

## Comments on Wildfire Safety Advisory Board Recommendations

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**From:** Mike Bullock <mike\_bullock@earthlink.net>  
**Sent:** Monday, April 13, 2020 5:38 PM  
**To:** Wildfire Safety Advisory Board  
**Subject:** WSAB, Wildfire Safety

**Importance:** High

Dear Board:

I apologize for submitting this after 5 PM. I hope you will accept it as “close enough”.

From public accounts, it appears to me that the cost of failure has been underestimated. Please spare no expense to do what the experts say is needed to not start fires with poor equipment. Where ever poor equipment exists, you must shut the system down as soon as fire conditions become possible.

Transmission should be replaced with distributed generation as fast as possible.

Finally, do all you can to urge the state to derive, develop, and implement plans to achieve climate-stabilizing targets in all emission categories, especially cars and light-duty trucks, since they emit the most, by far. Currently, we are on a path to destabilize the climate. We can't get off this path unless large reductions in emissions are achieved by 2030. We are running out of time. The hotter it gets, the harder it will be to prevent fires.

Thank you for your leadership.

**Highest regards,**



Mike Bullock  
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Oceanside, CA 92054  
760-754-8025

California Democratic Party Delegate, 76 AD (author of 2 adopted resolutions and 5 Platform changes)  
Elected Member of the San Diego County Democratic Party Central Committee (author of 5 adopted resolutions)

Satellite Systems Engineer, 36 years (Now Retired)

Air and Waste Management Association published and presented papers:

Author, ***The Development of California Light-Duty Vehicle (LDV) Requirements to Support Climate Stabilization: Fleet-Emission Rates & Per-Capita Driving***

Author, ***A Climate-Killing Regional Transportation Plan Winds Up in Court: Background and Remedies***

Co-author, ***A Plan to Efficiently and Conveniently Unbundle Car Parking Cost***

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**From:** ca-climate-actives@googlegroups.com [mailto:ca-climate-actives@googlegroups.com] **On Behalf Of** Jennifer Tanner

## Comments on Wildfire Safety Advisory Board Recommendations

**Sent:** Monday, April 13, 2020 10:43 AM

**To:** Jack Eidt <jack.eidt@wilderutopia.com>

**Cc:** Adriene Couter <indivisibleventura@gmail.com>; Rebecca Elliot ISJ <rebelliot408@gmail.com>; Dave (Green) Shirling <Movefreespeech@gmail.com>; Igor Tregub <itregub@gmail.com>; Erika morgan <erika@cacommunityenergy.org>; Ken Jones. <meta4ken350@gmail.com>; Gladwyn D'Souza <godsouza@mac.com>; Susan Morgan <susanemorgan@gmail.com>; Amy Woodson <woodson.boulton@gmail.com>; Mandeep S. S. Gill <msgill@slac.stanford.edu>; Andrea Lum <andreamlum@gmail.com>; Jessica Craven <jescny@gmail.com>; Audrey Ichinose <aichinose@gmail.com>; Daryl Gale <TURTLEPERSON@earthlink.net>; California Climate Activist List <CA-Climate-Actives@googlegroups.com>; Barbara Stebbins <bstebbins14@gmail.com>

**Subject:** Re: ONE more URGENT ACTION TODAY request for wildfire safety and thanks

**Importance:** High

Even one very short paragraph is useful cause it shows many people are NOW paying attention and they are being watched . You are welcome to synopsize in your own words. Not essential you copy this in fact best is just your own words.

Thanks  
Jennifer

On Apr 13, 2020, at 9:05 AM, Jennifer Tanner <[jjtanner18@gmail.com](mailto:jjtanner18@gmail.com)> wrote:

**READ NOW... COMMENTS DUE TODAY**

Thanks, wonderful activists who commented on PG&E's Wildfire Management Plan for the Wildfire Safety Division (WSD) to consider. . You all wrote such amazing things, and I thank you for forwarding your well written comments to me -- I know we are making a difference. Truly we have a chance to get through this time. In addition, I now have a positive communication with Caroline Thomas Jacobs, the Director of WMD, and I will be able to refer to all your letters when next we connect.

### **IMPORTANT**

We have another opportunity I just found out about today! a I'm so sorry for the last minute appeal. The deadline is right away -- **Monday, April 13 at 5pm! The Wildfire Safety Advisory Board (WSAB)**, was created to advise **the WSD**, where you made your comments. The WSAB has developed their initial recommendations for the WSD and this is our comment on their advice. . I will include that link below. It's a long document but they still do not address what is necessary.

Please write **comment to the Wildfire Safety Advisory Board** and email them to [wildfiresafetyadvisoryboard@cpuc.ca.gov](mailto:wildfiresafetyadvisoryboard@cpuc.ca.gov) by Monday, April 13 at 5pm. And put this name WSAB in your email subject as well:

To Wildfire Safety Advisory Board:

## Comments on Wildfire Safety Advisory Board Recommendations

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 distribution conductr.

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. 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 wildfire and to save lives. . In addition, the inflated costs that PG&E quotes per mile should be challenged.

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

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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 we await the WSD to come forward with those kind of recommendations.

Thanks,

Your name and organization

Link to WSAB document

<WSAB Recs on 2020 Utility WMPs - April 15 Meeting Draft - 4.03.2020.pdf>

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