Incident Investigation Report Reference Documents SED Incident E20210802-01 (Fly Fire)

#### Requesters: Hassan Jahami, Emily Fisher, and Samuel Mandell Request Date: February 4, 2022 Response Date: March 4, 2022

#### **Question 44:**

Describe what were the ambient conditions (e.g., wind speed, dry-bulb temperature, relative humidity, etc.) as recorded by PG&E's nearest weather station at the time of the incident?

#### **Response to Question 44:**

The closest PG&E weather station to the area of interest, designated PG315 "Bucks Lake Road", is located 4.11 miles from the area of interest at the following coordinates: 39.94472N, 120.98215W; Elevation 3443 FT.

We are producing weather data reported by station PG315 from 15:00 hours on July 21, 2021 to 19:00 hours on July 22, 2021. This data was extracted from our internal databases and is produced at Bates number PGE-FLY-CPUC-000000238.

Requesters: Will Dundon, Samuel Mandell, Layla Labagh Request Date: October 25, 2022 Response Date: November 18, 2022

#### **Question 2:**

Did PG&E representatives see downed conductors in the span between poles 100389434 and 100389433 while collecting the Smart Meters from and a span on July 25, 2021?

#### **Response to Question 2:**

On July 25, 2021, the United States Forest Service ("USFS") had blocked off the suspected origin site, and PG&E employees were not given access to the area. Based on observations from outside the areas cordoned off by the USFS, to the best of their recollection, the PG&E employees could see lines that were either down or sagging and at least one tree that had fallen over, but were not able to make any observations as to whether the downed or sagging lines and fallen vegetation were a cause of fire activity or the result of fire activity. Notably, the Fly Fire caused extensive damage to utility equipment and vegetation outside of the origin area as well.



### PACIFIC GAS AND ELECTRIC COMPANY

# **ELECTRIC INCIDENT REPORT FORM**

## **TO: CALIFORNIA PUBLIC UTILITIES COMMISSION**

PG&E Reference Number: EI210722B	
CPUC Website	August 2, 2021 at 2006 hours
CPUC Recipient	Date & Time CPUC Notified
1-800-235-1076	PG&E
Telephone Number	Reported by
	415-973-2782
	Telephone Number

#### Report Type: 20-Day Report

X

**INJURY/FATALITY:** An incident which results in a fatality or personal injury to an employee or 3rd party rising to the level of in-patient hospitalization and is attributable or allegedly attributable to utility owned electric facilities. Incidents involving motor vehicles are not reportable unless they result in death or injury attributable or allegedly attributable to electrical contact with the utility owned electric facilities.

**MEDIA:** An incident that is attributable or allegedly attributable to Pacific Gas and Electric owned electric facilities and is subject to significant public attention and/or media coverage.

**PROPERTY DAMAGE:** A single electric incident where property damage of the utility or a single 3rd party is estimated to exceed \$50,000 and is attributable or allegedly attributable to utility owned electric facilities.

**OPERATOR JUDGEMENT:** Any incident that is significant in the judgement of the operator, even though it may not meet the incident reporting criteria.

#### PACIFIC GAS AND ELECTRIC COMPANY



## **ELECTRIC INCIDENT REPORT FORM**

## **TO: CALIFORNIA PUBLIC UTILITIES COMMISSION**

20-Day Report

Date and Time of Incident:	July 22, 2021 at 1650 hours							
Date and Time Incident Determined Re	August 2,	August 2, 2021 at 1700 hours						
Location of Incident:	Butterfly V	Butterfly Valley Twain Road and Highway 70						
City: Quincy	City: Quincy				North Valley County:		as	
Circuit/Facility: Gansner 1101		Voltage:	12kV					
Service Interrupted (Date and Time):	, 2021 at 1650 hours			Total Customers Affected:				
Service Restored (Date and Time):	ed Restoration in Progress					223		

#### **Description of Incident:**

On July 22, 2021, between approximately 1649 and 1650 hours, data available to PG&E indicates electric SmartMeters off a single-phase tap line on PG&E's three-phase Gansner 1101 12kV Distribution Circuit (the "Gansner 1101 Circuit") reported powering down. The tap line serves customers off Butterfly Valley Twain Road, southwest of Highway 70 in Quincy, California. These meters were located downstream from customers in the area of 435 and 563 Butterfly Valley Twain Road, which is roughly four-tenths of a mile from where Butterfly Valley Twain Road branches off Highway 70 ("Area of Interest").

At approximately 1650 hours, certain line reclosers source side of the Area of Interest recorded alarms and other activity impacting each phase of the Gansner 1101 Circuit. The second second second fault currents are corded fault currents exceeding the Minimum to Trip threshold. However, the duration of the fault current was not long enough to cause the line recloser to open and de-energize the line downstream.

PG&E has identified smoke from what appears to be the Fly Fire in videos taken from Fire Watch cameras starting at approximately 1701 hours. The InciWeb Incident Information System website identifies the start time of the Fly Fire as approximately 1715 hours.

At approximately 1810 hours, a Distribution Control Center operator remotely de-energized the portions of the Gansner 1101 Circuit The outage resulted in approximately 223 customers out of power. At approximately 1921 hours, the United States Forest Service ("USFS") contacted PG&E's Emergency Phone Line to request de-energization of power lines approximately three miles west of 39696 Highway 70 in Quincy. At approximately 1942 hours, a PG&E troubleman was dispatched to the area. By 1945 hours, the troubleman confirmed both transmission and distribution lines were already de-energized.

On July 25, 2021, PG&E assisted the USFS in collecting two SmartMeters from properties located on Butterfly Valley Twain Road. At that time, PG&E observed the USFS investigating the broader area near 435 and 563 Butterfly Valley Twain Road. On August 2, 2021, the USFS requested assistance from PG&E in moving and examining a white fir that was resting on PG&E's lines on the Gansner 1101 Circuit (the "white fir") to which PG&E agreed.

On August 4, 2021, PG&E assisted the USFS in collecting evidence from three spans on the Gansner 1101 Circuit in the Area of Interest, including portions of the white fir and the conductors and the equipment on the poles (including cross arms, insulators, and fuses, but excluding transformers and the bottom portions of the poles themselves). While assisting the USFS, PG&E observed that the conductors had what appeared to be burn marks or other signs of disturbance near the areas that may have been in contact with the white fir and also that the white fir had burn marks near the areas that may have been in contact with the conductors.

PG&E reported this incident to the CPUC on August 2, 2021 under the Media criterion due to significant media attention. The National Wildfire Coordinating Group website (the "website") reported as of July 25, 2021 at 0000 hours that the Fly Fire had consumed 4,300 acres, and that as of the night of July 24/25, 2021 the Fly Fire had merged with the Dixie Fire and that the website would not be providing further updates on the Fly Fire. The website did not provide statistics regarding the number of structures that were damaged or destroyed by the Fly Fire, but PG&E has observed at least two structures damaged or destroyed by fire on Butterfly Valley Twain Road.

This incident remains under investigation and this information is preliminary. The cause of this incident has not been determined and may not be fully understood until further investigation is complete and additional information becomes available. PG&E understands that the USFS is investigating this incident, and PG&E continues to cooperate with the investigation. PG&E is continuing its investigation and will develop corrective actions if deemed necessary.



## PACIFIC GAS AND ELECTRIC COMPANY

# **ELECTRIC INCIDENT REPORT FORM**

Attachments:

• Attachment 07a\_Photos\_Photos.zip

- Attachment 07b\_Photos\_Photos.zip
- Attachment 07c\_Photos\_Photos.zip

#### Requesters: Hassan Jahami, Emily Fisher, Samuel Mandell Request Date: February 4, 2022 Response Date: May 27, 2022

#### **Question 25:**

Provide logs documenting the number of faults and other protective device relay operations that occurred on the affected section of the Subject Circuit during the past three years.

#### **Response to Question 25:**

We understand "faults and other protective device relay operations" to refer to momentary or sustained outages recorded by line reclosers or circuit breakers monitoring the affected section of the Gansner 1101 12kV Distribution Circuit ("Subject Devices").

We are producing a log of faults and other protective device relay operations recorded by the Subject Devices from July 1, 2018 to July 31, 2021 in Table 1 below.<sup>1</sup> The table below lists certain fuses as being a device that operated. To be clear, however, fuses do not record data. These fuses are listed because our outage management system can examine outage information reported by SmartMeters and estimate that a particular fuse may have opened. A physical inspection is required to confirm whether the fuse opened. We are also producing corresponding reports of outages on the Gansner 1101 Circuit from July 1, 2018 to July 31, 2021 from PG&E's Integrated Logging and Information System Operations Database ("ILIS"), at the Bates ranges provided in Table 1 below.

We are only producing entries or records relating to outages that are corroborated by SCADA data or Operations logs for the Subject Devices. We are not producing records of outages automatically populated into the ILIS database from SmartMeter data that indicate a momentary outage took place, but that are not corroborated by SCADA data or Operations logs for the Subject Devices. Such lack of corroboration indicates that these outages may not have actually occurred on the devices listed in the ILIS outage reports.

We are also not producing entries related to planned outages and Public Safety Power Shutoff ("PSPS") outages recorded by the Subject Devices, as these outages typically do not involve the automatic operation of a source side protective device. As we explain in our responses to the SED's Fly Fire Data Request Number 001, Questions 41 and 46, the Gansner 1101 Circuit did not meet the threshold criteria for inclusion in any PSPS events in July 2021.

<sup>&</sup>lt;sup>1</sup> We note that there are few faults or other protective device relay operations listed for LR 46826 because LR 46826 was a temporary device. It was installed to provide additional protection while the Gansner 1101 Circuit was temporarily sourced by generators, as indicated on the single-line diagram previously provided in our response to SED's Fly Fire Data Request Number 001, Question 6.

