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COMPANY

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 UNITED STATES OF AMERICA,
20
21 Plaintiff,
22
23 v.
24 PACIFIC GAS AND ELECTRIC COMPANY,
25 Defendant.

Case No. 14-CR-00175-WHA

**RESPONSE TO ORDER REQUESTING
INFORMATION REGARDING DIXIE,
FLY AND OTHER FIRES**

Judge: Hon. William Alsup

1 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this
2 response to the Court’s August 6, 2021 order requesting information regarding the Fly Fire, the Dixie
3 Fire and certain other fires. (Dkt. 1415.)

4 This submission proceeds in three parts. Part I addresses the Fly Fire. Part II
5 addresses the Dixie Fire. Part III addresses certain other fires.

6 **I. Fly Fire**

7 *PG&E shall please explain its role in the ignition of the Fly Fire, which*
8 *has now merged with the Dixie Fire. PG&E shall also describe any*
9 *PG&E equipment removed by the U.S. Forest Service and the location of*
the equipment when it was in use.

10 PG&E’s investigation into the cause and origin of the Fly Fire, which merged with
11 the Dixie Fire, is ongoing. PG&E provides the following information by the August 16 deadline set
12 by the Court, based on information currently known to PG&E and the records PG&E has been able
13 to collect and analyze in the time provided. As discussed in greater detail below, PG&E assisted the
14 United States Forest Service (“USFS”) in site visits on August 2 and 4, 2021 during which the USFS
15 asked for PG&E’s assistance in moving, examining and collecting portions of a White Fir on a
16 section of PG&E’s line (the “White Fir”).

17 The USFS has not reported a determination as to the cause of the fire. Based on an
18 interview with the Butte County District Attorney reported by the media, PG&E understands that
19 certain investigators are investigating whether there was “a tree into a line, and then a fire started, or
20 a fire started which put the tree into the line after a fire had started—presumably from the Dixie Fire
21 spotting over”.¹

22 According to PG&E’s records, between approximately 4:49 p.m. and 4:50 p.m. on
23 July 22, 2021, certain SmartMeters on the Gansner 1101 12 kV Distribution Circuit (the
24 “Gansner 1101 Circuit”) reported powering down, and PG&E line reclosers detected a line-to-

26 ¹ See North State Public Radio, *Dixie Fire: SPECIAL COVERAGE* (Aug. 5, 2021),
27 <https://www.myspr.org/news/2021-08-05/greenville-special-coverage-8-5-thur>.

1 ground fault on each phase of the Gansner 1101 Circuit, respectively, at approximately 4:50 p.m.
2 and 4:51 p.m. The InciWeb Incident Information System website identifies the start time of the fire
3 at approximately 5:15 p.m. on July 22, 2021,² and PG&E has identified smoke from what appears to
4 be the Fly Fire in videos taken from Fire Watch cameras starting at approximately 5:01 p.m. While
5 the USFS has not reported an origin point for the Fly Fire, based on the area from which PG&E
6 assisted the USFS in collecting evidence, it appears the USFS is investigating whether the Fly Fire
7 ignited somewhere in the broader area near 435 and 563 Butterfly Valley Twain Road in Quincy,
8 California, which is roughly four-tenths of a mile from where Butterfly Valley Twain Road branches
9 off of Highway 70.³ That area is served by PG&E's Gansner 1101 Circuit, and it is upstream of the
10 SmartMeters and downstream of the line reclosers mentioned above.

11 On August 2 and August 4, 2021, PG&E assisted the USFS in its site visits to
12 Butterfly Valley Twain Road and in collecting evidence from three spans on the Gansner 1101
13 Circuit between pole 100389432 and pole 100389435.^{4,5} The area between those four poles is
14 referred to hereinafter in this Section as the "Collection Area".

15 As mentioned above, during those site visits, PG&E assisted the USFS in moving,
16 examining and collecting portions of the White Fir that was resting on the Gansner 1101 Circuit
17 between pole 100389433 and pole 100389434. The approximate location of the base of the
18

19 ² See Fly Information, *InciWeb – Incident Information System* (July 28, 2021, 2:15 PM),
20 <https://inciweb.nwcg.gov/incident/7716/>.

