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COMPANY

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 FOLLOW-UP
QUESTIONS RE DIXIE AND FLY
FIRES, QUESTIONS 7 THROUGH 36**

Judge: Hon. William Alsup

1 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this
2 response to Questions 7 through 36 contained in the Court’s August 17, 2021 order (Dkt. 1417) and
3 the Court’s August 18, 2021 order (Dkt. 1418); the Court’s requests for transcripts of certain calls
4 (Dkt. 1419); and the Court’s request for a glossary of abbreviations and acronyms (Dkt. 1420).

5 **Question 7:**

6 Please provide copies of all reports and memos and emails regarding the site visit on
7 April 16, 2021, regarding the plan for under-grounding the circuit and all reports and
8 memos and emails summarizing, describing or referring to the need to do so or the
proposal to do so or the problem leading to such proposals.

9 **PG&E Response:**

10 PG&E will deliver to the Court on August 31, 2021 a thumb drive containing
11 electronic copies of 2,044 documents bearing Bates PGE-DIXIE-NDCAL-0000001 to PGE-DIXIE-
12 NDCAL-000008582 that PG&E has identified as responsive to this request.¹

13 PG&E has interpreted the request for documents regarding the “plan for under-
14 grounding the circuit” to refer to the system hardening project for the Bucks Creek 1101 distribution
15 circuit approved by the Wildfire Risk Governance Steering Committee in January 2021 (the “Bucks
16 Creek 1101 System Hardening Project”).² To respond to the Court’s document request in the time
17 provided by the Court, PG&E has conducted a reasonable search for responsive documents using the
18 following parameters:

19 a. PG&E identified a list of thirteen custodians (“Custodians”) likely to have emails
20 responsive to this question, including individuals involved with the 2021 Wildfire Distribution Risk
21 Model; individuals involved in the development, presentation, and management of the Bucks Creek
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23 ¹ PG&E is delivering a significant portion of responsive documents by August 31 and intends
24 to complete its production to the Court on or before September 3. PG&E notes that certain
25 documents being provided to the Court contain personally identifying information and other
26 confidential information. PG&E is in the process of identifying this confidential information and
will prepare and deliver a redacted set and file a corresponding administrative motion to seal.

27 ² PG&E does not interpret the Court’s question as calling for information protected by the
attorney-client privilege or attorney work product protection.

1 1101 System Hardening Project; and individuals who attended the April 16, 2021 site visit related to
2 the Bucks Creek 1101 System Hardening Project.

3 PG&E ran the following search terms against the Custodians' emails: (Buck* W/5
4 Creek) AND (underground* OR harden* OR visit*). Each of the Custodians' emails dated between
5 October 1, 2020 and July 13, 2021 that contained terms that satisfied this search are being reviewed
6 and, if determined to be responsive to this request, will be produced to the Court. Where applicable,
7 PG&E is redacting portions of documents determined to be protected by attorney-client privilege or
8 to constitute attorney work product.

9 b. PG&E has also collected for review and will produce to the Court documents
10 related to the Bucks Creek 1101 System Hardening Project that are contained in the following
11 electronic repositories: PG&E's Electronic Document Routing System ("EDRS"), which is a tool
12 used to route documents and generate requests for review and approval for projects such as the
13 Bucks Creek 1101 System Hardening Project, and SAP, a structured database and the system of
14 record for Plant Maintenance ("PM") Orders for such projects.

15 **Question 8:**

16 What indications are there that the Douglas Fir broke and fell onto the Bucks Circuit?

17 **PG&E Response:**

18 Although the Douglas Fir was leaning on the line, the stump was still rooted in the
19 ground on July 18, 2021, as reflected in the photos that PG&E submitted on August 25, 2021. *See*
20 Exs. R-1 through R-3, Dkts. 1428-09 through 1428-11. Photos taken after CAL FIRE cut the tree
21 off the line show that the bottom portion of the tree had separated from the stump. *See id.*; *see also*
22 Exs. S-1 through S-3, Dkts. 1428-13 through 1428-15 (photographs of the bottom portion of the
23 tree). CAL FIRE and/or other law enforcement have removed the trunk and stump from the site and
24 CAL FIRE has declined to provide PG&E with access to or receipts for the evidence that CAL FIRE
25 collected from the site.

1 **Question 9:**

2 What indications are there that the Douglas Fir uprooted and fell onto the Bucks
3 Circuit?

4 **PG&E Response:**

5 PG&E has seen no indications that the Douglas Fir seen leaning against the line
6 uprooted. Contrary indications are noted in PG&E’s response to question 8, *supra*.

7 **Question 10:**

8 Please state all other information on why the Douglas Fir fell.

9 **PG&E Response:**

10 At this point, PG&E has not reached a conclusion as to why the tree failed, and to
11 PG&E’s knowledge, CAL FIRE has not publicly announced any view on the issue. No PG&E
12 arborist has been granted access to the bottom portion of the tree or the stump, both of which CAL
13 FIRE (or assisting law enforcement) has removed. A PG&E arborist who reviewed the photographs
14 taken on July 26, 2021 of the tree’s roots observed that one of eight roots of the tree shows signs of
15 internal rot, but without further inspection has not reached a conclusion, for example, as to why the
16 tree failed or whether there were any visible, external indications. *See* PG&E Arborist Decl. (Ex. Y)
17 ¶ 4. PG&E’s investigation is ongoing. PG&E requested access to evidence that CAL FIRE
18 removed but CAL FIRE denied that request.

