Subject: Serious Concerns Regarding Inadequate Assessment of Cumulative Evacuation Risks in Montclair Hills re PG&E's Proposed 2028–2037 Electrical Undergrounding Plan

November 2, 2026

To the Office of Energy Infrastructure Safety:

I am writing to express serious concerns about PG&E's proposed 2028–2037 Electrical Undergrounding Plan (EUP). I am particularly concerned about its increased reliance on benefit-cost comparisons that do *not adequately account for the cumulative and compounding risks to human life* in communities with severely constrained evacuation access, such as Montclair Hills, in Oakland, California.

Montclair Hills, Oakland, is a heavily wooded, high-fire-risk neighborhood with narrow, winding roads, significant vegetation with high tree-fall hazards, and only two exits to safety. Thousands of residents depend on these limited exits. A single downed utility pole or electrical line blocking a road could have catastrophic consequences. In the 1991 firestorm, Montclair Hills residents reported waiting 3 hours in their cars to evacuate. The majority of people who died in the 1991 firestorm – immediately adjacent to this area – died in 30 minutes.

This is the reason I am urging OEIS to support PG&E's undergrounding of all powerlines in this area as soon as possible, and before another catastrophic event occurs.

Below are my specific concerns and why I believe OEIS should NOT approve PG&E's plan as currently drafted. It also explains why OEIS should require PG&E to conduct a holistic assessment of the *combined and cumulative risks* to our area with its overhead lines and provide specific data-supported rationale for decisions regarding whether or not to underground powerlines in the Montclair Hills.

1. PG&E's proposed methodology represents a significant change in undergrounding decisions.

KEY POINT: New provisions allow PG&E to exclude undergrounding in areas with known public-safety vulnerabilities, even though those vulnerabilities have not been fully quantified. This is not an acceptable way to fully account for risk to human life.

In its earlier 2023–2025 Wildfire Mitigation Plan (page 436), PG&E identified tree-fall-in risk, ingress/egress constraints, and Public Safety Power Shutoff impacts as additional factors favoring undergrounding.

Under its proposed 2028–2037 EUP, PG&E introduces a more explicit economic screening process (Volume 1, pages 135–138), comparing undergrounding and overhead hardening using benefit-cost ratios and a 70% threshold relative to overhead hardening.

Most troubling, page 138 expressly states that PG&E may: "exclude targeted undergrounding for ingress/egress impacted areas (allowing for overhead hardening in those areas) from the current Project scope."

2. PG&E acknowledges important limitations in its quantitative models.

KEY POINT: Economic comparisons cannot reliably determine the safest mitigation when some of the most serious consequences to human life have not been adequately measured.

On page 136, PG&E recognizes that local safety considerations, including ingress/egress constraints and tree-strike exposure, are not fully captured by its quantitative models.

Nevertheless, PG&E's proposed methodology permits benefit-cost comparisons to influence whether undergrounding is retained or removed.

The problem is that PG&E can now exclude undergrounding intended to address one vulnerability without clearly demonstrating that it has adequately assessed the cumulative consequences of all the vulnerabilities acting together.

In Montclair Hills, these vulnerabilities include the combinations of: limited evacuation access, population exposure, narrow roads, high tree-fall risk, overhead electrical infrastructure, and the possibility of simultaneous road blockages. The combined and cumulative effects of these risk factors are not quantified or adequately considered in the current decision model.

3. PG&E's methodology fails to adequately capture a critical safety benefit of undergrounding.

KEY POINT: PG&E's wildfire-risk calculations focus substantially on reducing the likelihood of electrical ignition, but do not adequately account for the potentially more damaging risks of downed power lines due to wildfire and/or tree-fall-in incidences that would likely block roads to safety.

Overhead hardening retains poles and wires that can fall or obstruct roadways during a wildfire; *undergrounding of electrical powerlines virtually removes this hazard*.

4. The entire interconnected evacuation network must be evaluated.

KEY POINT: Evaluating individual projects without adequately considering these network-wide consequences would substantially underestimate the safety benefits of comprehensive undergrounding.

Montclair Hills cannot be evaluated as a collection of isolated roads or electrical projects.

The appropriate unit of evacuation-safety analysis is the entire interconnected neighborhood.

Our few principal evacuation arteries depend on smaller residential streets and connecting roads. A fallen tree bringing down electrical lines on one of these streets could prevent hundreds of residents from reaching a main exit. Multiple blockages could compound congestion and interfere with emergency response.

