

# **EXHIBIT H**

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

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

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

13 Attorneys for Defendant PACIFIC GAS AND  
ELECTRIC COMPANY

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

16  
17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 vs.

20 PACIFIC GAS AND ELECTRIC  
21 COMPANY,

22 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

1 I, [REDACTED] declare at follows:

2 1. I am currently employed by Pacific Gas and Electric Company (“PG&E”) as a  
3 Troublemaker in the Chico area. I make this declaration based upon personal knowledge and if  
4 called as a witness, I could and would testify competently to the matters set forth herein.

5 2. On July 14, 2021, I received a tag on my Getac device alerting me to a partial  
6 outage along the Paradise 1105 circuit. I received the tag near the end of my shift, which was  
7 scheduled to end at 3:30pm. On my way to the location, the tag was elevated with further  
8 information that the fire department was on site. I therefore headed directly to Fuse 1291 near the  
9 intersection of Skyway and Indian Drive in Magalia to investigate and, if necessary, open the fuses  
10 to deenergize the line completely and make the scene safe. When I got close to Fuse 1291, I saw  
11 that one of the three fuses was open. I ascended the pole and, for safety reasons, opened the other  
12 two fuses, which de-energized the line between the fuses and the load. I estimate that Fuse 1291  
13 was approximately a half a mile from Bader Mine Road. I could not see Bader Mine Road from  
14 that location.

15 3. I then drove down to Bader Mine Road to assess the situation there. When I  
16 arrived, I observed one or more fire engines that appeared to be Cal Fire vehicles. A sheriff  
17 vehicle was leaving the area as I arrived. There was also another PG&E troublemaker on site.  
18 There was retardant on the ground, and any fire that had been in the vicinity appeared to have been  
19 completely suppressed by the time I arrived.

20 4. I also saw that one of the two phases on the line at Bader Mine Road was down,  
21 and there was a tree leaning on the phase that was still intact. The other troublemaker on site cut the  
22 downed line to make the scene safe. I filled out a tag for another crew to repair the line before I  
23 departed the scene.

24 ///

25

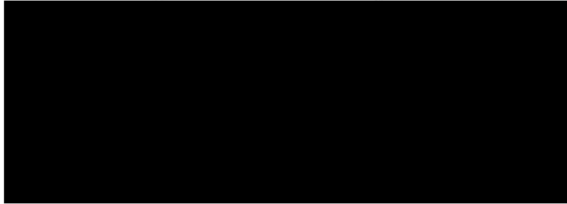
26

27

28

1 I declare under penalty of perjury under the laws of the United States and the State of  
2 California that the foregoing is true and correct.

3 Executed this 28th day of July, 2021, in the City of Chico, County of Butte, State of  
4 California.



5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28