From: Ken Bishop
To: Wildfire Safety Advisory Board
Subject: TankVisions, Inc - 6/28/21 Wildfire Safety Advisory Board Meeting Public Comment Monday,
Date: June 28, 2021 8:59:58 AM

Good morning,

Our public comment is the following:

We would like to recommend the following highlighted to be included in General Order Number 166, Standards for Operation, Reliability, and Safety During Emergencies and Disasters.

General Order No. 166

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Standards for Operation, Reliability, and Safety During Emergencies and Disasters

Standard 1. Emergency Response Plan

The utility shall prepare an emergency response plan ("plan") setting forth anticipated responses to emergencies and major outages. The plan will help assure the utility is best able to protect life and property during an emergency or major outage and communicate the scope and expected duration of an outage. The plan shall include the following elements:

J. Fuel Tank Inventory Control Plan

The plan shall describe how the utility will assure the measures taken for absolute fuel tank inventory control, tank data (location, size, product) and fuel tank compliance documentation. The plan shall include details of a web-based platform to access all of the required tank information. The utility shall designate an in-house or outsource personnel to act as liaison in accessing tank data when required. The utility shall submit plan updates as part of the annual report required by Standard 11.

K. Plan Update

The Office of Emergency Services has already stipulated that Utilities must provide Cal OES locations of energy facilities during an emergency. I have provided that outline below:

State of California Emergency Plan, Section 14: State Roles and Responsibilities

14.5.3. CALIFORNIA ENERGY COMMISSION (CEC)

Hazardous Materials: Assists in developing federal and state emergency response plans and procedures for accidents involving nuclear waste/radioactive material shipments.

Utilities: Provides advice, technical assistance, and public outreach to respond to energy shortage or disruption. Provides Cal OES the location of energy facilities and technical assistance for forecasting energy shortages (electricity, natural gas,and fuel) and develops specific state actions in the event of a serious shortage of energy. At the direction of the Governor, implements the Fuel Set-Aside Program for events requiring regional or statewide coordination of fuels.

I to have been appointed to the National Fire Protection Association (NFPA) task group on developing and implementing fuel tank management to their NFPA 1600 Standard on Continuity, Emergency and Crisis Management and would appreciate the opportunity to discuss our recommendations with a Wildfire Safety Advisory Board Member.

Thank you,

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