

TIMELINE

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- Oct. 21 Witch fire starts.
- Oct. 22 Guejito and Rice Canyon fires start. SDG&E notifies CPSD that Santa Ana winds have caused several fires in San Diego County and that many circuits are affected.
- Nov. 5 Witch, Guejito, and Rice Canyon fires fully controlled.
- Nov. 6 CPSD Utilities Engineer Mahmoud (Steve) Intably from Los Angeles contacts SDG&E claims personnel and requests a site visit. Intably also seeks to set up interviews with the first employees to respond to the fires and is asked to contact SDG&E counsel Larry Davis. At the time, SDG&E had its available employees, plus numerous contract and mutual aid crews, responding to the major wildfires that had burned or were still burning in San Diego County, including restoring power to its customers, and was staffing its Emergency Operations Center to direct its response.
- Nov. 9 Intably is escorted by SDG&E claims personnel to the Witch, Guejito, and Rice Canyon fire origination sites.
- Nov. 12 SDG&E Emergency Operations Center de-activated. CPUC Assistant General Counsel calls Davis this week to insist on SDG&E's cooperation in setting up witness interviews. Davis explains that the reason interviews were not set up earlier was not due to a lack of cooperation on SDG&E's part but rather because it took time to identify the first on-site employee for each fire and to find a time when they could be made available for interviews.
- Nov. 13 SDG&E is sued in two class action lawsuits alleging that it is responsible for the damage caused by the Witch/Guejito and Rice Canyon Fires.
- Nov. 15 Intably sends SDG&E's compliance management team lead CPSD's first set of data requests for all fires.
- Nov. 21 Intably interviews SDG&E construction supervisor John Hotta, the first employee to arrive at the Witch fire origination site.
- Nov. 30 Cal Fire sends letter to Davis indicating that it regards the Witch fire origination area "to be a crime scene" and asserts its authority over the area.
- Dec. 1 Last wildfire in San Diego County (Poomacha) is fully controlled.

- Dec. 6 SDG&E responds to CPSD's first set of data requests relating to all fires.
- Dec. 13 Intably interviews SDG&E construction supervisor Ron Smith, the first employee to arrive at the Guejito and Rice Canyon fire origination sites.

2008

- Jan. 9 Intably leaves voicemail message for an SDG&E paralegal proposing a meeting on Jan. 18 to discuss SDG&E's fire investigation and any new findings, etc.
- Jan. 10 CPSD Director Richard Clark advises the Commission at a business meeting that "Our part of the investigation of the San Diego Firestorms will be completed next month. We are not sure when the fire agencies will complete their investigations and begin any criminal or civil prosecutions, but we will be acting in the capacity of expert witnesses in any prosecutions that may occur." (Emphasis added.)
- Jan. 10 Intably sends SDG&E a second set of data requests relating to the Rice Canyon Fire.
- Jan. 12 Davis, who is in the midst of a jury trial for SDG&E, learns on a Saturday of Intably's meeting request and asks SDG&E's paralegal to advise Intably that he will be unable to meet until the conclusion of the trial.
- Jan. 14 Intably sends e-mail to SDG&E's paralegal indicating that he believes the information SDG&E has provided to date is inadequate, requesting a meeting on Jan. 18, and stating: "We request to meet with your appropriate staff this week to get a briefing on your investigation of the fires. During the meeting, we would like to get [a] detailed description on how your company is handling this investigation (what have you accomplished so far, what are your next steps, what have you discovered, and any other issues related to your investigation)." SDG&E's paralegal calls Intably to let him know that Davis is in trial.
- Jan. 16 CPSD counsel sends letter to Davis indicating that, among other things:
 (1) CPSD is becoming concerned that SDG&E "is being less than forthcoming in this matter of critical importance," (2) SDG&E is obligated to answer all questions propounded by the Commission, (3) CPSD intends to go forward with the proposed Jan. 18 meeting, and (4) SDG&E was not responsive to CPSD's requests in November.
- Jan. 17 The jury returns its verdict in Davis's trial. Davis calls CPSD counsel that same day and offers to meet the next day, Jan. 18, as requested by CPSD.

