

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 27, 2026

EA2026-1496

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), SM Arafat Kamal of my staff conducted an electric distribution audit of IID's Coachella Valley District from September 28 to October 2, 2026. 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 November 27, 2026, 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 SM Arafat Kamal at (213) 902-0325 or [SMArafat.Kamal@cpuc.ca.gov](mailto:SMArafat.Kamal@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Majed Ibrahim".

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

Enclosures: Audit Findings

Cc: Koko Tomassian, Director for Safety and Enforcement Division, CPUC  
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC  
Saimon Islam, Senior Utilities Engineer, Supervisor, ESRB, CPUC  
SM Arafat Kamal, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

## **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 I.*

**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 February 1, 2024 to August 31, 2026, IID had 168 patrol inspections that were either completed or pending completion past IID's scheduled due dates.

**GO 95, Rule 18-B1 - Maintenance Programs**, states in part:

*Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...*

**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.*

**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 records indicated from February 1, 2024 to August 31, 2026, IID had 1099 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 structures during the field inspection portion of the audit:

| No. | Structure ID. | Structure | City          | Latitude    | Longitude    |
|-----|---------------|-----------|---------------|-------------|--------------|
| 1   | 1244629       | Pole      | La Quinta     | 33.62826213 | -116.2332643 |
| 2   | 97790D        | Pole      | La Quinta     | 33.62809395 | -116.2332613 |
| 3   | 1245799       | Pole      | La Quinta     | 33.62926201 | -116.233263  |
| 4   | 97788         | Pole      | La Quinta     | 33.62929299 | -116.2332672 |
| 5   | 1227951       | Pole      | La Quinta     | 33.62989633 | -116.2332671 |
| 6   | 97786D        | Pole      | La Quinta     | 33.63048862 | -116.2332598 |
| 7   | 207836        | Pole      | La Quinta     | 33.63059918 | -116.233256  |
| 8   | 1248929       | Pole      | Coachella     | 33.68524282 | -116.16665   |
| 9   | 1071412       | Pole      | Coachella     | 33.68557301 | -116.167055  |
| 10  | 1248931       | Pole      | Coachella     | 33.68481088 | -116.166138  |
| 11  | 1248932       | Pole      | Coachella     | 33.68431889 | -116.1655241 |
| 12  | 1248933       | Pole      | Coachella     | 33.68389466 | -116.1650055 |
| 13  | 96042         | Pole      | Thermal       | 33.63329511 | -116.2161831 |
| 14  | 9044D         | Pole      | Thermal       | 33.63300135 | -116.2161853 |
| 15  | 909555D       | Pole      | Thermal       | 33.63299634 | -116.2159097 |
| 16  | 93826         | Pole      | Thermal       | 33.63081219 | -116.2290277 |
| 17  | 903114D       | Pole      | Thermal       | 33.63077865 | -116.2290255 |
| 18  | 919293D       | Pole      | Thermal       | 33.63016631 | -116.22903   |
| 19  | 93825         | Pole      | Thermal       | 33.63005995 | -116.2290253 |
| 20  | 918837D       | Pole      | Thermal       | 33.62973183 | -116.2290346 |
| 21  | 93824D        | Pole      | Thermal       | 33.62930219 | -116.2290198 |
| 22  | 93823D        | Pole      | Thermal       | 33.62855453 | -116.2290227 |
| 23  | 93822         | Pole      | Thermal       | 33.6278057  | -116.2290279 |
| 24  | T9269D        | Pole      | Thermal       | 33.6275299  | -116.229061  |
| 25  | 908954D       | Pole      | Thermal       | 33.61294461 | -116.1952137 |
| 26  | 908955D       | Pole      | Thermal       | 33.61281746 | -116.1952066 |
| 27  | T4104         | Pole      | Thermal       | 33.56818426 | -116.1126413 |
| 28  | T4139         | Pole      | Oasis         | 33.52520862 | -116.1129883 |
| 29  | 1237788       | Pole      | Oasis         | 33.52511035 | -116.1130057 |
| 30  | 1237789       | Pole      | Oasis         | 33.52495852 | -116.112983  |
| 31  | 1247176       | Pole      | Oasis         | 33.52481917 | -116.1129784 |
| 32  | 1238240       | Pole      | Oasis         | 33.52471669 | -116.1129889 |
| 33  | 1237790       | Pole      | Oasis         | 33.52398105 | -116.112992  |
| 34  | 1237791       | Pole      | Oasis         | 33.52342379 | -116.112972  |
| 35  | 1237792       | Pole      | Oasis         | 33.52272124 | -116.1129621 |
| 36  | 907125D       | Pole      | Desert Shores | 33.40211652 | -116.0420446 |

