October 26, 2026

To the Office of Energy Infrastructure Safety:

**Subject:** Urgent Concerns Regarding PG&E's Proposed 2028-2037 Undergrounding Plan - Montclair Hills

I am writing as a resident of Montclair Hills, Oakland, to express serious concern about PG&E's proposed 2028-2037 Electrical Undergrounding Plan and its implications for the safety of our community.

Montclair Hills faces extraordinary wildfire risks. Our heavily wooded and densely populated neighborhood has narrow, winding roads, very limited evacuation routes, and significant tree-fall hazards. Thousands of residents depend on just a few roads to escape, and fire crews depend on those same roads to reach a fire. A single downed utility pole or electrical line blocking a critical road could have catastrophic consequences for hundreds, potentially thousands, of people.

Due to the severe canyon winds sweeping through Shepherd Canyon during the dry, windy seasons, PG&E's hardening of overhead powerlines and automatic power shutoffs are not adequate to substantially reduce wildfire risk here. A single spark from an overhead line can quickly become a firestorm in these winds. PG&E's plan should give significant weight to this seasonal phenomenon in its holistic evaluation.

PG&E's proposed plan represents a significant change in how undergrounding decisions are made. It gives greater weight to benefit-cost comparisons, even though PG&E acknowledges that important public-safety risks - including evacuation constraints and falling-tree hazards - are not fully captured by its quantitative risk models. The value of human life cannot be reduced to a financial calculation that fails to account for the full consequences of a catastrophic wildfire.

Most troubling, the plan now expressly permits PG&E to exclude undergrounding in areas with known public-safety risks, without clearly demonstrating that it has adequately assessed the cumulative consequences of all the vulnerabilities acting together.

In Montclair Hills, these vulnerabilities cannot be separated. Limited evacuation access, population exposure, high tree-fall risk, and overhead electrical infrastructure combine to create potentially catastrophic consequences during a wildfire. All these factors should be assessed cumulatively.

An additional concern is the interconnectedness of our entire neighborhood. Our very few evacuation roads depend on a network of smaller residential streets and connecting roads. A fallen pole or power line on one of these smaller roads could prevent hundreds of residents from even reaching a main evacuation route. PG&E must therefore evaluate the safety of the entire interconnected evacuation network - not simply individual roads - and consider comprehensive undergrounding throughout Montclair Hills.

I also ask OEIS to weigh the local safety evidence now available, including Oakland Fire Chief Damon Covington's input on Montclair's ingress and egress risks, and the independent evacuation modelling shared with District 4 Councilmember Janani Ramachandran.

I therefore urge the Office of Energy Infrastructure Safety to require PG&E to evaluate and quantify the cumulative and compounding risks facing Montclair Hills and demonstrate how those risks influence its undergrounding priorities and decisions.

OEIS should not approve a methodology that allows economic comparisons to override the combined risks to human life when those risks have not been adequately evaluated.

Respectfully,

**Justin Kasad**
Montclair Hills, Oakland, California