

# **Exhibit AA**

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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]  
("TROUBLEMAN") IN SUPPORT OF  
RESPONSE TO ORDER REQUESTING  
RESPONSE TO FOLLOW-UP  
QUESTIONS RE DIXIE AND FLY FIRES,  
QUESTIONS 7 THROUGH 36**

Judge: Hon. William Alsup

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

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

4 2. I am a Distribution Troubleman with Pacific Gas and Electric Company ("PG&E").  
5 This declaration supplements the declaration I submitted on July 28, 2021.

6 3. I understand that on August 18, 2021, the Court issued an order asking PG&E to  
7 respond to a series of questions. I have personal knowledge of information relevant to some of the  
8 Court's questions in that order. I have provided that information below.

9 4. Regarding Question 21, while patrolling the Cresta Dam area to discover the cause  
10 of the power outage, I used binoculars to inspect the Bucks Creek 1101 Line and saw what I  
11 thought may have been a fuse hanging down from a pole on the circuit. My best estimate, based  
12 on my recollection and review of GPS data, is that this happened between approximately 12:20  
13 and 12:40 p.m. At the time I made this observation, I was standing in an opening in what I know  
14 as the Grizzly Tunnel located at Cresta Dam and near a wood pole at the end of the Buck's Creek  
15 1101 Line. I used my binoculars to look up the line from my location. This location is depicted as  
16 a yellow box on a map attached to PG&E's August 25, 2021 submission as Exhibit X-1.

17 5. Regarding Question 22, I did nothing that could have caused the fire. The actions  
18 that I took upon arriving at Fuse 17733 before seeing the fire are described in my July 28, 2021  
19 declaration. It is clear to me that the fire had started before I arrived. I base this conclusion on the  
20 fact that as soon as I arrived and exited my vehicle I smelled smoke. I also base this conclusion on  
21 the fact that I saw the fire within minutes of my arrival, and it was already between 600 and 800  
22 square feet in size.

23 6. Regarding Question 23, I did not observe anything in the area of the pole and Fuse  
24 1733 that would lead me to believe the blown fuses sparked the fire. I did not observe any fire or  
25 signs of fire near the pole with the blown fuses, which I recall was surrounded by decomposed  
26 granite without any obvious sources of ignition. I did not observe any fire or signs of fire on or  
27 near the fuses themselves. The closest I got to the fuses at any point was approximately 15 to 20  
28 feet away, when I de-energized the third fuse from my bucket.

1           7.       Regarding Question 24, I did not replace, try to replace, or touch the blown fuses. I  
2 drove to the fuse's location to identify any problem and, if appropriate, replace any fuses that had  
3 blown and needed replacing with the new fuses in my truck. After arriving at the site of the fuses  
4 and seeing that two fuses had blown, I ascended in my bucket and looked down the line to see if  
5 something on the line caused the outage. As I was ascending in my bucket, I observed the tree on  
6 the line and the fire; so I decided not to replace the blown fuses. Instead, I opened the third fuse  
7 for safety reasons.

8           8.       Regarding Question 25, I estimate that I first saw the tree on the line and the fire  
9 when my bucket had ascended approximately 5 to 10 feet from its cradle. Once I saw the tree on  
10 the line and the fire, I decided not to attempt to replace the fuses, and instead I quickly opened the  
11 third fuse. I then descended in my bucket. I immediately attempted to call for help, and I began to  
12 fight the fire as described in my July 28, 2021 declaration.

13           9.       When I observed the tree on the line, it appeared to be green at the top where it  
14 leaned against the line. I did not see any smoke or indications of fire coming from the top part of  
15 the tree that was touching the line. I did not otherwise inspect the tree. I also looked down the  
16 line from my bucket while I was ascending. I did not see any breaks in the lines or damage to  
17 other equipment, aside from the tree on the line.

18           10.      Regarding Question 26, I did not hear or see any arcing on the line.

19           11.      Regarding Question 27, I did not remove, replace, or touch the two fuses that had  
20 blown. I opened the third fuse for safety reasons and did not remove that fuse either.

21           12.      Regarding Question 28, when I first observed the tree from my bucket, it was  
22 approximately two-thirds of the way down the line to the next pole. I understand that the pole  
23 holding the fuses is approximately 260 feet uphill from the next pole. The line travels down a  
24 relatively sharp incline from the pole with the fuses to the next pole, and I estimate that the tree  
25 leaning on the line was approximately 180 to 200 feet away from the fuses.

26           13.      When I first saw the fire, it appeared to be progressing uphill. I estimate that the  
27 edge of the fire nearest to the pole with the fuses was 120 feet away when I first saw it.

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1           14.     I did not stand by the base of the pole before I ascended in my bucket. The base of  
2 the pole was located downhill from the road where I parked my truck. The only time I stood at the  
3 base of the pole that held the fuses was when I placed a TMOL (“Tag Man On Line”) on the pole  
4 for safety reasons. This occurred after I first had observed the fire and tree from my bucket and  
5 after I had attempted to fight the fire. I do not recall whether the tree leaning on the line could be  
6 seen from the ground by the pole. I did not see the tree leaning on the line before I began  
7 ascending in my bucket. I am unsure whether I could have seen the tree leaning on the line from  
8 the place I was standing near my truck when I arrived on site, because after parking my truck, I  
9 focused on ascending in my bucket to de-energize the third fuse. The first time I saw the tree  
10 leaning on the line was early into this ascent.

11           15.     Regarding Question 29, when I first saw the fire, the edge of the fire nearest to the  
12 distribution line was roughly 25 feet away from the ground directly beneath the distribution line.  
13 From the time I first saw the fire and during the time I attempted to fight the fire, I did not see the  
14 fire burning under the distribution line, and I did not see any evidence that the fire had burned into  
15 the right of way. The right of way is the area that extends from the centerline below the  
16 distribution line out to roughly 15 feet on each side of the distribution line.  
17 When I first saw the oval-shaped fire, the base of the tree appeared to be within the oval of the fire  
18 and towards the downhill edge of the oval.

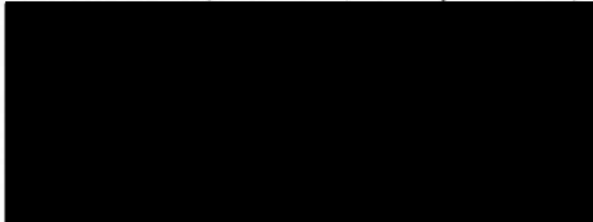
19           16.     Regarding Question 31, when I began fighting the fire, I observed it on the ground.  
20 I recall the ground covering consisted of pine needles, but not grass. At various times while I was  
21 fighting the fire, I observed the fire spread up into some of the small live oak trees that I estimate  
22 were 15 to 20 feet tall. These trees were green, and it appeared to me that these smaller trees did  
23 not conduct the spread of the fire well. I do not recall a lot of wind at the time. I did not observe  
24 the fire spread to the canopy of the tall, mature trees in the area.

25           17.     Regarding Question 32, I did not observe any fires in the area other than the oval-  
26 shaped fire I have described. I did not observe a line of fire from under the distribution line where  
27 the tree was touching the line to where the oval-shaped fire was then actively burning, nor did I  
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1 observe any burned area or other indication of a line of fire from the fuse pole to the oval shaped  
2 fire area.

3 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
4 knowledge.

5 Executed this 31th day of August, 2021, in the City of Chico, County of Butte, State of  
6 California.



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