Subject: Comments on PG&E's Proposed 2028–2037 Undergrounding Plan

To the Office of Energy Infrastructure Safety:

Thank you for the opportunity to submit comments. I am writing as a resident of Montclair Hills, Oakland, to voice my and my family's comments on PG&E's proposed 2028–2037 Electrical Undergrounding Plan and its implications for the safety of our community.

My family resides near the Shepherd Canyon located in the middle of the Montclair Hills. Our neighborhood faces extreme wildfire risks. Our heavily wooded and densely populated neighborhood is exposed to strong canyon winds during the dry fire season. The neighborhood has narrow, winding roads, very 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 evacuate during a wildfire emergency. A single downed electrical line, whether hardened or not, will block a critical road that could have catastrophic consequences for thousands of people.

Due to the severe canyon winds sweeping through Shepherd Canyon during the dry windy seasons, PG&E's hardening of overhead powerlines and automatic power shut-offs are not adequate to substantially reduce wildfire risk in our neighborhood. The severe canyon wind will quickly turn a single spark of an overhead powerline into a firestorm. PG&E's plan should place significant weight of such seasonal phenomenon in its holistic evaluation for undergrounding, especially now global warming and El-Ninos are making weather patterns very unpredictable.

The PG&E places great weight to benefit-cost comparisons, even though PG&E acknowledges that important public-safety risks—including evacuation constraints and falling-tree hazards—are not fully captured by its quantitative risk models. 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 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 firefighting access and evacuation routes, dense population, proximity of structures, strong winds, 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's plan should weigh the risk of limited ingress and egress heavily, and evaluate

the safety of the entire interconnected evacuation network—not simply individual roads—and consider comprehensive undergrounding throughout Montclair Hills.

Mere economic comparisons between $-cost and $-benefit cannot reliably determine the safest mitigation of wildfire when the risk to human life cannot be quantified in economic terms.

I therefore urge the Office of Energy Infrastructure Safety NOT to approve the PG&E plan as proposed, and require PG&E to fully evaluate and quantify the cumulative and compounding risks of Montclair Hills and demonstrate how those risks influence its undergrounding priorities and decisions.

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

Respectfully,

So’s Family
Montclair Hills, Oakland, California