	Table 1: Faults and Protective Device Relay Operations, Gansner 1101 Circuit, July 1, 2018 to July 31, 2021										
Date	First "No- Light" Time	Device	Type of Outage	Type of Fault	Current Magnitude	Event Duration	Phases Involved <sup>2</sup>	ILIS Event Report	ILIS Cause	Corrective Action	Bates Reference
12/14/2018	20:50:00	Fuse 18101	Sustained	Force Out	N/A	2 hours, 9 minutes	N/A	18- 0109301	Equipment Failure/Involved – Overhead – Leaning Pole	Switching work on 12/14/2018 restored power.	PGE-FLY- CPUC- 0000010926
2/13/2019	06:41:00	Fuse 1797	Sustained	Line to Ground	No Data	8 hours, 4 minutes	No Data	19- 0022093	Vegetation – Tree branch fell on line	Switching work on 2/13/2019 restored power.	PGE-FLY- CPUC- 0000010929
2/13/2019	07:50:00	Fuse 18101	Sustained	Line to Ground	No Data	6 hours, 55 minutes	No Data	19- 0021890	Vegetation – Tree fell into line	Switching work on 2/13/2019 restored power.	PGE-FLY- CPUC- 0000010932
2/26/2019	01:49:00	Fuse 1797	Sustained	Multi- Fault	No Data	63 hours, 3 minutes	No Data	19- 0028383	Vegetation – Tree fell into line	Power restored after repairs were made.	PGE-FLY- CPUC- 0000010935
2/26/2019	01:49:00	Fuse 18101	Sustained	Multi- Fault	No Data	63 hours, 3 minutes	No Data	19- 0028383	Vegetation – Tree fell into line	Power restored after repairs were made.	PGE-FLY- CPUC- 0000010935
7/13/2019	13:46:00	LR 2424	Momentary	Force Out	N/A	0 hours, 0 minutes	N/A	19- 0077075	Equipment Failure/Involved – Overhead – Regulator not operating	Switching work on 7/13/2019 restored power.	PGE-FLY- CPUC- 0000010938
11/26/2019	21:47:00	LR 99388	Momentary	Line to Line	Ia = 1862 A/ Ic = 1841 A	0 hours, 0 minutes	A-C	19- 0129686	Unknown Cause – Patrol Not Conducted	Switching work on 11/26/2019 restored power.	PGE-FLY- CPUC- 0000010941

<sup>&</sup>lt;sup>2</sup> We note that phases involved are as recorded by the device and may not match between devices.

	Table 1: Faults and Protective Device Relay Operations, Gansner 1101 Circuit, July 1, 2018 to July 31, 2021										
Date	First "No- Light" Time	Device	Type of Outage	Type of Fault	Current Magnitude	Event Duration	Phases Involved <sup>2</sup>	ILIS Event Report	ILIS Cause	Corrective Action	Bates Reference
2/25/2020	11:19:00	LR 2424	Momentary	Force Out	N/A	0 hours, 0 minutes	N/A	20- 0025647	Vegetation – Tree branch fell on line	Clearance and switching work conducted, power restored on 2/25/2020.	PGE-FLY- CPUC- 0000010944
5/17/2020	09:41:00	LR 2424	Sustained	Line to Ground	Ic = 300 A/ 3I0 = 285 A	2 hours, 45 minutes	C-G	20- 0050971	Equipment Failure/Involved – Overhead – Lightning Arrestor Failed/Faulted	Switching work on 5/17/2020 restored power.	PGE-FLY- CPUC- 0000010947
8/8/2020	06:22:00	Fuse 18101	Sustained	Force Out	No Data	9 hours, 1 minute	No Data	20- 0081013	Vegetation – Trees grew into line – Line manually de-energized to allow for hazard clearance	Power restored after hazard cleared.	PGE-FLY- CPUC- 0000010950
8/27/2020	14:35:00	LR 2424	Sustained	Line to Ground	Ia = 94 A/ 3I0 = 87 A	3 hours, 27 minutes	A-G	20- 0090756	3rd Party – Vehicle	Power restored after repairs made.	PGE-FLY- CPUC- 0000010953
8/27/2020	14:35:00	Fuse 18101	Sustained	Open on Dead Line	N/A	3 hours, 27 minutes	N/A	20- 0090756	3rd Party – Vehicle	Power restored after repairs made.	PGE-FLY- CPUC- 0000010953
9/27/2020	15:45:00	CB 1101/2	Sustained	None	N/A	5 hours, 10 minutes	N/A	20- 0102117	Unknown Cause – Patrol Found Nothing	Transmission outage. Patrol found no cause; switching work on 9/27/2020 restored power.	PGE-FLY- CPUC- 0000010956
9/27/2020	15:45:00	LR 99388	Sustained	Open on Dead Line	N/A	5 hours, 10 minutes	N/A	20- 0102117	Unknown Cause – Patrol Found Nothing	Transmission outage. Patrol found no cause;	PGE-FLY- CPUC- 0000010956

	Table 1: Faults and Protective Device Relay Operations, Gansner 1101 Circuit, July 1, 2018 to July 31, 2021										
Date	First "No- Light" Time	Device	Type of Outage	Type of Fault	Current Magnitude	Event Duration	Phases Involved <sup>2</sup>	ILIS Event Report	ILIS Cause	Corrective Action	Bates Reference
										switching work on 9/27/2020 restored power.	
11/17/2020	13:14:00	LR 336664	Sustained	Line to Line	No Data	12 hours, 26 minutes	No Data	20- 0121955	Vegetation – Tree fell into line	Power restored after repairs made.	PGE-FLY- CPUC- 0000010960
11/17/2020	13:1 <b>4</b> :00	Fuse 18101	Sustained	Open on Dead Line	N/A	12 hours, 26 minutes	N/A	20- 0121955	Vegetation – Tree fell into line	Power restored after repairs made.	PGE-FLY- CPUC- 0000010960
1/27/2021	21:56:00	Fuse 18101	Sustained	Line to Line	No Data	17 hours, 14 minutes	No Data	21- 0017313	Vegetation – Tree fell into line	Patrol and repairs conducted on 1/28/2021; power restored automatically.	PGE-FLY- CPUC- 0000010963
1/28/2021	08:37:00	LR 336664	Sustained	Line to Line	Ia = 67 A/ Ic = 96 A	17 minutes	A-C	21- 0017272	Unknown Cause – Patrol Not Conducted	Switching work on 1/28/2021 restored power.	PGE-FLY- CPUC- 0000010966
7/21/2021	16:07:00	LR 99388	Sustained	Force Out	N/A	30 minutes	N/A	21- 0092837	PG&E Initiated – Construction Activity/Equipment	Power restored after temporary generator configuration established.	PGE-FLY- CPUC- 0000010969
7/21/2021	16:16:00	CB 1101/2	Sustained	Force Out	N/A	17 minutes	N/A	21- 0092837	PG&E Initiated – Construction Activity/Equipment	Power restored after temporary generator configuration established.	PGE-FLY- CPUC- 0000010969

Date	First "No- Light" Time	Device	Type of Outage	Type of Fault	Current Magnitude	Event Duration	Phases Involved <sup>2</sup>	ILIS Event Report	ILIS Cause	Corrective Action	Bates Reference
7/21/2021	16:16:00	LR 46826	Sustained	Force Out	N/A	17 minutes	N/A	21- 0092837	PG&E Initiated – Construction Activity/Equipment	Power restored after temporary generator configuration established.	PGE-FLY- CPUC- 0000010969
7/22/2021	<b>1</b> 6:50:00	Fuse 1797	Sustained	Line to Ground	No Data	42 days, 1 hour, 3 minutes	No Data	21- 0093767	Environmental/External – Fire – Forest/Grass	Fly Fire event. Restoration and switching work conducted. Part of the Gansner 1101 Circuit re- energized on 7/24, all remaining customers re- energized by 11/5.	PGE-FLY- CPUC- 000001097:
7/22/2021	18:02:00	Fuse 18101	Sustained	Line to Ground	No Data	28 days, 18 hours, 20 minutes	No Data	21- 0093767	Environmental/External – Fire – Forest/Grass	Fly Fire event. Restoration and switching work conducted. Part of the Gansner 1101 Circuit re- energized on 7/24, all remaining customers re- energized by 11/5.	PGE-FLY- CPUC- 000001097

	First "No-		e 1: Faults an Type of	d Protective Type of	e Device Relay Current	Operations, Event	Gansner 110 Phases	)1 Circuit, Jul	y 1, 2018 to July 31, 2021	Corrective	Bates
Date	Light" Time	Device	Outage	Fault	Magnitude	Duration	Involved <sup>2</sup>	Report	ILIS Cause	Action	Reference
7/22/2021	18:10:00	LR 2424	Sustained	Force Out	Ic = 34 A/ 3I0 = 29 A <sup>3</sup>	43 hours, 57 minutes	C-G	21- 0093767	Environmental/External – Fire – Forest/Grass	Fly Fire event. Restoration and switching work conducted. Part of the Gansner 1101 Circuit re- energized on 7/24, all remaining customers re- energized by 11/5.	PGE-FLY- CPUC- 0000010972

<sup>&</sup>lt;sup>33</sup> LR 2424 did not operate automatically, but we are providing the current magnitude because a Distribution Control Center operator opened LR 2424 manually after noticing above-baseline ground amps. This current, although above baseline, was below LR 2424's Minimum to Trip ("MTT") threshold, which is 70 amps for ground. We refer to our response to the SED's Fly Fire Data Request Number 001, Question 23 for additional information related to LR 2424's MTT threshold.

Requesters: Will Dundon, Samuel Mandell, and Emily Fisher Request Date: July 1, 2022 Response Date: September 2, 2022

#### **Question 11:**

Based on the TCC curve, and the fault currents detected in the Subject Circuit, at what time did Fuse 18101 (#1) blow, approximately?

