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 resident of Montclair Hills, Oakland, along with other residents, to express serious concern about PG&E's proposed 2028–2037 Electrical Undergrounding Plan and its implications for the safety of our community. We live in a densely populated area, with narrow streets and high fire danger.

PG&E's proposed plan represents a significant change in how undergrounding decisions are made. It gives greater weight to cost benefits at the possible expense of public safety considerations including extreme potential for wildfire, 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 important safety risks, including evacuation constraints and tree-fall hazards, are not fully captured by its quantitative models.

The problem is that PG&E's proposed plan now expressly permits PG&E to exclude undergrounding of electrical lines in areas with known public-safety risks, without clearly demonstrating that it has adequately assessed the cumulative consequences of all the 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. All these factors should be assessed 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 simply 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.

The lives of our residents depend on decisions that fully recognize these dangers.

Respectfully,

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