21 ³ PG&E notes that the InciWeb Incident Information System provides a description of the
22 location as "3.5 miles North of Quincy, California" and lists GPS coordinates of 40.007, -120.965,
23 which is approximately three-tenths of a mile from the area from which PG&E assisted the USFS in
collecting evidence.

24 ⁴ To facilitate the collection of the conductor between these four poles for the USFS, and at the
25 direction of the USFS, PG&E cut the conductor a few feet past pole 100389432 and
26 pole 100389435, respectively (that is, a few feet closer to pole 100389431 and pole 100389436,
respectively).

27 ⁵ On July 25, PG&E also assisted the USFS in collecting two SmartMeters located near
28 pole 100389435.

1 White Fir is marked in Exhibit N, along with the approximate locations of the poles in the Collection
2 Area and the approximate location where the White Fir was observed laying on the Gansner 1101
3 Circuit, which is approximately 90' from pole 100389433 and 140' from pole 100389434. While
4 assisting the USFS, PG&E observed that the conductors had what appeared to be burn marks or
5 other signs of disturbance near the areas that may have been in contact with the White Fir and also
6 that the White Fir had burn marks near the areas that may have previously been in contact with the
7 conductors. Photographs taken by PG&E during the USFS site visits appear to show that the fuses
8 on both phases of pole 100389433 (which is upstream of the location of the White Fir) had operated.
9 In connection with this submission, PG&E is producing a thumb drive to the Court that has the
10 numerous photographs that PG&E took as it assisted the USFS in moving and collecting evidence
11 that show, among other things, the fuses, the White Fir and the nearby conductors.^{6,7}

12 In addition to portions of the White Fir, on August 4, 2021, PG&E assisted the USFS
13 in collecting the conductors and the equipment on the poles (including cross arms, insulators, and
14 fuses, but excluding transformers and the bottom portions of the poles themselves) in the Collection
15 Area.⁸ The USFS provided PG&E with an inventory of PG&E equipment that the USFS collected,
16 and PG&E is providing that inventory as Exhibit O.

17
18
19
20 ⁶ Faces and names have been obscured to protect the privacy of all persons (employees,
21 contractors and law enforcement officials) participating on these occasions. In addition to these
22 photographs, PG&E has several short video clips taken on the same occasions, which PG&E can
provide to the Court upon request.

23 ⁷ As reflected in certain of these photographs, PG&E notes that a tree other than the White Fir
24 can also be observed resting on the Gansner 1101 Circuit in the Collection Area. This tree, which
25 PG&E understands to be a Douglas Fir, appears to be in the same span as the White Fir, but the
26 Douglas Fir is closer than the White Fir is to pole 100389434. While PG&E was assisting the USFS
on August 2, a USFS personnel informed a PG&E employee that this Douglas Fir had fallen after the
USFS was already on site. The USFS did not collect the Douglas Fir.

27 ⁸ As noted above, on July 25, PG&E also assisted the USFS in collecting two SmartMeters
located near pole 100389435.

1 *PG&E shall additionally describe the extent of trimmed and untrimmed*
2 *vegetation in the area near where the U.S. Forest Service took possession*
3 *of PG&E's equipment.*

4 PG&E's records reflect that the span that included the White Fir—the span between
5 pole 100389433 and pole 100389434—was inspected on July 6, 2021 as part of a routine vegetation
6 management patrol, and based on PG&E's analysis of records associated with that patrol, the
7 White Fir was not identified for either removal or trimming. Six other trees in that span were
8 identified for trimming on a scheduled basis and were not identified to be priority trees. This work
9 was outstanding at the time of the Fly Fire, consistent with the applicable timelines to complete such
10 work. PG&E's records also reflect that the CEMA inspection for the Gansner 1101 Circuit was
11 completed in April 2021, and inspectors did not identify any trees for work in that span. Based on
12 PG&E's analysis of relevant records, PG&E believes that no other trees in that span (aside from the
13 six noted above) that had been identified for work in routine vegetation management patrols or
14 CEMA patrols between 2011 and 2021 had work outstanding as of July 22, 2021.

