Subject: Urgent Concerns Regarding PG&E's Proposed 2028–2037 Undergrounding Plan — Montclair Hills

To the Office of Energy Infrastructure Safety:
I am writing as a Montclair Hills resident in Oakland to express serious concern about PG&E's proposed 2028–2037 Electrical Undergrounding Plan and its implications for our community's safety.

Montclair Hills faces extraordinary wildfire risks. Our heavily wooded, densely populated neighborhood has narrow, winding roads, limited evacuation routes, and significant tree-fall hazards. The fire crew and thousands of residents depend on just a few roads to extinguish fires and reach safety during an emergency. A single downed utility pole or electrical line blocking a critical road could have catastrophic consequences for hundreds, potentially thousands, of people.
Because severe canyon winds sweep through Shepherd Canyon during the dry, windy seasons, PG&E's hardening of overhead power lines and automatic power shut-offs are not adequate to substantially reduce wildfire risk in our neighborhood. Severe canyon winds can quickly turn a single spark from an overhead power line into a firestorm. PG&E's plan should place significant weight on these seasonal phenomena in its holistic evaluation of undergrounding.
PG&E's proposed plan represents a significant change in how it makes undergrounding decisions. It places greater weight on benefit-cost comparisons, even though PG&E acknowledges that its quantitative risk models do not fully capture important public-safety risks, including evacuation constraints and falling-tree hazards. The value of human life cannot be reduced to a financial calculation that fails to account for the full consequences of a catastrophic wildfire.
Most troubling, PG&E acknowledges that its quantitative models do not fully capture important risks, including evacuation constraints and tree-fall hazards.
The problem is that PG&E's proposed plan now expressly permits it to exclude undergrounding electrical lines in areas with known public-safety risks, without clearly demonstrating that it has adequately assessed the cumulative consequences of all vulnerabilities acting together.
In Montclair Hills, these vulnerabilities cannot be separated. Limited evacuation access, population exposure, high tree-fall risk, and overhead electrical infrastructure combine to create potentially catastrophic consequences during a wildfire. We should assess all these factors cumulatively.
An additional concern is the interconnectedness of our entire neighborhood. Our very few evacuation roads depend on a network of smaller residential streets and connecting roads. A fallen pole or power line on one of these smaller roads could prevent hundreds of residents from even reaching a main evacuation route. PG&E must therefore evaluate the safety of the entire interconnected evacuation network, not just individual roads, and consider comprehensive undergrounding throughout Montclair Hills.
Economic comparisons cannot reliably determine the safest mitigation when some of the most serious consequences to human life have not been adequately quantified.
I therefore urge the Office of Energy Infrastructure Safety to require PG&E to evaluate and quantify the cumulative and compounding risks facing Montclair Hills and demonstrate how those risks influence its undergrounding priorities and decisions.
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.
Our residents' lives depend on decisions that fully recognize these dangers.

Respectfully,

Lucas Grassi Gurfein
Montclair Hills, Oakland, California