August 3, 2026

California Wildfire Safety Advisory Board
715 P Street, 20th Floor
Sacramento, CA 95814
WSAB@energysafety.ca.gov

RE: Comments of the Joint Associations on the Staff Draft: Situational Awareness and Protective Equipment and Device Settings

Dear Chair Block and Board Members,

The California Municipal Utilities Association (CMUA) and Golden State Power Cooperative (GSPC), (collectively, the "Joint Associations") respectfully submit these comments to the California Wildfire Safety Advisory Board (WSAB or Board) on the *Staff Draft: Situational Awareness and Protective Equipment and Device Settings* (Draft Staff Paper), issued on July 3, 2026. The Joint Associations thank the WSAB Staff for the substantial research and thoughtful effort reflected in the Draft Staff Paper. The paper assembles a wide range of technical information, operational considerations, information sources, and utility examples, and provides a useful tool for publicly owned electric utilities (POUs) and electrical cooperatives (co-ops) to review as they evaluate their individual wildfire mitigation programs.

1. **The Draft Staff Paper is a Valuable Resource for POUs and Co-ops When Reviewing Options and Strategies.**

The Joint Associations appreciate the practical and accessible manner in which the Draft Staff Paper discusses situational awareness and protective equipment and device settings (PEDS). The paper synthesizes a substantial amount of technical information and identifies a broad range of tools that utilities may evaluate, including publicly available weather products, utility weather stations, grid monitoring technologies, fire modeling tools, wildfire detection tools, and different approaches to protective settings. Bringing these resources together in a single document may help utilities identify additional questions to consider and sources of information that may inform future wildfire mitigation planning.

The Draft Staff Paper also recognizes the practical considerations that shape utility decisions. For example, the paper acknowledges the value of experienced operators and field crews, the usefulness of publicly available information, limitations on communications infrastructure in rural areas, staffing needs associated with monitoring technologies, maintenance and calibration requirements, equipment and supply-chain constraints, and the potential reliability consequences of more sensitive protective settings. The discussion of PEDS appropriately connects potential ignition-risk reductions with outage response, protection coordination, and the needs of affected communities rather than considering protective settings in isolation.

The Joint Associations also appreciate that the Draft Staff Paper recognizes that the identified strategies are not equally appropriate for every utility, and acknowledges that utilities will select strategies based on their own risks, risk-management approaches, budgets, staffing, and other constraints. Section 1.1 of the Draft Staff Paper explains that the focus areas provide examples and resources, and that not every element will apply to every utility's wildfire mitigation plan (WMP). These clarifications add value to the paper by highlighting that the information serves as a collection of considerations that can support informed utility decision-making without displacing the technical judgment, local knowledge, and governing-board oversight that must guide each utility's WMP. It is not intended to establish best practices or industry standards for every utility to adopt.

2. The WSAB Should Consider Providing Additional Clarification in the Paper that it is an Informational Resource and Not an Industry Standard or Best-Practice Document.

The Joint Associations understand the Draft Staff Paper to be a resource that identifies options for utilities to consider. As a research paper, it should clearly be noted that it is not intended to be interpreted as establishing an industry standard, identifying a generally applicable set of best practices, prescribing a sequence of program maturity, or creating a checklist for determining whether an individual utility's wildfire mitigation program is sufficient. Although the Draft Staff Paper generally includes appropriate qualifications in the introductory and conclusory statements, some portions of the Draft Staff Paper use language to describe potential approaches as a progression from simpler to more involved measures, and rely in part on programs developed by the large investor-owned utilities. Without an express clarification, future readers could infer that the listed measures form a linear progression or benchmark that all utilities should follow. The paper itself recognizes that a situational awareness program may draw on different combinations of capabilities, that there is no single protection recipe for PEDS, and that utilities must select strategies based on their own risks and constraints.

To reinforce the Draft Staff Paper's existing framework, the Joint Associations respectfully recommend modifying Section 1.2 to include the following:

> This paper is an informational resource that describes examples and options utilities may consider. It is not intended to establish an industry standard, identify generally applicable best practices, specify a particular level of wildfire mitigation maturity, or create minimum requirements for a wildfire mitigation plan. The applicability and relative value of any practice described herein depends on a utility's specific wildfire risk, system design and equipment, geography, operational capabilities, reliability needs, staffing, budget, and community priorities. The fact that a utility does not employ a particular practice described herein, or that a utility utilizes tools or practices not discussed herein, should not be viewed as evidence that its wildfire mitigation plan is insufficient or less mature than that of other utilities.