19 **Question 11:**

20 Please state all information and data on local or regional wind gusts or wind
21 conditions at or about the time of power interruptions near the Douglas Fir.

22 **PG&E Response:**

23 The line recloser at the Bucks Creek substation for the Bucks Creek 1101 Line
24 recorded momentary current levels on two of the three phases in excess of the Minimum To Trip
25 (“MTT”) at 6:48 a.m. Dkt. 1408-02, Recloser Witness 1 Decl. (Ex. B) at 3. Shortly thereafter,
26 power was reported out at the Cresta Dam. Dkt. 1408-05, Custodian 1 Decl. (Ex. E) ¶ 3. PG&E
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1 provides the following information concerning wind conditions near the Douglas Fir at 6:48 a.m.:

2 On July 13, 2021, the nearest weather station, for which the National Weather Service reports data,

3 to the Douglas Fir's location was weather station PG326, located approximately 5.9 miles from the

4 tree. Meteorologist Decl. (Ex. Z) ¶ 3. Weather station PG326 sits at an elevation of approximately

5 4,249 feet above sea level. GPS from a photograph of the stump of the Douglas Fir indicates an

6 elevation of approximately 2392 feet above sea level.³ At 6:40 a.m. on July 13, 2021, PG326

7 reported winds of approximately 5 mph, with gusts of approximately 9 mph. *Id.* ¶ 4. Ten minutes

8 later, at 6:50 a.m., the same station reported winds of approximately 7 mph, with gusts of

9 approximately 9 mph. *Id.* The below chart provides the approximate distance from the Douglas Fir,

10 elevation, time, sustained wind speed, gust wind speed, and wind direction for the weather stations

11 within 10 miles of the Douglas Fir's location on July 13, 2021.

Station	Distance from Douglas Fir	Elevation	Observation 1				Observation 2			
			Time	Sustained Wind	Wind Gust	Wind Direction	Time	Sustained Wind	Wind Gust	Wind Direction
PG326	5.9 miles	4249'	6:40 a.m.	5 mph	9 mph	57°	6:50 a.m.	7 mph	9 mph	55°
PG328	7.6 miles	2785'	6:40 a.m.	17 mph	20 mph	87°	6:50 a.m.	17 mph	20 mph	82°
PG468	9.5 miles	2943'	6:40 a.m.	10 mph	16 mph	9°	6:50 a.m.	10 mph	15 mph	9°

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17 **Question 12:**

18 With respect to the patrols on November 11, 2020, and January 14, 2021, what was

19 identified for work, if anything, within one-quarter mile of the Douglas Fir?

20 **PG&E Response:**

21 Below is a table containing information from PG&E's vegetation management

22 records regarding the trees that those records indicate were identified for work in either the

23 November 11, 2020 routine inspection or the January 14, 2021 CEMA aerial inspection and within

24 approximately one quarter mile of the Douglas Fir. PG&E Arborist Decl. (Ex. Y) ¶ 5.

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26 ³ PG&E provided this photo to the Court on August 4, 2021, labeled 2021-07-18_1278.

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Inspection	Species	Height (feet)	DBH ⁴ (inches)	Type of Work	Date Work Marked Complete
Nov. 2020 Routine	Douglas Fir	100	38	Remove	6/10/21
Nov. 2020 Routine	Cedar	80	75	Side Trim	6/11/21
Nov. 2020 Routine	Ponderosa Pine	80	22	Side Trim	6/11/21

Question 13:

With respect to any other patrols or inspection within the last five years, please state all other work, if any, was specified within one-quarter mile of the Douglas Fir.

PG&E Response:

Below is a table containing information from PG&E's vegetation management records regarding the trees that those records indicate were identified for work in vegetation management patrols or inspections within the past five years other than those conducted on November 11, 2020 and January 14, 2021 and within approximately one quarter mile of the Douglas Fir. PG&E Arborist Decl. (Ex. Y) ¶ 5.

Inspection	Species	Height (feet)	DBH (inches)	Type of Work	Date Work Marked Complete
Sept. 2018 Routine	Ponderosa Pine	32	12	Top	6/18/19
Sept. 2018 Routine	Ponderosa Pine	100	33	Overhang	6/18/19
Sept. 2018 Routine	Ponderosa Pine	30	10	Top	6/18/19
Sept. 2018 Routine	Ponderosa Pine	35	10	Side Trim	6/18/19
Sept. 2018 Routine	Cedar	26	7	Remove	10/6/18
Sept. 2018 Routine	Black Oak	30	6	Remove & Treat Stump	10/6/18
Sept. 2018 Routine	Ponderosa Pine	35	12	Top	10/6/18
Sept. 2018 Routine	Ponderosa Pine	40	13	Side Trim	6/18/19

⁴ DBH stands for Diameter at Breast Height.

