

Exhibit Y

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 kdye@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

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]
("ARBORIST") IN SUPPORT OF
RESPONSE TO FOLLOW-UP
QUESTIONS RE DIXIE AND FLY FIRES**

Judge: Hon. William Alsup

1 I, [REDACTED], declare as follows:

2 1. I am currently employed by Pacific Gas and Electric Company (“PG&E”) as the
3 Vegetation Management Supervisor, North Valley South, and I have training as an arborist. This
4 declaration is based on my personal knowledge and records in the possession of PG&E that I have
5 reviewed.

6 Fly Fire

7 2. On August 2 and 4, 2021, I was present at the area of 435 and 563 Butterfly Valley
8 Twain Road in Quincy, California where PG&E assisted the United States Forest Service in
9 collecting evidence. I participated in assisting with the site visit, including with collecting
10 portions of a white fir tree (the “White Fir”).

11 3. I have reviewed photographs taken during the site visits. Based on that review, I
12 believe that the White Fir uprooted and fell into the line. The photographs appear to depict the
13 White Fir’s trunk in one, non-broken piece attached to what appears to be the White Fir’s root ball
14 or a portion of it. Upon observing the exposed root ball of the tree following its uprooting, I
15 observed what looked to me to be signs of rot in the root ball, as reflected in, for example, the
16 photographs labeled IMG_6189.JPG, IMG_6195.JPG and IMG_6199.JPG. I understand that
17 these three photographs were previously submitted to the Court.

18 Dixie Fire

19 4. I visited the reported area of origin of the Dixie Fire on several occasions, including
20 on July 26, 2021, after the stump I understand to be associated with the tree that fell into the line
21 was removed. I have also reviewed photographs of the roots of that stump taken during the site
22 visits, including ones I understand were previously submitted to the Court labeled 2021-07-
23 26_0698.JPG and 2021-07-26_1644.JPG. I believe that one root shows signs of internal rot. I
24 have not reached any conclusion as to whether this rot is related to the falling of the tree or
25 whether there were any external indications of the rot.

26 5. I am familiar with the systems that PG&E uses to track its vegetation management
27 work, including its Vegetation Management Database (“VMD”), which contains tree-level data

1 regarding trees identified for work. At my direction, a PG&E employee I manage queried the
 2 system to retrieve information responsive to the Court's questions about the trees identified for
 3 work within one quarter mile of the Douglas Fir that fell in the November 2020 routine patrol, the
 4 January 2021 CEMA inspection, and other inspections and patrols the prior five years (the
 5 "Questions"). I reviewed the output of those queries. The table below, Table A, accurately
 6 reflects the data contained in VMD that is responsive to the Questions. None of the trees
 7 identified below was the Douglas Fir that was observed on the Bucks Creek 1101 Circuit.

8 **Table A**

9 Inspection	Species	Height (feet)	DBH (inches)	Type of Work	Date Work Marked Complete
11 Sept. 2018 Routine	Ponderosa Pine	32	12	Top	6/18/19
12 Sept. 2018 Routine	Ponderosa Pine	100	33	Overhang	6/18/19
13 Sept. 2018 Routine	Ponderosa Pine	30	10	Top	6/18/19
14 Sept. 2018 Routine	Ponderosa Pine	35	10	Side Trim	6/18/19
15 Sept. 2018 Routine	Cedar	26	7	Remove	10/6/18
16 Sept. 2018 Routine	Black Oak	30	6	Remove & Treat Stump	10/6/18
18 Sept. 2018 Routine	Ponderosa Pine	35	12	Top	10/6/18
19 Sept. 2018 Routine	Ponderosa Pine	40	13	Side Trim	6/18/19
20 Sept. 2018 Routine	Ponderosa Pine	45	14	Side Trim	6/18/19
21 Sept. 2018 Routine	Live Oak	32	18	Slope Trim	6/18/19
22 Sept. 2018 Routine	Live Oak	16	3	Brush Trim	6/18/19
23 Sept. 2018 Routine	Cedar	80	75	Overhang	6/18/19
24 Sept. 2018 Routine	Douglas Fir	30	7	Remove	6/18/19
25 Sept. 2018 Routine	Douglas Fir	26	7	Remove	6/18/19
26 Sept. 2018 Routine	Douglas Fir	100	38	Remove	6/18/19

Inspection	Species	Height (feet)	DBH (inches)	Type of Work	Date Work Marked Complete
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 ¹	Douglas Fir	90	29	Remove	6/26/19
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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

¹ PG&E’s records indicate that this tree was identified for work because of an EC tag rather than a routine patrol or inspection.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

Executed this 30th day of August, 2021, in the City of Marysville, County of Yuba, State of California.

