Subject: Public Comment on PG&E's Proposed 2028-2037 Undergrounding Plan – Please protect human lives in the Oakland Montclair Hills

To the Office of Energy Infrastructure Safety:

I live in Montclair with my partner and lived in the Bay Area during the devastating 1991 fire in Montclair and the Oakland Hills. Twenty-five people lost their lives in that fire, many of them caught as they were trying to evacuate on our narrow, winding streets. I am asking OEIS to withhold approval of PG&E's proposed 2028–2037 Undergrounding Plan until PG&E demonstrates that its decisions adequately account for evacuation risks in our neighborhood.

Montclair has narrow, winding streets, mature trees, steep terrain, and limited routes out of the hills. My street and most of the others in our neighborhood typically has cars parked on the street, making it effectively a single lane road. Residents trying to leave would share those single lane roads with emergency crews trying to get in. A fallen pole or power line on a connecting street could prevent people from reaching a main evacuation route, even if that route remained open.

In the 1991 fire, people trying to get to safety had to abandon their cars and run. Those cars then became yet another barrier to the fire crews trying to reach and fight the fire.

Power shutoffs and overhead hardening have a role in reducing wildfire risk. But shutting off electricity does not remove a fallen line, a pole, or an abandoned car from a road. The evacuation analysis needs to consider blocked streets regardless of whether PG&E equipment starts the fire.

I am a CPA and understand cost-benefit analyses. However, PG&E's analysis is missing important inputs since it does not adequately factor in the difficulty that our neighborhood terrain represents and therefore the risk to human life should we need to evacuate quickly. PG&E has acknowledged that they have not properly accounted for these risks, yet they are not willing to revise their model.

PG&E's proposed plan expressly permits PG&E 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.

Before approving the plan, I ask OEIS to require PG&E to:

- Evaluate Montclair's connected street network, including the smaller roads residents must use to reach evacuation routes.
- Assess scenarios in which high winds, falling trees, and downed electrical infrastructure block multiple roads during a wildfire.
- Incorporate Oakland Fire Department's assessment of local access and evacuation conditions, and explain how that assessment affects project priorities.

- Publish a clear explanation of Montclair's undergrounding priority, including uncertainties in the analysis and the reasons for selecting overhead measures where undergrounding is not proposed.

I support undergrounding in Montclair and want it evaluated against the consequences of losing access during an emergency. I recognize that undergrounding is expensive and cannot eliminate every wildfire hazard. That makes a careful, transparent comparison especially important.

All of the residents of Montclair as well as the firefighters depend on these roads being clear of obstruction in an emergency. Before accepting a plan that could leave overhead infrastructure in place for another decade, please require PG&E to show how it has addressed the risk that this infrastructure could block our way out and block the firefighters' way in.

Sincerely,

Jennifer Meriwether
Montclair, Oakland, California