



IID

A century of service.

www.iid.com

Since 1911

March 21, 2024

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

Re: Transmission Audit of IID's Imperial Valley Service Area

Mr. Daye:

The Imperial Irrigation District (IID) received your June 12, 2023 letter regarding the findings of the California Public Utilities Commission's (CPUC) transmission audit (Audit) of IID's Imperial Valley Service Area, which CPUC staff conducted in March 2023. The Audit's findings indicated that the CPUC staff identified inconsistencies between certain IID facilities and the standards prescribed in CPUC General Orders. Please accept our sincere apologies for the delay in this response. While Mr. Miller's report findings were sent in June 2023, our response was unfortunately delayed during a company re-organization, and with new roles and responsibilities our response was overlooked and thus delayed.

IID is committed to providing safe and affordable service to its customers and appreciates the diligent work of the Electric Safety and Reliability Branch of the CPUC. IID still maintains that as a municipal utility, it is not subject to the jurisdiction of the CPUC, except as specifically authorized by statute. Therefore, IID is under no obligation to provide the CPUC with a response to the Audit findings.

With that being said, IID is glad to inform you that the majority of the inconsistencies identified in the June 12, 2023, letter have been corrected and for those still pending we have a work plan in place as shown within the enclosed documentation. The pending items fall into two main categories: 1) in a small number of incidences, pole numbers indicated on the report were inconsistent with pole numbers in the data base and field; and 2) staff was unable to obtain clearances due to the corrections required were in close proximity to energized transmission conductors and the inconsistency identified was deemed not to be an immediate threat to the operation of the line or public. All unaddressed inconsistencies shall continue to be addressed in a timely manner on a priority basis as line outages are allowed by System Operation.

Sincerely,

Matthew MacDonald
Supt. Gen. Energy Construction & Maintenance, Energy
Office: (760) 482-9968
Email: MSMacDonald@IID.com



IID

A century of service.

www.iid.com

Since 1911

Cc: James Miller, james.miller@cpuc.ca.gov
Jamie Asbury, IID
Geoffrey Holbrook, IID
Mathew Smelser, IID
Sabrina Barber, IID
Veronica Zaragoza, IID

POLE #	VISIBILITY	MOLDING	GROUND	HV SIGN	ANCHOR
L-4901	X			X	FIXED GUY WIRE
L-4905	X	X	X	X	
L-4906	X	X	X	X	
L-4907	X	X	X	X	
L-4902	X			X	
L-4903	X			X	
L-4904	X			X	
M-3103	X	X	X	X	
M-3036	X		Clearance		
M-3005	X		Clearance	X	
M-3004	X		Clearance	X	
M-0208	X		X	X	
M-0207	X	X	Clearance	X	
M-0206	X		Clearance	X	
M-0204	X	X		X	
M-0203	X			X	
M-0202	X	X		X	
1075012	X	X	X		
T-12003	X	X		X	
T-12006	X	X	X	X	
T-12501	X			X	
T-12503	X			X	
T-12620	X	X		X	
M-0205			Clearance	X	
T-12616		Clearance			
1244995		Clearance			
1209170		Clearance			
1189804		Clearance			
1244995		Clearance			
M-3006			X	X	