

July 11, 2026

Wildfire Safety Advisory Board
c/o WSAB Branch, Office of Energy Infrastructure Safety
715 P Street, 15th Floor
Sacramento, CA 95814
Submitted via email: wsab@energysafety.ca.gov

Re: Public Comment on Draft: Situational Awareness and Protective Equipment and Device Settings

Dear Members of the Wildfire Safety Advisory Board:

I appreciate the opportunity to comment on WSAB's July 2026 draft on Situational Awareness and Protective Equipment and Device Settings (PEDS). My comments below focus on the distinction between wildfire *likelihood* and wildfire *consequence*, and the opportunity to more fully operationalize that distinction specifically in PEDS activation criteria.

1. PEDS activation criteria in the draft are likelihood-only; consequence should be considered

Section 2 of the draft states that “wildfire risk is the product of likelihood and consequence, and situational awareness supports both dimensions” (p. 7). Yet when the draft turns to how utilities actually decide *when* to activate protective settings most criteria is drawn exclusively from the likelihood side of the equation: Fire Potential Index thresholds, relative humidity, projected wind speed, and dead fuel moisture.

A remote circuit crossing sparsely vegetated rangeland and a circuit of similar length threading through a dense wildland-urban interface community can register similar fire weather risk, yet the consequence of an ignition on each is entirely different in terms of structures threatened, population exposed, and critical infrastructure at risk.

Recommendation: We recommend the Board's guidance public utilities and co-ops building out PEDS programs, to incorporate consequence data (structures impacted from simulated wildfires ran et the segment level and updated daily based on weather and fuel conditions, structure density and proximity, WUI classification, critical facilities, egress and evacuation constraints) into PEDS activation criteria at the circuit or segment level, rather than relying solely on system-wide or zone-wide weather and fire-potential thresholds.

Tools are available that address this exact topic. In our own operational work with utilities, cooperatives use [Firescape's](#) GridWatch platform to determine when and where to apply protection settings, based on models of ignition likelihood, spread probability and fire consequence (modeling from simulated wildfire spread and impact to structures). We have found that granular, consequence-weighted activation criteria materially change *where* PEDS is applied on a given day, even when weather conditions are uniform across a service territory. And importantly, we have found that transitioning from seasonal settings to daily, or even hourly settings has reduced outages by 2-3X. This allows utilities to concentrate the reliability cost of PEDS on the circuits where the wildfire consequence justifies it, and can help balance safety with reliability.

2. Consequence-awareness will strengthen the reliability discussion in Section 3.5

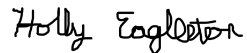
The draft frames reliability impacts as the central tradeoff utilities must manage when using PEDS (Section 3.5), and recommends refining activation criteria as one mitigation path (3.5.1). I would suggest that consequence-informed, granular targeting is not simply one option among several for refining activation criteria, but rather it is the most direct lever available for improving the risk-reduction-per-

outage tradeoff, because it allows utilities to reserve the most sensitive settings for the segments with the highest risk of starting an ignition and where an ignition would do the most harm.

We would also note that Figure 1's cost-effectiveness comparison, expressed as cost per avoided structure burned, is itself a consequence-based metric, notably different from ignitions avoided. I encourage the Board to draw that connection more explicitly: **if cost-effectiveness is based in terms of structures protected, then the protection setting activation criteria should be based on consequence.**

We appreciate the Board's continued work developing this focus-area guidance and would welcome the opportunity to provide further technical input, including specific examples of consequence-informed PEDS activation frameworks we have developed in partnership with utility clients.

Respectfully,

A handwritten signature in black ink that reads "Holly Eagleston". The signature is written in a cursive, flowing style.

Holly Eagleston, PhD
Founder & Chief Executive Officer
Firescape
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