

EXHIBIT B

JENNER & BLOCK LLP
Reid J. Schar (*pro hac vice*)
RSchar@jenner.com
353 N. Clark Street
Chicago, IL 60654-3456
Telephone: (312) 222-9350
Facsimile: (312) 527-0484

CLARENCE DYER & COHEN LLP
Kate Dyer (Bar No. 171891)
kdyer@clarencedyer.com
899 Ellis Street
San Francisco, CA 94109-7807
Telephone: (415) 749-1800
Facsimile: (415) 749-1694

CRAVATH, SWAINE & MOORE LLP
Kevin J. Orsini (*pro hac vice*)
korsini@cravath.com
825 Eighth Avenue
New York, NY 10019
Telephone: (212) 474-1000
Facsimile: (212) 474-3700

Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF [REDACTED]
IN SUPPORT OF RESPONSE TO ORDER
REQUESTING INFORMATION ON
DIXIE AND BADER FIRES**

Judge: Hon. William Alsup

DECLARATION OF [REDACTED] IN SUPPORT OF RESPONSE TO ORDER REQUESTING
INFORMATION ON DIXIE AND BADER FIRES
Case No. 14-CR-00175-WHA

I, [REDACTED] hereby declare under penalty of perjury as follows:

1 I make this declaration based upon personal knowledge and if called as a witness I
2 could and would testify competently to the matters set forth herein.

3 I am the Senior Manager of the Distribution Planning Group at Pacific Gas and
4 Electric Company ("PG&E").

5 In the course of my duties at PG&E, I have become familiar with the operation of
6 the line reclosers used by the company, and the electronic data they transmit and store.

7 On July 21, 2021 I received from [REDACTED] a PG&E Distribution Line
8 Technician, electronic data that she advises she downloaded that day from the line recloser located
9 at the Bucks Creek Substation (the recloser for PG&E's Bucks Creek 1101 12kV Line). I also
10 received from [REDACTED] among other pictures, a screen shot of a comparison she performed of
11 the time shown by the clock on her laptop with the time shown by the clock on the line recloser. I
12 thereafter provided both this data and the screen shot to [REDACTED] a PG&E Senior Distribution
13 Engineer.

14 I have reviewed the declarations of both [REDACTED] and [REDACTED] that are
15 being submitted concurrently with this declaration.

16 The line recloser at Bucks Creek Substation functions as a breaker. It monitors
17 PG&E's Bucks Creek 1101 12kV Line for certain preset fault conditions and, in the event such
18 fault conditions are detected and remain unresolved for a preset time, it will open and thereby de-
19 energize the line. This line recloser also can be set in a mode whereby, after opening, it will
20 automatically reclose in order to re-energize the line and determine whether the preset fault
21 condition it had detected no longer exists. However, the downloaded data shows that this mode
22 was disabled on May 6, 2021, and remained disabled thereafter, including on July 13, 2021. The
23 purpose for disabling this mode is to avoid the risk during fire season that automatically reclosing
24 and re-energizing the line might cause a fire.

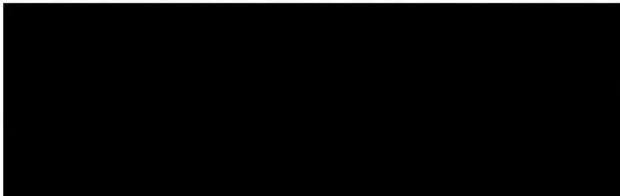
25 In the setting operative on July 13, detection of any one of three different preset
26 fault conditions could cause the line recloser to "trip"—that is, to open and de-energize the line.
27 For each of these preset fault conditions, detection of current in excess of a "Minimum To Trip"



1 (“MTT”) amperage is a necessary condition to trip the line recloser. For a phase fault the MTT is
2 100 amps. For a ground fault the MTT is 50 amps. And for a sensitive ground fault the MTT is
3 20 amps.

4 In order for the line recloser to trip open for a fault condition, the fault current has
5 to exceed the MTT threshold for the period of time defined by the applicable time characteristic
6 curve (TCC). Under a TCC, the greater the current, the shorter the period of time required to trip
7 open the line recloser. The applicable TCC is selected so that downstream devices will trip before
8 the line recloser in order to limit the number of customers impacted by a fault condition.

9 The controller on the line recloser records various data, including oscillography
10 data for events when a fault condition with amperage in excess of an applicable MTT is detected.
11 The data downloaded from the line recloser includes just one such event on July 13, 2021. That
12 event involved a phase to phase fault with amperage in excess of the applicable MTT on two of
13 the three phases of the line. This event began at approximately 6:47:47 a.m.;¹ the event apparently
14 lasted less than 4/100ths of a second and that was too brief to trip the line recloser.

15 I declare under penalty of perjury under the laws of the United States and the State of
16 California that the foregoing is true and correct to the best of my knowledge.

17 Executed this 28th day of July, 2021, in the City of Folsom, County of Sacramento, State
18 of California. 

23 ¹ The downloaded oscillography data in event file indicates that the fault event begins at
24 approximately 22:57:18.4000 on July 12, 2021. However, the oscillography data uses
25 Coordinated Universal Time, which is seven hours before Pacific Daylight Time. In addition, 
26  comparison of the time reported on the clock on the recloser with the time reported on
27 the clock on the laptop to which she downloaded the data shows that the time on the recloser clock
28 was 50 minutes and 28.3 seconds behind the time on her laptop. Adjusting for these two facts, the
time of the event recorded in the oscillography data begins is approximately 6:47:46.7 on July 13,
2021.