|    |           |                      |               |             |              |
|----|-----------|----------------------|---------------|-------------|--------------|
| 37 | 907124D   | Pole                 | Desert Shores | 33.40211355 | -116.0416502 |
| 38 | 906288    | Pole                 | Desert Shores | 33.40209398 | -116.0414823 |
| 39 | 919101D   | Pole                 | Desert Shores | 33.40236124 | -116.0413804 |
| 40 | 98039     | Pole                 | Desert Shores | 33.40236324 | -116.0414645 |
| 41 | 1187220D  | Pole                 | Desert Shores | 33.40235415 | -116.0416468 |
| 42 | 98040     | Pole                 | Desert Shores | 33.40162264 | -116.0416015 |
| 43 | 98133D    | Pole                 | Desert Shores | 33.40091057 | -116.041623  |
| 44 | 907126    | Pole                 | Desert Shores | 33.40169326 | -116.0420393 |
| 45 | 912016    | Pole                 | Mecca         | 33.56913597 | -116.0751162 |
| 46 | 1211151   | Pole                 | Mecca         | 33.56923011 | -116.0751257 |
| 47 | 912015    | Pole                 | Mecca         | 33.56921724 | -116.0754082 |
| 48 | 912014    | Pole                 | Mecca         | 33.56922512 | -116.0753292 |
| 49 | 1117301D  | Pole                 | Mecca         | 33.56922527 | -116.0747418 |
| 50 | 1117519   | Pole                 | Mecca         | 33.56944529 | -116.0746287 |
| 51 | 118092    | Pole                 | Mecca         | 33.56961221 | -116.0746367 |
| 52 | 922146D   | Pole                 | Mecca         | 33.56967817 | -116.0746381 |
| 53 | 1185300   | Pole                 | Mecca         | 33.56968983 | -116.0744049 |
| 54 | 91126     | Pole                 | Mecca         | 33.56970356 | -116.0740162 |
| 55 | 1059302   | Pole                 | Mecca         | 33.56970927 | -116.0737484 |
| 56 | UN1180006 | Padmount Transformer | Mecca         | 33.56966962 | -116.0742014 |
| 57 | UN1201508 | Padmount Switch      | Mecca         | 33.57004831 | -116.0737674 |
| 58 | UN8251    | Padmount Transformer | La Quinta     | 33.6373716  | -116.2536087 |
| 59 | 8250      | Vault                | La Quinta     | 33.63733046 | -116.2539947 |
| 60 | 907976    | Pole                 | La Quinta     | 33.66545875 | -116.3110968 |
| 61 | 907977    | Pole                 | La Quinta     | 33.66545284 | -116.3119409 |
| 62 | 48105CWT  | Pole                 | La Quinta     | 33.66543745 | -116.312808  |
| 63 | 907978D   | Pole                 | La Quinta     | 33.66546268 | -116.3136548 |
| 64 | 907979D   | Pole                 | La Quinta     | 33.66545764 | -116.3144883 |
| 65 | 44500CWT  | Pole                 | La Quinta     | 33.66546468 | -116.3144709 |
| 66 | 41448CWT  | Pole                 | La Quinta     | 33.66543787 | -116.3153596 |
| 67 | 205449D   | Pole                 | La Quinta     | 33.66546397 | -116.3162303 |
| 68 | 919738    | Pole                 | La Quinta     | 33.6654535  | -116.3168511 |
| 69 | 1203022   | Pole                 | La Quinta     | 33.67113509 | -116.2650201 |
| 70 | T19161D   | Pole                 | La Quinta     | 33.67113817 | -116.2645112 |
| 71 | 1187561D  | Pole                 | La Quinta     | 33.67126264 | -116.2655693 |
| 72 | T19163    | Pole                 | La Quinta     | 33.6711108  | -116.2655809 |
| 73 | T19164    | Pole                 | La Quinta     | 33.67112483 | -116.2663383 |
| 74 | UN1168716 | Padmount Transformer | La Quinta     | 33.72527362 | -116.2877735 |