(See: Dr. Bernard Zeigler/RTSync Executive Summary attached to this letter.)

5. Requested actions by OEIS

I therefore urge the Office of Energy Infrastructure Safety to require PG&E to:

1. **Evaluate and quantify cumulative and compounding risks to human life**, including the combined consequences of evacuation constraints, falling trees, overhead infrastructure, and potential road blockages.
2. **Demonstrate how those combined risks influence undergrounding priorities and mitigation decisions**, rather than allowing economic comparisons to displace inadequately measured public-safety considerations.
3. **Quantify the additional evacuation risks associated with retaining overhead infrastructure**, including potential road obstructions, evacuation delays, and interference with emergency access.
4. **Evaluate comprehensive undergrounding of Montclair Hills as a neighborhood-wide alternative**, recognizing the interconnectedness of residential streets, connecting roads, and principal evacuation routes.
5. **Establish transparent, reproducible decision criteria**, including documentation of local safety assessments, mitigation-effectiveness assumptions, and the application of benefit-cost thresholds.

OEIS should not approve a methodology that allows economic comparisons to override the combined risks to human life when those risks have not been adequately evaluated.

PG&E's proposed plan gives greater weight to economic comparisons while acknowledging that important public-safety vulnerabilities are not fully captured by its quantitative models. For a community with Montclair Hills' extraordinary evacuation constraints combined with other risk factors, that is an unacceptable basis for deciding whether critical overhead electrical infrastructure should remain in place or be undergrounded for improved public safety.

The potentially devastating consequences of getting these decisions wrong would be both irresponsible and irreversible.

Respectfully,

Cynthia H. Barbera

Montclair Hills, Oakland, California

Attached:

A –Dr. Bernard Zeigler/RTSync Recommendations (Executive Summary)
B- Map of Montclair Hills not yet undergrounded “Let’s Finish the Job”

A Recommendation for an Explicit Decision Algorithm for Undergrounding vs Hardening Power Lines in Fire-Prone Communities

Why narrow, windy hillside streets and complex topography require undergrounding utility lines to avoid cascading evacuation delays.

RTSync Corp. — November 1, 2026

PART I - Executive Summary

Overview: The situation that this submission addresses

The residents of Montclair Hills, Oakland, California, live in a hillside community characterized by a Dendritic street pattern (or Tree-Like) network where minor local streets feed into collector streets, which then funnel traffic into a very small number of arterial exit points. During a wind-driven fire, power lines fall across streets and a downed line on a narrow street is repaired only as fast as the crew can get through the cars it has trapped; a second line further up turns that delay into a cascade the crew may never catch up with.

Our simulation model concludes that overhead powerlines – even if hardened - could lead to catastrophic consequences that would be totally mitigated by undergrounding of powerlines.

Key variables that are not quantified in PG&E's current risk model:

1. **Three measurable quantities decide the outcome of how to measure risk** to human life during a wildfire when deciding to underground or harden overhead lines. *None of these measurable qualities appears in PG&E's current 2028-2037 Undergrounding Plan filing:*

    a) The pass rate on each street (lanes, parking, width),

    b) The number of downed spans on one route in a wind event, and

    c) Whether residents will receive and act on information about blocked streets.

2. **The critical issue of repair time:** The repair-time figure that enters any underground-versus-harden calculation must include access: the time to reach the span through the streets between it and the exit, given their width and the queue that will be on them. A fallen line should represent an **impassable hazard** until public safety agencies cut or

bypass it. PG&E's current benefit-cost procedure cannot see this distinction; its qualitative "ingress/egress" flag only gestures at it without a number.

3. **Cascading effects of multiple lines down:** the risk is not the sum of the individual spans' risks. Mitigation (such as undergrounding) on a particular route – regardless of where it is - is effective only when it covers the entire route; partial undergrounding of a tree-shaped street leaves the cascade intact.

