

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 10, 2026

TA2026-1386

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

Subject: Transmission Audit of IID's El Centro Service Area

Ms. Asbury:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Kyle King of my staff conducted a transmission audit of IID's El Centro Service Area from March 16-20, 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). Included with this letter is a copy of the audit findings that itemize the violations discovered during the audit. Please advise me no later than May 11, 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 Kyle King at (213) 222-3260 or kyle.king@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: Lee Palmer, Deputy Executive Director for Safety Enforcement, Safety Policy and Water, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Kyle King, Utilities Engineer, Electric Safety and Reliability Branch, 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. Records Review – Violations List

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

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.

IID's records indicated that from March 2023 to November 2025, IID completed 110 overhead work orders past IID's scheduled due date for corrective action.

III. Field Inspections

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

No.	Structure ID.	Structure	Location	Latitude	Longitude
1	1056999	Pole	Salton City	33.28503	115.97024
2	1213726D	Pole	Salton City	33.28467	115.97124
3	1057001	Pole	Salton City	33.28439	115.97204
4	1057002	Pole	Salton City	33.28407	115.97294
5	1057003	Pole	Salton City	33.28381	115.97376
6	1057004	Pole	Salton City	33.28356	115.97450
7	1057005	Pole	Salton City	33.28334	115.97528
8	1057006	Pole	Salton City	33.28308	115.97597
9	1057007	Pole	Salton City	33.28278	115.97682
10	1057008	Pole	Salton City	33.28251	115.97766
11	L4407D	Pole	Salton City	33.28140	115.95404
12	L4406D	Pole	Salton City	33.27961	115.95276
13	L4405O	Pole	Salton City	33.27785	115.95150
14	L4404D	Pole	Salton City	33.27623	115.95036
15	L4403D	Pole	Salton City	33.27449	115.94906
16	L4402D	Pole	Salton City	33.27277	115.94785
17	L4401D	Pole	Salton City	33.27123	115.94674
18	L4307D	Pole	Salton City	33.26943	115.94546
19	L4306D	Pole	Salton City	33.26773	115.94417
20	L4305D	Pole	Salton City	33.26600	115.94299
21	1246466	Pole	Westmorland	33.03736	115.61440
22	T1483D	Pole	Westmorland	33.03742	115.61379
23	1246465	Pole	Westmorland	33.03740	115.61321
24	T51318	Pole	Westmorland	33.03735	115.61254
25	T51317	Pole	Westmorland	33.03741	115.61218
26	T51316	Pole	Westmorland	33.03739	115.61174
27	T51315	Pole	Westmorland	33.03740	115.61127
28	T51314	Pole	Westmorland	33.03740	115.61071
29	T51313	Pole	Westmorland	33.03742	115.61043
30	T51312	Pole	Westmorland	33.03737	115.60964
31	T51311	Pole	Westmorland	33.03736	115.60908
32	T51310	Pole	Westmorland	33.03739	115.60858
33	T51309	Pole	Westmorland	33.03738	115.60803
34	T51308	Pole	Westmorland	33.03734	115.60752
35	T51307	Pole	Westmorland	33.03738	115.60694
36	T51306	Pole	Westmorland	33.03736	115.60649
37	T51305	Pole	Westmorland	33.03738	115.60594
38	T51304	Pole	Westmorland	33.03740	115.60544
39	T51303	Pole	Westmorland	33.03737	115.60488
40	TS1302	Pole	Westmorland	33.03738	115.60437
41	C3006	Pole	Winterhaven	32.74349	114.75517
42	C3005	Pole	Winterhaven	32.74363	114.75739
43	C3004	Pole	Winterhaven	32.74360	114.75974
44	C3003	Pole	Winterhaven	32.74355	114.76225