Inspection	Species	Height (feet)	DBH (inches)	Type of Work	Date Work Marked Complete
Sept. 2018 Routine	Ponderosa Pine	45	14	Side Trim	6/18/19
Sept. 2018 Routine	Live Oak	32	18	Slope Trim	6/18/19
Sept. 2018 Routine	Live Oak	16	3	Brush Trim	6/18/19
Sept. 2018 Routine	Cedar	80	75	Overhang	6/18/19
Sept. 2018 Routine	Douglas Fir	30	7	Remove	6/18/19
Sept. 2018 Routine	Douglas Fir	26	7	Remove	6/18/19
Sept. 2018 Routine	Douglas Fir	100	38	Remove	6/18/19
Sept. 2018 Routine	Black Oak	45	16	Slope Trim	6/14/19
Sept. 2018 Routine	Douglas Fir	80	22	Side Trim	6/14/19
Sept. 2018 Routine	Alder	38	14	Top	6/14/19
June 2019 Tag ⁵	Douglas Fir	90	29	Remove	6/26/19

Question 14:

Turning to the Fly Fire, what indications are there that the White Fir broke and fell onto the Gasner Circuit?

PG&E Response:

PG&E has seen no indications that the trunk of the White Fir broke before being observed laying on the Gansner 1101 Circuit.⁶ Contrary indications are noted in PG&E's response to question 15, *infra*.

⁵ PG&E's records indicate that this tree was identified for work because of an electric corrective ("EC") tag rather than a routine patrol or inspection.

⁶ The terms "White Fir", "Gansner 1101 Circuit" and "Collection Area" used in this submission have the definitions ascribed in PG&E's August 16, 2021 submission. Dkt. 1416.

1 **Question 15:**

2 What indications are there that the White Fir uprooted and fell into the Gasner
3 Circuit?

4 **PG&E Response:**

5 A PG&E arborist was part of the team of PG&E personnel that assisted the United
6 States Forest Service (“USFS”) in the August 2 and 4 site visits, which included collecting portions
7 of the White Fir. PG&E Arborist Decl. (Ex. Y) ¶¶ 1, 2. That arborist is of the opinion that the
8 photographs PG&E submitted in connection with its August 16, 2021 filing appear to show that the
9 White Fir uprooted and fell into the line. *Id.* ¶ 3. Specifically, the arborist believes that the
10 photographs appear to depict the White Fir’s trunk in what appears to be one, non-broken piece still
11 attached to what appears to be the White Fir’s root ball or a portion of it. *Id.*

12 **Question 16:**

13 Please state all other information on why the White Fir failed and fell.

14 **PG&E Response:**

15 The information currently available to PG&E regarding the White Fir’s failure is
16 based on visual observation of the Collection Area and the White Fir. As part of PG&E’s August
17 16, 2021 filing, PG&E submitted to the Court on a thumb drive the photographs that PG&E took as
18 it assisted the USFS in moving and collecting evidence on July 25, August 2 and August 4, which
19 include photograph of the Collection Area and White Fir. *See* Dkt. 1416 at 4. Appendix A identifies
20 the pictures on the thumb drive that, based on a review for this filing, contain images of the White
21 Fir.

22 As noted above, a PG&E arborist is of the opinion that the White Fir appears to have
23 uprooted. PG&E Arborist Decl. (Ex. Y) ¶ 3. At this point, PG&E has not reached a conclusion as to
24 why the White Fir failed in this manner, nor have investigators announced any conclusions. Upon
25 observing the exposed root ball of the tree following its uprooting, the PG&E arborist observed what
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1 looked to him like signs of rot in the root ball, which may have contributed to the tree's
2 uprooting. *Id.*⁷

3 **Question 17:**

4 Please state all information and data about local or regional wind gusts and wind
5 conditions at about the time of the Fly Fire ignition.

6 **PG&E Response:**

7 At about the time of the Fly Fire's ignition, the nearest weather station to the recorded
8 location of the White Fir that reports wind data to the National Weather Service was QYRC1, which
9 is part of the USFS's Remote Automatic Weather Station network, and is located approximately
10 2.5 miles from the recorded location of the White Fir. Meteorologist Decl. (Ex. Z) ¶ 2. That
11 weather station reported winds of 4 mph with gusts to 16 mph at 4:15 p.m. and winds of 3 mph with
12 gusts to 17 mph at 5:15 p.m. *Id.* The below chart provides the approximate distance from the
13 White Fir, elevation, observation time, sustained wind speed, gust wind speed, and wind direction
14 for the weather stations within 10 miles of the Collection Area that record and report wind speeds to
15 the National Weather Service. PG&E has included below data from the July 22, 2021 observations,
16 from each such weather station, immediately preceding or concurrently with the approximate time
17 when PG&E's line recloser first detected a fault at 4:50 p.m., as well as the first observation after
18 that time.

Station	Distance from White Fir	Elevation	Observation 1			Observation 2				
			Time	Sustained Wind	Wind Gust	Wind Direction	Time	Sustained Wind	Wind Gust	Wind Direction
QYRC1	2.5 miles	3652'	4:15 p.m.	4 mph	16 mph	188°	5:15 p.m.	3 mph	17 mph	237°
CHAC1	2.8 miles	4478'	4:47 p.m.	14 mph	31 mph	221°	-- ⁸	--	--	--
C3FRC	4.0 miles	3452'	4:50 p.m.	3 mph	5 mph	211°	4:52 p.m.	7 mph	10 mph	199°
PG315	4.1 miles	3443'	4:50 p.m.	6 mph	21 mph	281°	5:00 p.m.	7 mph	16 mph	278°

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25 ⁷ See also photos that PG&E provided to the Court on August 16, 2021, labeled IMG_6189.JPG, IMG_6195.JPG and IMG_6199.JPG. Dkt. 1416 at 4.

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27 ⁸ CHAC1 does not appear to have recorded weather observations on July 22, 2021 after 4:47 p.m.

