Centro
103	M0202D	M	H-Frame	El Centro
104	M0201	M	Lattice Tower	El Centro
105	J-0112	J & B	Pole	El Centro
106	J-0113	J & B	Pole	El Centro
107	J-0114	J & B	Pole	El Centro
108	J-0115	J & B	Pole	El Centro
109	J-0116	J & B	Pole	El Centro
110	J-0117	J & B	Pole	El Centro
111	J-0118	J & B	Pole	El Centro
112	J-0119	J & B	Pole	El Centro
113	A0102A	A & B	Lattice Tower	El Centro
114	A0103A	A & B	Lattice Tower	El Centro
115	A0104A	A & B	Lattice Tower	El Centro
116	A0105A	A & B	Lattice Tower	El Centro
117	A0201A	A & B	Lattice Tower	El Centro
118	A0202A	A & B	Lattice Tower	El Centro

III. Field Inspection Violations List

My staff observed the following violations during the field inspections portion of the audit:

GO 95, Rule 31.1, Design Construction and Maintenance, states in part:

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.

Ground wires on the following structures had been cut:

- 1075012D
- T-12006
- M3006D
- L4906D
- L4907D
- M0207
- M0206D
- M0205
- A0105A

GO 95, Rule 51.6, Marking and Guarding, High Voltage Marking of Poles, states in part:

Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words “HIGH VOLTAGE”, or pair of signs showing the words “HIGH” and “VOLTAGE”, not more than six (6) inches in height with letters not less than 3 inches in height. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.

“High Voltage” signs on the following structures were either missing or damaged:

- 1189804
- M3006D
- M3005D
- M3004D
- T-12501
- T-12503
- 1244995
- L4902D
- L4903D
- L4904D
- L4905
- L4906D
- L4907D
- M0208M0206D
- M0205
- M0204D
- M0203D
- M0202D

GO 95, Rule 54.6-B, Ground Wires, states in part:

That portion of the ground wires 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 (see Rule 22.8).

The ground moulding on each of the following structures did not fully enclose the structure’s ground wire:

- T-12003
- T-12006
- M3103D

- M3004D
- T-12616
- 1209170D

- T-12620
- L4905
- M0207

- M0202D

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, Use, states in part:

Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44 .

A down guy wire attached to the east side of H-Frame L4901 was loose.