

July 21, 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

Subject: Public Comments on the Office of Energy Infrastructure Safety Staff Draft Report

Situational Awareness and Protective Equipment and Device Settings

Submitted by: Green Grid Inc.

Dear Office of Energy Infrastructure Safety:

Green Grid Inc. appreciates the opportunity to provide comments on the Office of Energy Infrastructure Safety (OEIS) Staff Draft Report, Situational Awareness and Protective Equipment and Device Settings.

Overall, we believe the report provides a comprehensive overview of the technologies currently used to improve wildfire mitigation and operational awareness. We respectfully recommend one addition that would strengthen the report by providing a more complete representation of currently available monitoring technologies.

Recommendation

Section 2.2 discusses continuous grid monitoring technologies but does not include continuous visual and thermal monitoring of utility infrastructure as a distinct monitoring capability. The report does not recognize technologies that continuously visually observe the physical condition of utility assets and the surrounding environment before equipment failures or wildfire ignitions occur. Controlling ignitions of electric grid equipment is essential to prevent wildfires.

Continuous visual and thermal monitoring complements existing monitoring technologies by providing awareness of conditions that cannot be measured through electrical measurements or single-parameter sensors alone. These systems can continuously identify developing conditions such as:

- Vegetation encroachment
- Leaning or damaged poles
- Damaged crossarms
- Broken, missing, or contaminated insulators
- Loose, damaged or missing hardware/equipment
- Wildlife nests and damaged wildlife protection devices

- Conductor sag
- Foreign objects
- Security and public safety concerns
- Arc, spark, flash and ignition
- Other observable conditions that may contribute to outages or wildfire ignition

These capabilities complement, rather than replace, existing electrical monitoring systems, periodic inspections, and wildfire detection technologies. These are proactive measures rather than reactive actions.

Suggested Revision to Section 2.2

We recommend that Section 2.2 also includes continuous visual and thermal infrastructure monitoring and as an example, reference Green Grid Inc.'s Artificial Intelligence of Things (AIoT) platform, Instant Situational Insights® for Utilities, iSIU® (pronounced as I see you) as a commercially available implementation of this capability that has been continuously deployed by a California investor-owned utility (IOU) for more than two years. Additional California and other utilities across the country are planning to deploy this technology in near future.

Including iSIU® in this and other reports to IOUs, POUs and all electric utilities in California would provide readers with a more complete overview of the monitoring technologies currently available to utilities and would accurately reflect the growing role of continuous visual and thermal observation in improving wildfire prevention, system reliability, and operational awareness.

This recommendation is not intended to endorse a particular vendor. Rather, it is intended to ensure the report consistently represents the range of commercially available technologies currently supporting utility wildfire mitigation and situational awareness.

Closing

Green Grid Inc. appreciates OEIS's efforts to improve California's Wildfire Mitigation Plan guidance and believes this addition would strengthen the report by recognizing an important capability that complements the other technologies already described.

Thank you for the opportunity to provide these comments.

Submitted by



Jeff Pickles
Chief Technology Officer
Green Grid Inc.