Subject: Protecting Human Life in Montclair Hills — PG&E's Proposed Undergrounding Plan

To the Office of Energy Infrastructure Safety:

I am a resident of Montclair Hills, Oakland, and am deeply concerned about PG&E's proposed 2028–2037 Electrical Undergrounding Plan and its potential consequences for our community.

Our heavily wooded and densely populated neighborhood faces extraordinary wildfire risks, with narrow, winding roads, very few evacuation routes, and significant tree-fall hazards. Thousands of residents depend on just a few roads to escape. A single fallen utility pole or power line blocking a critical road could prevent hundreds, potentially thousands, of people from reaching safety.

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 on such seasonal phenomena in its holistic evaluation for undergrounding.

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.

These dangers are interconnected, and their combined and cumulative effects cannot be evaluated separately. A tree falling onto overhead electrical lines could bring down poles and wires, blocking a neighborhood street and preventing families from reaching one of our few main evacuation roads. As traffic backs up and other routes become congested, the consequences could spread far beyond the original blockage. Our safety depends on the entire interconnected network of streets, not simply the principal roads leading out.

Yet, PG&E acknowledges that serious risks, including evacuation constraints and falling-tree hazards, are not fully captured by its quantitative models. In spite of this, PG&E's proposed methodology expressly permits excluding undergrounding in areas with these known vulnerabilities.

PG&E must be able to justify its economic comparisons by demonstrating that they adequately account for the combined and cumulative dangers to the lives of the people who live here.

I therefore urge the Office of Energy Infrastructure Safety to require PG&E to evaluate and quantify the cumulative and compounding risks throughout Montclair Hills, demonstrate how these risks influence undergrounding decisions, and consider comprehensive undergrounding of our entire neighborhood.

The lives of our families and neighbors must come before economic comparisons that fail to account for the full consequences to human life.

Respectfully,
Joel Baxter
Montclair Hills, Oakland, California