**Wildfire Safety Advisory Board Draft Recommendations 2025 Review**

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**Wildfire risk modeling**

* I strongly agree with expanding the number of wildfire models. While administratively challenging, I would suggest an even more structured approach, such as a modeling intercomparison project, to ensure robust testing of the same models in different service territories and allow for coordinated improvements. It would also necessitate a more standardized approach to the data and creation of scenarios/types of simulations.
	+ Suggest including AI models -> Success would democratize access to wildfire risk information and enable smaller utilities to participate.
	+ The above actions would also increase transparency in reported metrics. There is an incentive for private companies to report large risk reductions to demonstrate the value of their products (often without clear validation).
* Uncertainty: Providing guidance on the types of uncertainty to quantify. For example, aleatoric uncertainty is irreducible due to inherent uncertainties in wildfire processes vs. epistemic uncertainty from the data and models being deployed. The latter would help identify areas to focus on modeling improvements, while the former we need to accept and build into our risk management frameworks.

**Effectiveness of metrics**

* Metrics that describe climate resilience more broadly are also valuable. Given the co-benefits of wildfire investments, risk reduction in other more easily quantifiable hazards provide evidence for improvement. For instance, improvements in vegetation-related SAIDI/SAIFI suggest effectiveness of vegetation management programs that very likely reduce wildfire risk.

**Other comments:**

* Section 3.2 How many wildfires in the Redbooks have an unknown source? This could obscure trends in power sector linked wildfires if there is high uncertainty and/or a high proportion of unknown fire sources
* Section 3.2 “Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE), and San Diego Gas and Electric Company (SGD&E) have reported ignition data to the CPUC annually since 2014” -> Is the full dataset public? This would be a real benefit considering wildfire modellers have limited ignition data and make general assumption (I.e., using random ignition locations or spatially weighted by limited data)
* Section 3.2: While I understand the need to measure improvements in wildfire mitigation, it is difficult to identify trends and draw conclusions from a small record of utility wildfire ignitions. The paper mentions reductions in 2022 and 2023, but this is in the context of one of the strongest El Nino events on record, starting in mid-2020 and terminating in mid-2023, bringing unusually cool and wet conditions to the region and suppressing vegetation flammability.
* Section 3.3.1 -> Any thoughts on balancing risk reduction and reliability from PSPS/EPSS? Quantifying the cost-benefit of PSPS & EPSS is a worthwhile endeavour.