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23 COMPANY

24 UNITED STATES DISTRICT COURT
25 NORTHERN DISTRICT OF CALIFORNIA
26 SAN FRANCISCO DIVISION

27 UNITED STATES OF AMERICA,
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29 Plaintiff,
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31 v.
32
33 PACIFIC GAS AND ELECTRIC COMPANY,
34
35 Defendant.

Case No. 14-CR-00175-WHA

**RESPONSE TO ORDER FOR
FURTHER RESPONSES RE DIXIE
FIRE**

Judge: Hon. William Alsup

1 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this
2 response to the Court’s October 13, 2021 order requesting information regarding the Dixie Fire (Dkt.
3 1492).

4 **Question 20:**

5 *To the data produced at Dkt. No. 1444-5 at 7, provide pre-fault data going*
6 *back to 6:00 AM on July 12, 2021, for all three phases of the Bucks Creek*
7 *1101 line. Reproduce the old data. Adjust the new chart so that each row*
represents a singular time.

8 **PG&E Response:**

9 Please see Attachment 1 hereto for the requested data in the requested format.

10 **Question 21:**

11 *Did the chart produced at 1444-5 at 7 give readings in amperes or*
kiloamperes? Did it give times in UCT or local time?

12 **PG&E Response:**

13 The data produced at Dkt. No. 1444-5 at 7 (a) gives readings in amperes and (b) gives
14 times in local time.

15 **Question 22:**

16 *In that chart, amps appear to go to zero on Phase C at 6:48 a.m. on July*
17 *13. They appear to go to zero at 18:09 on Phase A and at 18:55 on Phase*
C. Clarify the meaning of the columns ending.

18 **PG&E Response:**

19 As explained in paragraph 4 of Dkt. No. 1444-5:

20 Line reclosers transmit to the company’s RT SCADA system a variety of
21 data at periodic intervals of between approximately 15 and 30 seconds. **If**
22 **the data read at any particular time interval differs from the data**
23 **read at the immediately preceding time interval, the data point is**
recorded in the company’s PI Historian database. This includes the
data point regarding the current level on each phase of the distribution
circuit on which the line recloser operates.

24 (emphasis added). Consequently, the absence of an entry in the referenced table for each phase after
25 the noted times does not indicate that the amps went to zero at that time; rather, the absence of any
26 entry after the last noted times for each phase indicates that no additional data were recorded in the
27 PI Historian database for the remainder of July 13. Based on PG&E’s understanding of the PI
28

1 Historian software program, that means that the line recloser thereafter periodically reported
2 (approximately every 15 to 30 seconds) the *same* current level for each phase as it had reported at
3 the time of the last recorded entry for that phase.¹ If the amp level at the recloser’s location had
4 dropped to zero – or had changed at the reporting intervals to any value other than the previously
5 recorded level – that change would be recorded. The data indicate that measured amps remained at
6 the same level at the recloser’s location for the remainder of the day after the last recorded entry for
7 each phase.² Similar periods of stable amp level measurements (resulting in no recorded data) can
8 be seen, for example, on Phase A from 7/12/21 20:39 to 7/12/21 6:48; on Phase B from 7/12/21
9 17:08 to 7/13/21 4:35; and on Phase C from 7/12/21 5:54 to 7/12/21 20:36. The PI Historian
10 database did not record zero amps on any of the three phases until 12:04 on July 14, at which point it
11 recorded zero amps on all three phases. PG&E has added to Attachment 1 the data on each phase to
12 12:04 on July 14. The outage log reflects that the recloser was opened at CAL FIRE’s request at
13 20:00 on July 14.

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15 Dated: October 18, 2021

Respectfully Submitted,

JENNER & BLOCK LLP

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18 By: /s/ Reid J. Schar
Reid J. Schar (*pro hac vice*)

CRAVATH, SWAINE & MOORE LLP

21 By: /s/ Kevin J. Orsini
Kevin J. Orsini (*pro hac vice*)

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¹ The same is true for Attachment 1 hereto.

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² As described, the SCADA system only communicated with the line recloser at periodic (albeit
26 relatively short) intervals. The SCADA system did not measure current between those periodic
27 intervals; during those intervals current levels could go up or down and then return to the previously
28 recorded value.

