From:	Kevin Collins
To:	Wildfire Safety Advisory Board
Cc:	Kevin Collins
Subject:	Comment June 28, 2021 meeting Monday,
Date:	June 28, 2021 10:08:51 AM

Hello,

I was unable to comment during the meeting due to my confusion with the phone number and time sync.

I am generally impressed with the recommendations of this board. Thank you.

However there are fundamental rule sets, i.e CPUC . General Order 95 and associated codes that are primary to all other regulatory standards for power utility system safety.

GO 95 is astonishingly out of date. For example the rules for conductor sizes and strengths are thoroughly obsolete and continue to allow tiny size power conductors (wire/cable) to be newly installed and used today. These bare, uninsulated conductors are far too fragile and prone to failure. These various General Order codes are the primary regulations and they bear upon every investigation of fire ignition events and who bears responsibility.

Today we have regulation by tort law liability after fires, rather than regulation by codes to prevent fires.

The legis;iature has confused this entire matter with SB 901, by establishing parallel regualtory pathways that tend to obscure this issue rather than clarifiy it.

Until the Commission's (CPUC) code standards are updated, it will be impossible for resolve the CA wildfire risk from utility ignited wildfires.

Matters such as replacing expulsion fuses with fire safe contained fuses, high strength covered (insulated) conductors, high impedance arc fault interuption and so forth have all been discussed. None are yet required.

Until these obvious improvements in fire safety are code/law adopted by the Commssion, CA's utility associated wildfire crisis will not have been addressed at the basic build-code-standards level.

I placed this issue before the Commission in a docketed adjudicatory Complaint C.18-09-011 in 2018. My Complaint was dismissed, as I expected that it would be.

Regards,
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