October 30, 2026

Subject: Montclair Hills and PG&E's 2028–2037 Under-grounding Plan

To the Office of Energy Infrastructure Safety:

I live in Montclair Hills. I'm writing because PG&E's proposed 2028–2037 Under-grounding Plan doesn't account for what a fire would mean here.

Our neighborhood is dense and heavily wooded. Its streets are narrow and winding, and there are few ways out. Thousands of residents and the crews sent to protect them depend on the same handful of roads. One downed pole or line in the wrong place could trap hundreds of people.

We've seen how fast this can happen. In October 1991, a wind-driven fire swept through the Oakland and Berkeley hills, killing 25 people and destroying about 3,000 homes. Narrow roads slowed both evacuation and firefighting. The terrain, the vegetation and the wind haven't changed since then.

In the dry season, wind drives through Shepherd Canyon hard and fast. In those conditions, one spark from an overhead line can become a firestorm. Hardening the lines and shutting off power doesn't change that. Seasonal wind should carry real weight in any under-grounding decision here.

Our community is classified as a high fire risk. Our insurers have priced that risk into every policy in the neighborhood, and premiums have risen sharply. The insurance industry sees this danger clearly. PG&E's plan should too.

The plan changes how under-grounding decisions get made by relying more on benefit-cost comparisons. PG&E admits its models don't fully capture evacuation constraints or tree-fall hazards, and those are the risks that matter most here. The plan also lets PG&E exclude areas with known public-safety risks without showing it has weighed how those risks compound.

In Montclair, you can't weigh those risks one at a time. Limited egress, population density, tree fall and overhead lines all act together, so they should be assessed together.

The same goes for the road network. Our main evacuation routes are fed by small residential streets. A line down on one of them can keep hundreds of people from ever reaching a main road. PG&E should evaluate the whole network, not one road at a time, and consider under-grounding throughout Montclair Hills.

A cost comparison can't find the safest option when the worst consequences, the ones measured in lives, haven't been measured at all.

I ask OEIS to require PG&E to evaluate and quantify the cumulative risks facing Montclair Hills, and to show how those risks shape its under-grounding priorities. OEIS should not approve a

method that lets economic comparisons outweigh risks to human life that were never fully assessed.

The people who live here are counting on getting this right.

Respectfully,
David Gunderman
Montclair Hills, Oakland, California

510-205-4369