At CPSD counsel's request, Davis calls Richard Clark directly but learns that Mr. Clark is not available to meet on Jan. 18.

- Davis writes letter to CPSD counsel in which he (1) explains his efforts to honor CPSD's request to meet on Jan. 18, (2) raises the issue of Clark's comments about CPSD acting as expert witnesses for any Cal Fire prosecutions along with Cal Fire's declaration of the Witch fire origination site as a crime scene, (3) explains that CPSD has put SDG&E's employees in an awkward situation given the potential for them to be coerced into responding to CPSD questions by virtue of SDG&E's obligations to the Commission and then potentially have their answers used against them in either a criminal prosecution or civil litigation, (4) indicates that SDG&E has already been sued in five lawsuits and is conducting its investigation under the attorney client privilege, (5) acknowledges SDG&E's obligations to the Commission, and (6) outlines why SDG&E's conduct in November was reasonable under the circumstances.
- Jan. 23 SDG&E representatives meet with Richard Clark, CPUC General Counsel Randy Wu, CPSD counsel Ed Moldavsky, and Raffy Stepanian and explain in more detail the awkward position for SDG&E and its employees vis-à-vis potential criminal and civil actions. The SDG&E representatives commit to be as cooperative as possible with CPSD's investigation.
- Jan. 24 Intably sends SDG&E a third set of data requests relating to the Rice Canyon and Guejito Fires.
- Jan. 24 Intably sends SDG&E a second set of data requests relating to the Witch Creek Fire.
- Jan. 25 SDG&E responds to CPSD's second set of data requests relating to the Rice Canyon Fire.
- Jan. 31 SDG&E responds to CPSD's second set of data requests relating to the Witch Creek Fire.
- Feb. 4 SDG&E responds to CPSD's third set of data requests relating to the Rice Canyon Fire.
- Feb. 7 Telephone call between Davis and CPSD counsel regarding concern that Davey Tree was not being sufficiently responsive to CPSD's investigation. Davis responds that he will urge Davey Tree's counsel to cooperate.
- Feb. 8 Davis secures Cal Fire's written permission (as required by Cal Fire's Nov. 30 letter) to visit the Witch fire origination site. Intably again visits

	the Witch, Guejito, and Rice Canyon fire origination sites and is escorted by SDG&E representatives.		
Feb. 11	CPSD counsel sends a set of data requests seeking voluminous amounts of information directly to Davis relating to all fires.		
Feb. 19	CPSD sends SDG&E a fourth set of data requests relating to the Witch Creek Fire.		
Feb. 27	Intably requests an inspection of SDG&E down guys that match the design description Ed Clark contends are improperly grounded.		
Feb. 28	Davis responds to the set of data requests from CPSD counsel relating to all three fires with an 18 page single-spaced letter providing detailed information about all three fires, including an explanation of why the sycamore tree was trimmed for safety reasons on the day the Rice Canyon fire started (Oct. 22) and four October 15 pictures of the sycamore tree.		
March 4	SDG&E responds to CPSD's fourth set of data requests relating to the Witch Creek Fire.		
March 10	Intably and SDG&E representatives inspect transmission down guys on SDG&E's system.		
March 13	Intably sends SDG&E a fifth set of data requests relating to the Witch Creek Fire.		
March 25	CPSD counsel deposes the Davey Tree inspector who inspected the Rice Canyon sycamore tree on July 18, 2007.		
March 27	CPSD counsel — more than three months after the last SDG&E witness was interviewed — requests that three employees submit to examinations under oath.		
March 28	CPSD counsel deposes a Davey Tree foreman about the Oct. 22 trimming of the tree.		
March 28	SDG&E responds to CPSD's fifth set of data requests relating to the Witch Creek Fire.		
April 18	CPSD counsel deposes SDG&E's Vegetation Management Program Manager Don Akau, Forrester Michael Daleo, and Forester Chris Thompson regarding the Rice Canyon Fire.		

