Jason Silver - Opening Comments on PG&E's Proposed 2028-2037 Electrical Undergrounding Plan - Montclair Hills

To the Office of Energy Infrastructure Safety:

I am a homeowner and resident of Montclair Hills in Oakland, California. I urge OEIS not to approve PG&E's proposed 2028-2037 Electrical Undergrounding Plan in its current form without requiring a more comprehensive evaluation of the wildfire risks facing our community.

My principal concern is that PG&E's risk assessment and prioritization methodology may not adequately capture the cumulative consequences of a wildfire in a densely populated hillside neighborhood with severely constrained evacuation routes.

Montclair presents a dangerous combination of risks: steep terrain, abundant vegetation, seasonal high winds, overhead electrical infrastructure, narrow and winding roads, and limited evacuation routes. These hazards are not independent of one another. A wind event that increases the probability of electrical infrastructure damage can simultaneously increase the speed of fire spread, create fallen-tree obstructions, and compromise residents' ability to evacuate or firefighters' ability to respond.

As a parent raising a child in this neighborhood, I am particularly concerned about a fast-moving wildfire in which our family's ability to reach safety depends on a small number of interconnected roads. A single fallen utility pole or electrical line could block access well beyond the immediate location of the obstruction.

I recognize that undergrounding involves substantial expense and that PG&E must allocate resources responsibly. However, a cost-benefit framework is only as reliable as its underlying risk estimates. If the model inadequately accounts for evacuation limitations, cascading infrastructure failures, and the consequences of blocked access during a wildfire, its recommendations may systematically undervalue undergrounding in communities like Montclair.

I therefore request that OEIS:

1. Require PG&E to assess the combined effects of wildfire ignition risk, extreme winds, falling trees, population exposure, emergency responder access, and evacuation constraints in Montclair Hills.

2. Require PG&E to evaluate the interconnected evacuation-road network, including the possibility that an obstruction on a smaller residential road could prevent residents from reaching a major evacuation route.

3. Incorporate local expertise from the Oakland Fire Department and available community wildfire and evacuation modeling into its risk assessment.

4. Require PG&E to transparently explain how these risks are represented in its modeling, how they affect Montclair's priority for undergrounding, and how undergrounding compares with proposed overhead mitigation alternatives.

I support a rigorous, evidence-based approach to wildfire mitigation. That approach must accurately reflect the full consequences of catastrophic events, especially where human lives depend on the reliability of a limited evacuation network.

I respectfully request that OEIS withhold approval of PG&E's proposed plan until these issues have been adequately evaluated and addressed.

Sincerely,

Jason Silver Montclair Hills, Oakland, California