YUROK TRIBE

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October 30, 2026

Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Re: Public Comment for Docket #EUP-PGE

I write today to submit an official public comment to the Office of Energy Infrastructure Safety on behalf of the Yurok Tribe Department of Planning & Community Development with regard to PG&E's 10-Year Electrical Undergrounding Plan (EUP). **We strongly encourage PG&E to scope and prioritize a 2.2-mile express feeder near Weitchpec within the current plan - infrastructure that would leverage ~$127M of additional funding to address longstanding issues of reliability, resilience, and wildfire risk on our ancestral lands.** We support the plan's purpose, and we ask that this critical infrastructure be included within it.

The Yurok Tribe's reservation runs along 44 miles of the Klamath River in Humboldt County. This terrain is mountainous, steep, and ruggedly beautiful, all of which makes it an exceptionally difficult region in which to maintain safe and reliable electrical service. The Hoopa 1101 Circuit, which serves the upriver portion of our reservation, is consistently among PG&E's worst performing in terms of outage frequency and duration. This region is also within a Tier 2 and Tier 3 High Fire Threat District, and we live with the constant threat of wildfire. Just this summer, the Mile Post 18 fire closed down Highway 96 for days and burned across the powerlines that serve our community. The existing EUP does not reach the Yurok Tribe. There is no planned undergrounding on the Hoopa 1101 Circuit, even though PG&E's EUP risk rankings place the circuit's mainline segment 10th out of 11,482. This is unsurprising, given the long history of underinvestment in utility infrastructure and services in this community. After all, powerlines only reached the ancestral village of Wautec in 2018, and the Yurok Tribe acquired the funding for and managed construction of those lines ourselves.

To address these longstanding issues, the Yurok Tribe is working with the Hoopa Valley Tribe, the Blue Lake Rancheria, the Schatz Energy Research Center, and other partners to develop the Tribal Energy Resilience & Sovereignty Project (TERAS). This system of networked microgrids will greatly improve the reliability and resilience of the Hoopa 1101 Circuit while reducing wildfire risk and the associated burden of frequent EPSS outages. This project is in advanced planning and design stages and has assembled ~$127M of funding for generation, storage, grid upgrades, and microgrid controls. PG&E is already a partner in this effort through the Microgrid Incentive Program. Once operational, TERAS will dramatically improve resilience circuit-wide.

A critical piece of the design of this system is a 2.2-mile underground express feeder near Weitchpec that will allow the distribution system to bypass the Yurok Community Microgrid during certain grid conditions. The express feeder will create the following system benefits:

- **Allow the Yurok Community Microgrid to island without fracturing the grid.** This enables the system to function as an end-of-line microgrid rather than a more complicated mid-feeder system, reducing overall operational complexity and creating flexibility for PG&E's distribution system operators as they work to operate and maintain the system and mitigate ignition risk.

- **Improve resilience for communities on the north-eastern fork of the circuit, including Orleans and Somes Bar**. When there is a fault within the Yurok Community Microgrid, service can continue uninterrupted from the bulk grid (under "blue sky" conditions) or from the Hoopa Substation Microgrid (when there is a fault on PG&E's transmission system).
- **Contribute to Tribal sovereignty** by giving the Yurok Community Microgrid a single point from which to island. The Yurok Tribe feels that this confers a degree of energy independence and autonomy.
- **Reduce outage and wildfire risk** by reducing the exposure of vulnerable distribution infrastructure in Tier 2 and Tier 3 HFTD.

We recognize that this is an atypical undergrounding project in that its primary purpose is to enable the full functionality of other electrical infrastructure being deployed as part of a Tribally-led project to address circuit-wide resilience and reliability issues. In this sense, the positive effects of the project will extend beyond the 2.2-mile undergrounded section, benefiting a significant portion of the Hoopa 1101's 142 circuit miles and ~5,000 residents.

