

August 20, 2023

Office of Energy Infrastructure Safety (OEIS)
Sacramento, California

Dear OEIS,

Thank you for the opportunity to comment on PGE's August 7, 2023 Reply to your Revision Notice relating to PGE's 2023-2025 WMP.

We are a group of residents in the Oakland Hills Montclair District. PGE's current undergrounding plan does not include Montclair. We would like to submit the following comments:

1) PGE noted in its Reply that it is "difficult" to underground in mountainous terrain and hard rock areas.

We'd like to point out that undergrounding can indeed 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.

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

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

CAL FIRE has designated Montclair a “Very High Fire Severity Zone”. Montclair’s terrain, vegetation, density of population and dwellings closely resemble its neighboring area in Oakland Hills that suffered the 1991 Oakland Hills Firestorm. To illustrate the potential disastrous consequences in a wildfire in Montclair, it is helpful to compare the loss in the 1991 Oakland Hills Fire to the loss in the 2018 Camp Fire caused by PGE powerlines:

There were approximately 1384 dwellings per square mile destroyed in the 1991 Oakland Hills Fire, whereas there were approximately 78 dwellings per square mile destroyed in the 2018 Camp Fire. Due to the dense population and proximity of dwellings in Montclair, combined with Montclair’s a high risk of limited ingress/ egress, a wildfire 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 high wildfire risk and potential of disastrous consequence of a wildfire in Montclair, the powerlines in Montclair should be undergrounded to substantially reduce the wildfire risk in Montclair.

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.

In sum, PGE should consider the high fire risk and potential disastrous loss in an densely populated area like Montclair that has limited ingress/egress. They should weigh the loss of human lives and dwellings above and beyond the installation “difficulty” and financial costs. Therefore, we respectfully request that OEIS considers the above comments before making the decision to approve/deny PGE’s 2023-2025 WMP.

Sincerely,

Brenda So
Undergrounding Montclair Working Group

P.S. A letter from CA Senator Skinner is attached for your reference