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COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
PACIFIC GAS AND ELECTRIC COMPANY,  
  
Defendant.

Case No. 14-CR-00175-WHA

**MEMORANDUM RE ERRATA TO PG&E'S  
2019 WILDFIRE SAFETY PLAN, RESPONSE  
TO ORDER TO SHOW CAUSE WHY  
PG&E'S CONDITIONS OF PROBATION  
SHOULD NOT BE MODIFIED, AND  
RESPONSE TO NOTICE RE CALIFORNIA  
WILDFIRES**

1 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this memorandum  
2 in connection with its filing of errata concerning (a) PG&E’s Wildfire Safety Plan (Dkt. 1004-1),  
3 (b) PG&E’s Response to Order to Show Cause Why PG&E’s Conditions of Probation Should Not Be  
4 Modified (Dkt. 976), and (c) PG&E’s Response to Notice Re California Wildfires (Dkt. 956).

5 On February 6, 2019, PG&E filed its Wildfire Safety Plan pursuant to the Court’s Order dated  
6 January 30, 2019 (Dkt. 992). PG&E’s Wildfire Safety Plan was provided to the California Public  
7 Utilities Commission (“CPUC”) pursuant to Senate Bill 901 (“SB 901”) earlier that day. On  
8 February 12, 2019, PG&E submitted to the CPUC an errata to correct Attachment E of the Wildfire  
9 Safety Plan. On February 14, 2019, PG&E submitted to the CPUC an amendment to the Wildfire Safety  
10 Plan. PG&E is attaching the errata and amendment as Exhibits A and B.

11 On January 23, 2019, PG&E filed its Response to Order to Show Cause Why PG&E’s  
12 Conditions of Probation Should Not Be Modified (Dkt. 976). PG&E has identified a correction to that  
13 filing. Lines 3-5 on page 36 should be changed from “In 2017 alone, PG&E removed an additional  
14 approximately 156,000 dead or dying trees, and in 2018, it removed an additional approximately 120,000  
15 dead or dying trees.” to “In 2017 alone, PG&E removed an additional approximately 156,000 dead or  
16 dying trees, and in 2018, it removed an additional approximately 70,000 dead or dying trees.”

17 Finally, on December 31, 2018, PG&E filed its Response to Notice Re California Wildfires  
18 (Dkt. 956). This submission included factual reports and supplemental factual reports concerning the  
19 Camp Fire and the October 2017 North Bay Wildfires (Exhibits A, L-AAA, respectively). Upon further  
20 review of the relevant documentation, PG&E has identified certain corrections to the supplemental  
21 factual reports concerning some of the October 2017 North Bay Wildfires.<sup>1</sup> Attached as Exhibit C is an  
22  
23

24 <sup>1</sup> PG&E is continuing to identify and collect documents relevant to the Camp Fire in response to data  
25 requests from regulators and other third parties, including the CPUC, the California Department of  
26 Forestry and Fire Protection (“CAL FIRE”), the California Independent System Operator (“CAISO”), the  
27 Butte County District Attorney and its Monitor. To the extent necessary, PG&E will provide an errata  
28 for the Camp Fire factual report once PG&E has identified all relevant underlying documentation and  
substantially completed its responses to these requests.

1 errata sheet prepared with respect to the supplemental fact reports for the following fires: Adobe, Honey,  
2 LaPorte, Lobo, Maacama, McCourtney, Norrbom, Nuns, Oakmont, Point, Potter Valley and Redwood.

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5 Dated: February 14, 2019

Respectfully Submitted,  
JENNER & BLOCK LLP,

6  
7 By: /s/ Reid J. Schar  
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