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23 COMPANY

24 UNITED STATES DISTRICT COURT
25 NORTHERN DISTRICT OF CALIFORNIA
26 SAN FRANCISCO DIVISION

27 UNITED STATES OF AMERICA,
28
29 Plaintiff,
30
31 v.
32
33 PACIFIC GAS AND ELECTRIC COMPANY,
34
35 Defendant.

36 Case No. 14-CR-00175-WHA
37
38 **SUPPLEMENTAL RESPONSE TO**
39 **REQUEST FOR INFORMATION**
40 **RE: NUMBER OF FIRES**
41 **(GREATER OR EQUAL TO 10**
42 **ACRES IN SIZE)**
43
44 Judge: Hon. William Alsup

45 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this
46 supplemental response to the Court’s September 17, 2019 request for information regarding the

1 number of fires (greater or equal to ten acres in size) in 2019 that involved PG&E equipment.
 2 PG&E submitted its response on October 1, 2019, in which it identified nine fires of ten acres or
 3 more during 2019 that its equipment may have contributed to igniting. (Dkt. 1099.) On October 2,
 4 the Court requested additional information about three of those fires. (Dkt. 1100.) In PG&E's
 5 October 9, 2019 response to the Court's October 2 Order, PG&E identified an additional fire of ten
 6 acres or more that its equipment may have contributed to igniting. (Dkt. 1103.)

7 PG&E submits this supplemental response because it has identified an additional fire
 8 greater than ten acres to which its equipment may have contributed, which was inadvertently
 9 excluded from its prior submissions. This fire occurred on June 25, 2019. Although the cause of
 10 this fire is currently unknown and the California Department of Forestry and Fire Protection ("Cal
 11 Fire") is investigating, PG&E's equipment may have contributed to igniting that fire.

12 PG&E's analysis of the event described below is ongoing and the information below
 13 represents PG&E's current understanding of the circumstances.

14 **June 25, 2019 Ignition**

- 15 1. The fire was approximately 2546 acres.
- 16 2. The fire occurred in Monterey County.
- 17 3. The Cal Fire designation for this fire is the Lonoak Fire.
- 18 4. The fire ignited on June 25, 2019, at approximately 4:00 p.m. and was contained on
 19 June 26, 2019 at approximately 3:00 p.m.
- 20 5. There were no structures burned.
- 21 6. It appears that the fire started when a bird contacted a conductor causing a fault,
 22 which caused a conductor to contact the ground. Cal Fire is currently investigating
 23 this fire. *See* California Department of Forestry & Fire Protection, Lonoak Fire,
 24 General Information *available at* <https://fire.ca.gov/incidents/2019/6/26/lonoak-fire/>.

25 In addition, since its initial submission, PG&E has identified other ignitions that
 26 resulted in a fire greater than ten acres to which its equipment may have contributed. One of these is
 27 the Kincade Fire. The information regarding those fires, including the time the fires started, the
 28

1 number of acres burned and whether there was any damage is still preliminary. PG&E will provide
2 the information to the Court once PG&E has it. PG&E notes, however, that it may be delayed in
3 doing so in view of the ongoing Public Safety Power Shutoff (“PSPS”) events, which require
4 significant resources to ensure the timeliness of decision-making, the re-energization of power lines
5 and that customers get the support they need before, during and after the shutdowns.

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7 Respectfully Submitted,

8 Dated: October 28, 2019

JENNER & BLOCK LLP

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