#### **Response to Question 11:**

We estimate, based on available SmartMeter and fault current data, that Fuse 18101 (#1) blew at approximately 1802 hours. The data also indicates that Fuse 1797 likely blew at approximately 1650 hours, although we cannot confirm that this fuse definitively operated because it was collected by the United States Forest Service and we have not gained access to examine it. Fuses also do not record when they operate.

#### Requesters: Will Dundon, Samuel Mandell, and Emily Fisher Request Date: July 1, 2022 Response Date: September 9, 2022

### **Question 16:**

Please answer the following questions regarding de-energization of a distribution power line:

- a. Describe the data and information PG&E's Distribution Operators have access to when making a decision to de-energize the line?
- b. Describe the process of deciding to de-energize the line and explain specifically in the context of what the operator would have known on July 22, 2021 with regard to the Subject Circuit.
- c. Did the Distribution Operators have access to the oscillography data that showed the fault?
- d. Describe what customer information the Distribution Operators were aware of for the Subject Circuit?
- e. Did PG&E receive any calls from customers regarding outages on the Subject Circuit from 1600 hours to 1810 hours, when the Distribution Operators remotely de-energized the circuit?
- f. List all SCADA alarms the Distribution Operator saw for the subject circuit, originating near the incident area on July 22, 2021 from 1550 hours to 1810 hours with the time and priority level (as described in in PG&E Utility Procedure TD-2700P-09).

#### **Response to Question 16:**

- a. When making a decision to de-energize a line, our Distribution Operators have access to Outage Management Tool ("OMT"),<sup>1</sup> Supervisory Control and Data Acquisition ("SCADA") data and any information from personnel in the field.
- b. In deciding to de-energize a line, our Distribution Operators rely on many sources of information, including SCADA alarms, discussed below. We are unable to confirm definitively which information Distribution Operators considered before deciding to de-energize the Gansner 1101 12kV Distribution Circuit (the "Gansner Circuit") on July 22, 2021, but generally speaking, Distribution Operators are constantly monitoring the electrical system and any planned work. Some additional relevant guidance can be found in TD-2700P-06 and TD-2700P-09, which we previously produced at Bates ranges PGE-

<sup>&</sup>lt;sup>1</sup> OMT is a tool used to manage each outage. It tracks, for example, the relevant device information, the relevant customer information and the PG&E personnel assigned to address the outage, and it sends such information to PG&E personnel in the field.

# FLY-CPUC-0000000280 to PGE-FLY-CPUC-0000000294 and PGE-FLY-CPUC-0000000388 to PGE-FLY-CPUC-0000000400, respectively.

As discussed in our response to the SED's Fly Fire Data Request Number 002, Question 17, at 1650 hours on July 22, 2021, the Distribution Operator observed alarms related to fault current, but the alarms were not sustained because the faults did not meet the relevant devices' minimum-to-trip thresholds. Because the alarms indicated that the fault cleared, the Distribution Operator did not de-energize the line.

At approximately 1655 hours, Distribution Operators saw that SmartMeters near the Incident Area had powered down. The time delay between the fault currents at 1650 hours and the Distribution Operators receiving the SmartMeter outages at 1655 hours is due to the internal process whereby SmartMeters communicate with each other to confirm that there are sustained outages and not just momentary outages.

Once the Distribution Operators were aware of the sustained SmartMeter outages, a PG&E troubleman was dispatched to the Incident Area less than ten minutes later, at 1703 hours. Typically, Distribution Operators make the decision to de-energize a line in response to information coming directly from a troubleman or other personnel in the field. The troubleman who was dispatched was already in the field and planned to travel to the Incident Area, but he had to leave the field in order to evacuate his home. After he reached his home, at around 1808 hours, he observed smoke near the Incident Area from a distance and advised the Distribution Operator to de-energize the line. The Operator therefore opened Line Recloser ("LR") 2424 at approximately 1810 hours. We note that the area of line near the incident area was likely de-energized earlier, as the data indicates that Fuse 1797 likely blew at approximately 1650 hours, as discussed in our response to the SED's Fly Fire Data Request Number 002, Question 11.

- c. We understand subpart (c) of this Question as referring to oscillography data related to the Gansner Circuit on July 22, 2021. The Distribution Operators did not have access to oscillography data for the Gansner Circuit on July 22, 2021 at or around 1650 hours. Oscillography data is not available in real time during an event because it has to be downloaded from the relevant devices after the fact.
- d. PG&E has interconnections between many systems that provide customer data for use during operations and in post-operations investigations. Below we describe the customer information that is typically available in our systems. This data is the data that Distribution Operators most commonly use during events, and it was available to the Distribution Operators during the Fly Fire event.

The Distribution Management System ("DMS") provides the electrical connectivity information for the distribution grid.<sup>2</sup> Customer information for a particular outage is

<sup>&</sup>lt;sup>2</sup> DMS contains data on all of PG&E's distribution lines and equipment, as well as how the electric distribution system is connected. It presents visually where all of the equipment is located geographically, and it can be used to trace circuits and provide information from other systems related to devices and outages—in other words, the user can mark where an outage is in the system and DMS will then calculate the number of customers downstream from that outage.

available through the DMS servers, which connects to OMT. OMT pulls relevant data from the Customer Care & Billing ("CC&B") database.<sup>3</sup>

DMS has links to two main screens from Outage Dispatch Tool ("ODT"), which is a part of OMT. The first is Outage Trouble Report screen. It includes fields with customer data such as:

- 1. Call Time
- 2. Transformer ID
- 3. Customer Name
- 4. Customer Address
- 5. Premise Phone Number
- 6. Contact Phone Number
- 7. Reported By (e.g., customer, SmartMeter or Mixed)

The second main linked ODT screen is the Affected Customers screen that contains the following customer data:

- 1. Service Point ID ("SPID")
- 2. Customer Name
- 3. Priority
- 4. Rate Schedule
- 5. Customer Type (e.g. Commercial or residential)
- 6. Transformer ID
- 7. Advanced Metering Infrastructure ("AMI") (Restoration)
- 8. AMI (Partial Voltage)
- 9. Meter Number
- 10. Service Address
- 11. Premise Phone
- 12. Contact Phone
- 13. City
- 14. Zip Code

Additional customer information can be obtained through other means but is not typically used by Operators during restoration activities without a particular need.

- e. We did not receive any calls from customers regarding outages on the relevant section of the Gansner Circuit<sup>4</sup> from 1600 hours to 1810 hours on July 22, 2021.
- f. We are producing the SCADA alarms the Distribution Operators saw for the Gansner Circuit originating near the Incident Area<sup>5</sup> on July 22, 2021 at Bates number PGE-FLY-CPUC-0000011476.

<sup>&</sup>lt;sup>3</sup> CC&B is PG&E's customer information system. It holds all customer account information, including payment and billing information, contact information, meter information and more.

<sup>&</sup>lt;sup>4</sup> We understand the relevant section of the Gansner Circuit to be the spans between Pole 100389432 and Pole 100389435.

<sup>&</sup>lt;sup>5</sup> We understand the "Incident Area" to refer to the spans between Pole 100389432 and Pole 100389435 on the Gansner Circuit. We are producing SCADA alarms corresponding with the devices near the Incident Area, *i.e.*, Line

Recloser ("LR") 2424, LR 99388 and LR 336664. Please note, alarms have assigned priority levels ranging from Priority 1 (P01) (lowest) to Priority 10 (P10) (most critical).

#### Requesters: Hassan Jahami, Emily Fisher, and Samuel Mandell Request Date: February 4, 2022 Response Date: May 2, 2022

#### **Question 22:**

Indicate if any protection devices on the Subject Circuit operated at any time, from 24 hours prior to the start of the Fly Fire up to 24 hours after the start of the Fly Fire. Provide a log and screenshots of the event summary for each of the protective devices that activated on the Subject Circuit during the 24-hour periods before and after the start of the Fly Fire.

#### **Response to Question 22:**

We understand the "Subject Circuit" in this Question as referring to the Gansner 1101 12kV Distribution Circuit (the "Gansner 1101 Circuit"). We refer to our response to SED's Fly Fire Data Request 001, Question 19 for electrical operations associated with the protective devices on the Gansner 1101 Circuit related to the incident.

We refer to our response to SED's Fly Fire Data Request 001, Question 21 for Supervisory Control and Data Acquisition ("SCADA") Interval and Event Data between July 21, 2021 at 0000 hours and July 23, 2021 at 2400 hours for Line Reclosers ("LR") 99388, 336664 and 2424 on the Gansner 1101 Circuit.<sup>1</sup> These protective devices, in addition to LR 46826, collect oscillography data for recorded electrical events. We are producing screenshots of this data, along with other data downloaded from these protective devices, at Bates range PGE-FLY-CPUC-0000004117 to PGE-FLY-CPUC-0000004156.

<sup>&</sup>lt;sup>1</sup> We note that our records do not contain SCADA Interval and Event Data for LR 46826 because LR 46826 was a temporary device. It was installed to provide additional protection while the Gansner 1101 Circuit was temporarily sourced by generators, as indicated on the single-line diagram previously provided in our response to SED's Fly Fire Data Request 001, Question 6.

#### Requesters: Hassan Jahami, Emily Fisher, and Samuel Mandell Request Date: February 4, 2022 Response Date: April 29, 2022

#### **Question 1:**

Provide a timeline of the actions PG&E took which were directly related to the Fly Fire. The timeline should begin 24 hours prior to the start of the fire to the last occurring of all of the following events: when the United States Forest Service (USFS) obtained PG&E facilities for evidence, when USFS released the incident location, and when PG&E completed all repairs.