Why an Explicit Decision Algorithm is Necessary to Measure Risk to Human Life

Lessons from 1991 Fire in Montclair Hills:

1. **"It took 3 hours for people to get out."** This comment is repeated by many who lived in the Montclair Hills at the time. Some people reported not being able to get out of their driveways due to the clogged streets and wound up running down the hill. Many people did not evacuate. *(Note: this is consistent with the 3-hour estimate of some of our simulation models although no official report gives a single evacuation duration, and the figure does not appear in the NFPA, U.S. Fire Administration, or State OES reviews.)*

2. **Downed power lines were the most common problem for (fire) engines** (185 reports), ahead of water supply (165) and narrow steep roads (132) (Source: OES multi-agency review: tally of engine-company problems.)

3. **"…in some cases, fire apparatus and private vehicles were trapped in areas for several hours…"** (Source: OES multi-agency review & NFPA report.)

4. Most deaths occurred between 11:30 and 12:00pm. **For the people who died, the race was lost in 15 to 45 minutes, not three hours.**

5. **"…traffic jams developed, residents "abandoned their cars in frustration so they could run to safety,"** and the abandoned cars then became roadblocks. (Source: NFPA report.)

6. **"…over half of the fatalities occurred in cars that burned on the winding roads."** The USFA report: at Parkwoods (456 units, one gate), engines reported more than 1,000 residents trying to escape by 11:37, and "collisions and falling power lines blocked narrow streets." On Charing Cross Road, a collision jammed cars in the narrowest section; eleven people died there, trapped in the queue, and eight more "on narrow streets in the same area."

7. **Battalion Chief Riley was electrocuted by a falling power line** while helping a woman leave by car. Officer Grubensky died with the people he had loaded into his car when their route was blocked.

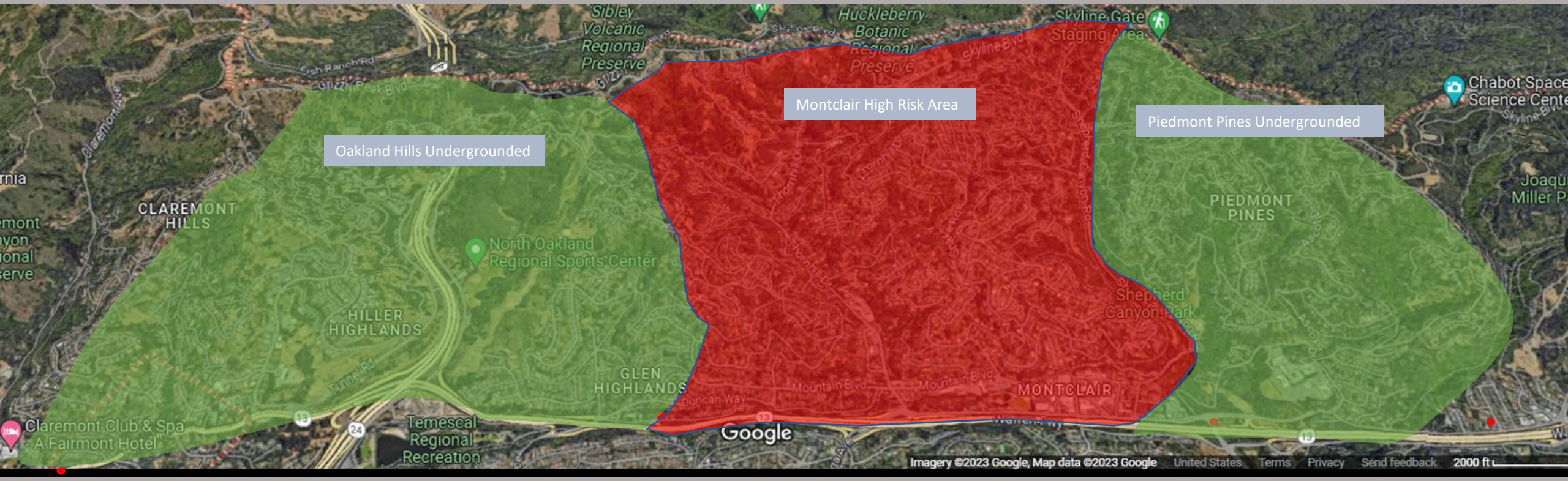
8. **Why it still matters.** The roads have not changed: a 2011 retrospective quotes the Diablo Fire Safe Council that "the width of the narrow roads hasn't changed at all."

Summary Conclusion

During the 1991 firestorm, which occurred immediately adjacent to the Montclair Hills, downed lines were the leading cause of blocked streets, not an edge case. The lethal failure mode was a queue stopped at a narrow point by a collision or downed power line, with the fire arriving within minutes.

