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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

No. CR 14-00175 WHA

v.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

**REQUEST FOR INFORMATION RE
DIXIE, FLY, AND OTHER FIRES**

First, PG&E shall please explain its role in the ignition of the Fly Fire, which has now merged with the Dixie Fire. PG&E shall also describe any PG&E equipment removed by the U.S. Forest Service and the location of the equipment when it was in use. PG&E shall additionally describe the extent of trimmed and untrimmed vegetation in the area near where the U.S. Forest Service took possession of PG&E's equipment. PG&E shall name the relevant circuit and identify (by name, position and house address, the latter may be under seal) officers or other employees who made the decision to leave the relevant circuit energized.

Second, with respect to the Dixie Fire, please submit all documentation of the segments of the Bucks Circuit imaged by the drone or from the ground by PG&E or contractor(s), which depict, *prior* to the fire, the Douglas Fir that is suspected of starting the fire. In submitting the documentation, please identify the tree somehow, so that we can pick it out from the forest. PG&E shall also name the contractor and its employee(s) (by name, position and house address, the latter may be under seal), that operated the drone near the Dixie Fire, on the day of the Dixie Fire's ignition. Describe the purpose of the drone's surveillance. If the drone was

1 not working for PG&E when it flew close to the Dixie Fire, please inform the Court for whom
2 the drone was working. Also explain what the drone was doing. Finally, identify the date and
3 time on which the relevant stretch of the Bucks Circuit had last been worked (and by whom)
4 and what the risk ranking was for that stretch.

5 *Third*, in a filing not to exceed five pages, please identify each fire that PG&E started, or
6 is suspected to have started, this wildfire season. In a chart that is separate from PG&E's
7 responses to the above questions, state the following with respect to each fire:

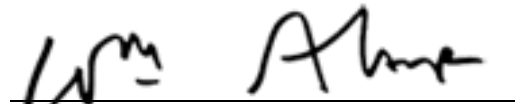
- 8 1. The date it started;
- 9 2. The suspected cause;
- 10 3. The number of acres burned;
- 11 4. The number of structures burned; and
- 12 5. The number of fatalities.

13 PG&E's responses will not be deemed as an admission by PG&E that it *caused* any fire, but
14 they will serve as a starting point for discussion.

15 All responses shall be due **AUGUST 16 AT NOON**.

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17 **IT IS SO ORDERED.**

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19 Dated: August 6, 2021.

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22 _____
23 WILLIAM ALSUP
24 UNITED STATES DISTRICT JUDGE
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