#### **Response to Question 1:**

Below is a timeline of the actions we took directly related to the Fly Fire from 24 hours prior to July 22, 2021 at approximately 5:15 p.m., which is the start time of the Fire as identified on the InciWeb Incident Information System website, until we downloaded data from two SmartMeters collected by the United States Forest Service ("USFS") on November 18, 2021. We are also including in this timeline actions we took with respect to protective devices on the single-line diagram produced in response to the SED's Fly Fire Data Request Number 001, Question 6 at Bates number PGE-FLY-CPUC-000000676. This timeline does not include actions taken as part of PG&E's privileged investigation in anticipation of litigation, or actions of third parties relating to the Fly Fire, including evidence collections performed by the USFS and site visits by third parties.

Our investigation into this matter is ongoing. The events set forth below are based on our investigation to date.

Date	Event
July 22, 2021 approx.	The InciWeb Incident Information System website identifies
5:15 p.m.	the start time of the Fly Fire.
July 22, 2021 approx.	A PG&E Distribution Control Center operator remotely de-
6:10 p.m.	energizes portions of the Gansner 1101 12kV Distribution
	Circuit (the "Gansner 1101 Circuit"), downstream of Line
	Recloser ("LR") 2424.
July 22, 2021 approx.	The USFS contacts PG&E's Emergency Phone Line to
7:21 p.m.	request de-energization of power lines approximately three
	miles west of 39696 Highway 70 in Quincy.
July 22, 2021 approx.	A PG&E troubleman is dispatched to the area to confirm de-
7:42 p.m.	energization of electrical lines.
July 22, 2021 by	The PG&E troubleman confirms both the Gansner 1101
approx. 7:45 p.m.	Circuit and the Caribou #2 60kV Transmission Circuit
1019-100-100-100-100-100-100-100-100-100	("Caribou #2 Circuit") were de-energized. <sup>1</sup>

<sup>&</sup>lt;sup>1</sup> The Caribou #2 Circuit was de-energized previously as part of Dixie Fire mitigation efforts.

Date	Event
July 23, 2021 to	PG&E first responders perform emergency safety work in
November 05, 2021	response to the Fire, including grounding and switching
	activities on the Gansner 1101 Circuit and its protective
	devices. All such activities were initially outside of the Area
	of Interest, <sup>2</sup> to which the USFS restricted access.
July 23, 2021 between	A PG&E troubleman conducts patrolling along the Gansner
1:50 a.m 2:02 p.m.	1101 Circuit between LR 2424 and Switch 3089, but outside
	of the Area of Interest due to access constraints. The
	troubleman finds that Fuse 18101, 1 of 2 had blown (#1).
	Fuse 18101 is located source side of the single-phase tap-line
	feeding PG&E's Butterfly Valley Twain Road customers.
	The PG&E troubleman opens the remaining fuse (#2) and
	collects both fuses as evidence.
July 24, 2021 by	A PG&E troubleman completes a patrol between LR 2424
approx. 2:03 p.m.	and Switch 3089, which are located source side of the Area
	of Interest. No damage is found to PG&E electrical assets in
	this area.
	28-24-00-CL (2019) GONNET 20
	We receive authorization from the USFS to re-energize a
	section of the Gansner 1101 Circuit source side from LR
	2424 downstream to Switch 3089.
July 24, 2021 between	We conduct additional switching and subsequently re-
approx. 2:05 p.m	energize the section of the Gansner 1101 circuit between LR
2:07 p.m.	2424 to Switch 3089.
July 25, 2021	We visit the Area of Interest after the USFS allows access.
	We assist the USFS in collecting two SmartMeters from
	properties located on Butterfly Valley Twain Road.
July 28, 2021 approx.	A PG&E troubleman collects two SmartMeters from the
11:45 a.m. – 12:15 p.m.	Gansner 1101 Circuit outside of the Area of Interest in the
<b>P</b>	vicinity of Highway 89/70.
	,
	We begin conducting SmartMeter field verifications to
	obtain data from SmartMeters not communicating with our
	network.
August 02, 2021	We file an Electric Incident Report ("EIR") with the CPUC's
ə,	Safety and Enforcement Division concerning the Fly Fire
	under the Media criterion due to significant media attention.
August 02, 2021	We assist the USFS in moving and examining a white fir that
	was resting on PG&E's lines on the Gansner 1101 Circuit
	(the "White Fir"). PG&E employees, contractors and
	subcontractors are present.
August 04, 2021	We assist the USFS in collecting evidence from three spans
August 04, 2021	of the Gansner 1101 Circuit in the Area of Interest, including
	portions of the White Fir, conductors and equipment on the
	poles (including cross arms, insulators, and fuses, but
	excluding transformers and the bottom portion of the poles

 $<sup>^2</sup>$  By "Area of Interest" we refer to the three spans on the Gansner 1101 Circuit between Pole 100389432 and Pole 100389435.

Date	Event
	themselves). We also assist the USFS in collecting remnants from a third SmartMeter near Pole 100389432. PG&E
	employees, contractors and subcontractors are present.
August 04, 2021	The USFS completes its investigation at the Area of Interest and releases the scene to PG&E.
August 05, 2021	We conduct an observational site visit at the Area of Interest, and identify and photograph evidence not collected by the USFS. PG&E employees, contractors and subcontractors are present.
	We observe a service line with a USFS evidence tag (E/I #14) on the ground in proximity to Pole 100389432. We advise the USFS of the uncollected E/I #14.
August 05, 2021	A PG&E troubleman transfers custody of Fuse 18101 (#1 and #2), which had previously been collected on July 23, 2021, to our third party evidence collection vendor, Fire Cause Analysis ("FCA").
August 05, 2021	A PG&E contractor completes a LiDAR scan of the Area of Interest.
August 06, 2021	The USFS returns to the Area of Interest and collects E/I #14.
August 07, 2021	Two CPUC engineers conduct an observational site visit at the Area of Interest with PG&E personnel. Together with FCA, we collect evidence not collected by the USFS. PG&E employees, contractors and subcontractors are present.
August 08, 2021 approx. 9:55 a.m. – 11:45 a.m.	A PG&E troubleman collects an additional nine SmartMeters from customer locations on Butterfly Valley Road.
August 08, 2021 approx. 6:10 p.m.	We transport 11 SmartMeters to our Applied Technology Services ("ATS"), which are secured for subsequent physical download at a later time.
August 25, 2021	We download data from 10 SmartMeters at our ATS building in San Ramon. <sup>3</sup>
August 30, 2021	We file with the CPUC's Safety and Enforcement Division a 20-Day EIR concerning the Fly Fire.
November 05, 2021 approx. 12:25 p.m.	We complete restoration and re-energize remaining customers on the Gansner 1101 Circuit.
November 18, 2021	We meet with the USFS at our ATS building in San Ramon and download data from two SmartMeters collected by the USFS.

<sup>&</sup>lt;sup>3</sup> We were unable to download data from one additional SmartMeter we collected, as it was not communicating with the device used to download the data.

#### Requesters: Hassan Jahami, Emily Fisher, Samuel Mandell Request Date: February 4, 2022 Response Date: May 27, 2022

#### **Question 23:**

Did the protection scheme work as designed on the Subject Circuit (i.e., did any potential fault trigger the proper relays and open breakers to de-energize the Subject Circuit or portion of the circuit)? Did PG&E have to manually trip-open breakers to de-energize the Subject Circuit?

#### **Response to Question 23:**

We understand the "Subject Circuit" in this Question as referring to the Gansner 1101 12kV Distribution Circuit (the "Gansner 1101 Circuit").

At this time, we are not aware of facts establishing that the protection scheme did not work as designed on the Subject Circuit.

The first recorded de-energization of the Gansner 1101 Circuit by a protective device following the Fire occurred on July 22, 2021 at approximately 6:10 p.m., when a Distribution Control Center operator remotely de-energized portions of the Gansner 1101 Circuit downstream of Line Recloser ("LR") 2424 after noticing ground amps above baseline. This current, although elevated, was below LR 2424's Minimum to Trip ("MTT") threshold, which is 70 amps for ground.

Prior to the de-energization of the entire section of line downstream of LR 2424, the portion of the Gansner 1101 Circuit serving the incident location may have been de-energized by Fuse 1797, the fuse closest to the incident location. Because fuses do not record data, including their time of operation, we are not certain of when or under what conditions Fuse 1797 may have operated. We have not been able to examine Fuse 1797 since the Fly Fire because it was collected by the United States Forest Service as evidence.

LR 2424, LR 336664 and LR 99388 were the protective devices on the Gansner 1101 Circuit between Butterfly Valley Twain Road, Highway 70/89 and the Gansner Substation that could record data. All of these devices were upstream of Fuse 1797 (*i.e.*, farther away from the incident location). LR 336664 was in sectionalizer mode at the time of the Fly Fire, as indicated on the single-line diagram previously provided in our response to the SED's Fly Fire Data Request Number 001, Question 6. LR 46826 was a temporary protective device installed to provide additional protection while the Gansner 1101 Circuit was temporarily sourced by generators, also indicated on the single-line diagram.

The table below provides a timeline of electrical operations associated with the above-identified Line Reclosers on the Gansner 1101 Circuit. As noted in the table, prior to the start time of the Fly Fire, the currents detected by LR 2424 and LR 99388 exceeded the LRs' MTT thresholds but did not do so for the designed prescribed amount of time to cause the LRs to trip. Additionally, the design conditions required for Sectionalizer 336664 to operate were not met. Based on this data, it appears these devices worked as designed.

MTT is a threshold setting on line reclosers. Continuously exceeding the line recloser's MTT threshold for a prescribed amount of time will cause the line recloser to open or "trip", resulting in the de-energization of the line it protects. The delay avoids the operation of the protective devices in response to transient conditions, such as normal changes in loads on the line, and gives time for downstream devices to operate. A sectionalizer operates when a protective device, such as a line recloser or a circuit breaker, upstream of the sectionalizer operates and the sectionalizer detects a fault downstream, meaning that the current exceeds its MTT. When a sectionalizer operates, the upstream protective devices can close and restore power to customers, and the outage is then isolated to a smaller area that requires investigation for restoration instead of the entire zone.

