

Proceeding No.: I.08-11-006  
Exhibit No.: \_\_\_\_\_  
Witness: Michael Daleo

**DIRECT TESTIMONY OF**

**MICHAEL DALEO**

**SAN DIEGO GAS & ELECTRIC COMPANY**

**(RICE FIRE)**

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA  
June 5, 2009**



1 **DIRECT TESTIMONY OF**  
2 **MICHAEL DALEO**  
3 **SAN DIEGO GAS & ELECTRIC COMPANY**

4 Q: Please state your name and title.

5 A: Michael Daleo. I am the System Forester at SDG&E. My qualifications are  
6 appended to this testimony.

7 Q: What is the purpose of your testimony in these proceedings?

8 A: My testimony relates to the CPSD's allegation that I had a conversation with Jack  
9 McCabe of Davey Resource Group regarding the CPSD investigation that was inconsistent with  
10 SDG&E's duty to cooperate with the CPSD.

11 Q: Do you agree with the CPSD's allegation?

12 A: No. I believe that the CPSD misunderstood my conversation with Jack McCabe,  
13 and I completely disagree with the suggestion that I somehow interfered with the CPSD  
14 investigation relating to the Rice Fire.

15 Q: Did you speak with Jack McCabe at some point regarding the CPSD investigation?

16 A: Yes. I received a telephone call on or about February 1, 2008 from someone  
17 seeking information about contacts at Davey Resource Group. The individual identified himself  
18 as being with the CPSD or CPUC, but I was not familiar with the individual and did not recall  
19 speaking with him before. I recall that the individual was looking for information relating to  
20 Mark Clemens, who was the Davey Resource Group employee who had pre-inspected tree  
21 FF1090 prior to the Rice Fire. I had previously been told to refer any calls from the CPSD to  
22 SDG&E's legal department, so I very cordially asked the individual to contact the legal  
23 department for the requested information. After receiving that call, I called Jack McCabe, who I  
24 knew to be a manager at Davey Resource Group, to let him know that somebody from the CPSD  
25 might be contacting Davey Resource Group for information. I also recall informing Jack that we  
26 had been advised that requests from the CPSD to SDG&E should go through SDG&E's legal  
27 department and that he might want to consult with Davey Resource Group's legal department  
28 regarding requests from the CPSD. I passed along our in-house counsel's name and telephone  
number in case Davey Resource Group's legal department had any questions. At no point during

1 my brief conversation with Jack did I state or otherwise suggest that Jack or anyone at Davey  
2 Resource Group should not cooperate with the CPSD.

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4 Q: Did you tell Jack McCabe that CPSD investigator Steve Intably might say  
5 something that was not true in order to get information?

6 A: No. I do not recall saying anything like that, and I was not even familiar with  
7 Steve Intably at that time.

8 Q: About how long was your telephone conversation with Jack McCabe that day?

9 A: I would estimate that the conversation lasted about five minutes or so.

10 Q: Did you have any other conversations with Jack McCabe regarding the CPSD  
11 investigation?

12 A: No.

13 Q: Did you ever tell Jack McCabe that Davey should not speak with CPSD  
14 investigator Steve Intably?

15 A: No.

16 Q: Did you ever tell Jack McCabe that Davey should limit the amount of information  
17 to be provided to the CPSD or in any way withhold information from the CPSD?

18 A: No.

19 Q: Did you ever tell Jack McCabe that Davey should not cooperate with the CPSD?

20 A: No.

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1 **QUALIFICATIONS**

2 My name is Michael Daleo. I am employed by San Diego Gas & Electric Company  
3 (“SDG&E”) as the System Forester for the Vegetation Management Department. My business  
4 address is 8315 Century Park Court, CP22C, San Diego, California, 92123. I received a  
5 Bachelors of Science degree in Natural Resources, with a specialization in Forester and Watershed  
6 Management, from Humboldt State University in 1995. I am a Certified Arborist and Utilities  
7 Specialist as recognized by the International Society of Arboriculture (“ISA”). I have been  
8 employed by SDG&E since September 2004. In my current capacity, I am responsible for the  
9 day-to-day operations of our Department’s tree pruning and pre-inspection activities throughout  
10 SDG&E’s service territory. I supervise four SDG&E Area Foresters in their management of our  
11 tree pruning and pre-inspection contractors. Prior to my current position, I served as Southern  
12 Area Forester and Pre-inspection Supervisor for the Department. Prior to my employment with  
13 SDG&E, I worked for Pacific Gas and Electric for approximately ten years in various capacities in  
14 its Vegetation Management Department, including Pre-inspector, Supervisor, Auditor and  
15 Forester.

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