SUBJECT: Safeguarding Human Life in Montclair Hills - PG&E's Proposed Undergrounding Plan

To the Office of Energy Infrastructure Safety:

I am a resident of Montclair Hills, Oakland, and I am deeply concerned about PG&E's 2028–2037 Electrical Undergrounding Plan and its potentially life threatening consequences for our community.

I ask that OEIS not approve the plan for the Oakland Hills until PG&E demonstrates that its decisions adequately account for evacuation risks in our neighborhood.

Why Montclair is high-risk

- **History.** The 1991 Oakland Hills firestorm killed 25 people and destroyed roughly 3,400 homes. The area is a CAL FIRE Very High Fire Hazard Severity Zone.
- **Ignition probability.** Steep terrain, dry vegetation, and severe Shepherd Canyon winds raise tree-fall risk and can turn one spark into a firestorm.
- **Consequence.** About 6,800 residents, closely spaced homes, and very few roads for evacuation and fire-engine access.

Comparable Lessons from the 2025 Eaton Fire

The January 2025 Eaton Fire killed 19 people and destroyed more than 9,000 structures in Altadena and Pasadena. LA County fire officials attributed it to Southern California Edison equipment. It is the closest recent parallel to Montclair, where PG&E's overhead lines sit in a similar setting:

- **Utility ignition in high wind.** The fire started in a Santa Ana windstorm that carried embers up to two miles into neighborhoods. Shepherd Canyon channels comparable winds through Montclair.
- **Terrain and trees.** Officials pointed to streets following canyons and dense neighborhoods with heavy tree canopy that help spread fire—the same natural conditions found in Montclair.
- **Little time to escape.** Flames reached west Altadena hours before evacuation orders, and all but one of the 19 deaths occurred there. Reporting differs on whether officials could have issued warnings sooner, but wind-driven fire left little margin for error.
- **Blocked roads.** In Montclair, a power pole or line downed by wind or a tree could block off a connecting street, trapping residents and keeping fire engines out.

The lesson is that in a wind-driven fire, overhead utility equipment can be both the ignition source and an obstacle to escape.

Gaps in PG&E's analysis

- PG&E says hardening, cameras, and shutoffs are sufficient. By its own account, shutoffs cut ignitions only 68% in 2021–2022 versus the 2018–2022 average, while undergrounding cuts risk about 98%.
- PG&E's updated model now includes ingress and egress, but the plan weights benefit-cost comparisons more heavily, even though PG&E acknowledges evacuation constraints and falling trees are not fully captured.
- A shutoff does not clear a fallen pole, and hardening does not stop tree fall-in. These hazards compound.
- Cost is modest: PG&E's CEO said in January 2025 that “In a customer's bill today, $1 a month is for undergrounding. $20 a month is for vegetation management".

What I ask OEIS to require

1. **Network analysis.** Evaluate Montclair's full street network, including small, narrow roads residents use to reach main routes.
2. **Compounding scenarios.** Model wind, falling trees, and downed lines blocking multiple roads at once, and do not exclude an area on cost-benefit grounds when these risks are acknowledged as being not accounted for.
3. **Local fire input.** Incorporate the Oakland Fire Department's assessment, including Chief Covington's input, and explain how it changes priorities.
4. **Wind.** Give meaningful weight to canyon winds such as Shepherd Canyon's.
5. **Transparency.** Publish Montclair's priority ranking, the uncertainties, and why overhead measures were chosen where undergrounding is not proposed.
6. **Reconsideration.** Re-evaluate undergrounding for Montclair and Shepherd Canyon, and make approval for this area contingent on that showing.

Undergrounding is expensive and cannot eliminate every hazard—which is why your decision must be transparent, conclusive, and must not omit whether people can get out alive.

Respectfully,

Tim Rouch

Montclair Hills, Oakland, California