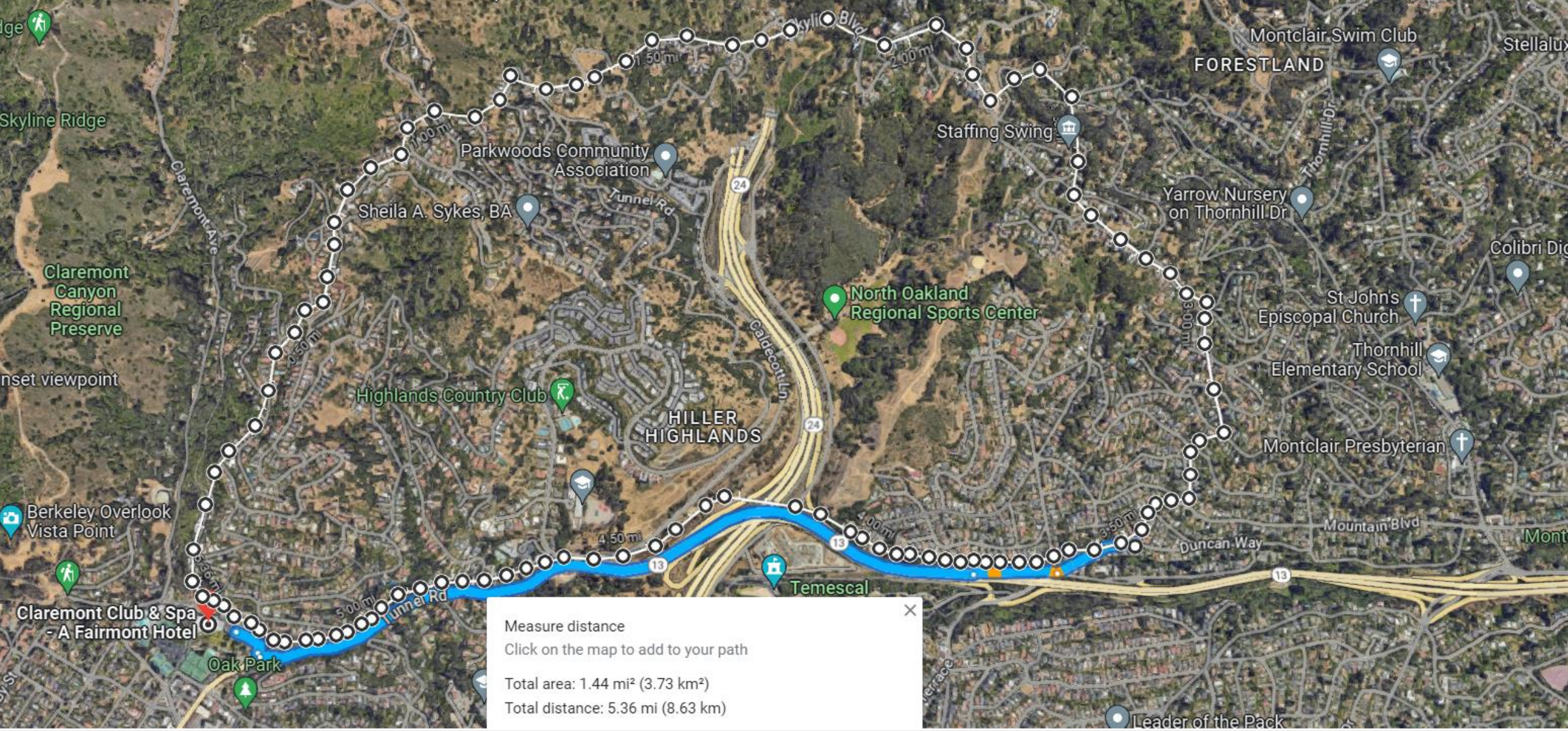
A downed line on a narrow street is repaired only as fast as the crew can get through the cars it has trapped; a second line further up turns that delay into a cascade the crew may never catch up with; on a grid, telling residents where the congestion points are helps to ameliorate the situation -- but burying the lines on a dendritic street pattern is the only solution.