45	C3002	Pole	Winterhaven	32.74355	114.76460
46	C3001	Pole	Winterhaven	32.74360	114.76702
47	C2907	Pole	Winterhaven	32.74356	114.76941
48	C2906	Pole	Winterhaven	32.74354	114.77172
49	C2905	Pole	Winterhaven	32.74356	114.77403
50	C2904	Pole	Winterhaven	32.74364	114.77630
51	A941D	Pole	Felicity	32.74800	114.75521
52	A940D	Pole	Felicity	32.74785	114.75615
53	A939D	Pole	Felicity	32.74800	114.75708
54	1040467	Pole	Felicity	32.74805	114.75740
55	1050497D	Pole	Felicity	32.76075	114.75603
56	1050496D	Pole	Felicity	32.76078	114.75807
57	1050495	Pole	Felicity	32.76074	114.75990
58	1050494D	Pole	Felicity	32.76077	114.76170
59	1050493	Pole	Felicity	32.76075	114.76367
60	1050492D	Pole	Felicity	32.76075	114.76569
61	T20547	Pole	El Centro	32.79712	115.53562
62	T20546	Pole	El Centro	32.79774	115.53562
63	T20544	Pole	El Centro	32.79896	115.53563
64	T20543	Pole	El Centro	32.79959	115.53562
65	T20542	Pole	El Centro	32.80018	115.53563
66	T20541	Pole	El Centro	32.80083	115.53561
67	T201	Pole	El Centro	32.80184	115.53558
68	1239861	Pole	El Centro	32.80212	115.53562
69	1239858	Pole	El Centro	32.80248	115.53562
70	T203	Pole	El Centro	32.80323	115.53560
71	T204	Pole	El Centro	32.80395	115.53558
72	T218	Pole	El Centro	32.80456	115.53555
73	T216	Pole	El Centro	32.80517	115.53556
74	T214	Pole	El Centro	32.80577	115.53555
75	T2812	Pole	El Centro	32.80635	115.53557
76	T199	Pole	El Centro	32.80701	115.53560
77	T198	Pole	El Centro	32.80765	115.53556
78	A0102A	Lattice Steel Structure	El Centro	32.80366	115.53504
79	A0103A	Lattice Steel Structure	El Centro	32.80356	115.53108
80	A0104A	Lattice Steel Structure	El Centro	32.80355	115.52675
81	A0105A	Lattice Steel Structure	El Centro	32.80354	115.52244
82	A0201A	Lattice Steel Structure	El Centro	32.80357	115.51843
83	A0202A	Lattice Steel Structure	El Centro	32.80360	115.51413
84	A0203A	Lattice Steel Structure	El Centro	32.80358	115.50998
85	PI-0118	Pole	El Centro	32.79339	115.53550
86	PW-0733	Pole	Heber	32.70998	115.53384
87	T-3449	Pole	Calexico	32.66824	115.49407
88	T1249518	Pole	Holtville	32.78059	115.29274
89	T-20717	Pole	Holtville	32.81287	115.39405

IV. 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.

The visibility strips supported on the following IID poles were damaged:

- C3006
- C3004
- C3002
- C2907
- A941D
- A940D
- A939O
- 1050492D
- T20546
- T20542
- T199
- T198

IID facilities on the following structures required maintenance:

- A0102A - IID lattice steel structure had vegetation that was covering one of the concrete footers
- A0105A - IID lattice steel structure had two steel angle beams that were bent
- A0201A – IID lattice steel structure had one of the concrete footers buried
- A0202A – IID lattice steel structure had one steel angle beam that was bent
- L4401D – ITO pole had a broken ground wire

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.

The high voltage signs on each of the following poles were damaged:

- 1213726D
- L4407D
- L4404D
- L4307D
- C3006
- C2907
- A941D
- 1040467
- 1050494D
- T20542
- T218
- T198
- 1057005
- L4406D
- L4403D
- L4306D
- C3004
- C2905
- A940D
- 10504970
- 1050492D
- T201
- T2812
- 1057007
- L4405D
- L4402D
- L4305D
- C3002
- C2904
- A939D
- 1050495
- T20544
- T203
- T199

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 attached to each of the following poles was damaged:

- L4403D
- C3002
- 1050497D
- T20547
- T20546
- T198
- L4402D
- C2904
- L4306D
- A941D

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.

The down guy wire supporting the following IID structures were loose or damaged:

- T203 – a down guy wire was loose.
- C3006 – a down guy wire was damaged.
- L4403D – a down guy wire was loose.