Montclair Needs a Place in PG&E's Undergrounding Plan

To the Office of Energy Infrastructure Safety:

Re: PG&E's Proposed 2028–2037 Undergrounding Plan: Montclair, Oakland

When I think about wildfire in Montclair, I look at my street and ask whether a fire engine could get up it. I am writing to ask that PG&E's undergrounding plan include Montclair, and that OEIS not approve the plan until PG&E shows it has seriously weighed the two problems that worry me most: roads too narrow to share, and power shutoffs that arrive every time the wind picks up.

The roads. Many Montclair streets are barely wide enough for two cars to pass. Add parked vehicles, tight curves and steep grades, and a single fire engine has little room to maneuver. Now picture a neighbor trying to leave while crews try to come in, all on pavement that was never meant to carry both. If a pole snaps or a line comes down across one of these streets, the road does not simply slow down; it closes. A closure on a small connecting street can strand everyone behind it, and it can keep firefighters from reaching the homes they came to protect. Overhead lines in this neighborhood are not only an ignition risk. They are a physical obstruction on the routes that matter most.

The shutoffs. When high winds are forecast, PG&E cuts power in our area to keep its lines from sparking. I understand why, and I do not dismiss the intent. But for those of us who live here, a shutoff is a stopgap, not a solution. It can leave residents without working garage doors or a dependable phone signal, precisely when high winds make a fast evacuation or an emergency alert most likely to matter. It also does nothing about a pole or wire that the wind or a falling tree has already pulled into the road. PG&E's own figures make the case: it reports that its automatic safety settings cut reportable ignitions by about 68% in 2022 on the lines where they were enabled, yet it says undergrounding eliminates nearly 98% of ignition risk from electrical equipment and lessens the need for safety shutoffs. We are being asked to accept repeated outages as the price of keeping overhead equipment that remains standing in the same place year after year.

I am also wary of leaning too heavily on cost-benefit models. A model can only weigh what it measures, and PG&E itself has acknowledged that evacuation constraints and tree-fall hazards are not fully captured. A favorable number tells us little if the things that make Montclair dangerous were never counted.

I therefore ask OEIS to require PG&E, before approval, to:

- Assess Montclair's connected street network, including the small roads that residents and firefighters depend on to reach main routes.
- Evaluate how narrow streets limit fire engine access, and how a downed pole or line would affect response times.
- Account for the repeated wind-driven power shutoffs our community has endured, and explain why continued overhead service is the better choice here.
- Explain publicly how Montclair ranks for undergrounding, including the uncertainties, and why undergrounding is not planned for any area that is passed over.

I support undergrounding in Montclair, and I know it is costly. That is exactly why the comparison must be honest about what it leaves out. Please ask PG&E to show that it has considered the people who live on these streets, and the crews who would have to reach them.

Sincerely,

Anne Thys

Montclair, Oakland, California