PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

May 15, 2026 SA2026-1395

Matthew Smelser
Power Department Manager
Imperial Irrigation District
333 East Barioni Blvd.
Imperial, CA 92251

SUBJECT: Substation Audit of Imperial Irrigation District El Centro (Imperial Valley) District

Mr. Smelser:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Eric Ujiiye of my staff conducted a substation audit of IID's El Centro (Imperial Valley) District from April 6-10, 2026. The audit was comprised of a records review and a substation facilities field inspection for the IID El Centro (Imperial Valley) District.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings that itemize the violations is enclosed with this letter. Please advise me no later than June 15, 2026, by electronic or hard copy, of all corrective measures taken by IID to remedy 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,

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: Lee Palmer, Deputy Executive Director, Safety Enforcement, Safety Policy, and Water, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records onsite:

- Map of the substations in IID El Centro (Imperial Valley) District.
- IID Substation maintenance and inspection procedures
- IID Substation Testing Policies and Procedures
- IID El Centro (Imperial Valley) District Substation Inspector – GO174 Training Records Documentation
- IID El Centro (Imperial Valley) District Substation Inspection Records from January 2023 – December 2025
- Inspection Checklists and One-Line Diagrams for three selected substations
- Pending and Completed Workorders for the year 2025.

II. Field Inspections

My staff inspected the following substation facilities during the field inspection:

No.	Substation ID	Location	Latitude	Longitude
1	Bard	Ross Road & Cocopah Road	32.781587	-114.574599
2	Winterhaven	E Street & 1st Street	32.738854	-114.633478
3	Araz	Algodones Road	32.738195	-114.714179
4	Pilot Knob	Algodones Road	32.736588	-114.714594
5	Drop 3	Highway 98	32.705956	-115.126355
6	Drop 4	Highway 98	32.705941	-115.218280
7	Verde	Bonds Corner Rd. & Verde School	32.722895	-115.337590
8	Highline	Evan Hewes Hwy	32.769531	-115.272945
9	Salton City	Service Rd. Harbor Drive	32.285356	-115.969796
10	Anza	Hwy 78 & Pole Line Rd.	33.125315	-115.978596
11	San Felipe	Split Mountain Rd. & Broadway	33.100370	-116.115405
12	Westmorland	C Street & East 5th Street	33.038011	-115.618901
13	Parkview	Western Ave. & River Dr.	32.986802	-115.543502
14	Brawley	Malan Street & S. 5th Street	32.970357	-115.533454
15	Brawley Diesel	Dogwood Rd. & Malan St.	32.968478	-115.534836
16	Panno	W. Legion Rd. & Panno St.	32.962880	-115.560958
17	Imperial Dam	Imperial Dam Rd.	32.880828	-114.473543
18	Central	La Brucherie & Treshill	32.818151	-115.578240
19	Euclid	N. La Brucherie & W. Euclid	32.799413	-115.578817
20	Dahlia	S. La Brucherie & Ross Ave.	32.781336	-115.577586
21	Clark	S. Clark Rd. & Manual Ortiz Ave.	32.736724	-115.565622
22	Hebar	E. Main St. & Mary Ave.	32.728775	-115.523958
23	Mall	S. Dogwood Rd.	32.759327	-115.534385
24	Terminal	W. Commercial & N. 3rd St.	32.795020	-115.549235
25	El Centro PV	N. Dogwood & Villa Ave	32.802911	-115.544527

III. Field Inspection - Violations List

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

GO 174, Rule 12, General, states in part:

> *Substations shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to promote the safety of workers and the public and enable adequacy of service.*
>
> *Design, construction, and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.*

Facilities at the following substations were not maintained for their intended use:

Bard Substation

- Several of the steel framing concrete foundation footings were fractured and corroded.

Winterhaven Substation

- Several of the steel framing and equipment concrete foundation footings were fractured and corroded.
- The B and C phase PT transformers on the USO gas switch exhibited damage with signs of tracking.

Araz Substation

- The vacuum gauge housing on the transformer bank was damaged, exposing the internal workings to the elements.

Pilot Knob Substation

- There was overgrown vegetation scattered throughout the substation.
- 34/95 kV REG 3: Avian nesting material was seen on top of a disconnect on REG 3.
- 34/95 kV Bank 1: A winding temperature gauge had a broken sight-glass on Bank 1
- 34/95 kV Transformer Bank 2 had an oil leak that ran down the side of the bank access cabinet.

Drop 3 Hydro Plant Substation

- The second transformer bank from the entrance gate had oil seepage; additionally, an oil reservoir tank gauge displayed oil levels below the one-quarter level and was nearly empty.

Drop 4 Hydro Plant Substation

- Transformer Bank 1 had oil leakage near the top of a supported radiator.
- Transformer Bank 2 had oil leakage; additionally, the oil gauge displayed a low oil level.

Verde Substation

- Transformer Bank 2 had an oil level gauge displaying an oil level below the "FILLING LEVEL".
- Transformer Bank 1 had an oil level gauge displaying an oil level below the "FILLING LEVEL".
- There was a chipped porcelain insulator on the line supported on the wooden structure leading to the H17 Regulator.

Highline Substation

- The oil level gauge displayed a low level near to the external reservoir tank of Bank 1.

Salton City Substation

- A 1 x 3 foot section of the perimeter chain-link fencing was cut out, allowing access.

San Felipe Substation

- A CT bushing gauge displayed low oil levels on the CT connected to the ROBW gas switch.
- A Battery Bank 1 battery cell was leaking near the negative terminal.

Parkview Substation

- There were avian nests located near the side and top of a capacitor located on Capacitor Bank One

Brawly Substation

- A radiator cooling fan was not functioning on transformer Bank 1.

Brawly Diesel Substation

- A radiator cooling fan was not functioning on transformer Bank 6.

Euclid Substation

- An NFPA diamond sign located on the front gate was faded and barely legible.
- A bonding wire was damaged and detached for a section of barbed wired supported near the entrance of the perimeter fencing.

Dahlia Substation

- The fluid level was below the minimum level indicator of Battery Cell 46 in the battery room.

Clark Substation

- An NFPA diamond sign located on the front gate was faded and barely legible.
- Sections of barbed wire were damaged and missing from the perimeter fencing.

Heber Substation

- An NFPA diamond sign located on the control room door was damaged and partially displayed.

Terminal Substation

- An NFPA diamond sign located on the front gate was faded and barely legible.