The Yurok Tribe strongly recommends that the Office of Energy Infrastructure Safety recognize the need for undergrounding on the Hoopa 1101 Circuit in its decision on PG&E's EUP, and direct PG&E to include the Weitchpec express feeder in its EUP scope as a valuable wildfire reduction project in its own right and as enabling infrastructure for a project that will result in widespread improvement to the Hoopa 1101 circuit.

Thank you,

Sophia Lay

Sophia Lay
Assistant Director of Planning

Attached:
Underground Express Feeder Technical Support Documentation

Proposed Underground Express Feeder on the Hoopa 1101 Distribution Circuit
Technical Support Documentation

The Hoopa 1101 Circuit is in Humboldt County, near the Oregon-California border. Figure 1 shows the approximate circuit location. The circuit serves rural communities at the northern extent of PG&E service territory, including the Hoopa Reservation, the upriver portion of the Yurok Reservation, and parts of the Karuk Tribe lands near the unincorporated towns of Orleans and Somes Bar.

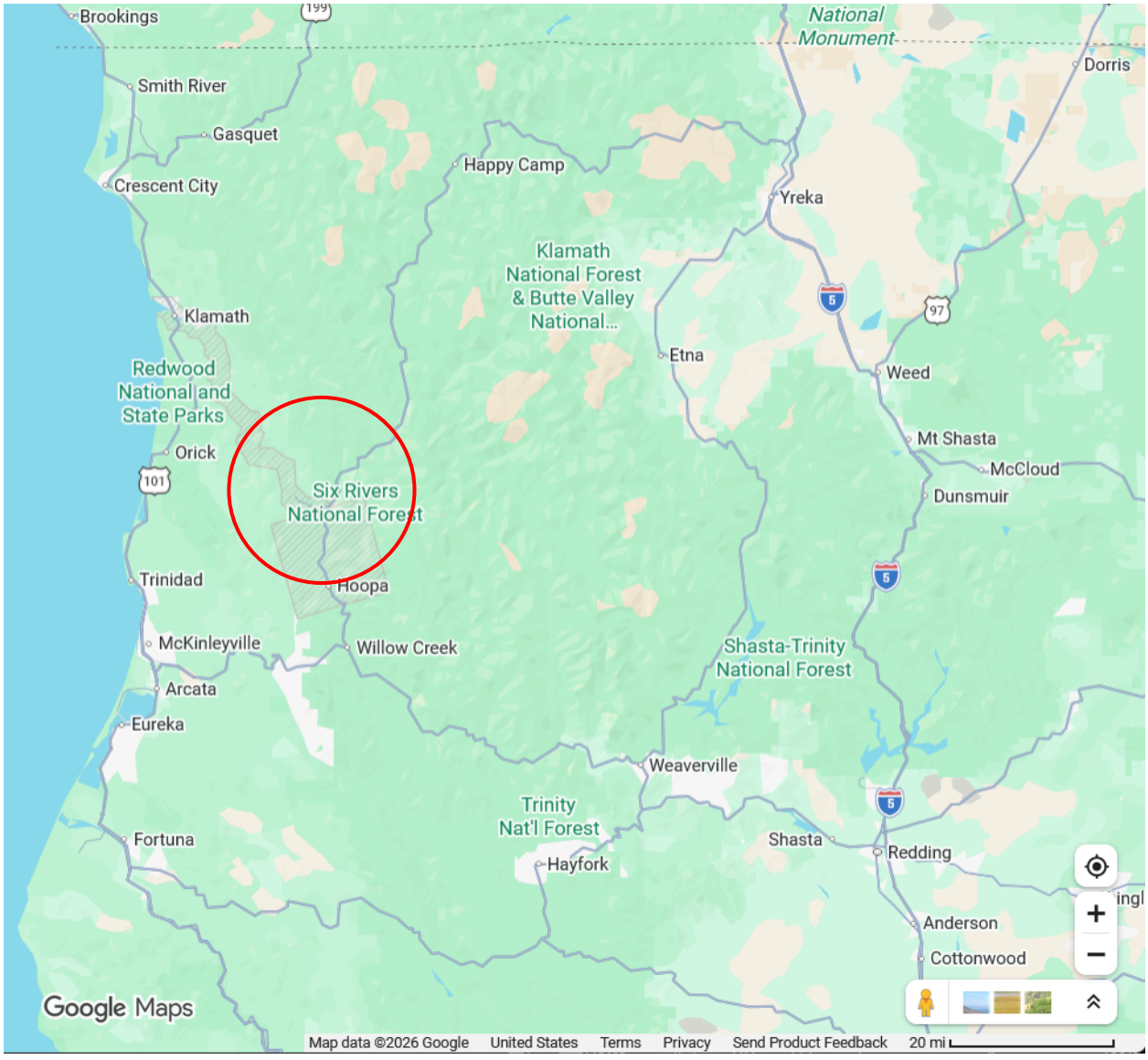


Figure 1: A map of California near the Oregon border. The approximate location of the Hoopa 1101 circuit has been circled. (Google. 2026. Retrieved October 28, 2026 from https://www.google.com/maps/@41.2198046,-124.2970529,8.67z?entry=ttu&g_ep=EgoyMDI2MTAyMC4wIKXMDSoASAFQAw%3D%3D)

The Hoopa Substation Microgrid covers the entire Hoopa 1101 Circuit, originating at the Hoopa Substation. It will be able to power the entire circuit during an outage of the Hoopa Substation. The Yurok Tribe Upriver Community Microgrid is nested within the Hoopa Substation Microgrid. During a substation outage, the Hoopa Valley Tribe provides the grid-forming source for the Hoopa Substation Microgrid, with additional generation supplied from within the Yurok Tribe Upriver Community Microgrid. The structure of the Hoopa Substation Microgrid is shown in Figure 2.

