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Subject: PG&E's Proposed 2028–2037 Undergrounding Plan — Montclair Hills

To the Office of Energy Infrastructure Safety:

I am writing as a home owner of a property in Montclair Hills, Oakland, to provide comment on PG&E's proposed 2028–2037 Electrical Undergrounding Plan and the basis for determining the necessary remediation to resolve the safety risks to our community of overhead power lines – that require the use of wood poles that support the electric and other under-built utilities.

Montclair Hills faces extraordinary wildfire risks. The roads that we rely on were built by the loggers that cleared the redwoods in the 1920's for homes in the Bay Area at the time. They were not built for the community development that followed when a realtor firm developed the area. (See Forgotten Montclair on Facebook). My grandfather moved into the home on Zinn Drive in 1936. The right turn from Snake Road to Zinn Drive is an example of something that would never have been developed from a city plan. Magellan Drive is another example of a narrow passageway, acceptable for a short-term logging operation but not built to a standard for acceptable passage on a city street.

The regrown multiple tall redwoods and densely populated neighborhood thus has high exposure to trees downing lines and potentially power poles with it narrow, winding roads, very limited evacuation routes, presents significant tree-fall related hazards. The fire crew and thousands of residents depend on just a few roads to extinguish fires and reach safety during an emergency. A single downed utility pole or electrical line blocking a critical road could have catastrophic consequences for hundreds, potentially thousands, of people.

My neighbor, Dr. Ziegler submitted a significant study of the risks associated with the features of our community that strongly supports the need to incorporate a specialized risk assessment methodology to properly assess the proper risk mitigation needed and fairly assess the cost/risk assessment of the undergrounding as alternative.

Thus, PG&E's proposed plan represents a significant change in how undergrounding decisions are made. It gives greater 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 major 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.

As the RTSynch Corp study demonstrates, the Montclair Hills specific vulnerabilities cannot be separated. Limited evacuation access, population exposure, high tree-fall risk, and overhead electrical and other utility infrastructure combine to create potentially catastrophic consequences during a wildfire or other evacuation threat. All these factors should be assessed cumulatively.

In addition, PG&E has noted (CEO, Patti Popee), significant progress in reducing undergrounding costs and should consider the Montclair area for a pilot project to study undergrounding efficiency improvements.

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 and encourage the CPUC to approve associated mitigation measures.

Thank you for your consideration of the critical importance of these concerns.

Respectfully,

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