Scott Beaver – Opening Comments

PG&E's 2028–2037 Electrical Undergrounding Plan · Docket EUP-PGE

Oct. 31, 2026

Office of Energy Infrastructure Safety

Re: The wildfire-safety case for undergrounding PG&E's lines in Montclair

Dear Energy Safety Staff:

I have lived in Montclair for 11 years. Our Street, Chambers Drive, is filled with majestic oak, redwood, and eucalyptus trees, kids playing in the street, and friendly neighbors walking their dogs. However, the street winds through the hillside, and garbage trucks, contractors working on houses, and firetrucks constantly block the street.

I ask Energy Safety to ensure that PG&E's 2028–2037 Electrical Undergrounding Plan includes and prioritizes undergrounding PG&E's overhead power lines in Montclair. PG&E says it chose locations where undergrounding "is forecasted to provide the greatest reduction in wildfire risk."[1] Montclair is clearly one of those places.

Montclair's fire risk is well documented. Montclair lies in Oakland's Very High Fire Hazard Severity Zone.[2] The Oakland-Berkeley hills have had 15 major fires since 1923, including one in Montclair itself.[3] Between 1923 and 1998, Diablo-wind fires in these hills destroyed 3,542 homes and took 26 lives.[4] The 1991 Oakland Hills Fire burned to the edge of our neighborhood.[5]

Power lines have started fires here before. In December 1980, a power line ignited a Diablo-wind fire in the Berkeley hills that destroyed five homes.[3] Overhead lines fail in exactly the conditions that turn a spark into a firestorm: high wind, falling branches and dry vegetation. PG&E itself says undergrounding reduces ignition risk by nearly 98 percent.[1]

PG&E's own actions show it recognizes the danger. In October 2020, PG&E shut off power to most of Montclair Village "to prevent gusting dry winds from damaging lines and sparking wildfires." That night, a falling tree struck a power line just north of Montclair.[6] On October 14, 2026, PG&E shut off power again, this time to about 4,700 Alameda County customers, mostly in the Berkeley and Oakland hills, "to reduce the risk of wildfire from energized powerlines." PG&E has also installed a wildfire camera, weather stations, 14 sectionalizing devices to target shutoffs, and automatic shutoff settings in Montclair.[7] These measures help detect and manage danger, but they leave the ignition source in place.

A fire here could be especially deadly. Montclair is densely built on steep slopes, with narrow, winding streets and few ways out. In 1991, downed power lines impeded residents fleeing down narrow roads, and a firefighter died shielding a woman from a live power line that fell on both of them.[8] The Oakland City Council has formally cited Montclair's population density and "extraordinary challenges for egress and ingress routes" in calling for undergrounding here.[2]

Undergrounding is feasible here. PG&E has already completed one undergrounding project in Montclair.[7] Next door, Piedmont Pines – same hills, same trees, same winds – has been moving its lines underground

through a City undergrounding district first formed in 2002, a two-decade effort. Wildfire safety should not depend on whether a neighborhood can organize and fund its own 20-year project.

PG&E's risk model must reflect these conditions. In 2023, PG&E said Montclair was left out of its plans because lines elsewhere were higher risk; it called fuel and weather its model's most important factors and said it would add ingress and egress.[5] That year, Oakland's chief resilience officer wrote to Energy Safety that Montclair's limited access and dense population are a "matter of life and death in a wildfire" and should weigh heavily in PG&E's model.[5] Before approving the plan, I ask Energy Safety to require PG&E to:

- include and prioritize undergrounding of its overhead distribution lines in Montclair, or explain specifically why not;
- show how its risk model accounts for Montclair's evacuation constraints, population density and wind-driven fire spread; and
- publish the risk scores for Montclair's circuit segments and how they compare with the cutoff for inclusion.

Thank you for considering my comments.

Sincerely,



Scott Beaver
Montclair, Oakland, California

Sources

1. PG&E news release announcing its 10-year Electrical Undergrounding Plan, Oct. 1, 2026; PG&E Electrical Undergrounding Plan page, pge.com/eup.
2. Oakland City Council, resolution on "Undergrounding of Power Lines in Very High Fire Severity Zone," including the Montclair District, July 18, 2023.
3. "Fires in the Oakland–Berkeley Hills" (fire history, rev. 2005), California Governor's Office of Emergency Services.
4. East Bay Regional Park District, "Fire History," ebparks.org.
5. San Francisco Chronicle, "PG&E urged to bury power lines in Oakland's Montclair neighborhood," 2023.
6. San Francisco Chronicle, "5,000 in Oakland hills wake up without power," Oct. 16, 2020.
7. ABC7 News, PG&E statement on wildfire measures in Montclair since 2018, April 26, 2023.
8. National Fire Protection Association, Fire Investigations report, "Oakland/Berkeley Hills Fire, October 20, 1991."
9. City of Oakland, Engineer's Report, Utility Underground Assessment District No. 2021-232 (Piedmont Pines Phase II), April 2021.