Date	Event
July 22, 2021, approx. 4:49 p.m.	Sectionalizer 336664 detects a fault current that is in excess of the MTT threshold, but it does not sectionalize the fault because the other protective devices upstream of it ( <i>i.e.</i> , LR 99388 and LR 46826) do not operate, as explained below. The MTT threshold for Sectionalizer 336664 is 240 amps for phase and 80 amps for ground.
July 22, 2021, approx. 4:50 p.m.	LR 2424 records current levels in excess of its MTT that are not long enough in duration to open the LR and de-energize the line. The MTT threshold for LR 2424 is 200 amps for phase and 70 amps for ground. LR 99388 records current levels in excess of its MTT that are not
	long enough in duration to open the LR and de-energize the line. The MTT threshold for LR 99388 is 300 amps for phase and 110 amps for ground.
	LR 46826 records current levels in excess of its MTT that are not long enough in duration to open the LR and de-energize the line. The MTT threshold for LR 46826 is 450 amps for phase and 80 amps for ground.
July 22, 2021, approx. 4:51 p.m.	Sectionalizer 336664 detects a fault current that is in excess of its MTT, but the other conditions to sectionalize the fault are not met, i.e., the source-side device does not open.
	LR 99388 again records current levels in excess of its MTT that are not long enough in duration to open the LR and de-energize the line.
	LR 46826 again records current levels in excess of its MTT that are not long enough in duration to open the LR and de-energize the line.
July 22, 2021, approx. 4:52 p.m.	LR 2424 again records current levels in excess of its MTT that are not long enough in duration to open the LR and de-energize the line.
July 22, 2021, approx. 5:52 p.m.	Sectionalizer 336664 detects a fault current that is in excess of its MTT, but the other conditions to sectionalize the fault are not met, i.e., the source-side device does not open.

Date	Event
July 22, 2021, approx. 5:53 p.m.	LR 2424 again records current levels in excess of its MTT that are not long enough in duration to open the LR and de-energize the line.
July 22, 2021, approx. 6:01 p.m.	Sectionalizer 336664 detects a fault current that is in excess of its MTT, but the other conditions to sectionalize the fault are not met, i.e., the source-side device does not open.
July 22, 2021, approx. 6:02 p.m.	LR 99388 again records current levels in excess of its MTT that are not long enough in duration to open the LR and de-energize the line. LR 46826 again records current levels in excess of its MTT that are not long enough in duration to open the LR and de-energize the line.
July 22, 2021, approx. 6:04 p.m.	LR 2424 again records current levels in excess of its MTT that are not long enough in duration to open the LR and de-energize the line.
July 22, 2021, approx. 6:09 p.m.	SCADA data shows LR 2424 at approximately 29 ground amps.
July 22, 2021, approx. 6:10 p.m.	A Distribution Control Center operator remotely de-energizes the portions of the Gansner 1101 Circuit downstream of LR 2424.

Requesters: Will Dundon, Samuel Mandell, and Emily Fisher Request Date: July 1, 2022 Response Date: August 1, 2022

#### **Question 10:**

Provide plots of Time Current Curve (TCC) curves for Fuse 1797 and Fuse 18101, as well as LR 2424, LR 336663, and LR 99388.

#### **Response to Question 10:**

We understand the question to be asking for plots of Time Current Curves ("TCC") for Fuse 1797, Fuse 18101, Line Recloser ("LR") 2424, LR 336664 and LR 99388. We understand that by "LR 336663", the SED means LR 336664, as the latter is one of the protective devices on the relevant section of the Gansner 1101 12kV Distribution Circuit serving Butterfly Valley Twain Road, Highway 70/89 to Quincy town proper.

We are producing TCC plots for Fuse 1797, Fuse 18101, LR 2424 and LR 99388 at Bates range PGE-FLY-CPUC-0000011471 to PGE-FLY-CPUC-0000011472. The TCCs reflect the Normal Profile set points for these devices. We refer to our response to the SED's Fly Fire Data Request Number 001, Question 22 for data downloaded from these protective devices, which shows that the devices were set to Normal Profile at the time of the incident. LR 336664 is not included on the TCC plots because it was in sectionalizer mode at the time of the incident and thus did not have active TCC curves.

#### Requesters: Hassan Jahami, Emily Fisher, and Samuel Mandell Request Date: February 4, 2022 Response Date: May 27, 2022

#### **Question 13:**

Provide copies of the five most recent vegetation management inspections conducted on the portion of the Subject Circuit spanning five structures in both directions, including branch line connections, beginning from the pole closest to the suspected fire ignition area. If there were any vegetation-related work orders generated during these inspections, please provide copies.

#### **Response to Question 13:**

We are producing Vegetation Management ("VM") records from our Vegetation Management Database ("VMD") of the five most recent routine VM patrols of the Gansner 1101 12kV Distribution Circuit (the "Gansner 1101 Circuit") spanning five structures in both directions from the span between Pole 100389433 and Pole 100389434 between January 2018 and July 2021. The five most recent routine VM patrols of the relevant area were the June-July 2021 routine patrol, the May-July 2020 routine patrol, the September-November 2019 routine patrol, the April-May 2019 routine patrol and the January-February 2018 routine patrol. The table below sets forth the inspection records being produced with this response.

Patrol	Date	Bates Numbers
Routine VM Patrol	January-February 2018	PGE-FLY-CPUC-
	10 25	0000009804 to PGE-FLY-
		CPUC-000009840
Routine VM Patrol	April-May 2019	PGE-FLY-CPUC-
		0000009841 to PGE-FLY-
		CPUC-000009844
Routine VM Patrol	September-November 2019	PGE-FLY-CPUC-
		0000009845 to PGE-FLY-
		CPUC-000009897
Routine VM Patrol	May-July 2020	PGE-FLY-CPUC-
		0000009898 to PGE-FLY-
s		CPUC-0000009946
Routine VM Patrol	June-July 2021	PGE-FLY-CPUC-
	h vegeze	0000009947 to PGE-FLY-
		CPUC-0000010012

We are also producing associated photographs at Bates range PGE-FLY-CPUC-0000010013 to PGE-FLY-CPUC-0000010047 and associated work requests at Bates range PGE-FLY-CPUC-0000010048 to PGE-FLY-CPUC-0000010085.

#### Cust.Inf. | MAP | History |

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				QUINCY		PL	)	(-HWY 70 @	2000 A.					· WEC
vision: lorth Valley	GANSNER 110		SSD #: 1797	SSD Rte #: 165	Routing #: 45	(none):			Area: N-49		SRA Yes	Alerts: DG		
	ime: (preload) 0:56:21 AM	Tag Type	Tag Number:	Line Name:			P	Pole Num: Qua E-1		Map: 2	Removal #	Customer I	lame/Phone:	
omment: GN @SSD	1797 W/O/#43	5 DRVWY;	LOOSE DOGS	S NOT A PR	OBLEM						1			
										Audit	Last Edit: 1/31	/2018 4:51:26 PM by		
Tree Number	Tree Species: Douglas Fir	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 65 14		rance Prox: 14 Inside	Cycle: Rtn	Qty: 1	Trim Type: Side	Account: M	Wire Conditions:	Insp Date: ( 1/31/2018 10:41:10 AM
1	1 Comment: 0.1SP W/O SSD S/SD/O/LNS-TTT					Notification OK	22	ork Request: CHNV10399	wc Date:       WK Request:     WC Date:       HNV1039985     4/27/2018			WC Trim: SD	Completed By:	Invoice: TR (104)
	The second secon					eeID: /863N4000	02754					Audit	Last Edit: 1/31/2018 by:	
	Rx Comment:													
Tree Number	Tree Species: White Fir	Crew: CB	Priority: Routine	TGR: No	Owned By: Private	Height DBH 35 12		rance Prox: 0 Inside	Cycle: Rtn		Trim Type: Side	Account: M	Wire Conditions:	Insp Date: 2/20/2008 10:26:20 AN
2	Comment: .2/SP/W;SSD	@ 435 DI	8WY			Notification	Notification: Work Request: <u>CHNV101580</u>			WC Date: 3/28/2008	wc qty: 1	WC Trim: SD	Completed By:	Invoice: TR (104)
	Lat/Long:				External Tr	eeID:						Audit	Last Edit: 1/31/2018 10:5	56:19 AM by:
	Rx Comment:													
Tree Number	Tree Species: Ponderosa Pine	Crew: CB	Priority: Accelerate		Owned By: Private	Height DBH 35 12		rance Prox: 0 Inside	Cycle: Rtn	Qty: 1	Trim Type: Side	Account: M	Wire Conditions:	Insp Date: 2/20/2008 10:26:20 AM
3	Comment: .6/SP/W;SSD	@ 435 DI	хwy			Notification: Work Request: CHNV101580			05	WC Date: 3/28/2008	wc qty: 1	WC Trim: SD	Completed By:	Invoice: TR (104)
	Lat/Long:				External Tr	eeID:		7.0				Audit	Last Edit: 1/31/2018 10:5	56:20 AM by:
	Rx Comment:													
Tree Number	Tree Species: Alder - White	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 20 8	H Clea	rance Prox: 3 Inside	Cycle: Rtn	Qty: 2	Trim Type: Top	Account: M	Wire Conditions:	Insp Date: 2/24/2016 10:06:47 AM
4	Comment: 1.4SP W/SSD	OR .65P	E/O XFR @ A	DD		Notification	. P.	ork Request: CHNV10347	39	WC Date: 4/23/2016	WC Qty: 2	WC Trim: TO	Completed By:	Invoice: TR (104)
	Lat/Long:				External Tr	eeID:				PANNUAL	TRIM	Audit	Last Edit: 1/31/2018 10:5	56:20 AM by
	Rx Comment:													
Tree Number	Tree Species: Douglas Fir	Crew: CA	Priority: Routine	TGR: No	Owned By: Private		H Clea	rance Prox: 17 Inside	Cycle: Rtn		Trim Type: Side	Account: M	Wire Conditions:	Insp Date: (PMN7) 3/19/2015 12:48:07 PM
5	Comment: 1.5SP W/O S	SD S/SD C	RK. FLGD RD	SD		Notification		/ork Request: CHNV10319	53	WC Date: 4/4/2015	wc qty: 1	WC Trim: SD	Completed By:	Invoice: TR (104)
5	Lat/Long:				External Tr	eeID:						Audit	Last Edit: 1/31/2018 10:5	56:20 AM by

