As a person who has been impacted by a firestorm and who is impacted every time PGE determines that there are peak fire hazard days and shuts off our power (sometimes for multiple days), I would like to respond to PGE comments around the difficulty of undergrounding in Montclair, cost/benefit analysis of undergrounding and PGE statement that hardening is sufficient for Montclair for wildfire mitigation.

First: 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).

That is not fact based since 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 and has been performed in Piedmont Pines, which is situated next to Montclair and has similar terrain.

Having lived in both Piedmont Pines and Montclair, I can tell you that the terrain is the same.

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

There are two responses to this. First, It seems odd that an onetime cost of undergrounding will not be offset by the yearly maintenance of trees, the drones and helicopters used in surveillance of power wires, the high costs associated with turning off power and bringing diesel generators to each EBMUD water facility in the Oakland hills, the yearly costs of maintaining disaster preparedness costs for the 7,000 Montclair residents. These costs not only add up within a year but will continue to be needed for years to come; while undergrounding will reduce or eliminate the need for these surveillance measures.

Second, cost/benefit can not ignore the human cost in lives and lost livelihood. 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.

Third: PGE has made the claim than Montclair is safe due to overhead hardening. However, PGE has also stated that overhead hardening is only 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, PGE's claim that Montclair is safe is not correct and is contrary to their own subject matter experts. Overhead hardening is NOT effective to mitigate wildfires in Montclair because of the very high tree fall-in risk and very poor ingress/egress, that leaves undergrounding the only effective option.