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September 12, 2023

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

RE: Substation Audit of IID El Centro District

Mr. Daye,

We would like to acknowledge receipt of your letter dated August 22, 2023, in which you shared the findings of the California Public Utilities Commission's (CPUC) substation audit of the Imperial Irrigation District's (IID) El Centro District, conducted by CPUC staff from June 12 to June 16, 2023. Your letter requested a response from IID on or before September 22, 2023.

As previously communicated in our response dated May 26, 2023, IID is unwavering in its commitment to delivering safe and affordable services to our valued customers. We also wish to express our gratitude for the dedicated efforts of the Electric Safety and Reliability Branch of the CPUC in conducting this audit.

It remains our steadfast position that, as a municipal utility, we are not subject to the jurisdiction of the CPUC except as explicitly authorized by statute. Consequently, IID is not obligated to provide a formal response to the audit findings, as we maintain our stance in this matter.

However, it is with great pleasure that we inform you that all of the inconsistencies highlighted in your August 22, 2023 letter have been promptly addressed, and the necessary documentation is enclosed herewith for your reference.

We appreciate your understanding of our position and hope that this resolution of the identified discrepancies demonstrates our commitment to maintaining the highest standards of service. Should you have any further inquiries or require additional information, please do not hesitate to reach out to us.

Sincerely,

Jesse Medina
Assistant Manager, Substations Operations & Maintenance
Imperial Irrigation District

Enclosure

cc: Stacey Ocampo, Stacey.Ocampo@cpuc.ca.gov
Jamie Asbury, IID
Matthew Smelser, IID
Gerardo Landeros, IID
Veronica Zaragoza, IID

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

Substations shall be designed, constructed, and maintained for their internal 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.

The following items were corrected as follow;

Item Description	WO#	Completed On
Euclid Substation		
<ul style="list-style-type: none"> The cooling fan on Transformer Bank 4 failed to start as expected. 	10623534	06/26/2023
<ul style="list-style-type: none"> A communication wire was exposed on the ground and poses a tripping hazard. 	10623534	06/20/2023
Clark Substation		
<ul style="list-style-type: none"> Bird nests were found under the LUWO circuit breaker A and C phase bushings. 	10623534	06/21/2023
<ul style="list-style-type: none"> A bird nest was found under the H1D1 switch A phase bushing. 	10623534	06/21/2023
<ul style="list-style-type: none"> Bird nests were found under the LUEO circuit breaker A and C phase bushings. 	10623534	06/21/2023
Mall Substation		
<ul style="list-style-type: none"> A bird nest was found under the EDNO circuit breaker C phase bushing. 	10623534	06/20/2023
<ul style="list-style-type: none"> A bird nest was found under the EDSD2 switch B phase bushing. 	10623534	06/20/2023
<ul style="list-style-type: none"> The Transformer Bank 1 was leaking oil from the bottom valve. 	10623534	06/20/2023
<ul style="list-style-type: none"> The ground wire on Transformer Bank 1 was damaged. 	10623534	06/20/2023
Heber Substation		
<ul style="list-style-type: none"> A bird nest was found under the PED2 switch A phase bushing. 	10623534	06/20/2023
El Centro Switching Station Substation		
<ul style="list-style-type: none"> The control wires under LXD4 switch (34 kV) were abandoned and pose a tripping hazard. 	10623534	06/26/2023
<ul style="list-style-type: none"> The Transformer Bank 3 was leaking oil under the radiators. 	10623534	06/26/2023

Item Description	WO#	Completed On
<ul style="list-style-type: none"> The U4 INO oil breaker was leaking oil from inside the cabinet. 	10623534	06/21/2023
<ul style="list-style-type: none"> The JNO oil breaker was leaking oil from inside the cabinet. 	10623534	06/26/2023
<ul style="list-style-type: none"> The Transformer Bank 2 was leaking oil underneath the fans. 	10623534	06/21/2023
<ul style="list-style-type: none"> The Transformer Bank 1 was leaking oil from the oil analyzer inside the cabinet. 	10623534	06/21/2023
<ul style="list-style-type: none"> The Transformer Bank 1 was leaking oil from the top of the phase 3 tank. 	10623534	06/21/2023
<ul style="list-style-type: none"> The Transformer Bank 1 was leaking oil from the bottom of the phase 1 tank. 	10623534	06/21/2023
<ul style="list-style-type: none"> The Transformer Bank 4 was leaking oil from radiators. 	10623534	06/21/2023
<ul style="list-style-type: none"> The Transformer Bank 4 was leaking oil from the motor junction box underneath the fans. 	10623534	06/20/2023
<ul style="list-style-type: none"> A bird nest was found under the TED3 switch C phase bushing. 	10623534	06/26/2023
<ul style="list-style-type: none"> A bird nest was found under the BSO circuit breaker A phase bushing. 	10623534	06/26/2023
Highline Substation		
<ul style="list-style-type: none"> The Transformer Bank 1 was leaking oil from the bottom valve. 	10623534	06/20/2023
<ul style="list-style-type: none"> A bird nest was found under the ED1 switch B phase bushing. 	10623534	06/20/2023
Holtville Substation		
<ul style="list-style-type: none"> The Transformer Bank 2 was leaking oil from the bottom valve. 	10623534	06/20/2023
<ul style="list-style-type: none"> The Transformer Bank 3 was leaking oil from the radiator. 	10623534	06/20/2023
Brawley Diesel Substation		
<ul style="list-style-type: none"> The substation perimeter fence located on the southside of the substation was damaged (potentially due to vandalism). 	10623534	06/22/2023
<ul style="list-style-type: none"> The control wires were abandoned and pose a tripping hazard. 	10623534	06/22/2023
Brawley Substation		
<ul style="list-style-type: none"> A bird nest was found under the COD1 switch A phase bushing. 	10623534	06/20/2023
Parkview Substation		

Item Description	WO#	Completed On
<ul style="list-style-type: none"> A bird nest was found under the COWD1 switch A, B and C phase bushings. 	10623534	06/22/2023
<ul style="list-style-type: none"> A bird nest was found under the COED2 switch A, B and C phase bushings. 	10623534	06/22/2023
Panno Substation		
<ul style="list-style-type: none"> One fan on Transformer Bank 1 failed to start as expected. 	10623534	06/26/2023
Beef Plant Substation		
<ul style="list-style-type: none"> A bird nest was found under the JSD2 switch A, B and C phase bushings. 	10623534	06/22/2023
<ul style="list-style-type: none"> A bird nest was found under the JSO circuit breaker A and C phase bushings. 	10623534	06/22/2023
<ul style="list-style-type: none"> A bird nest was found under the JNO circuit breaker A and C phase bushings. 	10623534	06/22/2023
<ul style="list-style-type: none"> A bird nest was found under the JND2 switch A, B and C phase bushings. 	10623534	06/22/2023