

Comments on Wildfire Safety Advisory Board Recommendations

From: Jim Stewart <drjimstewart@gmail.com>
Sent: Monday, April 13, 2020 10:12 AM
To: Wildfire Safety Advisory Board
Subject: Recommend massive wire replacement for maximum safety

To 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, but unfortunately important priority issues have not been addressed. 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.

PG&E's own 2020 Wildfire Mitigation plan, Section **5.3.3.17.3 Relationship Between System Hardening and Enhanced Vegetation Management** states: "System hardening (covered conductor plus pole replacement, exempt equipment and transformer replacement) was identified to mitigate 56% of the historical ignitions by itself. "

"EVM was identified to mitigate 31% of the historical ignitions by itself."

Thus PG&E admitted that "system hardening" was nearly **twice as effective** as vegetation removal.

Yet, PG&E is spending \$680 million on cutting trees and only spending \$240 million on replacing distribution conductors.

Your recommendations must **emphasize fast tracking "system hardening"**!

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. 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 before they can stop PSPS, but at this slow rate of replacement, it will be more like 20, 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 wildfires, and to save lives. In addition, the inflated costs that PG&E quotes per mile should be challenged.

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You need to tell the CPUC 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.

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

Thanks,

Jim Stewart, PhD
Cell: 213-820-4345
5235 Tri Bay Circle
Lakewood CA 90712

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