15 Following a June 25, 2021 enhanced inspection, Electric Corrective ("EC")
16 notifications were created for pole 100389433 and pole 100389434. (As noted above, the White Fir
17 was found between pole 100389433 and pole 100389434, about 90' from pole 100389433 and 140'
18 from pole 100389434.) Both notifications were assigned a completion date of June 25, 2022 and,
19 consistent with the applicable completion timelines, were outstanding at the time of the Fly Fire.
20 Both notifications list in the damage field, "CCHR Cyl Clearance (10' Radius x 8' High)", and they
21 note in the comments section either "Trees growing around the pole" or "Tree limbs overgrown
22 around pole". Pursuant to requirements imposed by Public Resources Code ("PRC") section 4292,
23 PG&E is required to, among other things, clear a 10-foot radius up to eight-feet high of vegetation
24 around poles in a State Responsibility Area that have non-exempt equipment. Based on PG&E's
25 records and a review of photographs, pole 100389434 did not have any non-exempt equipment that
26 would have made it subject to PRC section 4292. As to pole 100389433, which did have non-
27 exempt equipment, the photograph attached to the EC notification that shows vegetation in the
28

1 vicinity of a pole appears to be a photograph of pole 100389434, not pole 100389433. PG&E's
 2 records reflect that, under PG&E's vegetation clearance ("VC") program and pursuant to PRC
 3 section 4292, the vegetation around the base of pole 100389433 was last subject to clearing work on
 4 April 20, 2021. According to PG&E's records, and consistent with PG&E's general practice, the
 5 pole would have been subject to clearing work again approximately during the week ending July 31,
 6 2021.

7 PG&E is providing to the Court on a thumb drive aerial photographs taken in 2019
 8 that are associated with pole 100389433 and pole 100389434; a photograph that PG&E understands
 9 to have been taken in that span in connection with the July 2021 routine vegetation management
 10 patrol; and photographs taken during the June 25, 2021 enhanced inspection of these two poles.

11 *PG&E shall name the relevant circuit and identify (by name, position and*
 12 *house address, the latter may be under seal) officers or other employees*
 13 *who made the decision to leave the relevant circuit energized.*

14 PG&E's specific methodologies to operationalize compliance with the CPUC's
 15 guidelines for Public Safety Power Shutoffs ("PSPS") this fire season were set forth in Dkt. 1401.
 16 Because the forecast weather and other conditions for the Gansner 1101 Circuit did not meet, or
 17 approach, any of the applicable threshold levels for de-energization under those PSPS
 18 methodologies, PG&E did not reach any decision points by any PG&E officers or employees
 19 regarding whether to conduct a PSPS of the Gansner 1101 Circuit on July 22, 2021.

20 **II. Dixie Fire**

21 *[W]ith respect to the Dixie Fire, please submit all documentation of the*
 22 *segments of the Bucks Circuit imaged by the drone or from the ground by*
 23 *PG&E or contractor(s), which depict, prior to the fire, the Douglas Fir*
 24 *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.

25 Attached as Exhibit P are 15 photographs of the segments of the Bucks Creek Circuit
 26 that appear to depict the Douglas Fir. Fourteen of the photos were taken from the air on August 13,
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1 2019; one of the photos was taken on May 13, 2021 in connection with an equipment inspection.
2 PG&E has inserted arrows in those photographs that identify what appears to be the Douglas Fir
3 based on information available to PG&E.

4 *PG&E shall also name the contractor and its employee(s) (by name,*
5 *position and house address, the latter may be under seal), that operated*
6 *the drone near the Dixie Fire, on the day of the Dixie Fire's ignition.*
Describe the purpose of the drone's surveillance.

7 Based on its investigation into the drone issue raised by CAL FIRE, PG&E responds
8 as follows:

9 PG&E has not identified any individual or company who flew a drone near the Dixie
10 Fire on the evening of July 13, 2021.

11 PG&E has seen no indication that any PG&E employee or contractor was instructed
12 or asked to—or did—fly a drone along the Bucks Creek 1101 Circuit or near the Dixie Fire on
13 July 13, 2021.

14 PG&E records reflect that two PG&E contractors operated drones in the morning on
15 July 13, 2021 in Butte and Plumas Counties. As described below, neither flight was near the Dixie
16 Fire, and the records indicate that both flights were complete by approximately 12:30 p.m.

