

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 4, 2013

Edward L. Varnado
Assistant Engineer
Energy Reliability / Customer Operations
Imperial Irrigation District (IID)
1653 West Main Street
El Centro, CA 92243

CPUCID: EA2013-008

SUBJECT: Electric Audit of IID's Imperial Division


Dear Mr. Varnado:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Derek Fong and Zelalem Ewnetu of my staff conducted an audit of IID's Imperial Division from June 10, 2013 to June 14, 2013. The audit included a review of IID's records and field inspections of IID's facilities.

During the audit, we identified violations of General Orders 95 and 165. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than October 4, 2013, by electronic or hard copy, of all corrective measures taken by IID to remedy and prevent such violations.

If you have any questions, you can contact Derek Fong at (213) 576-6850 or derek.fong@cpuc.ca.gov.

Sincerely,



Raymond Fugere, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Audit Summary

Cc: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division
Fadi Daye, P.E., Senior Utilities Engineer Supervisor, CPUC – LA

AUDIT SUMMARY

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| 1. | Location: | Imperial Division |
| | Date of CPUC Inspection: | 6/10/2013 |
| Explanation of Violation(s): | | |
| <u>Late Work Orders</u> | | |
| <p>GO 165, Section IV, Record-keeping, States in part:</p> <p style="padding-left: 40px;"><i>For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.</i></p> <p>Records indicated that from 2012 to 2013, there were five late Critical or High Priority overhead work orders (Poles numbered 1088628, 55962, 50582, 4765, 40657) and one late Critical underground work order (Structure 1039266 on Circuit L511).</p> | | |
| <u>Late Underground Detailed Inspections</u> | | |
| <p>GO 165, Section IV, Standards for Inspection, States:</p> <p style="padding-left: 40px;"><i>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.</i></p> <p>Records indicated that underground transformers and switches in your IID Imperial Division have been inspected only once since 2006. GO 165, Table 1, requires all underground transformers and switches to be detail-inspected at least once every three years.</p> <p>Records indicated that padmounted structure in your IID Imperial Division have been inspected only once since 2006. GO 165, Table 1, requires all padmounted structure to be detail-inspected at least once every five years.</p> | | |

The following violations were not documented and/or addressed by IID during its last detailed inspection as required by General Order 165:

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| 2. | Location: | Pole No. 73993 |
| | Previous IID Visit Details: | 2012 |
| | Date of CPUC Inspection: | 6/11/2013 |
| Explanation of Violation(s): | | |
| <u>Loose IID Down Guy Wire</u> | | |
| GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, States in part: | | |
| <i>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.</i> | | |
| A down guy wire was not taut. This violation was not documented when IID last inspected the pole. | | |

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| 3. | Location: | Pole No. 73873 |
| | Previous IID Visit Details: | 2012 |
| | Date of CPUC Inspection: | 6/11/2013 |
| Explanation of Violation(s): | | |
| <u>Third Party Safety Hazard – Broken Lashing Wire</u> | | |
| GO 95, Rule 18B, Notification of Safety Hazards, States: | | |
| <i>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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.</i> | | |
| A lashing wire supporting a communication cable on the pole was broken. IID did not notify the communication company of this GO nonconformance when it last visited the pole. | | |

| | | |
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| 4. | Location: | Pole No. 65923 |
| | Previous IID Visit Details: | 2012 |
| | Date of CPUC Inspection: | 6/11/2013 |
| Explanation of Violation(s): | | |
| <u>Third Party Safety Hazard – Broken Lashing Wire</u> | | |
| <p>GO 95, Rule 18B, Notification of Safety Hazards, States:</p> <p style="text-align: center;"><i>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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.</i></p> <p>A lashing wire supporting a communication cable on the pole was broken. IID did not notify the communication company of this GO nonconformance when it last visited the pole.</p> | | |

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| 5. | Location: | UE325 |
| | Previous IID Visit Details: | 8/1/2008 |
| | Date of CPUC Inspection: | 6/13/2013 |
| Explanation of Violation(s): | | |
| <u>Missing Tie Down Bracket</u> | | |
| <p>GO 128, Rule 34.3-A, Strength, States:</p> <p style="text-align: center;"><i>The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</i></p> <p>A tie down bracket was missing. This violation was not documented when IID last inspected the padmounted structure.</p> | | |

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| 6. | Location: | UO41 |
| | Previous IID Visit Details: | 3/12/2007 |
| | Date of CPUC Inspection: | 6/13/2013 |
| Explanation of Violation(s): | | |
| <u>Missing Two Tie Down Brackets</u> | | |
| GO 128, Rule 34.3-A, Strength, States: | | |
| <i>The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</i> | | |
| Two tie down brackets were missing. This violation was not documented when IID last inspected the padmounted structure. | | |

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| 7. | Location: | 1043604 |
| | Previous IID Visit Details: | 3/28/2008 |
| | Date of CPUC Inspection: | 6/13/2013 |
| Explanation of Violation(s): | | |
| <u>Missing Tie Down Bracket</u> | | |
| GO 128, Rule 34.3-A, Strength, States: | | |
| <i>The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</i> | | |
| A tie down bracket was missing. This violation was not documented when IID last inspected the padmounted structure. | | |