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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. CR 14-0175 WHA

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC
COMPANY,

**FOLLOW-UP QUESTIONS RE
CPUC REPORT ON CAMP
FIRE**


Defendant.
_____ /

By **DECEMBER 19 AT NOON** PG&E shall please answer these follow-up questions concerning one recent CPUC Report on the Camp Fire:

1. On the Incident Tower, did the C-hook thread through the eye on the original runner arm or the eye on the added hanger plate or both? What was the point of two eyes?
2. What was the condition of the C-hook on the second parallel runner arm on the Incident Tower (the one that did not detach during the storm)?
3. What was the height above ground on the C-hook in question?
4. How closely did any drone inspect the C-hook in question prior to the Camp Fire? Are the images available? If so, provide the ones that show the C-hook in question.

- 1 5. Prior to the Camp Fire, did PG&E keep records from which PG&E could
- 2 determine how long the C-hooks and/or hanger plates in question had been in
- 3 place? Explain this history.
- 4 6. Prior to the Camp Fire, had PG&E ever previously noticed *any* worn C-hooks
- 5 and/or hanger plates on *any* of its transmission lines? Explain this history. Had
- 6 worn C-hooks been preserved (as evidence or for any other purpose)?
- 7

8 Dated: December 5, 2019.



WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE

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