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OAKLAND COUNCILMEMBER • DISTRICT 4 •

Councilmember Janani Ramachandran
Oakland District 4

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Office of Energy Infrastructure Safety:

Thank you for the opportunity to respond to your call for stakeholder comment regarding guidelines for the prioritization of areas for undergrounding of overhead powerlines as part of PG&E's Proposed 2028–2037 Electrical Undergrounding Plan.

As the elected representative for Oakland City Council District 4, I want to echo on-going concerns I have heard from constituents throughout Oakland's Very High Fire Severity Zone. Our office is working closely on many aspects of protecting Oakland residents from future catastrophes, and on planning the best way forward in an environment of increasing risk due to global climate change.

I understand that the proposed risk components for the 10-year Undergrounding Plan are based on wildfire risk reduction, public safety, cost efficiency, and reliability benefits. It is imperative that public safety be the highest concern.

I strongly support my constituents' request that California Energy Safety require PG&E to evaluate and prioritize the undergrounding of electrical distribution infrastructure along critical evacuation corridors serving the Montclair neighborhood in the Oakland Hills, before approving PG&E's proposed 2028–2037 Electrical Undergrounding Plan.

These neighborhoods are densely populated and face significant wildfire evacuation constraints, including narrow, heavily wooded roads, limited alternative routes, and overhead electrical infrastructure exposed to falling trees and other hazards.

Concern extends beyond the possibility that overhead infrastructure could ignite a wildfire. During a wildfire emergency, falling trees, utility poles, and electrical conductors could obstruct limited evacuation routes, preventing residents from leaving and emergency responders from entering. The loss of life could be catastrophic.

We respectfully request that the CPUC:

1. **Require identification of the relevant circuit segments.** Direct PG&E to identify the distribution circuit segments along the critical evacuation corridors serving Montclair, including their status in the proposed 2028–2037 undergrounding portfolio.
2. **Require a street-level ingress/egress assessment.** Direct PG&E to evaluate the consequences of falling trees, poles, and overhead conductors obstructing these roads, including the limited availability of alternative evacuation routes and the simultaneous needs of evacuating residents and incoming emergency responders.

3. **Require reconsideration of undergrounding priority.** Direct PG&E to determine whether these segments should receive higher priority based on their evacuation importance, tree-fall exposure, and the limitations of broader geographic risk assessments.
4. **Require comparison of alternative mitigations.** Direct PG&E to document how covered-conductor hardening compares with undergrounding in addressing wildfire ignition, tree fall-in hazards, and evacuation-route obstruction, including costs and feasibility.
5. **Require a documented response before approval.** Direct PG&E to explain whether these segments will be included or reprioritized in its 10-year plan and, if not, to provide a specific explanation of the findings supporting that decision.

I request that PG&E be required to modify its proposed Electrical Undergrounding Plan to prioritize critical evacuation corridors in the Montclair Neighborhood where loss of road access during a wildfire could have severe consequences for public safety.

Sincerely,

Janani Ramachandran