To whom it concerns in the Office of Energy Infrastructure Safety:

Re: PG&E's Proposed 2028–2037 Undergrounding Plan — Failure to Include Montclair Hills

I am writing as a resident of the Montclair hills district in Oakland, California, to express my concern about PG&E's proposed 2028–2037 Electrical Undergrounding Plan and its implications for the safety of our community.

The Montclair hills area is an area that faces very serious wildfire risks. The area is heavily wooded and densely populated residential district with narrow, winding roads, very limited evacuation routes, and significant tree-fall hazards. In the event of a wildfire, firefighters depend on just a few roads to gain access to the area to extinguish fires and save homes and families. Likewise, residents depend on those same limited number of narrow roads as exit routes to reach safety during an emergency. A single downed utility pole or electrical line blocking a critical road would have catastrophic consequences for hundreds, potentially thousands, of people.

PG&E's proposed hardening of overhead powerlines and automatic power shut-offs are not adequate to substantially reduce wildfire risk in our neighborhood. The severe canyon winds that sweep through nearby Shepherd Canyon during the dry windy seasons can 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 undergrounding analysis.

The Current plan proposed by PG&E, which excludes the Montclair hills area, represents a significant change in how undergrounding decisions are made. It gives greater weight to benefit cost-benefit 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 minimized based on a financial calculation that fails to account for the full consequences of a catastrophic wildfire.

PG&E acknowledges that important risks, including evacuation constraints and tree-fall hazards, are not fully captured by its quantitative models, but its plan does not adequately address these risks. Specifically, PG&E's proposed plan now expressly permits it 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 the Montclair hills area, these vulnerabilities cannot be separated. Limited evacuation access, population density, 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 routes 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 the Montclair hills.

For these reasons, I implore 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.

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

Respectfully,

Mark T. Johnson
Montclair neighborhood, Oakland, California