



Public comment for consideration by California's Commission on Catastrophic Wildfire Cost and Recovery

Submitted by Piedmont Pines Neighborhood Association,
representing 1300 homes in a high-risk fire area of Oakland

Thirty-two years ago, Piedmont Pines Neighborhood Association filed an application with the city of Oakland for Utility Undergrounding under the electrical tariff Rule 20-A. Only in 1999 did we make it to the top of the city's waiting list. We are in a heavily wooded, dense, extremely high-risk fire area. Since 1999, we've been through many CPUC, legislative and city council proceedings. Yet today, only 1/3 of the project – 200+ parcels – has been completed.

Our hope is that the commission will **make revamping of the CPUC rules for utility undergrounding a top priority** so that high-risk fire areas can get electric wires undergrounded faster and more affordably. Some areas in need of research and overhaul:

1. **Cost/benefit:** Rebuilding a community after a devastating wildfire is enormously expensive for homeowners, cities, insurance companies and utilities. If restoration expenses were compared with prevention costs, would the cost/benefit analysis favor undergrounding over time?
2. **Allocations:** Currently in California, undergrounding is funded through a tax on utility bills, then allocated to cities. Many cities are sitting on unused allocations, while other cities have a decades-long waiting list. Is there a more efficient way to allocate funds, and to favor high-risk communities?
3. **Property owner disincentives:** Rule 20-A covers the costs to underground cable, telephone and electrical, but not street lighting or city administration expenses. In Oakland, assessment districts are formed to cover these expenses, at a cost to property owners in the range of \$15,000 to \$20,000 per parcel. This becomes a disincentive for property owners to approve a project. Is there a more affordable solution to fund these expenses under the banner of public safety?
4. **Criteria to qualify a project:** There are four criteria spelled out in Rule 20 A to qualify an undergrounding project as being in the public interest. The criteria are vague, and subject to interpretation. Of great concern is the fact that none of the four criteria focus directly on public safety generally and more specifically on mitigating wildfire risk caused by electric lines and protecting escape routes in the event of wildfire or earthquake disaster. Meanwhile, fire risks increase each year. Can the criteria be reformulated to improve clarity, include public safety and allow communities more say in how they use their allocations?

We will be following this commission's work in hopes that utility undergrounding is given a high priority.

We are available to comment in person, and to provide more detail on our experience. For more information, contact Robbie Neely, Executive Director, Piedmont Pines Neighborhood Association, at robbie@PiedmontPines.org; 510 530-4286.

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