

Notice of Exemption

FILED
IMPERIAL COUNTY
JUL 17 2025

Appendix E

CHUCK STOREY, County Clerk

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

From: ^{Public Agency} _{Deputy Clerk} Imperial Irrigation District
P.O. Box 937
Imperial, CA 92250

County Clerk
County of: Imperial

(Address)

Project Title: El Centro Generating Station T3000 Controls Upgrade (Project No. 2.00XXX)

Project Applicant: Imperial Irrigation District

Project Location - Specific:

485 E. Villa Avenue, El Centro CA 92243

Project Location - City: El Centro, CA

Project Location - County: Imperial

Description of Nature, Purpose and Beneficiaries of Project:

See attached project description.

Name of Public Agency Approving Project: Imperial Irrigation District

Name of Person or Agency Carrying Out Project: Imperial Irrigation District

Exempt Status: (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: Sec. 15061(b)(3)
- Statutory Exemptions. State code number: _____

Reasons why project is exempt:

The proposed project is exempt as a "common sense" exemption under state CEQA Guidelines Section 15061(b)(3) because the project consists of the upgrade of computer control system hardware and software which clearly would not have the potential to cause a significant physical effect on the environment.

Lead Agency

Contact Person: Geoffrey Holbrook Area Code/Telephone/Extension: 760-339-9531

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: [Signature] Date: 7/16/25 Title: General Counsel

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

POSTED

Revised 2011

JUL 17 2025

Imperial County Clerk-Recorder
California

EI Centro Generating Station T3000 Controls Upgrade (Project No. 2.00370)

Project Description

In 2019, The Imperial Irrigation District (IID) had Siemens perform a software and hardware audit on the T3000 system that provides a distributed control system (DCS) for the operation of the Unit 3-1, Unit 3-2, Unit 3-0 turbines. The audit findings concluded that IID would need to upgrade main server hardware, server software, windows operating software, and data exchange I/O modules to insure required security and operating software updates would continue to be supported. The IID Generation department engaged Siemens Energy in Q3 of 2024 to provide a proposal to upgrade the DCS for the EI Centro Generating Station (ECGS) Unit 3. The work scope requested the replacement of software and hardware that will no longer be supported by Siemens as identified in the 2019 T3000 system audit. The work to be performed includes upgrading to the latest version of the Omnivise T3000 control system, replacing all obsolete hardware in the CRY cabinet, replace automation servers, replace thin clients, routers/firewalls, and implementing software and security enhancements to meet current applicable NERC compliance requirements.

The work also includes integration of enhanced alarm functionality (CRY I/O Alarms) and ASEL Block 2/3 logic improvements to enhance alarm management and analog signal processing. Siemens Energy will provide engineering, procurement, factory testing, installation, commissioning, and training support as part of a turn-key delivery, along with the implementation of a 5-year Customer Support Agreement (CSA) to ensure ongoing maintenance and system reliability.