|     |           |                      |               |             |              |
|-----|-----------|----------------------|---------------|-------------|--------------|
| 75  | 1168717   | Vault                | La Quinta     | 33.72530222 | -116.287823  |
| 76  | UN1168718 | Pole                 | La Quinta     | 33.72447435 | -116.2879725 |
| 77  | UN1168720 | Padmount Transformer | La Quinta     | 33.72364235 | -116.2879536 |
| 78  | UN1168721 | Padmount Transformer | La Quinta     | 33.72267061 | -116.2879254 |
| 79  | 1189055   | Pole                 | Indio         | 33.72213703 | -116.2521897 |
| 80  | 14263915  | Pole                 | Indio         | 33.72212094 | -116.2530273 |
| 81  | 1187439   | Pole                 | Indio         | 33.72211888 | -116.253954  |
| 82  | 1195307   | Pole                 | Indio         | 33.72217961 | -116.2479258 |
| 83  | 1195437D  | Pole                 | Indio         | 33.72213476 | -116.248425  |
| 84  | 1195306   | Pole                 | Indio         | 33.72213065 | -116.2488421 |
| 85  | 1208025   | Pole                 | Indio         | 33.72247779 | -116.2483857 |
| 86  | 903087D   | Pole                 | Indio         | 33.72291436 | -116.2483891 |
| 87  | 903086    | Pole                 | Indio         | 33.72294435 | -116.2482113 |
| 88  | 903095D   | Pole                 | Indio         | 33.7229129  | -116.2492902 |
| 89  | 903094D   | Pole                 | Indio         | 33.72278384 | -116.2492962 |
| 90  | 903096D   | Pole                 | Indio         | 33.72319522 | -116.2492677 |
| 91  | 903088    | Pole                 | Indio         | 33.72290221 | -116.24873   |
| 92  | 903176    | Pole                 | Indio         | 33.72303895 | -116.2483731 |
| 93  | 1039914   | Padmount Switch      | Indio         | 33.72211176 | -116.2584463 |
| 94  | UN1039913 | Padmount Transformer | Indio         | 33.7221147  | -116.2583971 |
| 95  | UN1179713 | Padmount Transformer | Indio         | 33.72210435 | -116.2587259 |
| 96  | UN1081204 | Padmount Transformer | Indio         | 33.71903944 | -116.2679641 |
| 97  | 1081203   | Padmount Transformer | Indio         | 33.71972327 | -116.2679844 |
| 98  | UN1081202 | Padmount Transformer | Indio         | 33.72043192 | -116.2679797 |
| 99  | 1081200   | Vault                | Indio         | 33.72109665 | -116.2679775 |
| 100 | 1081201   | Padmount Transformer | Indio         | 33.72115441 | -116.2681384 |
| 101 | 914226D   | Pole                 | Bermuda Dunes | 33.74272294 | -116.2864307 |
| 102 | 902187    | Pole                 | Bermuda Dunes | 33.74240339 | -116.2864372 |
| 103 | 902188    | Pole                 | Bermuda Dunes | 33.74184332 | -116.2860659 |
| 104 | 1248792   | Pole                 | Bermuda Dunes | 33.74176159 | -116.2860352 |
| 105 | 905518D   | Pole                 | Bermuda Dunes | 33.74168404 | -116.2861643 |
| 106 | 1248507   | Pole                 | Bermuda Dunes | 33.7412129  | -116.2856065 |
| 107 | 902189D   | Pole                 | Bermuda Dunes | 33.74116543 | -116.2856199 |