Tree lumber	Tree Species: Cedar	Crew: LA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 130 3		ance Prox: 16 Inside	Cycle Rtn		Trim Type: Overhang		Wire Conditions:	Insp Date: 2/24/2016 10:09:07 AM
6	Comment: @ CRK/SD X	FR				Notification	CO 100	ork Request: HNV10347	727	WC Date: 5/2/2016	WC Qty: 1	WC Trim: OV	Completed By:	Invoice: TR (104)
	Lat/Long:				External Tr	eeID:						Audit	Last Edit: 1/31/2018 10:5	6:20 AM by:
	Rx Comment:													
Tree Number	Tree Species: Black Oak	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 35 2	H Clear 14		Cycle Rtn		Trim Type: Br Trim	Account: M	Wire Conditions:	Insp Date: 1/31/2018 10:42:29 AM
7	Comment: 0.35P/W/0 S	55D 5/0/	LNS XSTM	LGIFO		Notification:     Work Request:       OK     CHNV1039985				WC Date: 4/27/2018	WC Qty: 1	WC Trim: BT	Completed By:	Invoice: BT (104)
	Lat/Long: 40.002767, -1	20.96794	9 Google N	ap!	External Tr W120967	eeID: 7949N4000						Audit	Last Edit: 1/31/2018 by	
	Rx Comment:													
Tree Number	Tree Species: Black Oak	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 37 4	H Clean 14		Cycle Rtn		Trim Type: Side	Account: M	Wire Conditions:	Insp Date: 1/31/2018 10:43:38 AM
8	Comment: 0.3SP W/O S	Notification OK		rk Request: HNV10399	985	WC Date: 4/27/2018	WC Qty: 1	WC Trim: SD	Completed By:	Invoice: TR (104)				
	Lat/Long: 40.002785, -1	reeID: 8108N40002785						Audit	Last Edit: 1/31/2018 by:					
	Rx Comment:													
Tree Number	Tree Species: White Fir	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 35 5	H Clear		Cycle Rtn		Trim Type: Top	Account: M	Wire Conditions:	Insp Date: 1/31/2018 10:44:58 AM
9	Comment: 0.3SP W/O S	SD S/SD	/0/LNS			Notification: Work Request: OK CHNV1039985			985	WC Date: 5/1/2018	WC Qty: 1	WC Trim: TO	Completed By:	Invoice: TR (104)
	Lat/Long: 40.002858, -1	20.968199	Google M	ap!	External Tr W120968	eeID: 8199N40002858						Audit	Last Edit: 1/31/2018 by:	i i i i i i i i i i i i i i i i i i i
	Rx Comment:													
Tree Number	Tree Species: Alder - White	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 28 2	H Clear 13		Cycle Rtn		Trim Type: Br Trim	Account: M	Wire Conditions:	Insp Date: 1/31/2018 10:46:48 AM
10	Comment: 1.1SP/W/O/S	SD -U/LI	S-XSTMS-	NF		Notification: Work Request: OK CHNV1039985				WC Date: 5/1/2018	WC Qty: 2	WC Trim: BT	Completed By:	Invoice: BT (104)
	Lat/Long: 40.003042, -1	20.96878	7 Google N	anl	External Tr W120968	eeID: 3787N4000	3042					Audit	Last Edit: 1/31/2018 by:	

#### Inspection Record Detail

#### Cust.Inf. | MAP | History |

ddrace				City: QUINCY		County: PL	Directions: X-HWY 70 @	MM 33	05·W//TO T	HTPD HSE				
ivision: North Valley	GAN5NER 11		SSD #:		Routing #: 30	12.57 A	X-HW970@	Area: N-49		SRA Yes	Alerts: DG			
	me: (preload)		Tag Number:	1 Contraction	1.5.5		Pole Num:	Quad E-11	Map:	Removal #: 4052553		ame/Phone:		
omment:	1797 W O ADD	435 DRVW	У, GO 15P W	-LOOSE DO	DGS NOT A	PROBLEM-	ES PROP OW	1.5	-	IS RENTER				
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Tree Number	Tree Species: Douglas Fir	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 0 65 14	Clearance Prox: 14 Inside	Cycle Rtn		Trim Type: Side	Account: M	Wire Conditions	Insp Date 10/31/2019 4:22:32 PM	
1	Comment: 0.1SP W/O/F	USE-S/SD	0/LNS-TT	T-PNF		Notification:	Work Request: CHNV10443		WC Date: 2/12/2020	WC Qty: 1	WC Trim: SD	Completed By:	Invoice: TR (104)	
	Lat/Long: 40.002754, -1	20.967863	Google Ma	ip!	External Tr W120967	eeID: /863N400027	54			Audit	Last Edit: 7/6/2021 6:3	7:07 РМ Ьу		
	Rx Comment: PNF													
Tree Number	Tree Species: Cedar	Crew: LA	Priority: Routine	TGR: No	Owned By: Private	Height DBH ( 40 9	Clearance Prox: 16 Inside	Cycle Rtn		Trim Type: Side	Account: M	Wire Conditions	: Insp Date: 11/4/2019 11:55:43 AM	
2	Comment: @ FUSE-S/S	D/O/LNS-	P&F			Notification:	Work Request: CHNV10443		WC Date: 2/12/2020	WC Qty: 1	WC Trim: SD	Completed By:	Invoice: TR (104)	
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	Rx Comment: P&F													
Tree Number	Tree Species: White Fir	Crew: CA	Priority: No Trim	TGR: No	Owned By: Private	Height DBH C 25 4	Dearance Prox: 12 Inside	Cycle Rtn		Trim Type: Top	Account: M	Wire Conditions	: Insp Date: 11/4/2019 12:09:57 PM	
3	Comment: 0.3SP/W/O/	SSD-S/SD	/O/LN5-P&F			Notification:	Work Request:	e l	WC Date:	WC Qty:	WC Trim:	Completed By:	Invoice: Not Worked	
	Lat/Long: 40.002858, -1	20.968199	Google Ma	External Tr W120968	eeID: 199N400028	58			Audit	Last Edit: 7/6/2021 6:3	7:07 PM by:			
	Rx Comment: P&F-LT 5/1/1	18												
Tree Number	Tree Species: Black Oak	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 0 37 17	Clearance Prox: 14 Inside	Cycle Rtn		Trim Type: Side	Account: M	Wire Conditions	: Insp Date: 11/4/2019 12:04:06 PM	
4	Comment: 0.3SP/W/O/	SSD-S/SD	/O/LNS-XST	TM-P&F		Notification:	Work Request: CHNV10443		WC Date: 2/12/2020	WC Qty: 1	WC Trim: SD	Completed By:	Invoice: TR (104)	
	Lat/Long: 40.002785, -1	20.968108	Google Ma	p!	External Tr W120968	eeID: 108N400027	85				Audit	Last Edit: 7/6/2021 6:3	7:07 PM by	
	Rx Comment: P&F													
Tree Number	Tree Species: White Fir	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 0 55 16	Clearance Prox: 12 Inside	1.000	1	Trim Type: Side	Account: M	Wire Conditions	Insp Date 11/4/2019 12:18:26 PM	
5	Comment: 0.35P/W/O/	SSD-S/SD	/O/LNS-P&F			Notification: Work Request: CHNV1044381			WC Date: 2/11/2020	WC Qty: 1	WC Trim: SD	Completed By:	Invoice: TR (104)	
	Lat/Long: 40.002692, -1	20.967861	Google Ma	pl	External Tr W120967	eeID: 861N400026	92			1	Audit	Last Edit: 7/6/2021 6:3	7:08 РМ Ьу:	
	Rx Comment: P&F													