Station	Distance from White Fir	Elevation	Observation 1				Observation 2			
			Time	Sustained Wind	Wind Gust	Wind Direction	Time	Sustained Wind	Wind Gust	Wind Direction
PG292	5.3 miles	2787'	4:50 p.m.	7 mph	17 mph	291°	5:00 p.m.	8 mph	18 mph	284°
PG311	7.0 miles	3793'	4:50 p.m.	10 mph	22 mph	223°	5:00 p.m.	11 mph	21 mph	223°
PG310	8.8 miles	3521'	4:50 p.m.	7 mph	15 mph	190°	5:00 p.m.	8 mph	17 mph	223°
PG746	9.2 miles	6174'	4:50 p.m.	10 mph	19 mph	271°	5:00 p.m.	7 mph	13 mph	263°

PG&E notes that the Collection Area has an elevation of approximately 3287 feet and that the CHAC1 station is located at an elevation approximately 1191 feet higher than the Collection Area and stands on the ridge of a large hill. Meteorologist Decl. (Ex. Z) ¶ 7.

Question 18:

Please provide photos of the White Fir after it fell onto the Gasner Circuit sufficient to show (i) whether it broke versus uprooted; (ii) the extent to which the tree burned; and (iii) whether the White Fir had disease or death (if any).

PG&E Response:

PG&E refers the Court to the pictures it provided on a thumb drive to the Court with its August 16, 2021 filing, which contains the photographs that PG&E took as it assisted the USFS in moving and collecting evidence on July 25, August 2, and August 4. *See* Dkt. 1416 at 4. As noted above, Appendix A identifies the pictures on the thumb drive that, based on a review for this filing, contain images of the White Fir.

Question 19:

What actual evidence indicates that the Fly Fire was started by a spot fire from the Dixie Fire?

PG&E Response:

PG&E's August 16, 2021 filing quoted the Butte County District Attorney, as reflected in an interview reported by the media, as the basis for its statement that "certain investigators are investigating whether there was 'a tree into a line, and then a fire started, or a fire started which put the tree into the line after a fire had started—presumably from the Dixie Fire

1 spotting over”’. Dkt. 1416 at 2 (footnote omitted). PG&E does not know what evidence, if any, has
2 been collected by the investigators that bear on whether the Dixie Fire spotted over.

3 **Question 20:**

4 Another thing that does not add up is that the line disruption was recorded at 6:48
5 a.m. on July 13 but, ten hours later, when the troubleman saw the fire (After 4:40
6 p.m.), the fire was only 600 or 800 square feet in size. If the fire had begun at or
7 about when the disruption occurred, the fire would have grown many times larger and
8 faster than that. What accounts for this delay?

9 **PG&E Response:**

10 PG&E’s investigation into how and when the Dixie Fire initially started is ongoing.
11 PG&E agrees that the size of the fire when the troubleman observed it after 4:40 p.m., Dkt. 1408-01,
12 Dixie Troubleman Decl. (Ex. A) ¶ 12, and the lack of any other known indications of a fire before
13 then, suggest that the fire had not been burning long at that time.

14 PG&E is aware of no evidence that the fire started at 6:48 a.m., when (a) the line
15 recloser at the Bucks Creek substation for the Bucks Creek 1101 Line recorded momentary current
16 levels on two of the three phases in excess of the Minimum To Trip and (b) the fuses on those phases
17 apparently opened and shut off power downstream of those locations. *See* Dkt. 1408 at 2; Dkt.
18 1408-02, Recloser Witness 1 Decl. (Ex. B); Dkt. 1408-03, Recloser Witness 2 Decl. (Ex. C); Dkt.
19 1408-04, Recloser Witness 3 Decl. (Ex. D). According to logs and records, between 8:52 a.m. and
20 9:04 a.m., a roving operator who reported to and inspected Cresta Dam reported power out, but did
21 not report any indication of a fire. *See* Dkt. 1408-06, Custodian Decl. 1 ¶ 3, Attach. 1 (Ex. E-1).
22 The troubleman arrived at Cresta Dam at approximately 12:30 p.m., and when he looked up the
23 Bucks Creek 1101 Line with his binoculars, he saw that a fuse had apparently opened, but did not
24 see any smoke or indication of a fire. *See* Dkt. 1408-01, Dixie Troubleman Decl. (Ex. A) ¶¶ 6-7.
25 PG&E is not aware of any reports of a fire in the area prior to the troubleman’s radio calls at
26 approximately 5:00 p.m.

27 PG&E understands, but has not been able to confirm, that CAL FIRE (or assisting
28 law enforcement) has taken evidence—the trunk, stump, and parts of the top of the tree, as well as

1 PG&E equipment—that might bear on the question of precisely what transpired (and over what
2 period of time) to start an ignition. PG&E has requested access to the PG&E equipment that CAL
3 FIRE collected from the area, as well as receipts for the equipment CAL FIRE removed; CAL FIRE
4 has denied those requests.

5 **Question 21:**

6 What time did the troubleman, evidently using his binoculars, first see the blown fuse
7 hanging down? Where exactly was he?

8 **PG&E Response:**

9 Shortly after he arrived at the Cresta Dam, the troubleman, using his binoculars to
10 visually inspect the Bucks Creek 1101 Circuit, first saw what appeared to be a fuse hanging down
11 from a pole on the circuit, which is the ordinary indication that such a fuse had operated and opened
12 the line. *See* Dkt. 1408-01, Dixie Troubleman Decl. (Ex. A) ¶ 7.