17 PG&E records reflect that employees of one drone contractor operated a drone in
18 Plumas County on the morning of July 13, 2021; per PG&E request as part of PG&E's enhanced
19 inspection process, the flight took images of a single structure on the Caribou-Westwood line about
20 30 miles from the Dixie Fire's apparent ignition point, measuring the distance point to point.
21 According to the flight records and time-stamps on the images this contractor returned to PG&E, that
22 drone flight was completed by around 11:00 a.m.

23 PG&E records reflect employees of the second drone contractor operated a drone in
24 Butte County beginning late morning on July 13, 2021; per PG&E request as part of PG&E's
25 enhanced inspection process, the flight took images of a single structure on the Caribou-Westwood
26 line about 20 miles from the Dixie Fire's apparent ignition site, measuring the distance point to
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1 point. According to the flight records and time-stamps on the images this contractor returned to
2 PG&E, that flight was completed by around 12:30 p.m.

3 PG&E records do not reflect that any additional drone flights were authorized or
4 taken by or on behalf of PG&E in Butte or Plumas Counties on July 13, 2021.

5 PG&E has actively cooperated with, and provided information to, the Butte County
6 District Attorney's office in connection with its investigation of any possible drone flights near the
7 Dixie Fire on July 13.

8
9 *If the drone was not working for PG&E when it flew close to the Dixie*
10 *Fire, please inform the Court for whom the drone was working. . . . Also*
11 *explain what the drone was doing.*

12 As noted above, PG&E's investigation has not identified anyone who operated a
13 drone close to the Dixie Fire on July 13, 2021, why anyone operating such a drone did so, or what
14 such a drone was doing. PG&E's investigation has revealed no reason to believe that any such drone
15 operator was acting at PG&E's direction or on PG&E's behalf.

16 *Finally, identify the date and time on which the relevant stretch of the*
17 *Bucks Circuit had last been worked (and by whom) and what the risk*
18 *ranking was for that stretch.*

19 Equipment Work: On May 1, 2019, PG&E performed a special equipment inspection
20 of the Circuit for PG&E's Wildfire Safety Inspection Program. The inspection identified for
21 replacement the pole supporting Fuse 17733. That pole was replaced on June 21, 2019 by UECC, a
22 contractor. That was the most recent equipment work performed on the span where the tree fell,
23 which was between the pole supporting Fuse 17733 and the next pole load-side and downhill from
24 Fuse 17733 (the "Span").

25 PG&E conducts routine Patrol Inspections and Detailed Inspections of its equipment
26 in accordance with CPUC General Order 165. The most recent Detailed Inspection of the Span
27 occurred on May 13, 2021 and the most recent Patrol Inspection of the Span occurred on May 29,
28

1 2020. PG&E’s records do not reflect that either inspection identified any finding requiring
2 corrective action within the Span or the poles that frame it.

3 Vegetation Inspections: The most recent tree work near the Span was performed in
4 June 2019 by a Mountain F. Enterprises, a contractor.

5 PG&E conducts routine vegetation management and CEMA vegetation management
6 patrols. The most recent routine patrol occurred on November 11, 2020 and the most recent CEMA
7 patrol was performed on January 14, 2021. PG&E’s records do not reflect that either inspection
8 identified the Douglas Fir for work.

9 Risk Ranking: PG&E uses the 2021 Wildfire Distribution Risk Model to rank Circuit
10 segments in High Fire Threat Districts (“HFTDs”) based on wildfire risk. For each segment, the
11 model factors in the probability of ignition and the predicted consequences of ignition. The model is
12 described in the company’s 2021 Wildfire Mitigation Plan. The Model calculates two probabilities
13 of ignition, one based on the probability of equipment failure (“Equipment Risk Model”) and one
14 based on the probability of contact from vegetation (as apparently happened here) (“Vegetation Risk
15 Model”), and generates separate risk rankings for each. Under the Equipment Risk Model, the
16 section was ranked 11 out of 3,635 circuit sections. The Vegetation Risk Model informs the
17 Enhanced Vegetation Tree Weighted Prioritization Ranking, which ranked the section 568 out of
18 3,074 circuit sections.