Tree lumber	Tree Species: Cedar	Crew: LA	Priority: Routine	TGR: No	Owned By: Private	25 4	learance Prox: 16 Inside	Cycle: Rtn	2	Trim Type: Top	Account: M	Wire Conditions	11/4/2019 12:21:24 PM
6	Comment: 0.35P/W/O/F	USE-UN	DRLNS-P&F	AVDH		Notification:	Work Request: CHNV10443	381	WC Date: 2/11/2020	WC Qty: 2	WC Trim: TO	Completed By:	Invoice: TR (104)
	Lat/Long: 40.003162, -12	0.967948	Google N	ap!	External Tr W120967	eeID: 7948N4000310	52			Audit	Last Edit: 7/6/2021 6:3	7:08 РМ Бу	
	Rx Comment: P&F												
Tree Number	Tree Species: Douglas Fir	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH C 140 30	learance Prox: 17 Inside	Cycle: Rtn		Trim Type: Overhang	Account: M	Wire Conditions	: Insp Date: 11/4/2019 12:27:44 PM
7	Comment: 0.45P/W/O/F	USE-5/5	D/O/LNS-P	åF		Notification:	Work Request: CHNV10443		WC Date: 2/11/2020	WC Qty: 1	WC Trim: OV	Completed By:	Invoice: TR (104)
	Lat/Long: 40.002763, -12	0.968015	Google N	ap!	External Tr W120968	eeID: 3015N4000276	53			Audit	Last Edit: 7/6/2021 6:3	7:08 PM by:	
	Rx Comment: P&F												
Tree Number	Tree Species: Black Oak	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH C 35 2	learance Prox: 14 Inside	Cycle: Rtn		Trim Type: Br Trim	Account: M	Wire Conditions	Insp Date: 1/31/2018 10:42:29 AM
8	Comment: 0.35P/W/O 5	SD 5/0/	LNS XSTM	FLG IFO		Notification:	Work Request: CHNV10399	985	WC Date: 4/27/2018	wc Qty: 1	WC Trim: BT	Completed By:	Invoice: BT (104)
	Lat/Long: 40.002767, -12	0.967949	Google N	Nap!	External Tr W120967	eeID: 7949N400027	67			Audit	Last Edit: 7/6/2021 6:3	7:09 PM by:	
	Rx Comment:												
Tree Number	Tree Species: Alder - White	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH C	learance Prox: 13 Inside	Cycle: Rtn		Trim Type: Br Trim	Account: M	Wire Conditions	Insp Date: 1/31/2018 10:46:48 AM
9	Comment: 1.1SP/W/O/S	5D -U/LN	S-XSTMS-	PNF		Notification:	Work Request: CHNV10399		WC Date: 5/1/2018	WC Qty: 2	WC Trim: BT	Completed By:	Invoice: BT (104)
	Lat/Long: 40.003042, -12	0.968787	Google N	Nap!	External Tr W120968	eeID: 3787N400030	42			Audit	Last Edit: 7/6/2021 6:3	7:09 PM by:	
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Tree Number	Tree Species: Alder - White	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH C 28 5	learance Prox: 13 Inside	Cycle: Rtn		Trim Type: Top	Account: M	Wire Conditions	Insp Date: 11/4/2019 12:38:15 PM
10	Comment: 1.1SP/W/O/S	SD -UND	R&N/50/0/	LNS-XSTM	5-P&F	Notification:	Work Request: CHNV10443	381	WC Date: 2/12/2020	WC Qty: 4	WC Trim: TO	Completed By:	Invoice: TR (104)
	Lat/Long: 40.003313, -12	0.96846	Google Mo	ip!	External Tr W120968	eeID: 3460N400033	13	Parties and an and a second		Audit	Last Edit: 7/6/2021 6:3	7:09 PM by:	
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11	Comment: 1.45P W/55D		E/0 XFR @	ADD		Notification:	Work Request: CHNV10347		WC Date: 4/23/2016	WC Qty: 2	WC Trim: TO	Completed By:	Invoice: TR (104)
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Number	Oragino I i												

	Lat/Long: 40.003527, -1	20.96889	7 Google Ma	<u>ip!</u>	External Tr W120968	eeID: 3897N400035	527				Audit	Last Edit: 7/6/2021 6:3	7:10 PM by
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13	Comment: 1.75P/W/O/I	USE-S/S	D/0/LNS-XS	TM-@LOG	OVR CRK	Notification:	Work Request: CHNV10443	81	WC Date: 2/12/2020	WC Qty:	WC Trim: SD	Completed By:	Invoice: TR (104)
	Lat/Long: 40.003402, -1	20.969234	4 _Google Ma	apl	External Tr W120969	eeID: 234N400034	402				Audit	Last Edit: 7/6/2021 6:3	7:10 PM b
	Rx Comment: P&F-2XSTM												
Tree Number	Tree Species: Cedar	Crew: LA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 130 35	Clearance Prox: 16 Inside	Cycle Rtn		Trim Type: Overhang	Account: M	Wire Conditions	: Insp Date: ( 2/24/2016 10:09:07 AM
14	Comment: © CRK/SD XFR					Notification:	Work Request: CHNV10347	27	WC Date: 5/2/2016	WC Qty:	WC Trim: OV	Completed By:	Invoice: TR (104)
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	Rx Comment:												
Tree Number	Tree Species: Black Oak	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 40 12		Cycle Rtn		Trim Type: Side	Account: M	Wire Conditions	Insp Date
15	Comment: 0.1SP/W/O/2	KFR@ADD	#563-5/5D/	/0/LN5-X	STM-F&P	Notification:	Work Request: CHNV10443	81	WC Date: 2/12/2020	WC Qty: 1	WC Trim: SD	Completed By:	Invoice: TR (104)
	Lat/Long: 40.003693, -1	20.969473	3 Google Ma	no!	External Tr W120969	eeID: 9473N400036	593				Audit	Last Edit: 7/6/2021 6:3	7:11 PM by
	Rx Comment: P&F-NXT 5H												
Tree Number	Tree Species: White Fir	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 130 42	Clearance Prox: 99 Inside	Cycle Rtn		Trim Type: FP-Major A	Account: M	Wire Conditions	: Insp Date: 11/6/2019 11:20:27 AM
16	Comment: 0.3SP/W/O/	XFR-NXT	CHICKENCO	OP-IFO AD	D	Notification:	Work Request: C1NV100271	WC Date: 2/20/2020	WC Qty:	WC Trim: FBA	Completed By:	Invoice: AB (104)	
	Lat/Long: 40.00376, -12	0.969673	Google Mar	bl	External Tr W120969	eeID: 9673N400037	760			Audit	Last Edit: 7/6/2021 6:3	7:11 PM by	
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17	Comment:		RLNS-P&F-A			Notification: OK	Work Request:		WC Date:	WC Qty:	WC Trim:	Completed By:	Invoice: Not Worked
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	Rx Comment: 5AG				1								
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18	Comment: 0.3SP/W/O/	SSD-UND	RLNS-P&F			Notification: Work Request: OK			WC Date:	WC Qty:	WC Trim:	Completed By:	Invoice: Not Worked
	Lat/Long: 40.003132, -12	20.967862	2 Google Ma	ip!	External Tr W120967	eeID: 7862N400031	132				Audit	Last Edit: 7/6/2021 6:3	7:12 РМ Бу
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White Fir	CA	Routine	No	Private	90 23	16 Inside	Rtn	1	FP-Ov B	M		7/6/2021 9:04:01 AM
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Rx Comment: CLR DEAD O	v											
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Tree Species: White Fir	Crew: CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH ( 90 23			Qty: 1	Trim Type: Side	Account: M	Wire Conditions	Insp Date: 7/6/2021 9:10:57 AM
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Rx Comment: SD+BLW-TTT-SWAY												
Tree Species: Ponderosa Pine	Crew: ε CA	Priority: Routine	TGR: No	Owned By: Private	Height DBH 0 47 12				Trim Type: Side	Account: M	Wire Conditions	Insp Date: 7/6/2021 9:14:12 AM
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External TreeID: W120967947N40003107 W120967947N40003107 Free Species: Crew: Priority: Comment: CA BEAD OV Free Species: OK Crew: Priority: TGR: No Owned By: Height DBH Clearance Prox: Private Cycle: Rtn Qty: Tree Species: Crew: Trim Type: Priority: Trim Type: VI20967997N40003175 WC Date: WC Qty: VI20967997N40003175   Lat/Long: 40.003175, -120.967997 Google Map! 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External TreeID: W120967997N40003175   Work Request:   WC Date:   WC Qty:   WC Trim:     SWAY   Free Species: SWAY   Crew: White Fir   Priority: CA   TGR: Notification: V120967957N40003175   Owned By:   Height DBH Clearance Prox: OK   Cycle: Qty: Rtn 1   Trim Type: Side   Account: MC Date:     Comment: 0.35P/W/O/SSD-S/LNS-P&F   Owned By:   Height DBH Clearance Prox: OK   Cycle: Qty: WC Trim:   Trim Type: Side   Account: MC Date:   Account: MC Qty:   MC Date:   WC Qty: WC Trim:     Audit 1   Rx Comment: SD-BLW-TTT-SWAY   Notification: Notification: OK   Work Request: OK   WC Date:   W	Comment: 0.45P/W/0/SSD-S/LNS   Notification: OK   Work Request: OK   WC Date:   WC Qty:   WC Trim:   Completed By:     Lat/Long: 40.003107, -120.967947   Google Mapl   External TreeID: W120967947N40003107   Motification: Storment: CLR DEAD OV   WC Trim:   Completed By:   Last Edit: 7/6/20216:3     Pres Species: 0.45P/W/0/SSD-N/LNS   Frivate   35   5   16   Inside   Rtn   1   Trim Type: Account:   Account: M   Wire Conditions     QASP/W/0/SSD-N/LNS   Notification: 0.45P/W/0/SSD-N/LNS   Notification: W120967997N40003175   Work Request: 0X   WC Date:   WC Qty:   WC Trim:   Completed By: Motification:     Account: 0.45P/W/0/SSD-N/LNS   External TreeID: W120967997N40003175   Work Request:   WC Date:   WC Qty:   WC Trim:   Completed By: Completed By:     Account: White Fin   Frie   Owned By:   Height DBH Clearance Prox: OK   Cycle:   Qty:   Trim Type: Side   Account: M   Wire Conditions     0.3SP/W/0/SSD-S/LNS-P&F   Owned By:   Height DBH Clearance Prox: OK   Cycle:   Qty:   WC Trim:   Completed By: Completed By:     1   Auditi   Kast Edit: 7/6/20216:3   Notification: OK   Work Request:   WC

#### Requesters: Hassan Jahami, Emily Fisher, and Samuel Mandell Request Date: February 4, 2022 Response Date: May 27, 2022

#### **Question 14:**

Provide copies of any other vegetation management-related inspections that PG&E has conducted in the last five years on the portion of the Subject Circuit spanning five structures in both directions, including branch line connections, beginning from the pole closest to the suspected fire ignition area. These other vegetation management-related inspections may include, but are not limited to, any Catastrophic Event Memorandum Account (CEMA) inspections, Accelerated Wildfire Risk Reduction (AWRR) vegetation management inspections, Enhanced Vegetation Management inspections, and Wildfire Safety Inspection Program (WSIP) inspections. If there were any vegetation-related work orders generated during these inspections, please provide copies.

