

1) PGE noted in its Reply that it is “difficult” to underground in mountainous terrain and hard rock areas (pg 69 of Reply Letter R-0).

Undergrounding can be done in Montclair’s terrain, as evidenced by:

- Undergrounding was successfully completed in the 1991 Oakland Hills Firestorm area which is adjacent to Montclair and has similar terrain as Montclair;
- Undergrounding is currently being performed in Piedmont Pines, which is situated next to Montclair and has similar terrain.

As shown in the picture below, Montclair is the middle area, which surrounded by the area already undergrounded.



2) PGE stated in its cost/benefit analysis that it costs more to underground in mountainous terrain.

PGE should place the potential disastrous loss in human lives and dwellings above financial costs in its cost/benefit analysis.

Montclair’s terrain, vegetation, density of population and dwellings closely resemble those of the Oakland Hills that suffered the 1991 Oakland Hills Firestorm. In comparing the loss in 1991 Oakland Hills Fire to the 2018 Camp Fire (which was caused by PGE powerlines), there were approximately 1384 dwellings per square mile destroyed in the Oakland Hills Fire, whereas there were approximately 78 dwellings per square mile destroyed in the Camp

Fire. Due to the density and proximity of dwellings in Montclair, and combined with the high risk of very limited ingress/egress, a fire occurring in Montclair of similar intensity as the Camp Fire would result in catastrophic losses of human lives and dwellings many times surpassing the loss in the Camp Fire. PGE stated that undergrounding reduces wildfire risk by 97%. With the potential of such disastrous consequence of a wildfire in Montclair, the powerlines in Montclair should be undergrounded.

**3) PGE stated that overhead hardening is effective in wildfire mitigation in areas with low tree fall-in risk and low risk in ingress/egress.**

Montclair is in complete opposite to these areas. Montclair has very high tree fall-in risk and very high risk in ingress/egress. As such, overhead hardening is NOT effective to mitigate wildfires in Montclair, that leaves undergrounding the only effective option.