19 Based on risk ranking, in January 2021, PG&E approved the Bucks Creek 1101
20 Circuit for system hardening—primarily undergrounding—to mitigate both vegetation and
21 equipment risks. On April 16, 2021, representatives of PG&E, CAL FIRE, the California
22 Department of Transportation, the USFS, the CPUC and others conducted a site visit to the Bucks
23 Creek 1101 Circuit to discuss planning, engineering, permitting and construction for hardening
24 projects on this circuit and others like it.

1 **III. Other Fires**

2 *[I]n a filing not to exceed five pages, please identify each fire that PG&E*
 3 *started, or is suspected to have started, this wildfire season. In a chart*
 4 *that is separate from PG&E's responses to the above questions, state the*
 5 *following with respect to each fire:*

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

11 Appendix A contains a two-page listing of ignitions, other than the two ignitions
 12 potentially related to the Dixie and Fly Fires, that, based on the information available to PG&E as of
 13 the date of the Court's August 6, 2021 Order, would constitute CPUC Reportable Ignitions in an
 14 HFTD on or after May 10, 2021—the earliest date in 2021 listed on CAL FIRE's website for "Fire
 15 Season Declarations (Summer/Winter Preparedness)".⁹ In addition to the CPUC Reportable
 16 Ignitions, Appendix A also includes ignitions for which PG&E has not formed a conclusion as to the
 17 suspected initiating event but for which PG&E submitted an Electric Incident Report to the CPUC
 18 because the events were allegedly attributable to PG&E equipment and otherwise satisfied the
 19 requirements for submitting an Electric Incident Report to the CPUC. All of the information
 20 provided in Appendix A is preliminary and subject to change, including as a result of ongoing
 21 investigations and analyses.

22 A CPUC Reportable Ignition is an ignition for which, to the best of PG&E's
 23 knowledge at the time that the information is submitted to the CPUC, each of the following is true:
 24 (i) the fire burned material other than electrical or communication facilities; (ii) the fire traveled
 25 more than one linear meter from the ignition point; and (iii) the suspected initiating event of the fire
 26 is attributable to PG&E's equipment. So that PG&E was able to provide the information requested

27 ⁹ See Stats and Events, CAL FIRE, <https://www.fire.ca.gov/stats-events/> (last visited Aug. 16,
 28 2021).

1 by the Court in the time period provided by the Court, PG&E limits its response as described above,
2 which allows PG&E to rely on its ongoing work to track and gather information for CPUC
3 Reportable Ignitions for its annual submissions to the CPUC. (*See* CPUC Decision 08-11-005,
4 Appendix C.) To the extent that the Court would like additional information about non-reportable
5 ignitions (*e.g.*, ignitions that affect only PG&E’s equipment or that travel less than one linear meter),
6 PG&E can prepare a supplemental response at the Court’s request.

7 As requested by the Court, Appendix A includes columns for each reported ignition’s
8 start date, suspected initiating event, number of acres burned, number of structures burned and
9 number of fatalities. As part of PG&E’s ongoing work to prepare its annual submissions to the
10 CPUC, PG&E gathers and tracks this information from CAL FIRE reports, in-field observations or
11 other sources. Based on that ongoing work, PG&E’s records do not reflect any of the ignitions listed
12 in Appendix A as resulting in any fatalities, and they reflect one structure being destroyed on
13 June 16, 2021 as a result of an ignition for which the suspected initiating event is contact with a bird.

1 Dated: August 16, 2021

Respectfully Submitted,

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Appendix A2021 Wildfire Season Ignitions in HFTDs as of August 6, 2021

