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

To the Office of Energy Infrastructure Safety:

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. The fire crew and thousands of residents depend on just a few roads to extinguish fires and reach safety during an emergency. 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 shut-offs are not adequate to substantially reduce wildfire risk in our neighborhood. The severe canyon wind will quickly turn a single spark of an overhead powerline into a firestorm. PG&E's plan should place significant weight of such seasonal phenomenon in its holistic evaluation for undergrounding.

PG&E's reliance on Public Safety Power Shutoffs (PSPS) is not an acceptable substitute for undergrounding. PG&E maintains that Montclair's wildfire risk is sufficiently addressed by overhead system hardening, camera monitoring, and power shutoffs. In practice, this means our neighborhood is de-energized every year during fire season, often for more than a day at a time. The most recent shutoff, earlier this month, left our community without power for over 30 hours. For the many residents who work from home, each event means lost workdays. For everyone, it means spoiled food and medication, loss of internet and sometimes cell service, and households scrambling to keep medical devices, refrigerators, and phones running. Repeated, multi-day blackouts should not be an accepted cost of living in a major California city in 2026.

These shutoffs can also undermine the very safety they are meant to protect. During a PSPS event, residents may lose the internet and cellular service needed to receive emergency alerts, and electric garage doors and gates may have to be opened by hand, all at precisely the moment when wind conditions make a fire most likely and a fast evacuation most important.

Nor are shutoffs sufficiently effective. By PG&E's own account, automatic shutoffs resulted in only a 68% reduction in ignitions in 2021–2022 compared to the 2018–2022 average. That leaves a substantial share of ignition risk in place on the very days when Shepherd Canyon's winds are strongest. PG&E itself agrees that undergrounding is the best solution to reduce wildfire risk. **A strategy that depends on repeatedly cutting power to thousands of residents, while still leaving meaningful ignition risk unaddressed, is a stopgap, not a solution.**

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, PG&E acknowledges that important risks, including evacuation constraints and tree-fall hazards, are not fully captured by its quantitative models.

The problem is that PG&E's proposed plan now expressly permits PG&E to exclude undergrounding of electrical lines 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.

Economic comparisons cannot reliably determine the safest mitigation when some of the most serious consequences to human life have not been adequately quantified.

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.

I also urge OEIS not to accept recurring Public Safety Power Shutoffs as an adequate long-term mitigation for Montclair Hills. Shutoffs shift the burden of PG&E's wildfire risk onto residents year after year without providing the lasting protection that undergrounding would.

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.

The lives of our residents depend on decisions that fully recognize these dangers.

Respectfully,

Can Berk Guder
Montclair Hills, Oakland, California