April 24 SDG&E representatives, together with Southern California Edison and PG&E representatives, meet with CPSD to discuss technical issues relating to Ed Clark's transmission down guy grounding contentions. Ed Moldavsky sends SDG&E a fifth set of data requests relating to the May 8 Rice Canyon Fire. May 15 Intably sends SDG&E a sixth set of data requests regarding the Sycamore tree trimming between the Clemens inspection and October 22, 2007. May 22 SDG&E responds to Intably's sixth set of data requests regarding the Sycamore tree trimming. May 23 In response to May 8 set of data requests that, among other things, asked for photographs of the sycamore tree related to the Rice Canyon fire, SDG&E again provides the four October 15 photographs. SDG&E responds to CPSD's fifth set of data requests relating to the Rice May 23 Canyon Fire. Davis notifies Intably of upcoming Witch fire evidence removal effort led May 28 by Cal Fire and invites him to attend. May 29 Commission orders CPSD to issue its report on the fires by July 31. June 2 Intably sends SDG&E a seventh set of data requests relating to the Rice Canyon fire. June 2-12 Cal Fire leads multi-party effort to remove and preserve evidence from the Witch fire origination site so that the power lines in question can be thoroughly examined and tested. CPSD does not attend. June 13 Intably sends SDG&E a sixth set of data requests relating to the Witch Creek Fire. June 17 SDG&E responds to CPSD's seventh set of data requests relating to the Rice Canyon Fire. June 18 SDG&E responds to CPSD's sixth set of data requests relating to the Witch Creek Fire. June 19 Intably sends SDG&E a seventh set of data request relating to the Witch Creek Fire. June 20 SDG&E responds to CPSD's seventh set of data requests relating to the Witch Creek Fire.

July 9 Cal Fire issues its reports on the Witch, Rice, and Guejito fires. July 28 SDG&E representatives meet with Richard Clark, CPSD counsel Ed Moldavsky, and Raffy Stepanian, and, among other things, provide them with a written chronology of the inspections of the Rice Canyon sycamore tree -- including inspections on October 15 and October 19 not mentioned in CPSD's final report. July 31 CPSD receives an extension of time to file its report on Sept. 2. August 21 Intably sends SDG&E an eighth set of data requests relating to the Witch Creek Fire. August 22 SDG&E responds to CPSD's eighth set of data requests relating to the Witch Creek Fire; Intably sends SDG&E a ninth set of data requests relating to the Witch Creek Fire. August 25 SDG&E responds to CPSD's ninth set of data requests relating to the Witch Creek Fire and Intably sends SDG&E a tenth set of data requests relating to the Witch Fire guy marker. August 27 SDG&E responds to CPSD's tenth set of data requests relating to the Witch Fire guy marker. Sept. 2 CPSD issues its report regarding the Guejito, Witch Creek, and Rice Canyon Fires. Nov. 12 The Commission issues two Orders Instituting Investigation relating to the Witch Creek/Rice Canyon Fires and the Guejito Fire. 2009 January 8 SDG&E responds to Orders Instituting Investigation regarding all fires. January 29 CPSD sends SDG&E a set of data requests under the Order Instituting Investigation proceedings relating to all fires. February 5 SDG&E provides CPSD responses to their January 29, 2009 Order Instituting Investigation set of data requests regarding all fires. February 13 SDG&E provides supplemental responses to their February 5, 2009 response to CPSD's January 29, 2009 Order Instituting Investigation set of data requests regarding all fires.

February 24 SDG&E provides further supplemental responses to their February 5, 2009 response to CPSD's January 29, 2009 Order Instituting Investigation set of data requests regarding all fires. February 25 SDG&E provides corrected responses to the CPSD's Order Instituting Investigation set of data requests relating to all fires. March 12 CPSD sends SDG&E a set of data requests under the Order Instituting Investigation proceedings relating to all fires. March 16 SDG&E responds to the CPSD's March 12, 2009 Order Instituting Investigation set of data requests regarding the Witch Creek Fire. March 17 CPSD sends SDG&E a set of data requests under the Order Instituting Investigation proceedings regarding the Witch Creek and Rice Canyon Fires. March 19 SDG&E responds to the CPSD's March 17, 2009 Order Instituting Investigation set of data requests regarding the Witch Creek Fire. March 20 CPSD provides Supplemental Direct Testimony of the Consumer Protection and Safety Division Regarding the Formal Witch Creek and Rice Canyon Fires Investigation. March 27 SDG&E serves a revised set of data requests on CPSD for the Witch and Rice fires. May 22 CPSD sends SDG&E a set of data requests relating to the Rice Canyon and Guejito Fires. May 26 CPSD, two months later, serves objections and responses to SDG&E's data requests. June 3 SDG&E responds in part to CPSD's May 22 data requests.