Montclair Oakland Hills Area Yet to be Undergrounded. Let's Finish the Job



This is a Failure to prepare

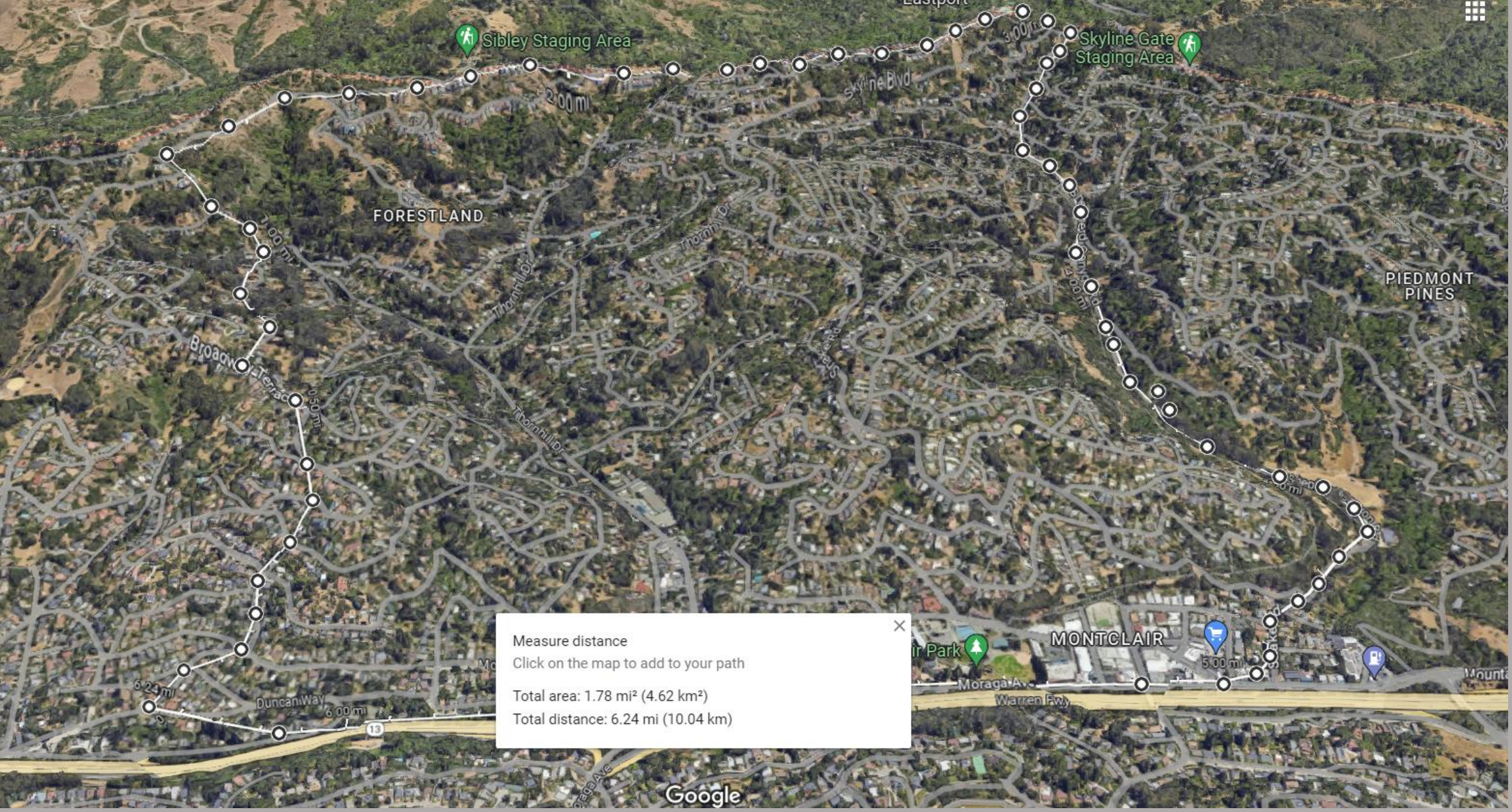
Areas in Green have been undergrounded previously.
Area in red have yet to be undergrounded.



Oakland Hills Currently Undergrounded Area from 1991 Fire. 1.4 Square Miles.