Date	Size	Structures Destroyed	Fatalities	Suspected Initiating Event
May 10, 2021	<3 meters of linear travel	0	0	Contact–Animal–Bird
May 10, 2021	<0.25 Acres	0	0	Vegetation Contact
May 10, 2021	0.26-9.99 Acres	0	0	Vegetation Contact
May 11, 2021	Structure-only	0	0	Equipment Failure
May 12, 2021	3 meters–0.25 Acres	0	0	Vegetation Contact
May 16, 2021	3 meters–0.25 Acres	0	0	Contact–Animal–Bird
May 17, 2021	<0.25 Acres	0	0	Equipment Failure
May 17, 2021	<0.25 Acres	0	0	Unknown
May 19, 2021	0.26-9.99 Acres	0	0	Vegetation Contact
May 20, 2021	<0.25 Acres	0	0	Vegetation Contact
May 20, 2021	3 meters–0.25 Acres	0	0	Contact–3rd Party
May 21, 2021	<0.25 Acres	0	0	Equipment Failure
May 24, 2021	1 meter–< 3 meters	0	0	Vegetation Contact
May 29, 2021	3 meters–0.25 Acres	0	0	Equipment Failure
May 31, 2021	10-99 Acres	0	0	Under Investigation
June 2, 2021	0.26-9.99 Acres	0	0	Vegetation Contact
June 3, 2021	<3 meters of linear travel	0	0	Vegetation Contact
June 6, 2021	Structure-only	0	0	Under Investigation
June 6, 2021	10-99 Acres	0	0	Vegetation Contact
June 7, 2021	<3 meters of linear travel	0	0	Vegetation Contact
June 10, 2021	<3 meters of linear travel	0	0	Vegetation Contact
June 10, 2021	<0.25 Acres	0	0	Vegetation Contact
June 16, 2021	<0.25 Acres	0	0	Equipment Failure
June 16, 2021	<3 meters of linear travel	1	0	Contact–Animal–Bird
June 16, 2021	0.26-9.99 Acres	0	0	Vegetation Contact
June 16, 2021	<0.25 Acres	0	0	Vegetation Contact
June 17, 2021	<0.25 Acres	0	0	Vegetation Contact
June 18, 2021	0.26-9.99 Acres	0	0	Vegetation Contact
June 19, 2021	<0.25 Acres	0	0	Equipment Failure
June 19, 2021	<0.25 Acres	0	0	Vegetation Contact
June 20, 2021	0.26-9.99 Acres	0	0	Vegetation Contact
June 20, 2021	<0.25 Acres	0	0	Vegetation Contact
June 24, 2021	<0.25 Acres	0	0	Contact–3rd Party
June 24, 2021	<3 meters of linear travel	0	0	Equipment Failure
June 26, 2021	<0.25 Acres	0	0	Equipment Failure
June 26, 2021	<0.25 Acres	0	0	Contact–3rd Party
June 26, 2021	0.26-9.99 Acres	0	0	Vegetation Contact
June 28, 2021	<3 meters of linear travel	0	0	Equipment Failure

Date	Size	Structures Destroyed	Fatalities	Suspected Initiating Event
June 29, 2021	100-299 Acres	0	0	Under Investigation
July 2, 2021	<0.25 Acres	0	0	Contact-3rd Party
July 3, 2021	<3 meters of linear travel	0	0	Contact-Animal-Other
July 4, 2021	0.26-9.99 Acres	0	0	Contact-Animal-Other
July 7, 2021	0.26-9.99 Acres	0	0	Equipment Failure
July 8, 2021	0.26-9.99 Acres	0	0	Equipment Failure
July 8, 2021	<0.25 Acres	0	0	Equipment Failure
July 8, 2021	0.26-9.99 Acres	0	0	Vegetation Contact
July 8, 2021	<0.25 Acres	0	0	Equipment Failure
July 10, 2021	<0.25 Acres	0	0	Contact-Animal-Bird
July 10, 2021	<3 meters of linear travel	0	0	Vegetation Contact
July 11, 2021	0.26-9.99 Acres	0	0	Vegetation Contact
July 12, 2021	0.26-9.99 Acres	0	0	Contact-Animal-Bird
July 12, 2021	0.26-9.99 Acres	0	0	Contact-3rd Party
July 12, 2021	<3 meters of linear travel	0	0	Equipment Failure
July 13, 2021	<0.25 Acres	0	0	Vegetation Contact
July 14, 2021	<0.25 Acres	0	0	Vegetation Contact
July 19, 2021	<0.25 Acres	0	0	Vegetation Contact
July 21, 2021	<0.25 Acres	0	0	Vegetation Contact
July 21, 2021	0.26-9.99 Acres	0	0	Equipment-Overloaded
July 25, 2021	<0.25 Acres	0	0	Vegetation Contact
July 27, 2021	<0.25 Acres	0	0	Vegetation Contact
July 31, 2021	<0.25 Acres	0	0	Equipment Failure
July 31, 2021	<0.25 Acres	0	0	Equipment-Overloaded