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July 21, 2023

Patricia K. Poppe
CEO, PG&E Corporation
300 Lakeside Drive
Oakland, CA 94612

RE: Support for including the city of Oakland's Montclair area in PG&E's 10,000-mile undergrounding plan.

Dear Ms. Poppe,

I am writing in strong support of the request by residents of the city of Oakland's Montclair area, located in the East Bay Hills, to include their high fire risk area in PG&E's 10,000-mile undergrounding plan.

I share the concerns of Montclair residents who are gravely worried about the growing risk of a devastating and deadly wildfire due to PG&E overhead powerlines in their high-fire-risk area.

The very limited number of entry and exit routes (ingress and egress) in the Oakland Hills' Montclair area, combined with its high population density, aging infrastructure and dense vegetation, create a high potential for catastrophic wildfires and loss of human life.

As you are likely aware, the Oakland Hills already has a tragic history of fire. CAL FIRE has designated the area as a "Very High Fire Severity Zone" (VHFSZ). The area sustained one of the worst firestorms in the history of the U.S. in 1991, with 3,400 homes destroyed and 25 lives lost, second only in California to the Camp Fire in 2018. In comparing the two fires, 78 homes/square mile burned in the Camp Fire/Paradise area, while in the East Bay hills, 1,384 homes/square mile burned.

Due to the density of dwellings in Oakland's Montclair neighborhoods, another fire in the area occurring of similar intensity to the Camp Fire could result in the loss of homes and lives many times surpassing the losses in the Camp Fire.

I was therefore surprised to learn that the Oakland Hills' Montclair area is not ranked by PG&E in the risk tier that qualifies this highly vulnerable neighborhood for undergrounding.

I was further surprised to learn that PG&E has repeatedly informed the Montclair community that overhead hardening of powerlines is an adequate measure for mitigating wildfire risk in this area. According to PG&E's recently submitted 2023-2025 Wildfire Mitigation Plan, hardening of powerlines is effective when an area has minimal tree fall-in risk and limited risk from ingress and egress factors. Montclair's conditions are opposite in the extreme: high tree fall-in risk and high risk due to ingress and egress factors. This leaves undergrounding of overhead powerlines the only effective fire mitigation option.

Due to PG&E's current undergrounding activity in the adjacent Piedmont Pines neighborhood of Oakland, which shares the same hillside topography as Montclair, it appears that undergrounding of Montclair's high-risk area and the immediately adjacent Shepherd Canyon neighborhood is feasible.

While I applaud PG&E's commitment to undergrounding 10,000 miles of powerlines in high-fire-risk areas to advance public safety, I understand that PG&E's current risk model for ranking locations for undergrounding does not consider egress and ingress *combined with* population density. Further, California Office of Energy Infrastructure Safety (OEIS) specifically notes that PG&E's undergrounding plan may leave wildfire risk unaddressed in the highest risk areas in its Revision Notice to PG&E's 2023-2025 Wildfire Mitigation plan.

I therefore strongly urge PG&E to expeditiously update its risk model to assign more weight to population density combined with ingress/egress considerations in high-fire-risk areas and reallocate resources for undergrounding plans accordingly.

I further strongly support the Oakland City Council Resolution, passed July 18, 2023, and urge PG&E to conduct a timely review and approval process for undergrounding of powerlines in the Oakland "Very High Fire Hazard Severity Zone," including the Oakland Hills' Montclair area and adjacent Shepherd Canyon neighborhood, recognizing the aforementioned risks. Hardening of infrastructure in this area is an inadequate solution.

The area's tragic history of extraordinary fire damage and loss of life, the 100-year history of repeated fires in the area, coupled with their population and vegetation density and few evacuation routes to safety, more than deserve this consideration.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Nancy Skinner". The signature is written in a cursive, flowing style.

Nancy Skinner
State Senator, District 9

Cc:

Sumeet Singh, Executive Vice President, Operations and Chief Operating Officer, Pacific Gas and Electric Company, 77 Beale St, Mail Code B23A, San Francisco, CA 94105