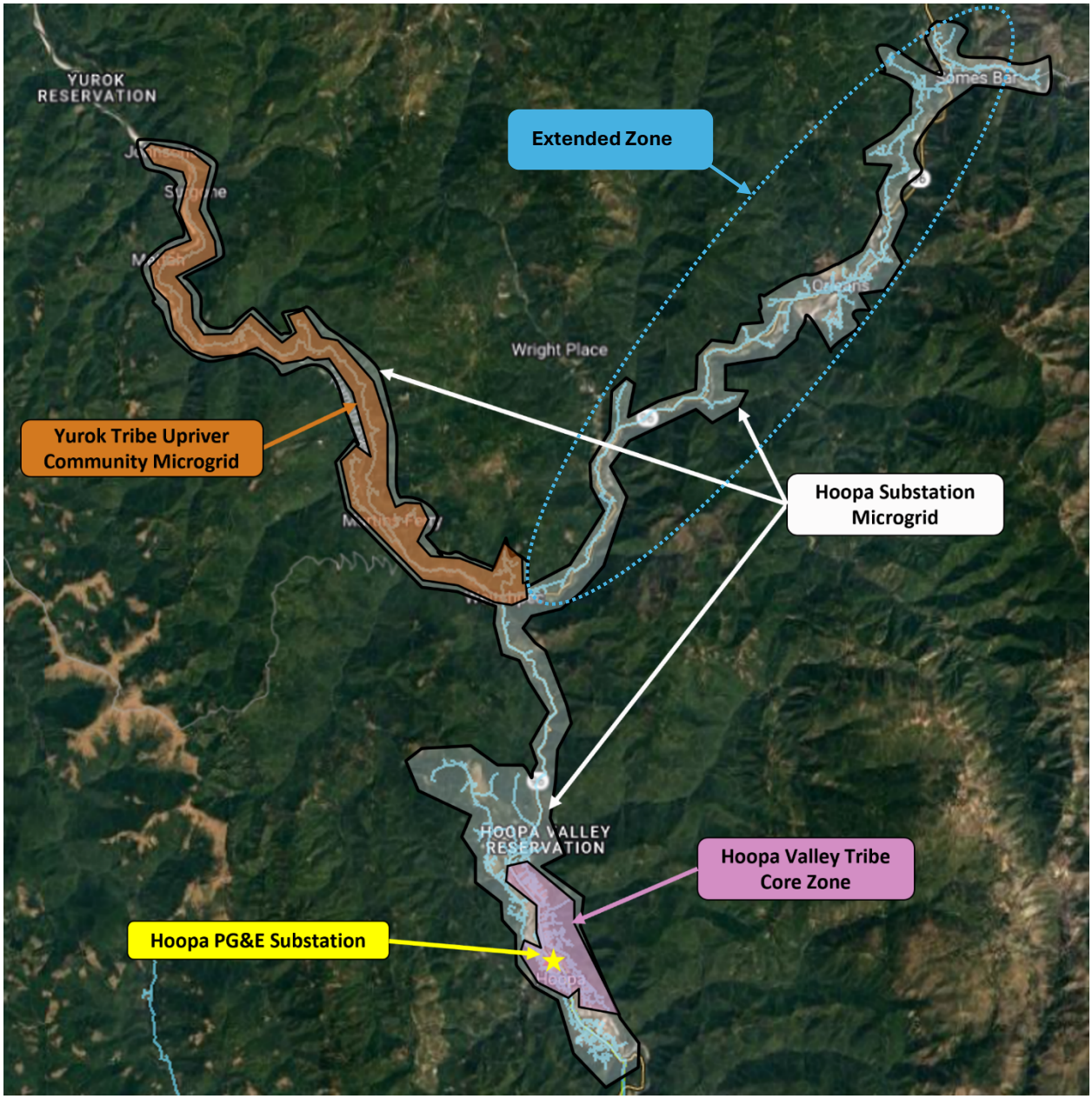


Figure 2: Layout of the Hoopa Substation Microgrid, which covers the entirety of the Hoopa 1101 Circuit. The Hoopa Valley Tribe Community Microgrid Core Zone and Yurok Tribe Upriver Community Microgrid are within the Hoopa Substation Microgrid. The "Extended Zone" is within the Hoopa Substation Microgrid, includes the Orleans and Somes Bar communities, and is home to a significant portion of the Karuk Tribe.

In cases where the substation is unavailable, generation is insufficient, and/or a portion of the circuit must be de-energized (e.g., due to a fault), both the Hoopa Valley Tribe Core Zone and the Yurok Tribe Upriver Community Microgrid can independently energize. This infrastructure also allows for faults to be isolated: if a power line is downed in the Yurok Tribe Upriver Community Microgrid territory, the microgrid can isolate from the rest of the circuit, preventing the fault from affecting Hoopa 1101 customers outside the Yurok Microgrid.

While the microgrids will protect the Hoopa 1101 circuit from faults and power shutoffs outside the circuit, faults within the circuit will still result in some customers losing power. Allowing different sections of the grid to isolate prevents a single fault from de-energizing the entire circuit, but absent the proposed express feeder, the customers in the “Extended Zone" shown in Figure 2 (including the communities of Orleans and Somes Bar) would be significantly more vulnerable. Figure 3 provides a closer look at the distribution fork near Weitchpec: one branch of the three-phase distribution line goes west, farther into the Yurok Reservation, and the other runs east, past the Yurok Reservation boundaries and into the Extended Zone. The proposed express feeder runs from the Hoopa Substation side of the islanding switch, along the highway, and connects to the Extended Zone distribution lines outside the Yurok Reservation.



Figure 3: Map showing the 12 kV distribution line fork at the confluence of the Klamath and Trinity Rivers. The proposed express feeder is shown, connecting the microgrid islanding switch to the distribution line in the Extended zone. A proposed air gap in the existing distribution line at the southeastern edge of the Yurok Reservation is also shown. The location of the microgrid battery and control systems is shown along the 12 kV distribution line.

