Todd Crampton - Opening Comments on PG&E's Proposed 2028-2037 Undergrounding Plan - Montclair Hills

To the Office of Energy Infrastructure Safety:

I am a homeowner in Montclair Hills, Oakland, and I am writing to urge your office to take a closer look at how PG&E's proposed 2028–2037 undergrounding plan evaluates wildfire risk in our community.

Montclair Hills is exactly the kind of neighborhood where undergrounding electrical lines should be a priority. We have dense vegetation, steep terrain, strong seasonal winds, and an extensive network of overhead power lines running alongside trees and residential streets. We also have very limited evacuation options. These conditions create a level of risk that cannot be adequately understood by looking at individual power lines or streets in isolation.

The 1991 Oakland Hills fire demonstrated the devastating consequences of a fast-moving wildfire in this terrain. Twenty-five people died, and thousands of homes were lost. One of the important lessons from that disaster was how quickly evacuation routes can become overwhelmed when fire spreads through densely populated hillside neighborhoods. It is difficult to justify leaving known vulnerabilities in place when we have already experienced the consequences of a catastrophic fire in this area.

My primary concern is the potential for an electrical equipment failure or a tree falling onto a power line to ignite a wildfire during a high-wind event. In the conditions we experience in the Oakland Hills, a small ignition could quickly grow into a major fire. By the time residents are alerted and begin evacuating, the situation could already be extremely dangerous.

There is also the very real possibility that the same event that starts a fire could interfere with evacuation. A downed pole or electrical line could block a residential road, preventing people from reaching the main evacuation routes. With so few ways out of the neighborhood, one blocked street could create a chain reaction of traffic congestion and delays. It could also make it harder for emergency responders to reach the fire.

This is why I am concerned about PG&E's increasing reliance on economic comparisons to determine which areas qualify for undergrounding. Cost is certainly a legitimate consideration, but it cannot be the deciding factor when the underlying analysis does not fully account for evacuation constraints, falling trees, and the cumulative risks to residents.

Strengthening overhead lines and using automatic shutoffs may reduce certain risks, but they are not equivalent to removing vulnerable overhead infrastructure. In a neighborhood with our particular combination of hazards, undergrounding offers a more permanent way to reduce the potential for an electrical ignition and the danger of downed lines obstructing roads.

I believe PG&E should be required to demonstrate that its undergrounding priorities account for the full consequences of a wildfire, not simply the estimated likelihood of an equipment-related ignition. That evaluation should include the entire network of neighborhood streets, the impact of severe

canyon winds, the possibility of blocked evacuation routes, and the number of residents who could be affected.

I am asking the Office of Energy Infrastructure Safety to ensure that Montclair Hills receives a comprehensive evaluation for undergrounding and that PG&E does not exclude high-risk residential areas based on cost calculations that fail to reflect these dangers.

The Oakland Hills fire should have taught us that the consequences of underestimating wildfire risk can be catastrophic. We cannot eliminate every danger associated with living in the hills, but we can take meaningful steps to reduce preventable risks. Undergrounding power lines is one of those steps, and I believe the safety of our community warrants that investment.

Thank you for your attention to this important issue.

Sincerely,

Todd Crampton Montclair Hills, Oakland, California