

## Comments on Wildfire Safety Advisory Board Recommendations

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**From:** Igor Tregub <itregub@gmail.com>  
**Sent:** Monday, April 13, 2020 3:17 PM  
**To:** Wildfire Safety Advisory Board  
**Subject:** WSAB

To 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, 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. 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 its distribution infrastructure.

**The number one element to focus on is the replacement of unsafe wire.** 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.

**I call on the CPUC needs to update its 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 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.** 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 you for your consideration!

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