Docket: EUP-PGE, Electrical Undergrounding Plans
Re: Comment on PG&E's proposed 2028 to 2037 Electrical Undergrounding Plan
Subject: Montclair hills, Saroni Drive and Shepherd Canyon

To the Office of Energy Infrastructure Safety:

My name is Brian Wong and I live at 6507 Saroni Drive in the Montclair hills in Oakland. I am asking that PG&E be required to put the overhead distribution lines in this neighborhood underground, including the lines on Saroni Drive and the span that runs directly in front of my house. PG&E's proposed 2028 to 2037 Undergrounding Plan leaves us out, and I am asking Energy Safety not to approve it as it stands.

Here is what this looks like from my driveway. There are two ways out. I can take Saroni Drive to Heartwood Drive to Colton Boulevard, or I can take Saroni the other direction down to Shepherd Canyon Road. That sounds like two options, but it really isn't. Both are narrow two lane roads with overhead lines strung under the same trees, so a bad wind exposes both at once, and they both feed into Snake Road, so everyone ends up in the same place regardless. One wind event can close both.

I have already seen the start of this. Branches come down on these roads and traffic backs up behind them, on ordinary days with no fire and nobody trying to leave. The limbs that land in the road are landing on the wires too. The lines on my street run directly under a mature canopy, so tree contact here is not an occasional event, it is the normal condition in a windy month. That is an ignition risk PG&E's model is built to measure, and I would like to know whether it was measured honestly on this circuit.

PG&E's answer to tree risk in Montclair is trimming, and trimming has to be done again every year. It also fails in the conditions that actually matter, because the limb that comes down in a hard canyon wind is not the one a crew flagged in the spring. Covered wire, cameras and fast shutoffs have the same weakness. They lower the odds, they do not remove the hazard, and they still leave a pole lying in the road. Undergrounding is the only measure that ends the ignition source and the roadblock for good, and PG&E tells its own customers that undergrounding is “the lowest cost way to prevent wildfires.”

The 1991 Tunnel Fire burned about two miles north of here and killed 25 people, most of them on roads they could not get through. I also want to support what the Oakland Fire Department is telling PG&E about access and evacuation in Montclair. PG&E's process says it checks its model against local public safety knowledge. Here the two disagree, and the local knowledge is right.

PG&E has admitted that its model does not fully capture evacuation problems or tree fall hazard, and the plan still leans heavily on comparing costs against benefits. A cost benefit test can only count what somebody has put a number on. If the worst consequence was never measured, the benefit of undergrounding comes out too low, and it comes out too low in exactly the places where that consequence would be worst. I understand PG&E has to decide where to spend its money. I do not accept that the decision should be made with the most important factor left out of the arithmetic.

I am asking Energy Safety to do the following.

1. Do not approve the plan as submitted. Require PG&E to evaluate and quantify Montclair's risks the way they actually combine, meaning limited exits, tree fall, canyon wind, population and overhead lines together, and to show how that assessment changed its undergrounding priorities.
2. Require PG&E to produce its vegetation contact and ignition figures for the circuits serving Saroni Drive, and to explain why repeated trimming is treated as an adequate substitute for undergrounding here.
3. Require PG&E to treat the evacuation route as one system, Saroni, Heartwood, Colton, Shepherd Canyon and the Snake Road junction, and to disclose what the Oakland Fire Department told it about access here and what difference that made.
4. Require undergrounding in the Montclair hills, Saroni Drive included.

I am not asking for anything unusual. I am asking for the lines on my street to be put in the ground before the fire comes rather than after.

Respectfully submitted,

Brian Wong
6507 Saroni Drive, Oakland, California 94611