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May 3, 2024

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 Imperial Irrigation District's La Quinta Service Area

Mr. Daye,

I would like to acknowledge receipt of your letter dated April 5, 2024, in which you shared the findings of the California Public Utilities Commission's (CPUC) substation audit of the Imperial Irrigation District's (IID) La Quinta Service Area, conducted by CPUC staff from March 4 to March 8, 2024. Your letter requested a response from IID on or before May 6, 2024.

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.

With that being said, IID is glad to inform you that the majority of the inconsistencies identified in the April 5, 2024 letter, have been repaired and for those pending we have a work plan in place documentation is enclosed.

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 C. Medina
Assistant Manager, Substations Operations & Maintenance
Imperial Irrigation District

Enclosure

cc: James Miller, James.Miller@cpuc.ca.gov
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Matthew Smelser, IID
Paul Rodriguez, IID
Veronica Zaragoza, IID
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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#	Status
Coachella Substation		
<ul style="list-style-type: none"> The high-side winding thermostat on the No. 1 Bank 230-92kV transformer may be defective. Its maximum temperature needle indicated that the coil's temperature had reached a temperature of 150°C since the last time it had been reset, a temperature which exceeded the unit's three high-temperature alarms. The maximum temperature needles on the unit's low-side winding and oil thermostats each displayed a reading of less than 40°C. 	10642071	Completed
Avenue 52 Substation		
<ul style="list-style-type: none"> A guy wire attached to a wooden H-Frame next to the KD4 Switch was broken. 	10642071	Scheduled
Thermal Substation		
<ul style="list-style-type: none"> The No. 1 Bank 92/13kV Transformer was leaking oil from its radiator. 	10642071	Scheduled
New Jackson Substation		
<ul style="list-style-type: none"> The door to the nitrogen cabinet of the No. 1 Bank Transformer was damaged and could not be opened by IID staff during our visit. 	10642071	Completed

Item Description	WO#	Status
Van Buren Substation		
<ul style="list-style-type: none"> One of the four bollards around the oil containment unit had fallen over. 	10642071	Completed
<ul style="list-style-type: none"> The nitrogen tank pressure indicator on the No. 1 Bank Transformer displayed a pressure of 0 PSIG. 	10642071	Scheduled
Dillon Substation		
<ul style="list-style-type: none"> The nitrogen blanket pressure indicator on the No. 2 Bank Transformer displayed a reading of less than 0 PSIG. 	10642071	Completed
Edom Substation		
<ul style="list-style-type: none"> The nitrogen tank pressure indicator on the No. 2 Bank Transformer displayed a pressure of 0 PSIG. 	10642071	Completed
<ul style="list-style-type: none"> The nitrogen blanket pressure indicator on the No. 2 Bank Transformer displayed a reading of 0 PSIG. 	10642071	Completed
Sky Valley Substation		
<ul style="list-style-type: none"> One of the cooling fans on the No. 1 Bank Transformer was vibrating excessively, and the fan's grate/cover was not attached. 	10642071	Completed
<ul style="list-style-type: none"> Another of the cooling fans on the Bank 1 Transformer was not plugged in. 	10642071	Completed
Francis Way Substation		
<ul style="list-style-type: none"> The cable tray cover was open near the substation's control room. 	10642071	Completed
<ul style="list-style-type: none"> Several ground wires had been cut and removed from Capacitor Bank 1's support rack. 	10642071	Completed
Northview Substation		
<ul style="list-style-type: none"> One of No. 2 Bank Transformer's cooling fans was not plugged in. 	10642071	Scheduled
<ul style="list-style-type: none"> The oil level gauge on the CAE B-Phase Voltage Transformer indicated that the unit's oil level was low. 	10642071	Completed

Item Description	WO#	Status
Avenue 42 Substation		
<ul style="list-style-type: none"> The oil level gauge on the Regulator 2 B-Phase Unit indicated that the unit's oil level was low. 	10642071	Scheduled
<ul style="list-style-type: none"> The viewing window of the SF6 pressure gauge on the CDO Gas Circuit Breaker contained a significant amount of water or another clear, colorless liquid. 	10642071	Completed
<ul style="list-style-type: none"> The CD CVT unit was leaking oil. 	10642071	Scheduled
Shadow Hills Substation		
<ul style="list-style-type: none"> Capacitor Bank 1's foundation was covered with mud. Several of the legs of the capacitor bank's rack's legs were significantly near their bases. 	10642071	Completed
Monroe Substation		
<ul style="list-style-type: none"> The walkways around this substation contained many holes in the ground that presented tripping hazards. 	10642071	Completed
<ul style="list-style-type: none"> One of the ground wires on the CWNDI A-Frame structure had been cut and removed. 	10642071	Completed
Shields Substation		
<ul style="list-style-type: none"> The nitrogen tank pressure indicator on the No. 2 Bank Transformer displayed a pressure of 0 PSIG. 	10642071	Completed
Avenue 48 Substation		
<ul style="list-style-type: none"> One of the cooling fans on the No. 2 Bank Transformer was not running. 	10642071	Scheduled
<ul style="list-style-type: none"> The lightning arrester for the Circuit N46 A-Phase pothead was damaged (distribution side). 	10642071	Scheduled
La Quinta Substation		
<ul style="list-style-type: none"> The nitrogen tank pressure indicator on the No. 1 Bank Transformer displayed a pressure of 0 PSIG. 	10642071	Scheduled

Item Description	WO#	Status
<ul style="list-style-type: none">• One of the No. 1 Bank Transformer's cooling fans was not plugged in.	10642071	Completed