|     |          |      |                |             |              |
|-----|----------|------|----------------|-------------|--------------|
| 108 | 904461D  | Pole | Bermuda Dunes  | 33.74097615 | -116.285698  |
| 109 | 34920CWT | Pole | Bermuda Dunes  | 33.74076164 | -116.2858343 |
| 110 | 902190D  | Pole | Bermuda Dunes  | 33.74021147 | -116.2860879 |
| 111 | 904052   | Pole | Indian Wells   | 33.7075617  | -116.2953261 |
| 112 | 904074D  | Pole | Indian Wells   | 33.70752387 | -116.2959635 |
| 113 | 904075D  | Pole | Indian Wells   | 33.70756021 | -116.2965277 |
| 114 | 904076D  | Pole | Indian Wells   | 33.70778341 | -116.2969725 |
| 115 | 1204276  | Pole | Indian Wells   | 33.70823037 | -116.2972297 |
| 116 | 904078D  | Pole | Indian Wells   | 33.70872953 | -116.2974255 |
| 117 | 904079   | Pole | Indian Wells   | 33.7092025  | -116.2975478 |
| 118 | 1204275  | Pole | Indian Wells   | 33.70941109 | -116.2975596 |
| 119 | 904081   | Pole | Indian Wells   | 33.70947278 | -116.2975688 |
| 120 | 1116920D | Pole | Indian Wells   | 33.70949256 | -116.2974652 |
| 121 | 904588   | Pole | Thousand Palms | 33.81506927 | -116.4003717 |
| 122 | 918436   | Pole | Thousand Palms | 33.81562246 | -116.4008424 |
| 123 | 1186232  | Pole | Thousand Palms | 33.81610875 | -116.4012262 |
| 124 | 916442   | Pole | Thousand Palms | 33.81618294 | -116.4012938 |
| 125 | 90761    | Pole | Thousand Palms | 33.81621385 | -116.4014477 |
| 126 | 1075810  | Pole | Thousand Palms | 33.81623108 | -116.4020231 |
| 127 | 1119702  | Pole | Rancho Mirage  | 33.79434144 | -116.4043123 |
| 128 | 900656D  | Pole | Rancho Mirage  | 33.79435505 | -116.4037003 |
| 129 | 1248700  | Pole | Rancho Mirage  | 33.79435182 | -116.403516  |
| 130 | 901190D  | Pole | Rancho Mirage  | 33.79459822 | -116.4036956 |
| 131 | 901191D  | Pole | Rancho Mirage  | 33.794639   | -116.4039735 |
| 132 | 1240472  | Pole | Rancho Mirage  | 33.79440662 | -116.399235  |
| 133 | 1083605D | Pole | Rancho Mirage  | 33.79438902 | -116.3989422 |
| 134 | 1115103D | Pole | Palm Desert    | 33.77286269 | -116.3488397 |
| 135 | 1115102D | Pole | Palm Desert    | 33.77284463 | -116.3475657 |
| 136 | 1115101D | Pole | Palm Desert    | 33.77286658 | -116.3462203 |
| 137 | 1115105D | Pole | Palm Desert    | 33.77286148 | -116.351241  |
| 138 | 1115106D | Pole | Palm Desert    | 33.77285099 | -116.3522809 |
| 139 | 1115107D | Pole | Palm Desert    | 33.77285023 | -116.3525176 |

#### IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection 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.*

IID's facilities on the following poles required maintenance:

- Pole No. 34920CWT – the riser strap was damaged.
- Pole No. 904461D – the transformer was rusted.
- Pole No. 902189D – the pole step was damaged.
- Pole No. 902189D – pole stub located adjacent to the pole.
- Pole No. 1211151 – a section of ground wire was damaged.
- Pole No. 1186232 – ground exposed at the pole base.
- Pole No. 1245799 – the pole bond requires staples to be securely attached to the pole.

