



# IID

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January 8, 2025

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

**Re: Audit of Imperial Irrigation District (IID) El Centro District**

Mr. Daye:

The Imperial Irrigation District (IID) received your November 21, 2024 letter regarding the findings of the California Public Utilities Commission's (CPUC) distribution audit of IID's El Centro District, which CPUC staff conducted in October 21 - 25, 2024. The Audit findings report that the CPUC staff identified inconsistencies between certain IID facilities and the standards prescribed in CPUC General Orders.

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, that we are 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 pleased to inform you that all of IID's inconsistencies identified in the November 21, 2024, letter have been corrected (see enclosed documentation).

Sincerely,

Paul Rodriguez  
Manager, Deputy, Power Department

Cc: Norvik Ohanian, [Norvik.Ohanian@cpuc.ca.gov](mailto:Norvik.Ohanian@cpuc.ca.gov)

Matthew Smelser, IID  
Geoffrey Holbrook, IID  
Sabrina Barber, IID  
Veronica Zaragoza, IID

**1. 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 following findings have been corrected as follows:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	4320	Pole	Calexico	Completed	12/16/2024
2	42547	Pole	Calexico	Completed	12/19/2024
3	24337	Pole	El Centro	Completed	12/19/2024
4	1129404	Pole	El Centro	Completed	12/16/2024
5	71271	Pole	Westmorland	Completed	12/19/2024
6	71267	Pole	Westmorland	Completed	12/16/2024

**2. GO 95, Rule 31.6, Abandoned Lines, states in part:**

*Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property.*

The following finding has been corrected as follow:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	73158	Pole	Calexico	Completed	12/16/2024

**3. GO 95, Rule 34 - Foreign Attachments**, states in part:

*Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*

The following findings have been corrected as follows:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	25960	Pole	El Centro	Completed	12/12/2024
2	T-435	Pole	Calexico	Completed	12/12/2024
3	T-434	Pole	Calexico	Completed	12/19/2024
4	T-433	Pole	Calexico	Completed	12/12/2024
5	T-432	Pole	Calexico	Completed	12/19/2024

**4. GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19**, requires the minimum radial separation between communication conductors and guys supported on the same poles to be 3 inches.

The following finding has been corrected as follow:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	30016	Pole	El Centro	Completed	12/16/2024

**5. GO 95, Rule 44.1 - Installation and Reconstruction,** states in part:

*Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term “planned” applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.*

The following findings have been corrected as follows:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	600210	Pole	Imperial	Completed	12/16/2024
2	20364 / 1216303	Pole	El Centro	Completed	12/17/2024

**6. GO 95, Rule 51.6A - 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. Such signs shall be of weather and corrosion–resisting material, solid or with letters cut out therefrom and clearly legible.*

The following findings have been corrected as follows:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	1129505	Pole	El Centro	Completed	12/19/2024
2	4320	Pole	Calxico	Completed	12/19/2024
3	42547	Pole	Calxico	Completed	12/19/2024
4	600211	Pole	Imperial	Completed	12/16/2024
5	600212	Pole	Imperial	Completed	12/19/2024
6	69467	Pole	Calipatria	Completed	12/19/2024
7	66931	Pole	Calipatria	Completed	12/19/2024
8	65489	Pole	Calipatria	Completed	12/16/2024
9	6674	Pole	Calipatria	Completed	12/16/2024
10	69464	Pole	Calipatria	Completed	12/19/2024
11	1209597	Pole	Calipatria	Completed	12/19/2024
12	70426	Pole	Westmorland	Completed	12/19/2024
13	73159	Pole	Westmorland	Completed	12/19/2024
14	73158	Pole	Westmorland	Completed	12/19/2024
15	17241	Pole	Brawley	Completed	12/19/2024
16	20475	Pole	El Centro	Completed	12/19/2024

**7. GO 95, Rule 54.6B - 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 following findings have been corrected as follows:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	1244233	Pole	El Centro	Completed	12/12/2024
2	1049601	Pole	Calexico	Completed	12/19/2024
3	69467	Pole	Calipatria	Completed	12/12/2024
4	21737	Pole	El Centro	Completed	12/19/2024

**8. GO 95, Rule 54.8 – Service Drops, 0-750 Volts, Table 10**, requires the minimum vertical clearance of insulated service drops of 0-750 volts above the roof of the house being served to be 0.5 inches.

The following finding has been corrected as follow:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	20475	Pole	El Centro	Completed	12/23/2024

**9. GO 95, Rule 56.2 - Overhead Guys, Anchor Guys and Span Wire 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 following finding has been corrected as follow:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	4321	Pole	Calexico	Completed	12/16/2024

**10. GO 95, Rule 91.3C - Stepping**, states in part:

*Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.*

The following finding has been corrected as follow:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	42547	Pole	Calexico	Completed	12/12/2024

**11. GO 128, Rule 17.1 - 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 following findings have been corrected as follows:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	1132908	Pad-mounted Transformer	Imperial	Completed	12/12/2024
2	1132910	Pad-mounted Transformer	Imperial	Completed	12/12/2024

**12. GO 128, Rule 35.3, Warning Signs**, states:

*Warning signs indicating high voltage shall be installed on an interior surface, or barrier if present, inside the entrance of vaults, manholes, handholes, pad mounted transformer compartments, and other above ground enclosures containing exposed live parts above 750 volts. Such warning signs shall also be installed on an exterior surface of all such pad mounted transformer compartments and other above ground enclosures. Such signs shall be clearly visible to a person in position to open any such access door, other opening, or barrier.*

The following findings have been corrected as follows:

#	Structure ID.	Type of Structure	Location	Status	Completion Date
1	1132908	Pad-mounted Transformer	Imperial	Completed	12/12/2024
2	UB283	Vault	Brawley	Completed	12/12/2024