

From: [Robert McCollum](#)
To: [Wildfire Safety Advisory Board](#)
Subject: CPUC Approval of PG&E's Wildfire Mitigation Plan
Date: Monday, June 15, 2020 5:02:58 PM

Board Members,

As a retired public employee, Butte County's Tree Maintenance Supervisor, I oppose the too easy acceptance of PG&E's WMP as it requires too little change to their continuing felonious mismanagement of their electric power system. In 1996 I was invited by the ALJ to participate in the OII Tree Trimming regarding fires caused by PG&E's failed tree trimming methods. They failed to apply Arboricultural Best Management Practices and have over the years exacerbated the problem of rapid re-growth into their wires. This has resulted in the ineffective destruction of the public's tree resources in urban and rural settings.

Now, with the availability of Covered Conductors and Arc Fault Interrupters wasteful tree hacking is mostly unnecessary and not justifiable. PG&E's own studies show that Grid Hardening is much more cost effective than Extreme Vegetation Management. PSPS demonstrates clearly their failure to make-safe their obsolete system.

In the interest of time I wish to sign on to the attached letter below.

Robin McCollum

**RECOMMENDATIONS ON THE
2021 WILDFIRE MITIGATION PLAN GUIDELINES,
PERFORMANCE METRICS, AND SAFETY CULTURE
CALIFORNIA WILDFIRE SAFETY ADVISORY BOARD**

(June 2, 2020 Draft for Public Comment pursuant to Assembly Bill 1054)

June 15, 2020

Dear Members of the California Wildfire Safety Advisory Board,

Thank you for the opportunity to comment on your thoughtful recommendations for investor-owned utilities being developed by the Wildfire Safety Division as they pursue Wildfire Mitigation Plan guidelines, performance metrics and safety culture, and considered by the CPUC in Rulemaking [18-10-007](#). We recognize that this is an important step in the process and commend the Board for its insights, especially its understanding of the importance of "*efforts necessary to revolutionize the electric grid in a changing climate and keep Californians safe.*"

The Valley Women's Club of the SLV is a 43-years active 501-c-3 non-profit organization dedicated to community action, awareness and leadership in environmental, educational, social, and political concerns that affect the health and welfare of the San Lorenzo Valley and our community. We have focused on the

health of the watershed – its unique forests, varied habitats, remarkable species, steep slopes, erosive soils, vital waterways and precious groundwaters – since our founding.

From many years of experience, research and analysis, we have acquired deep distrust of PG&E's actions and priorities (except for the dedication of its employees when obligated to respond to power outages). We see the hundreds of "conditions" that the WSD has had to impose in accepting the current WMP as an indictment of PG&E as still chronically failing to prioritize safety. We strongly feel that PG&E's *Wildfire Mitigation Plan* falls essentially short in its mission of safety, because of its failure to incorporate the most powerful actions that would prevent all forms of electric utility-associated wildfire ignition: 1. the pitiful number of miles planned for hardening (240 in 2020) and the failure to make a clear choice of steel-core, triple-insulated conductor for its distribution system; 2. the failure to commit to immediate installation of off-the-shelf, already thoroughly tested, computerized circuit breakers throughout that distribution system; and, 3. the irresponsibly unproven and environmentally destructive removal of millions of healthy, mature trees resulting from its ill-controlled Enhanced Vegetation Management.

We generally support and agree with your Recommendations, especially in going further (scientific review and justification); and, for additional performance metrics and reduction of PSPS as a wildfire mitigation tool, no less as the tool of choice. We are concerned about the recommendation that the WSD should not move from the CPUC. *It is severely hampered in its mission having to take a subservient role within the CPUC's ridiculously complex processes.* It should be independent, and have more immediate oversight over the utilities, especially the IOU's, since the CPUC has failed to do so. (For example, never having updated and upgraded its General Orders to include even the most basic regulations requiring ANY circuit breaker protections – a very basic requirement for a safe electrical system.)

We do not hold as high a regard for the Wildfire Mitigation Plans thus far, and are not convinced they "have made progress" sufficiently. We appreciate the idea that Stakeholders should have both access to information from the utilities and adequate opportunity to respond effectively.

We support the Risk Spend Efficiency analysis recommendation. We know that it will demonstrate the failure of Enhanced Vegetation Management as a mitigation measure.

We support the on-going upgrades of the Fire-Threat maps and sincerely hope that forested areas will receive the infrastructure hardening that will improve their status since removing trees will not change that at all.

We support having utilities to disclose detailed modeling methods and

assumptions. It is obvious that their assumptions and conclusions are not founded on scientific evaluation.

We wholeheartedly support **3.4 Aligning Vegetation Management Practice with Best Available Science**. Your recommendations here, however, fall far short. They should specifically include ENVIRONMENTAL REVIEW as a part of that “Available Science.” We agree that all utilities should understand the growth patterns and values of all species of trees within California, but do not agree that defining any species of subspecies as “at risk” has been proven to be effective or necessary as a guide for removal of healthy trees. Healthy, mature trees especially have been accorded protective status in General Orders and should be restored to that status. Cutting down healthy trees is primarily an arbitrary action when strengthened, insulated conductor, backed up by computerized circuit breaker protection, should be the focus of rapid improvement. Returning to legally mandated trimming, and removal of dead and dying hazard trees should be the vegetation management.

We regret the haste which the brief timeline imposed on our review, and hope that future Recommendations will provide at least a month for that. As an all-volunteer organization – impacted by the pandemic as much as those who are paid for this work – we would appreciate that in the future.

Respectfully submitted,

Nancy B. Macy, Chair

Environmental Committee for the San Lorenzo Valley

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