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CLARENCE DYER & COHEN LLP

By: /s/ Kate Dyer
Kate Dyer (Bar No. 171891)

Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

Appendix 1

Date/Time	Amps A	Date/Time	Amps B	Date/Time	Amps C
LAST RECORDED MEASUREMENT PRIOR TO 6:00 A.M. ON 7/12/21					
		7/11/2021 21:23	3.2		
				7/12/21 5:54	2.3
7/12/21 5:54	2.3				
ALL RECORDED MEASUREMENTS FROM 6:00 A.M. ON 7/12/21 THROUGH THE END OF 7/13/21					
7/12/21 6:18	3.5				
7/12/21 6:35	2.4				
7/12/21 6:39	3.5				
7/12/21 7:22	2.4				
7/12/21 7:38	3.5				
7/12/21 7:49	2.4				
7/12/21 8:04	3.5				
7/12/21 8:31	2.4				
		7/12/21 8:34	4.3		
		7/12/21 8:34	3.2		
7/12/21 8:38	3.5				
7/12/21 9:56	2.4				
7/12/21 10:06	3.5				
7/12/21 10:15	2.4				
7/12/21 10:16	3.5				
7/12/21 11:30	2.4				
7/12/21 11:32	3.5				
7/12/21 11:39	2.4				
7/12/21 11:41	3.6				
7/12/21 12:28	2.5				
7/12/21 12:50	3.8				
7/12/21 12:52	2.4				
7/12/21 12:59	3.5				
		7/12/21 13:17	4.5		
		7/12/21 13:17	3.4		
7/12/21 14:12	2.3				
7/12/21 14:14	3.4				
7/12/21 15:32	2.3				
7/12/21 15:45	3.4				
7/12/21 16:04	2.3				
7/12/21 16:19	3.6				
7/12/21 16:21	2.5				
		7/12/21 17:08	4.6		
		7/12/21 17:08	3.3		
7/12/21 17:45	3.6				
7/12/21 17:45	2.5				
7/12/21 19:39	3.6				
7/12/21 19:39	2.5				
7/12/21 20:36	3.6			7/12/21 20:36	3.4
				7/12/21 20:37	2.3
7/12/21 20:39	2.5				

1					7/12/21 20:45	1.2
					7/12/21 21:34	2.3
2					7/12/21 21:34	1.2
					7/12/21 22:02	2.3
3					7/12/21 22:04	1.2
					7/12/21 22:27	2.3
4					7/12/21 22:46	1.2
					7/12/21 23:01	2.3
5					7/12/21 23:09	1.2
					7/12/21 23:22	2.3
6					7/12/21 23:25	1.2
					7/12/21 23:32	2.3
7					7/12/21 23:37	1.2
					7/12/21 23:55	2.3
8						
9						
10					7/13/21 0:05	1.2
					7/13/21 0:29	2.3
11					7/13/21 0:39	1.2
					7/13/21 1:03	2.3
12					7/13/21 1:04	1.2
					7/13/21 2:23	2.3
13					7/13/21 2:23	1.2
					7/13/21 2:32	2.3
14					7/13/21 2:33	1.2
					7/13/21 3:03	2.3
15					7/13/21 3:04	1.2
					7/13/21 3:10	2.3
16					7/13/21 3:10	1.2
					7/13/21 3:26	2.3
17					7/13/21 3:33	1.2
					7/13/21 4:35	2.4
18					7/13/21 4:35	1.2
					7/13/21 5:03	2.3
19					7/13/21 5:04	1.2
					7/13/21 5:08	2.3
20					7/13/21 5:08	1.2
					7/13/21 5:09	2.3
21					7/13/21 5:09	1.2
					7/13/21 5:55	2.3
22						
					7/13/21 6:19	2.4
23					7/13/21 6:28	3.5
					7/13/21 6:48	1.1
24						
					7/13/21 7:44	2.3
25					7/13/21 7:45	1.2
					7/13/21 7:54	2.3
26					7/13/21 8:01	1.2
					7/13/21 8:15	2.3
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1	7/13/21 8:19	1.1			
2			7/13/21 8:21	2.3	
3	7/13/21 8:35	2.3			
4	7/13/21 8:39	1.2			
5			7/13/21 8:46	1.2	
6	7/13/21 8:47	2.3			
7	7/13/21 8:47	1.2			
8			7/13/21 8:49	2.3	
9	7/13/21 8:52	2.3			
10	7/13/21 9:09	1.2	7/13/21 9:09	1.2	
11	7/13/21 9:18	2.4	7/13/21 9:18	2.3	
12	7/13/21 9:20	1.2			
13	7/13/21 9:25	2.4			
14	7/13/21 9:25	1.2			
15			7/13/21 9:31	1.2	
16			7/13/21 9:46	2.3	
17	7/13/21 9:49	2.5			
18	7/13/21 9:50	1.2			
19			7/13/21 10:00	1.2	
20			7/13/21 10:05	2.3	
21	7/13/21 10:10	2.3			
22	7/13/21 10:23	1.2			
23			7/13/21 10:26	1.2	
24			7/13/21 10:40	2.3	
25			7/13/21 11:05	1.2	
26			7/13/21 11:08	2.3	
27			7/13/21 11:22	1.2	
28	7/13/21 11:28	2.4	7/13/21 11:28	2.3	
29			7/13/21 11:31	1.2	
30	7/13/21 11:32	1.2	7/13/21 11:32	2.3	
31			7/13/21 11:34	1.2	
32			7/13/21 11:35	2.4	
33			7/13/21 11:50	1.2	
34	7/13/21 11:51	2.3			
35			7/13/21 11:54	2.3	
36	7/13/21 12:00	1.2			
37	7/13/21 12:21	2.3	7/13/21 12:21	1.2	
38	7/13/21 12:21	1.2			
39			7/13/21 12:30	2.3	
40			7/13/21 12:50	1.2	
41			7/13/21 12:50	2.3	
42			7/13/21 12:51	1.2	
43			7/13/21 12:58	2.3	
44	7/13/21 13:04	2.3			
45	7/13/21 13:05	1.2			
46			7/13/21 13:15	1.2	
47			7/13/21 13:20	2.3	