3. The Final Paper Should Preserve the Distinction Between Utility Responsibilities and Fire-Suppression Responsibilities After an Ignition.

The Joint Associations appreciate that the Draft Staff Paper expressly recognizes the respective roles of utilities and fire agencies after an ignition. The paper states that a utility's role in wildfire detection is to confirm that an ignition has occurred and notify fire agencies as quickly as possible, while "[f]ire suppression is the responsibility of those agencies."[1] This is an appropriate distinction that should be retained. However, it is important to also recognize that an electric utility's fire detection efforts will primarily be focused on its own infrastructure and that the utility is not responsible for general wildfire detection unrelated to its role in providing electric service. While a co-benefit of utility-installed fire detection devices is that a utility may discover and be able to alert fire agencies of an ignition that is unrelated to utility infrastructure, that is not the focus or responsibility of the utility. Utilities may provide critical support by sharing system and location information, de-energizing facilities during a fire (when appropriate), assisting with access and safety around electrical infrastructure, and supporting restoration. Additionally, it should be noted that maintaining reliable electric service for communications and water pumping is an essential role during wildfires, in particular for rural utilities. Those supporting functions should not be described in a manner that duplicates or displaces the primary public-safety responsibilities of fire agencies.

4. The Paper's Utility-Specific Framework Should Guide the Discussion of Situational Awareness and PEDS.

POUs and co-ops vary substantially in size, system configuration, equipment, geography, fuel loads, wildfire exposure, communications coverage, staffing, financial resources, and the needs of the communities they serve. The Draft Staff Paper appropriately recognizes several of these differences. For

[1] Draft Staff Paper at 16.

example, it notes that one weather station may be adequate for a compact and topographically uniform service territory,[2] that rural communications limitations may constrain continuous monitoring technologies,[3] and that a utility should begin with tools it can operate reliably.[4] It also recognizes that equipment upgrades may take years and may be affected by supply-chain and workforce constraints.[5]

These differences are especially important for PEDS. Protective settings are engineering decisions that depend on (i) the design and condition of the utility's system, (ii) the capabilities and coordination of existing protective devices, (iii) local wildfire risk, and (iv) the consequences of additional outages. As the Draft Staff Paper acknowledges, PEDS can reduce ignition risk but may also increase unplanned outages, with potentially disproportionate impacts on remote communities and customers with access and functional needs.[6] Each utility must therefore evaluate PEDS as part of a broader balance among wildfire risk, system protection, reliability, outage-response capabilities, water pumping requirements, communications needs, and local community priorities.

Because of unique service territory considerations, practices developed by the large investor-owned utilities can provide useful examples but should not be treated as default benchmarks for POUs and co-ops. The scale, staffing, technology platforms, service territories, and risk profiles of those utilities may differ substantially from those of an individual POU or co-op. A smaller utility may reasonably rely on public weather products, experienced field personnel, direct coordination with local fire agencies, and existing protection schemes rather than independently deploying technologies described in the paper. Doing so may be the most effective and reliable approach for the utility, rather than an interim step toward a predetermined end state.

5. The Cost Effectiveness of PEDS Varies.

PEDS can provide meaningful reductions in ignitions and even reduce the overall damage caused by a wildfire. The Paper notes that "using PEDS during high-risk fire conditions can be significantly 'cost-effective at reducing wildfire damage to structures.'"[7] The Joint Associations caution, however, that determining what is cost-effective in the deployment of PEDS is going to vary depending on the same circumstances and unique characteristics that determine which PEDS should be deployed. Figure 1 shows the cost efficiency of wildfire adaptation investments and measures the efficiency as "cost per avoided structure burned."[8] However, some utilities may not base their cost-effectiveness determination solely on avoiding structure loss. As the valuation of structures and critical community assets can vary statewide, it is important to recognize that not all cost-effectiveness determinations will be the same.

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[2] *Id.* at 12.
[3] *Id.* at 9.
[4] *Id.* at 11.
[5] *Id.* at 25.
[6] *Id.* at 26.
[7] *Id.* at 21 (citing Dynamic Grid Management Technologies Reduce Wildfire Adaptation Costs).
[8] *Id.* at 22.

The Joint Associations thank the Board members and WSAB staff for their efforts to develop this valuable resource and for their consideration of these comments. With the clarifications described above, the Draft Staff Paper can provide meaningful support to utilities while preserving the utility-specific, risk-informed approach that the paper itself recognizes.

Sincerely,

Priscilla Quiroz

Priscilla Quiroz
Manager of Energy Policy
California Municipal Utilities Association

Jessica Nelson
General Manager
Golden State Power Cooperative