13 The time of this observation is estimated between approximately 12:20 and 12:40
14 p.m., based on the troubleman’s recollection and the GPS tracking data showing his time and
15 location, as reflected in one of the maps submitted on August 25, 2021. *See id.* ¶¶ 6-7; Dkt. 1428-24
16 (Ex. X-2); Dkt. 1428-25 (Ex. X-3); Troubleman Decl. (Ex. AA) ¶ 4. When the troubleman looked
17 up the line with his binoculars, he was standing next to a pole near Cresta Dam, as indicated on
18 another one of the maps submitted on August 25, 2021, in what is known as the Grizzly Dome
19 Tunnel. Dkt. 1428-23 (Ex. X-1); Troubleman Decl. (Ex. AA) ¶ 4.

20 **Question 22:**

21 No one saw any fire at all until after the troubleman arrived at the site. What, if
22 anything, did the troubleman do upon his arrival at the site that might have
23 accidentally caused the fire?

24 **PG&E Response:**

25 PG&E is not aware of anything the troubleman did at the site that would have caused
26 the fire, which he observed was a couple hundred feet away and down the hillside from the road
27 where he parked and operated his bucket truck. Upon arriving at the road near the pole with Fuse
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1 17733, the troubleman parked his truck; once he exited, he smelled smoke but initially assumed it
2 was coming from the Sugar Fire. *See* Dkt. 1408-01, Dixie Troubleman Decl. (Ex. A) ¶ 12. He
3 observed at that time that two of the three fuses had opened, and he got into the bucket of his truck to
4 go up towards the fuses. *Id.* As he ascended in the bucket, before he reached the fuses, he could see
5 a fire down the hillside and a tree on the line, as previously described. *Id.* The troubleman took no
6 other actions between the time he arrived at Fuse 17733 and the time he saw the fire. Troubleman
7 Decl. (Ex. AA) ¶ 5. PG&E has no reason to believe any of these actions should have resulted in a
8 fire, consistent with the Troubleman's observation that the fire was already burning. As noted
9 below, *after* he saw the fire, he opened the fuse on third conductor. Dkt. 1408-01, Dixie Troubleman
10 Decl. (Ex. A) ¶¶ 12-13.

11 **Question 23:**

12 What other sources of ignition were in the area? Could the blown fuse itself have
13 sparked the fire? What evidence or observations would so indicate?

14 **PG&E Response:**

15 The troubleman did not observe anything he perceived to be another source of
16 ignition near the 600 to 800 square foot fire and the base of the Douglas Fir. *See* Troubleman Decl.
17 (Ex. AA) ¶ 6.

18 The troubleman did not observe anything that would lead him to believe the fuses had
19 sparked the fire. *See* Troubleman Decl. (Ex. AA) ¶ 6. The troubleman did not observe any fire or
20 signs of fire near the pole, which he recalls was surrounded by decomposed granite without any
21 obvious sources of ignition. *Id.* The troubleman's observations appear consistent with the
22 subsequent photographs, which show no apparent signs of fire damage beneath the fuses or near the
23 bottom of the pole on which the fuses were installed. *See* Ex. GG (photos of bottom of pole taken on
24 July 18, 2021).⁹

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27 ⁹ PG&E provided these photos to the Court on August 4, 2021, labeled 2021-07-18_0048.JPG
and 2021-07-18_0913.JPG.

1 In addition, the absence of any indication of a fire until late in the afternoon suggests
2 that the fire began hours after the fuses operated. *See* Response to Question 20, *supra*.

3 The fuses that were installed on the pole *can* malfunction and cause ignition, but
4 PG&E is not aware of evidence indicating the fuses here malfunctioned. Based on PG&E records,
5 including a photograph from a May 13, 2021 overhead inspection, PG&E believes the fuses are
6 SMU-20 power fuses manufactured by S&C Electric Company with PT63 Polymer cutouts. *See*
7 Recloser Witness 1 Decl. (Ex. CC) ¶¶ 6-7. Such fuses are classified as exempt from Public
8 Resources Code section 4292. *See* Fuse Decl. (Ex. BB) ¶ 3.

9 These fuses have been the subject of a previous PG&E bulletin and recent review,
10 based on ignitions resulting from water intrusion into the fuse, which caused the fuse to remain
11 closed with the fault continuing until the fuse becomes overheated, resulting in ignition. *See* Fuse
12 Decl. (Ex. BB) ¶¶ 4-5. Here, by contrast, the recloser data shows that the fault event involving
13 current exceeding Minimum To Trip levels at approximately 6:48 a.m. lasted only some 4/100ths of
14 a second, which is consistent with the fuses operating as they are designed to do. Recloser Witness 1
15 Decl. (Ex. CC) ¶ 8; *see also* Dkt. 1408-02, Recloser Witness 1 Decl. (Ex. B) at 3:8-13 (last two
16 paras.); *see also generally id.* (entire declaration); Dkt. 1408-03, Recloser Witness 2 Decl. (Ex. C);
17 Dkt. 1408-04 Recloser Witness 3 Decl. (Ex. D). The recloser data show no subsequent fault events
18 that could cause a malfunctioning fuse to overheat and ignite. *See id.*; Recloser Witness 1 Decl. (Ex.
19 CC) ¶¶ 4-5 & Attach. 1.

