

Comments on Wildfire Safety Advisory Board Recommendations

From: Gladwyn D'Souza <godsouza@mac.com>
Sent: Monday, April 13, 2020 10:45 AM
To: Wildfire Safety Advisory Board
Cc: Jennifer Tanner
Subject: WSAB- Comments on wildfire safety

To Wildfire Safety Advisory Board:

Thank you for your analysis of the issues on Wildfire Safety and the opportunity to comment. Unfortunately important priority issues have not been addressed. We know from all reports and news articles that PG&E's continues to operated frayed and unsafe wires; and that wires are a major source of utility associated wildfire in California. Taking out the forests en masse will not stop antiquated bare wires from sparking and breaking in high winds causing grass fires in newly denuded area. Yet, PG&E is spending \$680 million on cutting trees and only spending \$240 million on replacing distribution conductr.

Please focus on replacing unsafe wires. SCE is replacing 750 miles a year with triple insulated hard steel center wire that can withstand broken branches, animals and balloons. In contrast, PG&E is only replacing 200 miles this year with single insulated steel center wires. This is the place to focus on if there is a serious intention to solve this problem instead of allowing PG&E to decide how little they can get away with doing.

There are at least 2700 miles of unsafe wire in high risk Tier 2 and 3 areas of PG&E territory. They should replace this within 3 years (not 20) to reduce PSPS events, reduce utility caused wildfire and to save lives. In addition, the inflated costs that PG&E quotes per mile should be challenged.

Where necessary intrusion into wildlands should be removed and these areas allowed to rewild. Many states like New York, North Carolina, Florida, and Texas are doing managed retreat from climate zones impacted by the New Normal like Sea Level Rise. California needs to apply this strategy decisively to wildfires before costs and deaths continue to increase exponentially.

Ultimately, the CPUC needs to update the inadequate General Orders -- improving these regulatory codes to adequately guide the utilities. The Commission has full power to address the defects and omissions in their General Orders, specifically the complete absence of any mention of computerized circuit breakers. Most importantly, Wildfire Mitigation Plans should move forward upon the initiative of the Commission and its engineering staff, rather than allowing utilities to set their own regulations. The goal is to dramatically improve the fire and electrocution safety performance of all utilities operating in California. SB 901 did not obstruct the Commission's authority.

PG&E has 22,000 miles of antiquated, unsafe bare 6-gauge wire, and General order 95 still allows this. It is time to take this inadequate wire out of the code, so it's no longer legal to use it. The Office of Safety Advocate (OSA) had clearly stated this in the past, but was ignored. Now, the OSA has now been disbanded and all its valuable safety recommendations disregarded. The new Wildfire Safety Division has taken over the duties of the OSA, but there is no sign that its valuable analyses and recommendations were used as guidelines by the utilities, or that the information is being used by the CPUC, so the WSD should be urged to recommend that it be so.

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Only the most robust agenda of replacing unsafe conductor, and installing computerized protective relays, will make California utilities fire-safe and we await the WSD to come forward with those kind of recommendations.

Thanks,

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