

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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April 22, 2024

EA2024-1118

Antonio Ortega
Government Affairs Officer
Imperial Irrigation District (IID)
88-600 Avenue 58
La Quinta, CA 92253

SUBJECT: Audit of Imperial Irrigation District (IID) Coachella Valley District

Mr. Ortega:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Eric Ujiiye of my staff conducted an electric distribution audit of IID's Coachella Valley District from February 5-9, 2024. The audit included a review of IID's inspection and maintenance records and a field inspection 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 May 22, 2024, by electronic or hard copy, of all corrective measures taken by IID to remediate and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Eric Ujiiye at (213) 620-2598 or eric.ujiiye@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

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, CPUC
Eric Ujiiye, Utilities Engineer, ESRB

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Intrusive test records.
- IID's visual inspection program.
- ESRB's interview of IID inspectors.

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 165, Section III-B, Standards for Inspection, states:

Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure 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.

GO 95, Rule 31.2, Inspection of Lines, states in part:

Lines shall be inspected frequently and thoroughly for the purpose of insuring that they are in good condition so as to conform with these rules.

IID records indicated from January 1, 2019 to January 1, 2024, IID had 190 patrol inspections that were either completed or pending completion past IID's scheduled due dates.

GO 95, Rule 18-A: Resolution of Safety Hazards and General Order 95 Nonconformances, states in part:

Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

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

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the

given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.

IID records indicated from January 1, 2019 to January 31, 2024, IID had 4,426 work orders that were either completed or pending completion past IID's scheduled due date for corrective action.

III. Field Inspection

My staff inspected the following facilities during the field portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	1071414	Pole	Coachella
2	1071415	Pole	Coachella
3	1034015	Pole	Coachella
4	950727D	Pole	Coachella
5	905045D	Pole	Coachella
6	950725D	Pole	Coachella
7	1034013	Pole	Coachella
8	1034008	Pole	Coachella
9	1034006	Pole	Coachella
10	93356D	Pole	Coachella
11	911321D	Pole	Coachella
12	909951D	Pole	Coachella
13	950721	Pole	Coachella
14	1206798	Pole	Coachella
15	922148D	Pole	Coachella
16	910030D	Pole	Coachella
17	1234628	Pole	Coachella
18	950720D	Pole	Coachella
19	93335 ID	Pole	Coachella
20	950719D	Pole	Coachella
21	31893CWT	Pole	Thermal / Oasis
22	1211686D	Pole	Thermal / Oasis
23	904972D	Pole	Thermal / Oasis
24	904973D	Pole	Thermal / Oasis
25	904974D	Pole	Thermal / Oasis
26	904975D	Pole	Thermal / Oasis
27	904976D	Pole	Thermal / Oasis
28	950233D	Pole	Thermal / Oasis
29	950234D	Pole	Thermal / Oasis
30	903834D	Pole	Thermal / Oasis
31	Polk Street	Pole	Thermal / Oasis
32	911459D	Pole	Thermal / Oasis
33	911466D	Pole	Thermal / Oasis
34	913333D	Pole	Thermal / Oasis
35	913334D	Pole	Thermal / Oasis
36	916729	Pole	Thermal / Oasis
37	1211605	Pole	Thermal / Oasis
38	913335D	Pole	Thermal / Oasis
39	913336D	Pole	Thermal / Oasis

40	913337D	Pole	Thermal / Oasis
41	UN1079012S	Pad Mount	La Quinta
42	UN1079010P	Pad Mount	La Quinta
43	1108021	Vault	La Quinta
44	1151101	Pad Mount	La Quinta
45	1151100	Pad Mount	La Quinta
46	UN1079018P	Pad Mount	La Quinta
47	UN1060617P	Pad Mount	La Quinta
48	1060616	Vault	La Quinta
49	UN1060701S	Pad Mount	La Quinta
50	UN1060628P	Pad Mount	La Quinta
51	UN4939S	Pad Mount	La Quinta
52	1204719S	Pad Mount	La Quinta
53	1204713S	Pad Mount	La Quinta
54	UN4215P	Pad Mount	La Quinta
55	4212IID	Vault	La Quinta
56	UN4207P	Pad Mount	La Quinta
57	UN4206S	Pad Mount	La Quinta
58	3955P	Pad Mount	La Quinta
59	UN3959P	Pad Mount	La Quinta
60	3960P	Pad Mount	La Quinta
61	4184	Pad Mount	La Quinta
62	UN3135P	Pad Mount	Indio
63	3132P	Pad Mount	Indio
64	3124P	Pad Mount	Indio
65	2126P	Pad Mount	Indio
66	2129P	Pad Mount	Indio
67	7298	Pad Mount	Indio

IV. Field Inspection – Violations List

GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states:

(3) 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 entity of such safety hazard(s) no later than 10 business days after the discovery.