20 PG&E's investigation into the causes of the fire, and its pre-existing, independent
21 review of the fuses, is ongoing.

22 **Question 24:**

23 Your July 28 submission states that the troubleman went to the pole to replace the
24 blown fuse, but is vague as to whether he did, in fact, replace it. Did the troubleman
25 replace the blown fuse or try to, even temporarily? If he did, wouldn't that have
26 allowed power to flow in that line (since the circuit was reported as otherwise having
27 a "good load") and pose a risk of arcing where the tree pushed the lines together?

28 **PG&E Response:**

1 PG&E had not intended to be vague with respect to the troubleman's actions. The
2 troubleman did not replace or try to replace the open fuses. Troubleman Decl. (Ex. AA) ¶ 7. After
3 he observed through his binoculars what appeared to be a hanging (i.e., open) fuse, the troubleman
4 drove to the fuse's location to identify any problem and, potentially, depending on what he observed
5 when he reached the fuses, replace any open fuses with new fuses he carries in his truck. *See id.*
6 After arriving at the site of the fuses and seeing that two fuses had operated (which would open or
7 de-energize the phases that the fuses were on), he ascended in his bucket and looked down the line to
8 see if something on the line caused the outage. *See id.* As he was ascending in his bucket, the
9 troubleman observed the tree on the line and the fire; so he decided not to replace the blown fuses.
10 *Id.* Instead, he quickly opened the fuse on the third phase—the fuse that had not operated earlier—
11 which de-energized the third phase; he did not replace or touch the blown fuses. *Id.*; *see also* Dkt.
12 1408-01, Dixie Troubleman Decl. (Ex. A) ¶ 13.

13 **Question 25:**

14 Precisely when in the sequence did the troubleman see the tree on the line? Wasn't it
15 dangerous to replace the blown fuse while the tree was still leaning on the line (and
16 the circuit still had a "good load")? Did he inspect the line (and the leaning tree)
before working on the fuses?

17 **PG&E Response:**

18 The troubleman observed the tree leaning on the line as he was ascending in the
19 bucket of his truck toward the fuses when he was approximately 5 to 10 feet from the bucket's
20 cradle. Dkt. 1408-01, Dixie Troubleman Decl. (Ex. A) ¶ 12; Troubleman Decl. (Ex. AA) ¶ 8. The
21 troubleman did not replace the blown fuses. *Id.* ¶ 7. Rather, to prevent "single phasing," which can
22 cause damage to equipment, the troubleman opened the third fuse. Dkt. 1408-01, Dixie Troubleman
23 Decl. (Ex. A) ¶¶ 12-13. Before opening the third fuse, he visually inspected the line and did not see
24 any breaks in the line or damage to other equipment. *Id.* ¶ 12; Troubleman Decl. (Ex. AA) ¶ 9.

26 When the troubleman observed the tree on the line, it appeared to him to be green at
27 the top where it leaned against the line, and he did not see any smoke or indications of fire coming
28

1 from the top part of the tree that was touching the line; because of the fire, he did not take time to
2 otherwise inspect the tree. Troubleman Decl. (Ex. AA) ¶ 9. He lowered his bucket in order to report
3 and fight the fire. *Id.* ¶ 8.

4 **Question 26:**

5 Did the troubleman hear any arcing on the line?

6 **PG&E Response:**

7 The troubleman did not hear (or see) any arcing on the line. Troubleman Decl. (Ex.
8 AA) ¶ 10.

9 **Question 27:**

10 When the troubleman replaced the blown fuse (if he did), how did it react upon being
11 installed? Blow again? Did it emit a smell? Crackle? All fuses from the site should be
12 preserved as evidence.

13 **PG&E Response:**

14 The troubleman did not remove, replace, or touch the two fuses that had operated.
15 Troubleman Decl. (Ex. AA) ¶ 11. He opened the third fuse for safety reasons and did not remove
16 that fuse either. *Id.*

17 The three fuses the troubleman left at the site are not in PG&E's possession. They
18 were not present on July 18, 2021 when PG&E was first permitted to access the site after the fire.¹⁰
19 PG&E has requested access to the PG&E equipment that CAL FIRE collected from the area, as well
20 as receipts for the equipment CAL FIRE removed; CAL FIRE has denied those requests.

21 **Question 28:**

22 Identify by pole number the pole that corresponded with fuse 17733. From the blown
23 fuse, how far away was the tree in question and how far away was the oval-shaped
24 fire? Couldn't the downed tree be seen from the ground standing by the pole?

25 **PG&E Response:**

26 ¹⁰ PG&E provided photos to the Court on August 4, 2021, including those labeled 2021-07-
27 18_0041 and 2021-07-18_0042, that show that the fuses were not in the fuse cutouts when PG&E's
28 representatives reached the site that day.

1 Fuse 17733 corresponds in PG&E's records with the pole with SAP number
2 100403908. Dkt. 1428-23 (Ex. X-1). The tree and fire were approximately two-thirds of the way to
3 the next pole, Dkt. 1408-01, Dixie Troubleman Decl. (Ex. A) ¶ 12, downhill, with the fire in an oval
4 shape that appeared to be progressing uphill. Troubleman Decl. (Ex. AA) ¶ 13. The troubleman
5 estimates that the tree leaning on the line was 180 to 200 feet away from the fuses, and the edge of
6 the fire nearest to the pole with the fuses was 120 feet away when he first saw it. *Id.* ¶¶ 12-13. The
7 near edge of the fire was not at the right of way, and the far edge was roughly 25 yards from the
8 right of way. Dkt. 1408-01, Dixie Troubleman Decl. (Ex. A) ¶ 12. The approximate location of the
9 oval fire is indicated in a map attached to PG&E's August 25, 2021 submission. Dkt. 1428-23 (Ex.
10 X-1).