Piedmont Pines Undergrounded. 1.0 square Miles





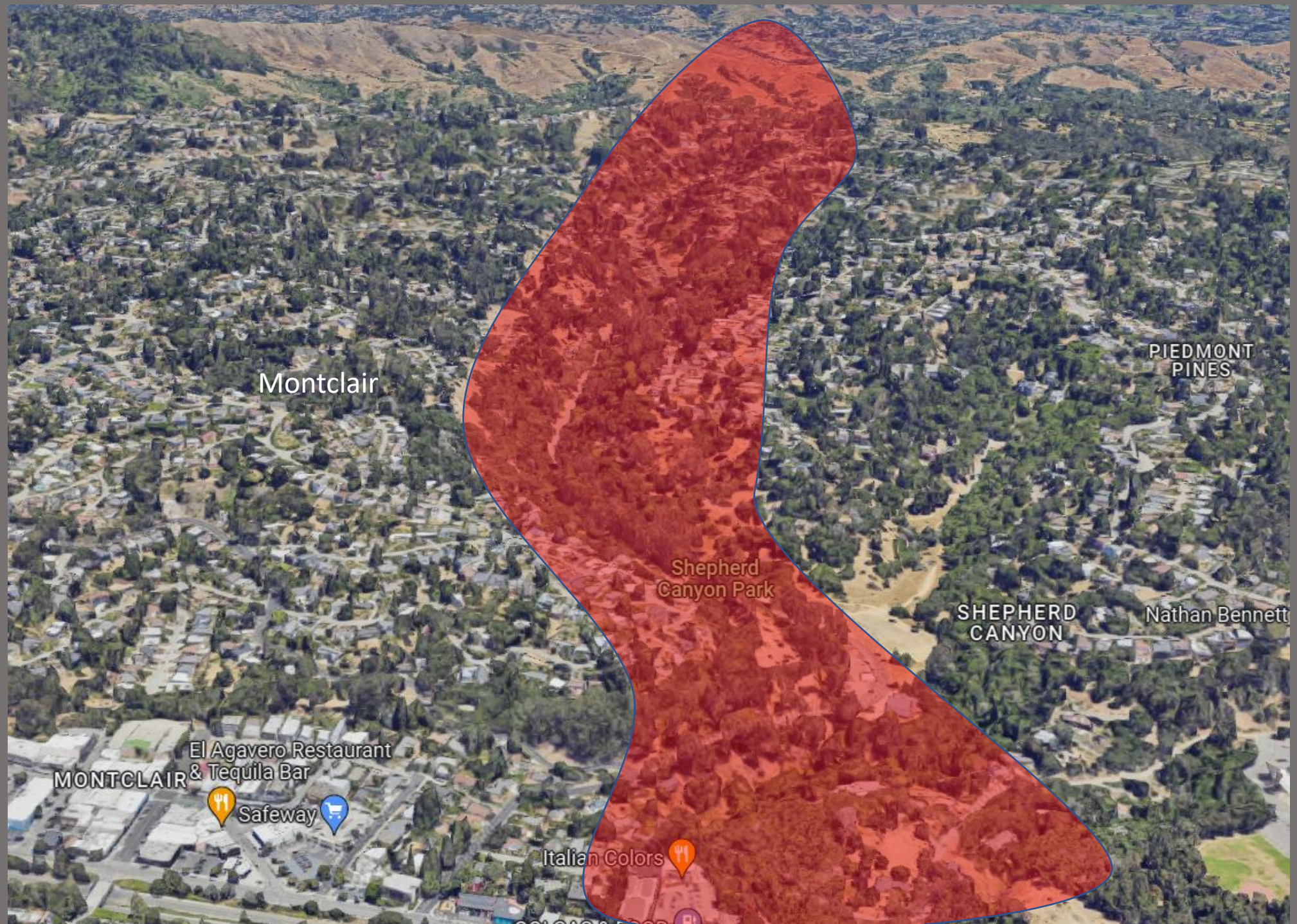
Montclair 1.7 Square Miles to be Undergrounded.

Montclair Shepperd Canyon Winds.

High Wind Corridor

between Eastbay Onshore winds and Central Diablo Winds

During the Oakland Hills Fire warm northeasterly Diablo winds blew in through the canyons. With gusts reaching upward of 65 mph, the 1991 fire quickly grew to an inferno in what we now know as the Oakland Firestorm.

