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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 **RESPONSE TO REQUEST FOR INFORMATION ON PSPS** Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company ("PG&E") respectfully submits this response to the Court's October 14, 2019 request for information on the Public Safety Power Shutoff that occurred from October 9 to October 12, 2019 (the "October 9-12 PSPS"). Specifically, the

Court requested that PG&E indicate how many trees and limbs fell or blew onto the deenergized lines as well as the number of infrastructure failures identified during the post-PSPS patrols and, for each, how many of those tree or branch strikes or infrastructure failures likely would have caused arcing had the lines been energized. PG&E provides that information below.

As an initial matter, PG&E wants to acknowledge the hardship that the October 9-12 PSPS as well as ongoing PSPS events have caused for the millions of people affected, and assures the Court that it intends to continue working with all key stakeholders to minimize, to the extent possible, the hardship caused by these PSPS events. In addition, PG&E notes that the information provided herein was collected in connection with the patrols that PG&E conducted of the 25,000 line miles that were included in the October 9-12 PSPS. These patrols were conducted to assess whether the lines were safe to re-energize, including whether line or equipment repairs were necessary before the lines could be re-energized. PG&E also notes that its ability to provide the Court with information about how many line strikes (from trees, branches or infrastructure failures) would have caused arcing involves some amount of speculation and is based on PG&E's best view based on factors such as the vegetation's location and the damage the vegetation or infrastructure failure appears to have caused.

Against that background, with respect to the tree or limb strikes, PG&E identified 74 instances of vegetation damage that appear to have occurred during the October 9-12 PSPS (*e.g.*, a tree branch laying across a power line).[1] PG&E's current information with respect to these 74 instances is that:

- 44 instances of vegetation damage likely would have caused arcing if the lines had been energized based on PG&E's assessment of whether the vegetation

[1] During the post-PSPS patrols, PG&E identified vegetation issues that may have pre-dated the October 9-12 PSPS (*e.g.*, vegetation that was within the applicable clearance zones). These issues are not included as part of the 74 instances of vegetation damage discussed above. PG&E addressed each of these issues prior to re-energizing its lines. PG&E's information about these issues is preliminary, but it will provide additional information to the Court once it is available. PG&E notes, however, that it may be delayed in doing so in view of the ongoing PSPS events, which require significant resources to ensure the timeliness of decision-making, the re-energization of power lines and that customers get the support they need before, during and after the shutdowns.

was contacting or had contacted the conductor (*e.g.*, a tree branch is laying on two phases of a conductor);

- 25 instances of vegetation damage likely would not have caused arcing (*e.g.*, the conductor was insulated); and
- with respect to 5 instances of vegetation damage, PG&E is unable to determine whether arcing likely would have occurred.

Each of the 44 locations where vegetation damage occurred that likely would have caused arcing is identified by county and coordinates on Exhibit A, attached herewith. Exhibit A also includes information regarding the date of the most recent vegetation management work at each of the locations where arcing likely would have occurred.

PG&E identified 41 instances of damage to its infrastructure that appear to have been caused by extreme wind and/or other fire conditions present during the October 9-12 PSPS (*e.g.*, a broken tie wire (the equipment connecting the insulator to the conductor)).[2] PG&E's current information with respect to these 41 instances is that:

- 12 instances of infrastructure damage likely would have caused arcing based on PG&E's assessment of the location of the damaged equipment (*e.g.*, two phases of conductor made contact);
- 26 instances of infrastructure damage likely would not have caused arcing (*e.g.*, the conductor was insulated) ; and

[2] During the post-PSPS patrols, PG&E identified equipment issues that may have pre-dated the October 9-12 PSPS (*e.g.*, a crack in a cross arm that may not have been caused by extreme wind). PG&E also identified two instances of damage to infrastructure that is owned and operated by third parties. These issues are not included as part of the 41 instances of infrastructure damage discussed above. PG&E addressed each of these issues prior to re-energizing its lines. PG&E's information about these issues is preliminary, but it will provide additional information to the Court once it is available. PG&E notes, however, that it may be delayed in doing so in view of the ongoing PSPS events, which require significant resources to ensure the timeliness of decision-making, the re-energization of power lines and that customers get the support they need before, during and after the shutdowns.

- with respect to 3 instances of infrastructure damage, PG&E is unable to determine whether arcing likely would have occurred.

Each of the 12 locations where infrastructure damage occurred that likely would have caused arcing is identified by county and coordinates on Exhibit B, attached herewith. Exhibit B also includes information regarding the date of the most recent inspection or patrol of the equipment at each of the 12 locations where arcing likely would have occurred.[3]

Respectfully Submitted,

Dated: October 30, 2019

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[3] A patrol is a simple, visual inspection of applicable overhead and underground facilities to identify obvious structural problems and hazards. Distribution patrols must be performed annually in urban areas, and every other year in rural areas, unless the area has been inspected in that year. All transmission line facilities are patrolled annually, but a detailed inspection (described below) may supplant an annual patrol if performed that year. A patrol of overhead lines may be performed by walking, driving or helicopter.

An inspection is a careful examination of individual components, structures and equipment through visual observation, and/or routine diagnostic tests in order to identify abnormal conditions that adversely impact safety or reliability. PG&E performs inspections of distribution lines every five years. For transmission facilities, detailed inspection frequencies vary depending on voltage, structure type (wood or steel), and foundation location relative to Bay waters.