#### **Response to Question 14:**

We refer to our response to the SED's Fly Fire Data Request Number 001, Question 13 for inspection records and associated work requests for the last five routine Vegetation Management ("VM") patrols on the Gansner 1101 12kV Distribution Circuit (the "Gansner 1101 Circuit") spanning five structures in both directions from the span between Pole 100389433 and Pole 100389434. The five most recent routine VM patrols were the June-July 2021 routine patrol, the May-July 2020 routine patrol, the September-November 2019 routine patrol, the April-May 2019 routine patrol and the January-February 2018 routine patrol.

We are producing records extracted from our Vegetation Management Database ("VMD") of all Catastrophic Event Memorandum Account ("CEMA") patrols of the relevant section of the Gansner 1101 Circuit between July 22, 2016 and July 22, 2021 at Bates range PGE-FLY-CPUC-0000010086 to PGE-FLY-CPUC-0000010087. We are also producing work requests associated with these CEMA patrols at Bates range PGE-FLY-CPUC-0000010088 to PGE-FLY-CPUC-0000010090.

We are further producing inspection logs from vegetation clearing ("VC") inspections extracted from our PCD2 Database at Bates range PGE-FLY-CPUC-0000010091 to PGE-FLY-CPUC-0000010331, screenshots of the VC inspection reports from the PCD2 Database at Bates range PGE-FLY-CPUC-0000010332 to PGE-FLY-CPUC-0000010373 and associated work requests at Bates range PGE-FLY-CPUC-0000010374 to PGE-FLY-CPUC-0000010925.

We note that no Accelerated Wildfire Risk Reduction Program ("AWRR") inspections or Enhanced Vegetation Management ("EVM") inspections were conducted on the relevant section of the Gansner 1101 Circuit in the past 5 years. We further note that Wildfire Safety Inspection Program ("WSIP") inspections are not VM inspections but rather inspections of PG&E equipment.

#### Requesters: Will Dundon, Samuel Mandell, and Emily Fisher Request Date: July 1, 2022 Response Date: September 2, 2022

#### **Question 7:**

PG&E's response to DR-1, Question 13 provided Routine VM Patrol records for spans around the Incident Area. The following attachments identify White Fir trees in the vicinity of the Incident Area: PGE-FLY-CPUC-0000009822, PGE- FLY-CPUC-000000-9863, and PGE-FLY-CPUC-0000009959. For each of the following trees, please provide all evidence within PG&E's possession as to whether the tree was or was not the White Fir tree which was leaning on the conductors of the Ganser Circuit 1101 (the Subject Tree), and please provide the vegetation management information requested.

- a. Confirm whether the tree identified at 40.002858, -120.968199 in PGE- FLY-CPUC-0000009822, PGE-FLY-CPUC-000000-9863, PGE-FLY-CPUC-0000009959, was the Subject Tree. Describe what vegetation management actions were taken when the tree at 40.002858, -120.968199 was identified in vegetation management inspections in January 2018, October 2019, July 2020, and July 2021.
- b. Confirm whether the tree identified at 40.003132, -120.967862 in PGE- FLY-CPUC-0000009959 was the Subject Tree. Describe what vegetation management actions were taken when the tree at 40.002858, -120.968199 was identified in vegetation management inspections in July 2021.
- c. Confirm whether the tree identified at 40.003107, -120.967947 in PGE- FLY-CPUC-0000009959 was the Subject Tree. Describe what vegetation management actions were taken when the tree at 40.003107, -120.967947 was identified in vegetation management inspections in July 2021.
- d. Confirm whether the tree identified at 40.003063, -120.967858 in PGE- FLY-CPUC-0000009959 was the Subject Tree. Describe what vegetation management actions were taken when the tree at 40.003063, -120.967858 was identified in vegetation management inspections in July 2021.

#### **Response to Question 7:**

Based on our analysis of records associated with the July 6, 2021 routine vegetation management ("VM") patrol, the Subject Tree was not identified for either removal or trimming. Six other trees in the span that included the Subject Tree—the span between Pole 100389433 and Pole 100389434—were identified during the July 6, 2021 routine VM patrol for trimming, but none of these trees was a White Fir in the same location and of the same height and diameter at breast height as the Subject Tree, which we believe was located at approximately 40.001834, -

120.580840, had a height of approximately 80 feet, and had a diameter at breast height of 16 inches.

Our records also reflect that the Catastrophic Event Memorandum Account ("CEMA") inspection for the Gansner 1101 12kV Distribution Circuit (the "Gansner 1101 Circuit") was completed in April 2021, during which inspectors did not identify any trees for work in the span that included the Subject Tree.

Based on our analysis of relevant VM records, we believe that no trees in that span identified for work in routine VM patrols or CEMA patrols between 2011 and 2021 had any work outstanding as of July 22, 2021, except for the work called for by the July 6, 2021 routine inspection.<sup>1</sup> As noted above, we believe that this work outstanding at the time of the Fire did not relate to the Subject Tree.

<sup>&</sup>lt;sup>1</sup> We are producing the record showing the completion of the work prescribed for the tree at 40.002858, -120.968199 in January 2018 at Bates range PGE-FLY-CPUC-0000011473 to PGE-FLY-CPUC-0000011474. Following the completion of this work on May 1, 2018, the tree remained in compliance during the October 2019 and July 2020 inspections and did not require further work.

#### Requesters: Will Dundon, Samuel Mandell, and Emily Fisher Request Date: July 1, 2022 Response Date: August 1, 2022

#### **Question 5:**

Provide all findings, observations, reports, and photographs from the PG&E arborist who investigated and reviewed evidence from the Fly Fire incident location.

#### **Response to Question 5:**

We understand the "Fly Fire incident location" in this Question as referring to the three spans on the Gansner 1101 12kV Distribution Circuit between Pole 100389432 and Pole 100389435. We further understand this question to refer to the PG&E-employed arborist who visited the incident location on August 2, August 4, August 5 and August 7, 2021.

The PG&E arborist was not asked to and did not prepare any reports nor take any photographs. We refer to our response to the SED's Fly Fire Data Request Number 001, Question 47 for photographs taken by PG&E incident investigators, a PG&E claims investigator and Fire Cause Analysis during the August 2, August 4, August 5 and August 7, 2021 site visits to the incident location.

The PG&E arborist was part of the team of PG&E personnel that assisted the United State Forest Service ("USFS") in the August 2 and August 4 site visits, which included collecting portions of the White Fir. Based on his observations, including a review of photographs taken by PG&E personnel during the site visits, it appeared to that arborist that the White Fir uprooted and fell into the line. Specifically, the White Fir's trunk appeared in those photographs to be in one, non-broken piece still attached to what appeared to be the White Fir's root ball or a portion of it. Upon observing the exposed root ball of the tree following its uprooting, the PG&E arborist observed what looked to him like signs of rot in the root ball, which may have contributed to the tree's uprooting.

Requesters: Hassan Jahami, Emily Fisher, and Samuel Mandell Request Date: February 4, 2022 Response Date: April 29, 2022

#### **Question 47:**

Provide all photographs and figures of or related to the incident location. All photographs and figures provided should be numbered and captioned appropriately.

#### **Response to Question 47:**

We understand the "incident location" in this Question as referring to the three spans on the Gansner 1101 12kV Distribution Circuit (the "Gansner 1101 Circuit") between Pole 100389432 and Pole 100389435.

We are producing photographs taken by a PG&E troubleman on July 24, 2021 at the pole supporting Fuse 18101 at Bates range PGE-FLY-CPUC-0000004166 to PGE-FLY-CPUC-0000004169. A PG&E troubleman collected the fuse on July 23, 2021, and it was transferred to Fire Cause Analysis ("FCA") custody on August 5, 2021.

We are also producing photographs taken by a PG&E Public Safety Specialist on July 25, 2021, including photographs of SmartMeter and SmartMet

We are additionally producing photographs taken by a PG&E troubleman on July 28, 2021, including photographs of SmartMeter SmartMeter SmartMeter and SmartMeter Smart

We are further producing photographs taken by PG&E incident investigators during the August 2, August 4, August 5 and August 7, 2021 site visits to the incident location at Bates range PGE-FLY-CPUC-0000004271 to PGE-FLY-CPUC-0000008938. We are also producing photographs taken by a PG&E claims investigator during the August 5, August 6, August 7 and August 8, 2021 site visits to the incident location at Bates range PGE-FLY-CPUC-0000008939 to PGE-FLY-CPUC-0000009066. These photographs are protected attorney work product; however, as part of our cooperation with the SED, we are producing them to the SED in response to this request. This limited production of photographs taken by PG&E incident investigators and a PG&E claims investigator does not constitute a waiver of the work product protection (or any other applicable privilege

<sup>&</sup>lt;sup>1</sup> PG&E assigns a unique identifier to each SmartMeter known as a badge number.

or protection) as to any other materials subject to that protection in PG&E's possession, custody or control. We assert all applicable privileges and protections with respect to those materials. We are continuing to identify and collect photographs from employees.

In addition, we are producing photographs taken by FCA during the August 5, August 7 and August 9, 2021 site visits at Bates range PGE-FLY-CPUC-0000009067 to PGE-FLY-CPUC-0000009757.

As stated in our Specific Objection to this Question, set forth in PG&E's Specific Objections to SED's Fly Fire Data Request Number 001, delivered to the SED on March 4, 2022, we are preparing for litigation, including retaining experts and collecting evidence. At this time, this work for purposes of litigation preparation, including the work performed by those experts, is protected by the attorney-client privilege and protections of the attorney work product doctrine. As such, we must assert our right to withhold photographs and figures subject to the attorney-client privilege or the work product doctrine and, on that basis, object to this data request to the extent it calls for such photographs and figures.