

EVERY FIRE
SURVIVOR'S
NETWORK


EFRU EATON
FIRE
RESIDENTS
UNITED

 **Extreme
Weather
Survivors**

 **UTILITY WILDFIRE
SURVIVOR COALITION**
Full Restitution • Affordable Energy • Wildfire Safety

 **FAIRNESS FOR
FIRE VICTIMS**



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Watchdog**

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CALIFORNIA**



SAN DIEGO 350
CLIMATE ACTION

350 Bay Area
CLIMATE ACTION

GREENPEACE  **SUNFLOWER
ALLIANCE**

April 21, 2026

Honorable Robert Rivas
1021 O Street, Suite 8330
Sacramento, CA 95814

Honorable Monique Limón
1021 O Street, Suite 8518
Sacramento, CA 95814

CC: California Legislature

Re: Opposition to CEA Recommendations Limiting Wildfire Survivors' Rights

Dear Legislative Leaders,

Climate change undoubtedly creates heightened risk of wildfires that call for new public policy solutions. However, the California Earthquake Authority's (CEA) recent report in response to SB 254 remarkably fails to place any blame on utilities themselves, although their misconduct was responsible for causing a substantial share of the major fires over the last decade.

A key goal of reform should be to reduce future costs by incentivizing utilities not to start wildfires. Yet the report appears to assume utilities are passive victims of climate change rather than actors whose operational decisions, maintenance practices, and financial incentives materially affect wildfire risk.

In fact, evidence from multiple major fires shows that utility equipment failures — often tied to aging infrastructure, inadequate maintenance, or operational decisions — have played a significant role in California’s wildfire crisis.

PG&E was found criminally liable for 84 felony manslaughter counts for starting the Camp Fire – the deadliest fire in California history at the time. PG&E failed to replace a nearly 100 year-old metal “c” hook, used well beyond its intended service life, which was the only equipment holding a high-voltage power line in place. Instead of regularly inspecting and maintaining its equipment in a known high-risk fire area, PG&E had a “run to failure” policy, which dictated that equipment would be kept in place until it failed. When the hook holding the high-voltage line in Feather River Canyon failed, the line fell, hit the ground, and started a fire which destroyed the town of Paradise.

Southern California Edison’s failure to maintain, inspect and operate its equipment were a cause of the Thomas and Woolsey fires. Similarly, the Eaton fire appears to have been sparked by Edison’s failure to remove an abandoned transmission line (a “ghost line”) and its failure to shut down the high voltage line next to it, from which the current appears to have jumped or “arced,” despite extraordinary dangerous conditions. Reporting shows that prior to the fire Edison decided not to spend hundreds of millions of dollars allocated for removing transmission lines like the ghost line that caused the fire. In September of 2025, the US Department of Justice filed a lawsuit against Edison alleging the company’s failure to maintain and upgrade its system, despite known risks, caused the Eaton fire. The Eaton fire killed 19 people and destroyed 6,000 homes.

Nowhere does the 100-plus page CEA report honestly grapple with the actions that caused the worst wildfires in California history. If you don’t confront the origins of these fires, how can you articulate credible solutions?

Instead, the CEA report’s recommendations skew toward absolving utilities of responsibility and placing burdens on ratepayers, wildfire survivors, taxpayers and consumers. For example, the report recommends eliminating punitive damages – which are only available in cases of malice, oppression or fraud, the most egregious kind of misconduct. What incentive do the utilities have not to start fires if they are not held accountable when they willfully do?

The CEA report’s focus on limiting the rights of wildfire survivors while reducing utility accountability is both misplaced and dangerous. It risks increasing—not reducing—the likelihood of future catastrophic fires.

Nowhere does the report even mention the fact that far from being economically stressed, Edison and PG&E made among their highest profits in years in 2025. Edison’s net profits were \$4.46 billion, while PG&E’s were \$2.59 billion.

Despite reportedly starting the deadly and catastrophic Eaton Fire, Edison gave its CEO, Pedro Pizarro, a 20% raise to \$16.6 million.

Utilities aren't the only ones profiting while avoiding accountability. The report also fails to address the role of fossil fuel companies in fueling the climate-driven extreme weather that has made wildfires worse — or to include any recommendations to make that industry pay its fair share. Like utilities, fossil fuel companies continue to post massive profits while the costs of this crisis are shifted onto ratepayers, taxpayers, and wildfire survivors.

When utilities with disastrous safety records post huge profits while Californians pay some of the highest electricity rates in the nation, reform should focus on curbing excessive profits and waste — not limiting wildfire survivors' right to recovery.

Sincerely,

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