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Exhibit A

No.	County	Latitude	Longitude	Date of Last Routine Inspection	Date of Last Drought and Tree Mortality Response ("CEMA") Inspection
1	Butte	39.7366321	-121.631646	7/10/2019	11/7/2018
2	Contra Costa	37.917642	-122.158792	1/15/2019	9/18/2019
3	El Dorado	38.75650556	-120.7646669	9/10/2019	5/3/2019
4	El Dorado	38.93421095	-120.7470918	6/27/2019	3/5/2019
5	Glenn	39.619579	-122.194749	9/17/2019	N/A[1]
6	Lake	38.762367	-122.61601	9/10/2019	9/10/2018
7	Lake	38.921837	-122.597501	4/10/2019	5/7/2019
8	Lake	38.964102	-122.712446	12/13/2018	6/25/2019
9	Napa	38.5885592	-122.6047347	7/15/2019	1/9/2019
10	San Mateo	37.524045	-122.488047	12/20/2018	8/15/2019
11	Santa Clara	36.9901	-121.7333	11/20/2018	8/29/2019
12	Santa Clara	37.25319	-122.11711	6/15/2019	8/10/2018
13	Santa Clara	37.1593	-121.9822	4/8/2019	8/13/2019
14	Santa Clara	37.15058	-121.97732	4/4/2019	8/13/2019
15	Santa Clara	37.1986	-122.0279	4/25/2019	8/13/2019
16	Santa Clara	37.198	-122.0284	4/17/2019	8/13/2019
17	Santa Clara	37.282777	-122.120663	6/15/2019	8/10/2018
18	Santa Clara	37.282777	-122.120663	6/15/2019	8/10/2018
19	Santa Clara	37.268674	-122.093026	5/2/2019	8/10/2018
20	Santa Clara	37.464379	-121.877234	5/31/2018	8/9/2019
21	Santa Clara	37.439813	-121.828561	6/11/2019	5/9/2018
22	Santa Cruz	37.0846	-122.0076	4/29/2019	2/2/2019
23	Santa Cruz	37.10299	-122.05492	10/11/2018	6/4/2019
24	Santa Cruz	37.0012	-122.0388	11/7/2018	4/19/2019
25	Santa Cruz	37.0538	-122.0766	9/16/2019	2/2/2019
26	Santa Cruz	37.084501	-122.088561	8/30/2019	6/4/2019
27	Santa Cruz	37.0559	-122.0197	4/15/2019	2/2/2019
28	Santa Cruz	37.0608	-122.0144	4/18/2019	2/2/2019
29	Santa Cruz	37.1529	-122.1322	9/27/2019	6/4/2019
30	Shasta	40.67319161	-122.2514249	3/11/2019	11/7/2018
31	Shasta	40.48512705	-122.291632	1/17/2019	11/6/2018
32	Shasta	40.389435	-122.299003	6/5/2019	1/29/2019
33	Shasta	40.72505574	-122.0820067	3/4/2019	8/2/2018

[1] The location where the vegetation damage occurred is outside the scope of the CEMA program.

No.	County	Latitude	Longitude	Date of Last Routine Inspection	Date of Last Drought and Tree Mortality Response ("CEMA") Inspection
34	Solano	38.4033	-122.0136	9/30/2019	2/25/2019
35	Sonoma	40.038611	-122.106437	6/25/2019	3/25/2019
36	Sonoma	38.271186	-122.453757	5/1/2018	8/9/2019
37	Sonoma	38.284143	-122.441792	6/14/2019	9/16/2019
38	Sonoma	38.28672	-122.67066	10/16/2018	4/23/2019
39	Sonoma	38.45493	-122.636788	4/2/2019	9/10/2019
40	Tehama	40.17885284	-122.3231927	7/30/2019	2/20/2019
41	Tehama	40.18872898	-122.1888241	9/19/2019	3/19/2019
42	Tehama	40.19228	-122.20472	9/19/2019	3/12/2019
43	Tuolumne	38.19367449	-119.9778051	7/8/2019	12/26/2018
44	Yuba	39.455212	-121.225802	3/28/2019	1/9/2017

Exhibit B

No.	County	Latitude	Longitude	Date of Last Patrol	Date of Last Inspection
1	Alameda	37.83742499	-122.1904235	3/15/2018	4/20/2019
2	Amador	38.443596	-120.714404	7/26/2019	3/25/2019
3	Butte	39.57913	-121.1102645	6/26/2019	4/26/2019
4	Contra Costa	37.90313	-122.18933	11/16/2018	4/16/2019
5	Contra Costa	37.847705	-122.147084	1/9/2018	1/4/2019
6	Placer	39.03025	-120.971402	2/26/2019	5/31/2019
7	Placer	39.00471963	-121.0364809	3/7/2019	2/28/2019
8	Placer	38.857352	-121.212649	8/30/2017	9/16/2015
9	Shasta	40.72226685	-122.3268417	10/17/2018	3/23/2019
10	Shasta	40.48158624	-122.2687965	3/25/2019	1/29/2015
11	Shasta	40.4839753	-122.3121229	2/11/2019	2/15/2015
12	Yuba	39.31297456	-121.4185258	5/20/2019	2/19/2015