

United States District Court
Northern District of California

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

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 CRITIQUES

The Court thanks the Monitor and PG&E for their recent reports and responses. These have important information for the public and the regulators. To assist in clarifying that information, by **DECEMBER 16 AT NOON**, the Monitor and PG&E are requested to critique each other's report/response as follows. The Monitor's report, submitted November 19, 2021, is appended hereto. Please read the other's report/response and identify those passages or portions thereof, if any, that you believe are misleading, inaccurate, incomplete, or in need of clarification and/or important to the public's understanding of the issues involved. Please reproduce those passages or portions to be critiqued along with your response.

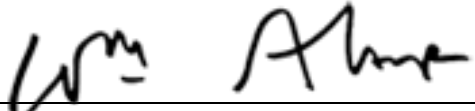
PG&E should, for example, state whether it's true, as stated by the Monitor at page 45, that "multiple" times between 2019 and 2021, PG&E failed to alert all account holders in advance of impending PSPS events. For another example, PG&E should state whether it's true that "without counting projects built to the fire rebuild standard toward its annual system

1 hardening goal . . . PG&E would not have satisfied its annual system hardening WMP target
2 for 2019 or 2020” (pages 43–44). Additionally, PG&E should clarify what it meant by the
3 phrase “stood up” at page 24. (Possibly, it was an editing error.)

4 Please limit these critiques to 20 pages plus 10 pages of exhibits. The United States is
5 invited to file its own critique of both reports/responses (up to the same page limits as to each)
6 by the same date. Also, it would be useful for PG&E and the Monitor to file a separate agreed-
7 on glossary of terms explaining in a single sentence terms like “DIRT,” etc. PG&E shall file
8 its critique as a public document. The Monitor’s shall be filed publicly as well.

9
10 **IT IS SO ORDERED.**

11
12 Dated: November 23, 2021.

13
14 
15 _____
16 WILLIAM ALSUP
17 UNITED STATES DISTRICT JUDGE
18
19
20
21
22
23
24
25
26
27
28

United States District Court
Northern District of California