IID did not document and report to the responsible third party the following safety hazards during its latest inspection:

- Pole 1034015 – a down guy anchor was severely corroded that it broke off at ground level and was lying in the dirt.
- Pole 1034006 – a communications span cable was severed and touching the ground.

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.

IID facilities on the following poles required maintenance:

- Pole 950725D – a pole step was damaged.
- Pole 911459D – a crossarm that was part of a double buck arm configuration was splitting at one end at the insulator attachment points.

On each of the following poles, the IID ground wire was missing a 3 to 4-foot section near the ground level of the pole:

- Pole 1034015
- Pole 905045D
- Pole 950725D
- Pole 1034013
- Pole 1034008
- Pole 1034006D
- Pole 909951D
- Pole 950721D
- Pole 922148D
- Pole 910030D
- Pole 950720D
- Pole 950719D

GO 95, Rule 51.6-A, 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.

The high voltage signs on each of the following IID poles were damaged and/or missing:

- Pole 1021415 – the “HIGH VOLTAGE” sign was damaged.
- Pole 950727D – the “VOLTAGE” portion of the sign was missing.
- Pole 905045D – the “HIGH VOLTAGE” was missing.
- Pole 950725D – the “HIGH VOLTAGE” sign was damaged.
- Pole 909951D – the “HIGH VOLTAGE” sign was damaged.
- Pole 1206798 – the “HIGH VOLTAGE” sign was missing.
- Pole 910030D – the “HIGH VOLTAGE” sign was missing.
- Pole 950720D – the “HIGH VOLTAGE” sign was missing.
- Pole 911466D – the “HIGH VOLTAGE” sign was damaged.
- Pole 916729 – the “HIGH VOLTAGE” sign was missing.
- Pole 913335D – the “HIGH VOLTAGE” sign was missing.
- Pole 913336D – the “HIGH VOLTAGE” sign was missing.

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 poles was damaged:

- Pole 1034015 – in addition to missing a 4-foot section of ground wire, the ground moulding is missing from ground to approximately 20 feet above ground.
- Pole 950727D – the ground moulding was damaged, exposing the ground wire at multiple locations.
- Pole 905725D – the ground moulding was damaged, exposing the ground wire near the primary level.

GO 95, Rule 92.4-C (2)e, Ground Rods (Ground Electrodes), states:

The driven ground rod(s), pipe(s), or equivalent shall be located 24 inches or more from the surface of the pole.

For Pole number 903834D, the ground rod was located 6 inches away from the surface of the pole (and protruding 4-inches out of the ground).

GO 128, Rule 17.1, 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.

IID facilities for each of the following underground facilities required maintenance:

- Padmount UN1030317Y – the secondary X2 bushing of the transformer was seeping oil at the attachment seal.
- Padmount 3955P – the padmount transformer was not secured to the pad.
- Padmount 3960P – portions of the padmount outer housing were deteriorated with holes.
- Padmount 4184P – a secondary bushing of the transformer was seeping oil at the attachment seal; additionally, the exterior housing was deteriorated with a hole in a corner of the lid.
- Padmount 3132P – the transformer was seeping oil around the base and openings.
- Padmount 2129P – Oil seepage was seen around the primary elbow and bayonet fuse of the transformer at the attachment seals.

GO 128, Rule 34.3-B, Guarding Live Parts, states in part:

Pad-mounted equipment that contains exposed live parts shall be installed to resist the passing of a wire the equivalent of a bare number 18 AWG from the outside between the pad and the housing of the equipment, into the compartment which contains live parts when it is closed.

Each of the following padmounted structure had a space between the pad and equipment that would allow an 18 AWG wire to pass into the compartment containing live parts when it is closed.

- Padmount UN1030317Y
- Padmount 3955P
- Padmount 2129P