11 The troubleman did not stand by the base of the pole before seeing the tree, as the
12 pole was downhill from the road where he parked his truck. Troubleman Decl. (Ex. AA) ¶ 14. He
13 did stand by the base of the pole that held the fuses after he attempted to fight the fire when he
14 placed a tag with the notation TMOL ("Tag Man On Line") on the pole for safety reasons. *Id.* He
15 does not recall whether the tree leaning on the line could be seen from the ground by the pole. *Id.*

16 Before he ascended in his bucket, standing near his truck on the road, the troubleman
17 did not see the leaning tree, given his location and the grade of the hill. *Id.* He does not know
18 whether the tree could have been seen from that location. *Id.*

19 **Question 29:**

20 How close to the distribution line and downed tree was the oval-shaped fire when the
21 troubleman first saw it, and what relationship did it have to them?

22 **PG&E Response:**

23 When the troubleman first saw the fire, it was on the ground, near the base of the tree
24 leaning against the line. Dkt. 1428-01, Troubleman Decl. (Ex. A) ¶ 12. The top of the tree was not
25 on fire, and the fire was not under the distribution line. Troubleman Decl. (Ex. AA) ¶¶ 9, 15.
26 Rather, the edge of the fire closest to him was not at the right of way, and the edge farthest from him
27 was roughly 25 yards from the right of way. Dkt. 1428-01, Dixie Troubleman Decl. (Ex. A) ¶ 12.
28

1 He did not see any evidence that the fire had burned into the right of way. Troubleman Decl. (Ex.
2 AA) ¶ 15. The approximate location of the fire is indicated on the map provided with PG&E's
3 submission on August 25, 2021. Dkt. 1428-23 (Ex. X-1).

4 **Question 30:**

5 Did the PG&E sensors record any surge or return of power, even momentarily, on any
6 of the lines in question on July 13 other than the 6:48 a.m. event? If so, set forth the
7 details of any return of power or surges, regardless of how brief.

8 **PG&E Response:**

9 Except for the 6:48 a.m., July 13, 2021 event, the line recloser at the Bucks Creek
10 substation for the Bucks Creek 1101 Line did not record any current in excess of the Minimum To
11 Trip on any of the three phases that day, either before or after the 6:48 a.m. event. *See* Dkt. 1408-02,
12 Recloser Witness 1 Decl. (Ex. B) at 3:8-13 (last para.); *see also generally id.* (entire declaration);
13 Dkt. 1408-03, Recloser Witness 2 Decl. (Ex. C.); Dkt. 1408-04 Recloser Witness 3 Decl. (Ex. D).
14 The current levels recorded in PG&E's Process Information ("PI") Historian database for July 13,
15 2021 are provided with this submission. Recloser Witness 1 Decl. (Ex. CC) ¶¶ 4-5 & Attach. 1.

16 PG&E has two users on the Bucks Creek 1101 Line located load-side and
17 downstream from Fuse 17733; namely, PG&E's Cresta Dam facility and the nearby Caltrans tunnel.
18 The Rock Creek Switching Center did not receive any indication from PG&E's SCADA system of a
19 restoration of power to the Cresta Dam facility subsequent to the 6:48 a.m. event. Custodian 1 Decl.
20 (Ex. DD) ¶ 3; *see also* Dkt. 1408-05 & -06. PG&E has seen no indication in the data recovered from
21 the meter at the Caltrans tunnel that power was restored, but PG&E is still analyzing that data to
22 determine whether it sheds any light on the events.¹¹

23 **Question 31:**

24 When the troubleman was fighting the fire, to what extent, by his observation, had the
25

26 ¹¹ The meter appears not to have been in communication with PG&E's system, and therefore
27 was not time synched. Determining what data relates to July 13, 2021 will therefore require
28 analysis.

1 flames gotten into the brush, into the trees, versus remaining in the grass?

2 **PG&E Response:**

3 When the troubleman began fighting the fire, he observed it on the ground, which the
4 troubleman recalls as containing pine needles, but not grass. Troubleman Decl. (Ex. AA) ¶ 16.

5 While fighting the fire, the troubleman observed the fire spread up into some small, green live oak
6 trees that he estimates were 15 to 20 feet tall. *Id.*; see Dkt. 1428-01, Dixie Troubleman Decl. (Ex.
7 A) ¶ 13. He does not recall a lot of wind at the time and did not observe the fire spreading to the
8 canopy of any of the tall mature trees in the area. Troubleman Decl. (Ex. AA) ¶ 16.

9 **Question 32:**

10 Was there any burned area other than the oval-shaped fire that the troubleman saw?
11 For example, was there any burned area leading from under the tree on the line to the
12 area then actively burning, indicating a path of fire?

13 **PG&E Response:**

14 As explained above, the fire was still burning at the base of the tree when the
15 troubleman first saw it. Dkt. 1428-03, Troubleman Decl. ¶ 3. The troubleman did not observe a line
16 of fire from under the line where the tree was touching the line to where the fire was then actively
17 burning, nor did he observe any burned area or other indication of a line of fire from the fuse pole to
18 the oval shaped fire area. Troubleman Decl. (Ex. AA) ¶ 17.

