

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

No. CR 14-0175 WHA

v.

PACIFIC GAS AND ELECTRIC  
COMPANY,

Defendant.

**FOLLOW-UP QUESTIONS RE  
DIXIE AND FLY FIRES**

By **NOON ON AUGUST 25**, PG&E shall please answer these following questions, except responses to Question No. 7 and thereafter may be submitted by **NOON ON AUGUST 31**.

1. The photo of the stump submitted on July 28 does not comport with the other photos from the scene submitted on that date. The stump is shown as burned to a crisp and about three-quarters gone, yet the limbs and needles very close by are green and unburned. Seems impossible. Moreover, the other photos show the fallen Douglas Fir as unburned and green (save for the line burns). How could the stump have burned so thoroughly yet the rest of the tree remain so unburned? This incongruity does not match up. Please explain. Provide the true picture of the true stump, as well as all other photos, including a photo of the bottom of the trunk of the Douglas Fir.

2. While the photos were being taken, what was the status of the Dixie Fire and who was trying to contain it? Who took the photos?

3. Please provide a sketch map with the following shown, approximately to scale, with respect to the Dixie Fire:

- (a) The Bucks Creek 1101 Line;
- (b) The fuse hanging down;
- (c) The place at the Cresta Dam for which the troubleman saw the fuse hanging down (using binoculars);
- (d) The Bucks Creek substation;
- (e) Rock Creek Switching Center;
- (f) The route that the troubleman took to reach the pole with the hanging fuse;
- (g) The Douglas Fir on the line;
- (h) The 600 or 800 square-foot fire first seen by the Troubleman;
- (i) Where the drone was seen; and
- (j) All other roads that would have allowed access to the location where the fuse was hanging down.

4. The Court has received information that PG&E informed the Monitor of the following: PG&E believed that the drone that interfered with Dixie firefighting on July 13 was being flown by a PG&E contractor at the time of the interference. PG&E believed that the contractor was not doing work for PG&E at the time of the interference, however, because records indicated that it had completed PG&E surveillance work for the day. Is it true that PG&E did believe that a PG&E contractor operated the drone (regardless of whether it was on behalf of PG&E or not)? What was the source of this information? Does PG&E still believe that?

5. The circuit was ranked 11 out of 3,635 circuits with respect to the Equipment Risk. Please state each reason the circuit received such an elevated risk rating.

6. The circuit was ranked 568 of 3,074 circuits with respect to Vegetation Risk. Please state each reason the circuit received such an elevated risk rating.

1           7. Please provide copies of all reports and memos and emails regarding the site visit  
2 on April 16, 2021, regarding the plan for under-grounding the circuit and all reports and  
3 memos and emails summarizing, describing or referring to the need to do so or the proposal to  
4 do so or the problem leading to such proposals.

5           8. What indications are there that the Douglas Fir broke and fell onto the Bucks  
6 Circuit?

7           9. What indications are there that the Douglas Fir uprooted and fell onto the Bucks  
8 Circuit?

9           10. Please state all other information on why the Douglas Fir fell.

10           11. Please state all information and data on local or regional wind gusts or wind  
11 conditions at or about the time of power interruptions near the Douglas Fir.

12           12. With respect to the patrols on November 11, 2020, and January 14, 2021, what was  
13 identified for work, if anything, within one-quarter mile of the Douglas Fir?

14           13. With respect to any other patrols or inspection within the last five years, please state  
15 all other work, if any, was specified within one-quarter mile of the Douglas Fir.

16           14. Turning to the Fly Fire, what indications are there that the White Fir broke and fell  
17 onto the Gasner Circuit?

18           15. What indications are there that the White Fir uprooted and fell into the Gasner  
19 Circuit?

20           16. Please state all other information on why the White Fir failed and fell.

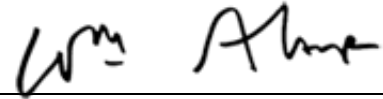
21           17. Please state all information and data about local or regional wind gusts and wind  
22 conditions at about the time of the Fly Fire ignition.

23           18. Please provide photos of the White Fir after it fell onto the Gasner Circuit sufficient  
24 to show (i) whether it broke versus uprooted; (ii) the extent to which the tree burned; and  
25 (iii) whether the White Fir had disease or death (if any).  
26  
27  
28

1           19. What actual evidence indicates that the Fly Fire was started by a spot fire from the  
2 Dixie Fire?

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4           **IT IS SO ORDERED.**

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6           Dated: August 17, 2021.



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WILLIAM ALSUP  
UNITED STATES DISTRICT JUDGE