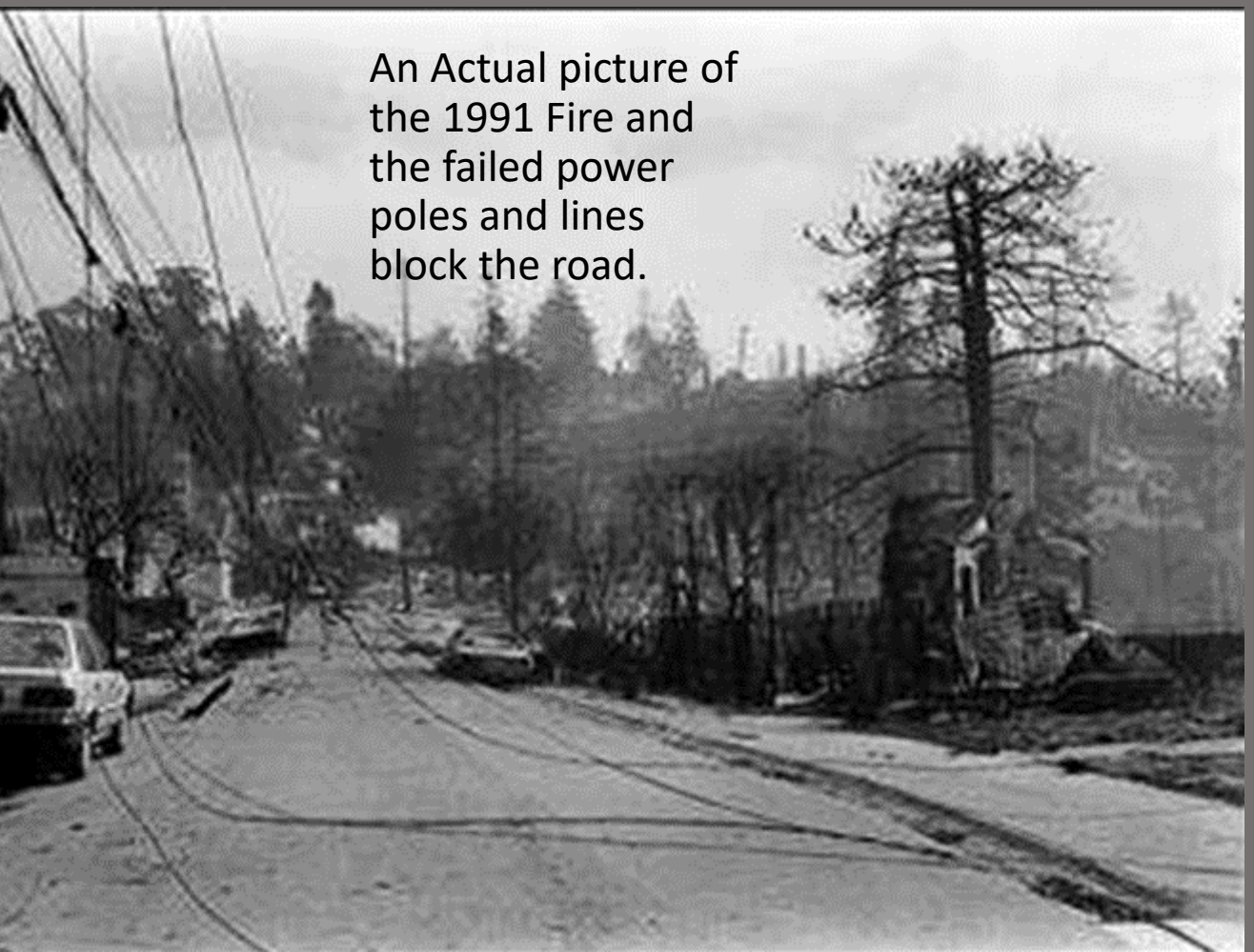


PG&E Hardening Efforts More Risk Not Less

PG&E Has stated that they intend to lessen the risk of fires caused by PG&E equipment by hardening their systems. This includes power interruption circuits, hardening poles, and shielding wire.