19 **Question 33:**

20 What were the wind conditions at the site in question during that day?

21 **PG&E Response:**

22 The nearest PG&E weather station to the incident location was weather station
23 PG326, located approximately 5.89 miles away. Meteorologist Decl. (Ex. Z) ¶ 3. PG326 sits at an
24 elevation of approximately 4,249 feet above sea level. *Id.* ¶ 6. During the day on July 13, 2021,
25 PG326 reported winds speeds between approximately 3 mph and 15 mph, with gusts between
26 approximately 15 mph and 20 mph. *Id.* ¶ 4.

1 The below chart provides the approximate distance from the Douglas Fir, elevation,
 2 sustained wind speed, and gust wind speed for the weather stations within 10 miles of the Douglas
 3 Fir's location on July 13, 2021.

Station	Distance from Douglas Fir	Elevation	Sustained Wind	Wind Gust
PG326	5.9 miles	4249'	3-17 mph	5-30 mph
PG328	7.6 miles	2785'	0-17 mph	0-24 mph
PG468	9.5 miles	2943'	0-8 mph	0-19 mph

8
 9 **Question 34:**

10 Provide a sketch map of the site, approximately to scale, that shows the relevant
 11 span(s), the poles (with identification numbers), the blown fuse, the downed tree, the
 12 oval-shaped fire of about 600 to 800 square feet, the road, and any other item of
 relevance. Show true north. Show approximate distances, such as the length of the
 span.

13 **PG&E Response:**

14 PG&E refers to the map PG&E provided to the Court on August 25, 2021 as Exhibit
 15 X-1 (Dkt. 1428-23), which contains the information requested.

16 **Question 35:**

17 Provide all recordings, statements, emails, and reports by the troubleman or anyone
 18 else setting forth his recollection that have not already been provided.

19 **PG&E Response:**

20 PG&E is providing the non-privileged records that PG&E identified as responsive to
 21 this question, including five audio recordings (provided on a thumb drive) and one record from
 22 PG&E's Integrated Logging Information System ("ILIS") (Ex. EE).¹² Four of the recordings are
 23 calls made by the troubleman late in the evening of July 13, 2021. One recording is a call made by
 24 another employee that day around 7:25 p.m.

25 **Question 36:**

26
 27 ¹² As noted with respect to Question 7, *supra*, PG&E does not interpret the Court's question as
 28 calling for information protected by the attorney-client privilege or attorney work product protection.

1 Finally, at what date and time did the drone interfere with the Dixie Fire suppression
2 efforts?

3 **PG&E Response:**

4 According to media reports, a drone is reported to have interfered with the Dixie Fire
5 suppression efforts at approximately 7:45 p.m. on July 13, 2021. As set forth in PG&E’s August 25,
6 2021 submission, this is consistent with the observations of a PG&E employee who heard a report of
7 a drone come over a CAL FIRE radio the evening of July 13, 2021. Dkt. 1428-02, PSS Decl. ¶ 3.

8 **Requests for Transcripts (Dkt. 1419):**

9 PG&E shall provide the Court with transcripts of any 911 calls and transcripts of any
10 calls to Cal FIRE reporting the Dixie Fire made by the troubleman, his supervisor,
11 and any other PG&E employee. Additionally, PG&E shall provide transcripts of radio
12 calls that the troubleman made (reporting the fire) to the dispatch centers at Rocklin
13 and Chico, to his supervisor, to Cal FIRE, and to any other emergency responder. It
shall also produce the transcripts of radio calls made to the troubleman by his
supervisor, as well as any other party, in response to the initial notification about the
Dixie Fire. If transcripts are not possible, then produce summaries.

14 **PG&E Response:**

15 Attached hereto as Exhibits FF-1 through FF-4 are transcripts of responsive calls,
16 transcribed from audio recordings in PG&E’s possession.

17 * * *

18 Attached hereto as Exhibit HH is the glossary requested by the Court in Dkt. 1420.

19
20 Dated: August 31, 2021

Respectfully Submitted,

JENNER & BLOCK LLP

21
22
23 By: /s/ Reid J. Schar
Reid J. Schar (*pro hac vice*)

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Attorneys for Defendant PACIFIC GAS AND
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Appendix A

1	IMG 1598-1599
2	IMG 3379
3	IMG 3474-3495
4	IMG 3497-3498
5	IMG 3500-3501
6	IMG 3504-3509
7	IMG 3511-3512
8	IMG 3514-3516
9	IMG 3521-3525
10	IMG 3527-3530
11	IMG 3535-3536
12	IMG 3544
13	IMG 3549
14	IMG 3551
15	IMG 3668-3671
16	IMG 6113-6121
17	IMG 6123-6131
18	IMG 6135
19	IMG 6138-6312
20	IMG 6317-6395
21	IMG 6419-6420
22	IMG 6580-6582
23	IMG 6738-7038
24	IMG 7040-7063
25	IMG 7065-7075
26	IMG 7079-7084
27	IMG 7087-7093
28	IMG 7116-7127
	IMG 7139-7140
	IMG 7149-7160
	IMG 7162-7170
	IMG 7173-7174
	IMG 7177-7180
	IMG 7182-7385
	IMG 7388-7432
	IMG 7683-7684