1			7/13/21 13:44	1.2		
2			7/13/21 13:49	2.3		
3			7/13/21 13:51	1.2		
4			7/13/21 13:54	2.3		
5	7/13/21 14:18	2.3				
6	7/13/21 14:21	1.2				
7	7/13/21 14:47	2.3	7/13/21 14:47	1.2		
8			7/13/21 14:47	2.3		
9			7/13/21 14:48	1.2		
10	7/13/21 14:51	1.2				
11			7/13/21 14:52	2.3		
12	7/13/21 15:06	2.4				
13	7/13/21 15:09	1.2				
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15			7/13/21 15:16	2.3		
16	7/13/21 15:21	2.3				
17	7/13/21 15:22	1.2				
18	7/13/21 15:22	2.3				
19	7/13/21 15:28	1.2				
20			7/13/21 15:37	1.2		
21	7/13/21 15:45	2.5	7/13/21 15:45	2.3		
22	7/13/21 15:46	1.2				
23			7/13/21 15:48	1.2		
24			7/13/21 15:56	2.4		
25			7/13/21 16:08	1.2		
26	7/13/21 16:09	2.3				
27	7/13/21 16:12	1.2				
28			7/13/21 16:19	2.4		
29			7/13/21 16:36	1.2		
30	7/13/21 16:43	2.3				
31	7/13/21 16:43	1.2				
32	7/13/21 17:12	2.3				
33	7/13/21 17:12	1.2				
34			7/13/21 17:21	2.4		
35			7/13/21 17:22	1.2		
36	7/13/21 18:09	2.3				
37	7/13/21 18:09	1.2				
38			7/13/21 18:54	2.3		
39			7/13/21 18:55	1.2		

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		7/14/21 9:44	2.3		
		7/14/21 9:44	1.2		
		7/14/21 9:45	2.3		
		7/14/21 9:48	1.2		
		7/14/21 11:29	2.3		
		7/14/21 11:29	1.2		
		7/14/21 12:00	2.3		
		7/14/21 12:00	1.2		
7/14/21 12:01	2.3	7/14/21 12:01	2.4	7/14/21 12:01	2.3
7/14/21 12:04	0	7/14/21 12:04	0	7/14/21 12:04	0