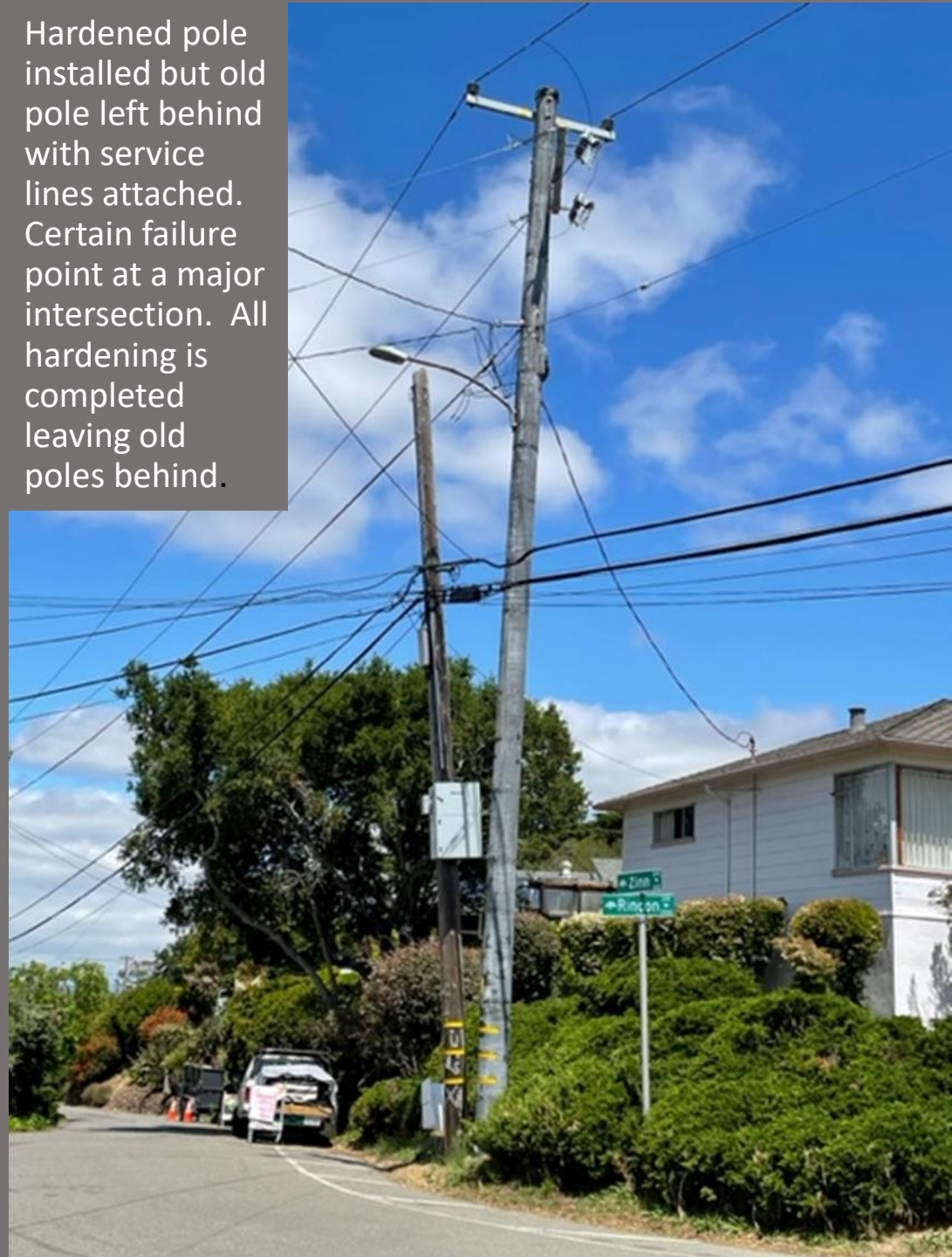
- Hardening is ineffective in area where trees can fall on lines. This is all of Montclair. Per PG&E's own 2023 PG&E wildfire mitigation report.
- Frequent interruption can cause hardship for elderly, people who require medical equipment and refrigerated medication.
- Forces the use of gas powered generators which have caused fires and electrical shock
- Powerlines can still cause fires.
- They very often fall on roads blocking the very limited egress routes needed.
- They have failed in many home fires since 1991 and created risk for firefighters and blocked access
- They provide increased risk during storms.
- They fail and fall across roads during earthquake.
- During hardening PG&E leaves the old wooden pole in place with service lines attached. Another point of failure

Poorly executed, low quality work makes failure imminent and hardening a waste of time.



An Actual picture of the 1991 Fire and the failed power poles and lines block the road.

Hardened pole installed but old pole left behind with service lines attached. Certain failure point at a major intersection. All hardening is completed leaving old poles behind.



An example failed pole with a distribution line on top. There are few options to drive or walk anywhere near this type of failure

