Docket: EUP-PGE, Electrical Undergrounding Plans

Re: Comment on PG&E's proposed 2028 to 2037 Electrical Undergrounding Plan

Subject: Montclair hills, Saroni Drive, mitigations that require advance warning

To the Office of Energy Infrastructure Safety:

I am Mary Wong, and I live at 6507 Saroni Drive in the Montclair hills in Oakland. I am asking that PG&E be required to underground the overhead distribution lines in this neighborhood, including the lines on our street. My reason is a narrow one, and I have not seen the plan address it. Every mitigation PG&E offers us in place of undergrounding depends on somebody correctly predicting the dangerous day in advance. The people with the least margin when that prediction fails are children.

Pacific Palisades is the case to look at. The fire was first reported at 10:27 on the morning of Tuesday, January 7, 2025. Homes were burning by 11:27. The first evacuation order for the nearest neighborhoods came at 12:07, and traffic was gridlocked before it issued. By early afternoon police were telling people to abandon their cars and leave on foot, and a bulldozer cleared vehicles so fire crews could pass. Four school campuses in that community burned. It was a weekday morning, when families are split between home, work and school. And it was January.

Fire risk in these hills no longer keeps to a season. PG&E's alternatives to undergrounding still do. Vegetation management runs on an annual cycle. Public safety shutoffs and fast trip settings are triggered by forecast conditions. Covered conductor and cameras lower the odds of ignition and do nothing about a pole lying across a road. A buried line is the only measure already working on a January morning that nobody flagged. That is a difference in kind rather than degree, and I do not believe the plan's benefit comparison reflects it.

The margin here is thin to begin with. Children do not evacuate themselves. An adult has to reach them first and then drive them out, which means driving toward the fire while everyone else is driving away. From our house there are two ways out, Saroni Drive to Heartwood Drive to Colton Boulevard, or Saroni down to Shepherd Canyon Road. Both are narrow, both run under tree cover with lines strung through it, and both feed into Snake Road. One limb closes either one. We have watched branches block traffic here on ordinary days. Our children ride these roads as well: AC Transit's Line 642 runs from Montera Middle School along Colton Boulevard and up Saroni Drive on school afternoons, and Joaquin Miller Elementary is on the same line.

PG&E has acknowledged that its risk model does not fully capture evacuation constraints or tree fall hazard, while telling its customers that undergrounding is “the lowest cost way to prevent wildfires.” If the consequences here were never measured, the benefit of undergrounding here was never counted.

I ask Energy Safety to:

1. decline to approve the plan as submitted;
2. require PG&E to show how its benefit analysis values a mitigation that works without advance warning against mitigations that depend on receiving one;
3. require PG&E to account for the schools and school transportation routes on Saroni Drive, Colton Boulevard and Shepherd Canyon Road, and for a fire beginning on a weekday during school hours in any month of the year;
4. require PG&E to evaluate evacuation time on these roads for households with young children, elderly residents and people without cars; and
5. require undergrounding in the Montclair hills, Saroni Drive included.

Pacific Palisades had no warning that it would be January. Neither will we.

Respectfully submitted,

Mary Wong
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