Kevin Collins
P.O. 722 Felton, CA 95018
831-335-4196, europa@cruzio.com

California Wildfire Safety Advisory Board June 15, 2020
Marcie Edwards, Chair
505 Van Ness Avenue
San Francisco, California 94102
By electronic mail to:
wildfiresafetyadvisoryboard@cpuc.ca.gov

Re: Comments on Draft 2021 Wildfire Mitigation Plan Guidelines, CPUC Proceeding R.18-10-007

Greetings Board Members:

This letter address select issues with the Utility Wildfire Mitigation Plan Proceeding R.18-10-007 and the Wildfire Safety Advisory Board's role in advising the Wildfire Safety Division.

After the catastrophic electric power utility ignited wildfires of 2017 and 2018 and the summer/fall 2019 PSPS events, impacting over 800,000 Californians, it is now clear that PSPS will be the tort law liability driven response of the IOU's to their infrastructure defects and deficits.

The Wildfire Safety Advisory Board has the expertise to help correct the past failures of the CPUC and of the IOUs, particularly PG&E.

The Advisory Board's comments on vegetation management are clear and welcome.

> "3.4 Aligning Vegetation Management Practices with Best Available Science
> The Board recommends that all utilities coordinate and complete an ongoing study, similar to what is ordered in WSD-005, that would ensure vegetation management practices align with best available science. The research should be reviewed by an independent scientific advisory panel or developed as part of a working group process overseen by WSD."

In December 2017 the Commission adopted its utility ignition wildfire hazard map for the entire state, in the process establishing the Tier 2 and 3 risk mapping delineations. In that same decision the Commission made a legal error when it added a "Guideline" to Rule 35 and declared that this change to General Order 95 was exempt from CA Environmental Quality Act review.

If an EIR had been conducted at that time to address the predictable adverse environmental impacts of that decision, then both wildfire science and alternatives analysis would have

been brought to the forefront of the entire problem that the Commission now attempts to address in Proceeding R.18-10-007.

There is a direct and reinforcing relationship between Enhanced Vegetation Management (EMV) and wind driven wildfires. Wind driven wildfires are directly related to electric power utility fire ignitions. Over-head power circuits are most prone to hot arcing electrical faults during high wind events, when debris of all types strikes and gets lodged into uninsulated conductors, jumper cables/wire and other energized equipment. Wind also places intensive breaking strain upon power poles.

The newly developing scientific understanding of wind driven wildfires, exposes the correlation between forest removal and thinning and the way that embers and firebrands blow ahead and in advance of the actual fire fronts during these wind driven wildfires.

In Paradise CA, film footage of the Camp Fire demonstrated that buildings in that town were already ablaze and igniting adjoining structures before the forest fire itself reached the town. Spot fires were being ignited a mile ahead of that fire front.

The EMV taking place now on a massive scale is making this problem worse. EMV opens up and widens the wind corridors formed initially by the roads that distribution voltage utility circuits follow across a terrain. Fire brands and embers flow over the landscape surface, often in a massed elevation of less than ten feet above the ground. Forests and their vegetation understory shrubs, even in dry conditions, slow and capture these wind-blown embers and firebrands and thus slow the advance of wildfires into towns and settlements, allowing more time for evacuation. EMV that widens these wind corridors, makes the fire risk from utility equipment ignitions worse.

There has always been a sensible justification to trim back trees from contact with overhead circuits. But now we have PG&E removing trees at what the company calls “strike distance”. In a tall conifer forest, the logical and clearly stated endpoint of this approach is a 400+ foot wide utility tree cutting corridor, far outside of any legal right of ways. This truly bizarre and destructive notion has been promoted by PG&E as its solution for wildfire prevention since the beginning of 2018. Intensive and completely unregulated forest removal on this scale began that year and has resulted in a tree disposal problem for the company and a huge unjustified harassment of homeowners and uncompensated damage to their property.

Similar though different mistakes have been made by manipulating and removing shrubs in chaparral landscapes. Woody chaparral is being demolished and replaced by rapidly spreading annual grasses, usually exotics. Dry grass is far more prone to rapid fire spread than is chaparral.

The second issue addressed in this letter is that of an independent scientific advisory panel.

“3.1 Scientific Review of Modeling Methods and Assumptions

• The Board recommends that the 2021 WMP Guidelines require the utilities to disclose detailed modeling methods and assumptions. An independent scientific advisory panel should be created to vet modeling methods. This scientific advisory panel would go through a nomination and confirmation process approved by the Board, the WSD, or the CPUC.
• The Board recommends that the CPUC require the utilities create a process to incorporate feedback from the scientific advisory panel."

I do not know why the Commission has ignored its own safety engineers during the course of Proceeding R.18-10-007. But the Commission has not relied upon the advice of its own staff. The CPUC's recently decommissioned Office of the Public Safety Advocate provided ample opportunity for the Commission to update its antiquated standards for overhead circuits in General Order 95. It is illuminating when one understands how outdated the Commission's circuit construction standards are. GO 95 contains no standards whatsoever for even fuses or reclosers. The use of obsolete small gauge wire and cable remains entirely legal under the Commission's standards. There has been no effort on the part of the Commission to promote or require the use of modern computer operated circuit safety relays. This equipment has been available for years and California remains in the dark ages because there is scant pressure on the IOU's to employ this highly effective, fully developed, safety equipment.

Instead the Commission relies upon the regulated utilities to make all the decisions regarding infrastructure and when and how their equipment will be updated or "hardened". The result has been preposterously elaborate and confusing WMP "plans" that will further delay and confuse the process of building a fire safe electrical grid.

The Advisory Board's recommendation for the formation of a scientific advisory panel is very welcome and this panel should include both engineers and scientists.

Regards,
Kevin Collins