

Comments on Wildfire Safety Advisory Board Recommendations

From: Jennifer Tanner <jjtanner18@gmail.com>
Sent: Monday, April 13, 2020 4:27 PM
To: Wildfire Safety Advisory Board
Subject: Comment to Wildfire Safety Advisory Board

Dear Chair Edwards and Members of the Wildfire Safety Advisory Board:

Thank you for your analysis of the issues on Wildfire Safety. There are quite a number of very good comments overall and we appreciate that, We are very grateful for your alertness that local community needs to be front and center in the decision making, not the one size fits all view by Utilities, and other valuable comments. People are so disappointed with the callous way PG&E just comes into neighborhoods without care of the local resident or homeowner. I hope this can be made to change. We at Indivisible California Green Team have been working well over a year to get attention on this to really fix the problem about the wildfires and PG&E's terrible behavior on all levels, and are pleased with much that you write.

Unfortunately important priority issues have (still) not been addressed and I will focus on that. We know from all reports and news articles that PG&E's *run to failure* business model has resulted in frayed, unsafe wires as a major source of utility associated wildfire in California. And taking out the forests en masse will not stop antiquated bare wires from sparking and breaking in high winds, causing grass fires that quickly turn into forest fires. Yet, PG&E is spending \$680 million on cutting trees and only spending \$240 million on replacing distribution conductor.

The number one thing to focus on, and we have not yet seen this, is to replace unsafe wire. SCE is replacing 750 miles a year with triple insulated hard steel center wire that can withstand broken branches, as well as animals and balloons and other dangers. Its still not enough but what a good start! 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. PG&E stated that it would be 10 years (now changed to 12) before they can stop PSPS, but at this slow rate of replacement, it will be more like 20 years, if not more. It's time to stop allowing the utilities to set their own inadequate standards that got us into this situation.

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) if there is sincere intention 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.

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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.

Its unfortunate that the focus has been to remove trees rather than fix the wires. Removing certain trees has no guarantee to prevent other trees from falling or to prevent branches from being blown in from afar. Removing trees has the potential of weakening nearby trees, making them susceptible to wind throw (we've seen it). Removing trees opens up the area around wires so that, if a tree were to fall from a distance, it has no trees impeding its falls, no trees to cushion its force, so it hits the wires with greater destructive force. Removing trees leaves the area vulnerable to erosion, slope instability, habitat destruction, reduction of property values, destroyed viewshed, and other environmental damage. Removing so many trees exacerbates climate change. Removing trees can create long, open wind tunnels that exacerbate a wind-driven wildfire as the wind carries firebrands through the wind tunnels until they hit homes and set them on fire - far ahead of the wildfire itself. This happened in Paradise and in Australia.

Additionally there is no focus on mandating protective relays, also called arc interruptors, that stop the sparking instantly. This is easily available, off the shelf tested and proven to prevent fires before they start. Its hard to grasp why this is not mandatory, much less not even discussed or encouraged. We are trying to prevent fires so its mystifying. 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.

We wish we had known about the advisory board earlier as we are all rushing to get our comments in such short notice. I would have been more thorough with my specific appreciation of your comments if I did and I apologize for that, as I mostly focused on what

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I felt was missing. And we want to say how grateful we are that you are welcoming our comments.

Thanks for listening.

Jennifer Tanner
Founder Indivisible California Green Team