The IID down guy anchor supporting each of the following poles was buried:

- Pole No. 903176
- Pole No. 1203022
- Pole No. 903094D

The pole tag attached to the following poles was damaged:

- Pole No. 1204276
- Pole No. 922146D

The following poles had a buddy pole:

- Pole No. 1204275
- Pole No. 1237792
- Pole No. 1204276
- Pole No. 1237791
- Pole No. 1208025
- Pole No. 1237790
- Pole No. 907124D

The visibility strip attached to the following poles was damaged:

- Pole No. 1083605D
- Pole No. 1187220D
- Pole No. 903095D
- Pole No. 919101D
- Pole No. 919738
- Pole No. 1237792
- Pole No. 1185300
- Pole No. 919293D
- Pole No. 912014
- Pole No. 1071412
- Pole No. 912016

**GO 95, Rule 35, Vegetation Management**, states in part:

*When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).*

The IID conductor attached to the Pole No. 1227951 was strained by vegetation.

**GO 95, Rule 54.6-B, Vertical and Lateral Conductors, 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 attached to each of the following poles was damaged:

- Pole No. 1240472
- Pole No. 900656D
- Pole No. 1119702
- Pole No. 90761
- Pole No. 904074D
- Pole No. 902190D
- Pole No. 902189D
- Pole No. 902187D
- Pole No. 914226D
- Pole No. T19164
- Pole No. 41448CWT
- Pole No. 907978D
- Pole No. 1185300
- Pole No. 922146D
- Pole No. 1211151
- Pole No. 1187220D
- Pole No. 907125D
- Pole No. 1237792
- Pole No. 1237791
- Pole No. 1238240
- Pole No. 1237789
- Pole No. 1237788
- Pole No. T9269D
- Pole No. 93824
- Pole No. 918837D
- Pole No. 93825
- Pole No. 919293D
- Pole No. 1244629

**GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wire**, 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.*

The IID down guy wire supporting each of the following poles was loose and not taut:

- Pole No. 1117519
- Pole No. 907126
- Pole No. 912014

**GO 95, Rule 56.9, Guy Marker (Guy Guard),** states in part:

*A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.*

The guy guard for the anchor guy attached to each of the following poles was missing/damaged:

- Pole No. 904075D
- Pole No. 903094D
- Pole No. 903086
- Pole No. 1117519
- Pole No. 1117301D

**GO 95, Rule 51.6-A, Marking and Guarding, High Voltage Marking,** 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. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.*

The high voltage sign on each of the following poles was either missing and/or damaged:

- Pole No. 1115107D
- Pole No. 1115105D
- Pole No. 1115103D
- Pole No. 904588
- Pole No. 1116920D
- Pole No. 904078D
- Pole No. 904074D
- Pole No. 914226D
- Pole No. 903088
- Pole No. 903096D
- Pole No. 903095D
- Pole No. 903087D
- Pole No. 1203022
- Pole No. 919738
- Pole No. 205449D
- Pole No. 907977
- Pole No. 907976
- Pole No. 91126
- Pole No. 1117301D
- Pole No. 912014
- Pole No. 98133D
- Pole No. 907124D
- Pole No. 908954D
- Pole No. 93824D
- Pole No. 93825
- Pole No. 919293D
- Pole No. 903114D
- Pole No. 93826
- Pole No. 909555D
- Pole No. 97786D

**GO 128, Rule 35.3, Warning Signs,** states:

*Warning signs indicating high voltage shall be installed on an interior surface, or barrier if present, inside the entrance of vaults, manholes, handholes, pad mounted transformer compartments, and other above ground enclosures containing exposed live parts above 750 volts. Such warning signs shall also be installed on an exterior surface of all such pad mounted transformer compartments and other above ground enclosures. Such signs shall be clearly visible to a person in position to open any such access door, other opening, or barrier.*

The high voltage warning sign on each of the following structures was either missing and/or damaged:

- Structure No. UN1039913
- Structure No. UN1168721
- Structure No. UN1168720
- Structure No. UN1201508
- Structure No. UN1168718

**GO 128, Rule 17.1 – 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 [the] communication or supply lines and equipment.*

The following IID vault covers were missing bolts and were not properly secured:

- Structure No. 1081200
- Structure No. 1168717