The Yurok Tribe Upriver Community Microgrid is designed to support the entirety of the Yurok Reservation within PG&E service territory. As seen in Figure 3, this includes a segment of distribution line connecting the Extended Zone to the rest of the Hoopa 1101 circuit, including the substation. This segment of distribution line is also where the Yurok Tribe Upriver Community Microgrid battery and control system will be located. The proposed underground express feeder is required to allow the Yurok Tribe Upriver Community Microgrid to island without disconnecting the Extended Zone.

The express feeder also makes the microgrid operationally simpler by configuring the Yurok Tribe Upriver Community Microgrid as an "end-of-the-line" microgrid. Ensuring seamless transitions between islanded and non-islanded operation requires a sophisticated control scheme and advanced protection relays to prevent the microgrid from reconnecting out of phase with the rest of the circuit. If a microgrid exists at the end of a distribution line, then the microgrid only needs a single point of interconnection to the larger grid, which means a single point where voltage and frequency need to be in sync. Adding additional points of interconnection – as would be necessary if the microgrid was in the middle, as opposed to the end of the distribution line – increases the complexity of the control scheme.

As the single line diagram in Figure 4 shows, with the express feeder in place, the Yurok Tribe Upriver Community Microgrid acts as an "end of line" microgrid, connecting to the rest of the circuit at a single point. Without the express feeder, twice as many islanding switches and advanced controls and power monitoring at twice as many locations would be required, significantly increasing complexity.

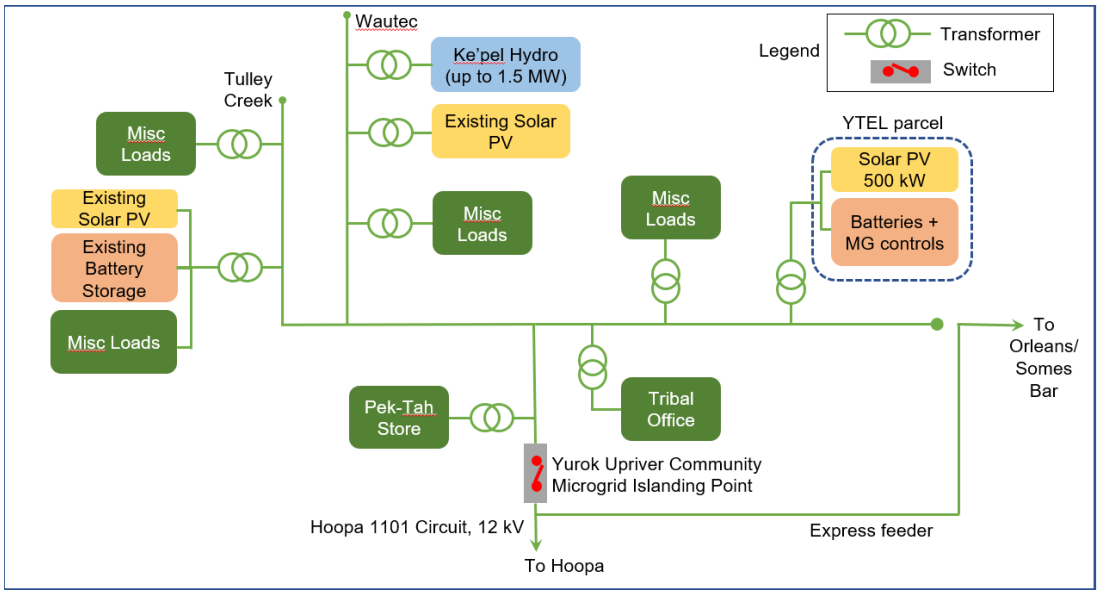


Figure 4: A simplified single-line diagram showing the energy storage, generation, and load components on the Yurok Tribe Upriver Community Microgrid. The proposed express feeder running from the Microgrid Islanding Point to Orleans and Somes Bar allows for the microgrid to isolate at a single point.