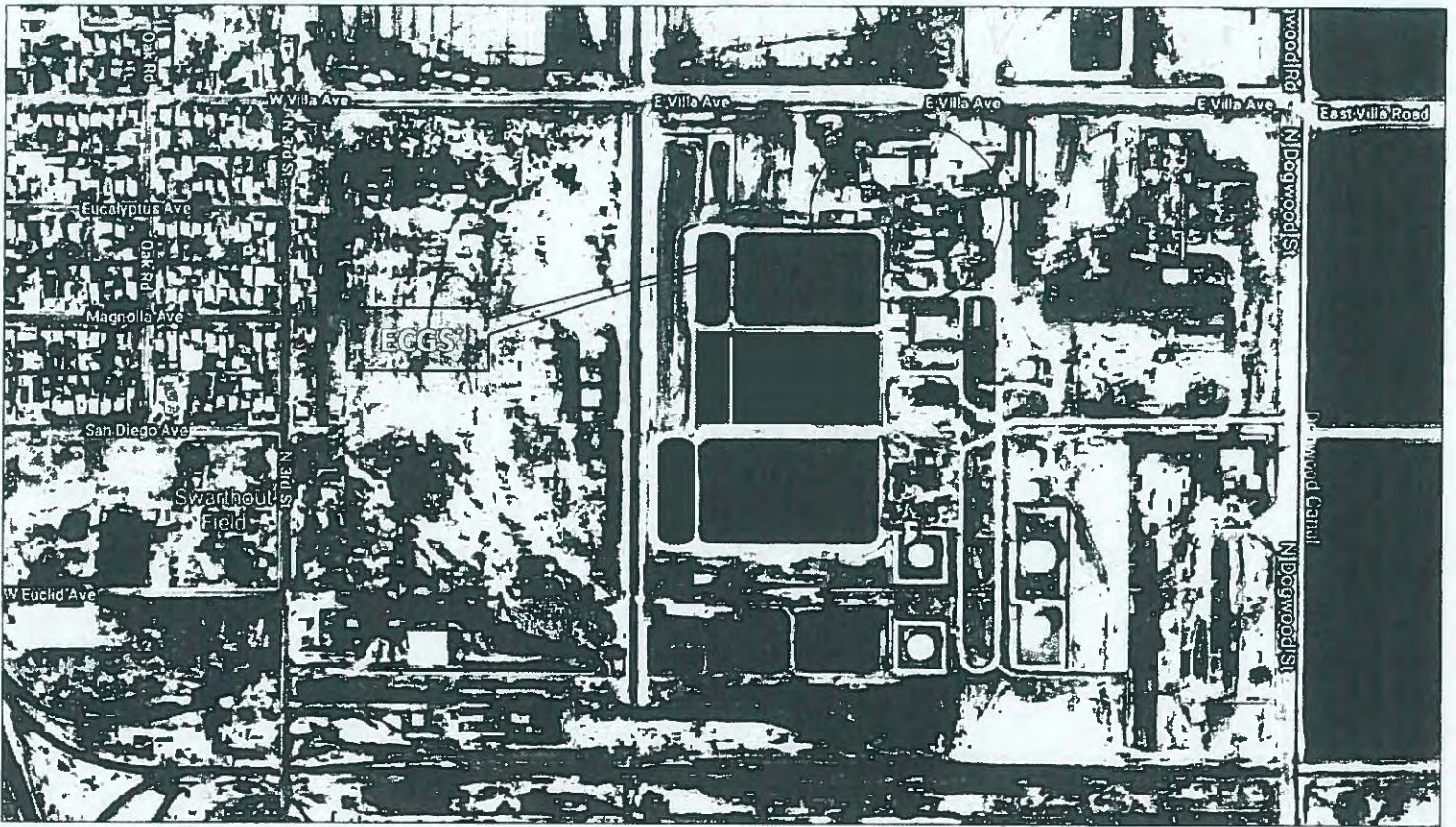
This DCS version upgrade is part of IID's broader initiative to modernize its generation control systems, mitigate cyber security risks, and ensure continued operational reliability for Unit 3.

Failure to upgrade the DCS may result in unexpected system outages, loss of operational control, and prolonged unit downtime, all of which could compromise the plant's ability to reliably generate and dispatch power. In the event of system failure, the loss of Unit 3's capacity could lead to financial losses, operational disruptions, and increased emissions risk during manual operation or emergency shutdown.

Upgrading the DCS system will:

1. Restore hardware and software lifecycle support.
2. Enhance cyber security posture and reliability.
3. Improve alarm and signal processing for safer, more effective operation.
4. Ensure compatibility with modern communication protocols and third-party systems.
5. Provide dedicated technical support and spare parts management through a 5-year CSA.

This investment will reduce the risk of unplanned outages, improve operator situational awareness, and ensure continued safe and efficient operations of Unit 3. Unit 3 is currently the primary resource for IID internal generation. Unit 3 provides energy to serve load for an average of 7,750 hours per year.



El Centro Generating Station T3000 Controls Upgrade (Project No. 2.00370)

Location Map