CPSD DATA REQUESTS AND RESPONSES

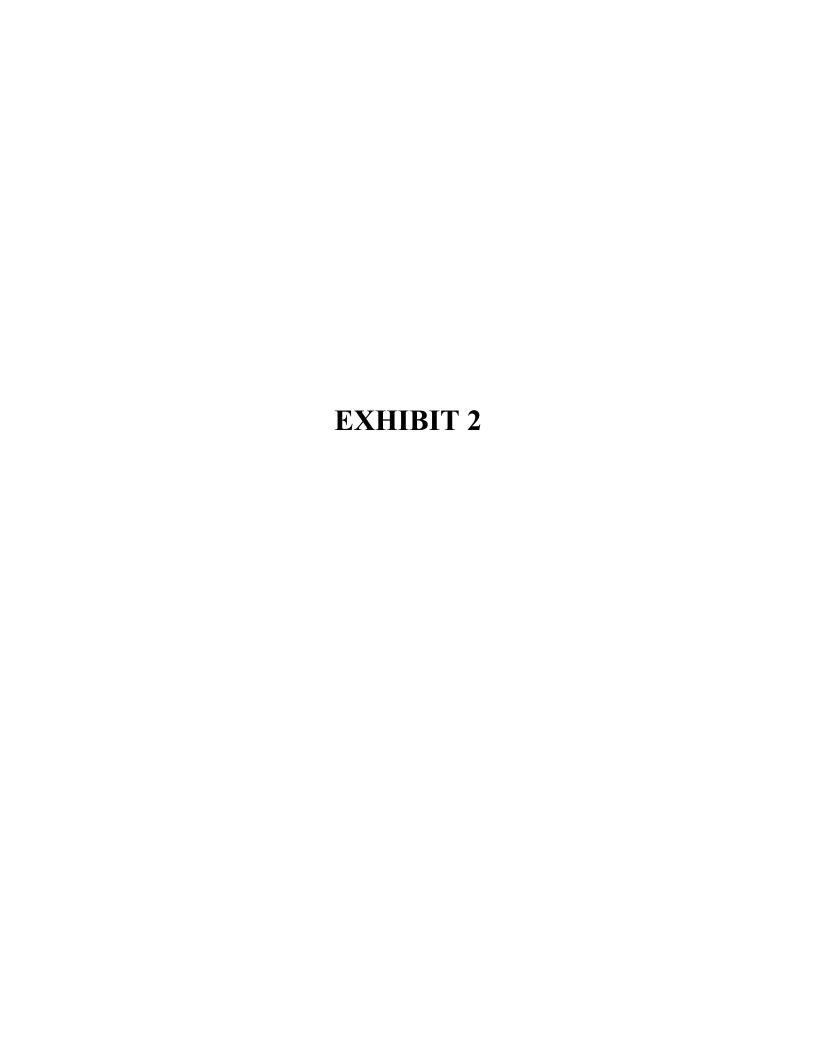
RICE CANYON FIRE

TAB NO.	REQUEST NO.	DATE ISSUED	DATE RESPONDED
1.	First	11/15/07	12/6/07
2.	Second	1/10/08	1/25/08
3.	Third	1/24/08	2/4/08
4.	Fourth	2/11/08	2/28/08
5.	Fifth	5/8/08	5/23/08
6.	Sixth	5/15/08	5/22/08
7.	Seventh	6/2/08	6/17/08
8.	OII	11/6/2008	1/8/09
9.	OII	1/29/09	2/5/09
10.	OII	1/29/09	2/13/09
11.	OII	1/29/09	2/24/09
12.	OII	5/22/09	6/3/09

CPSD DATA REQUESTS AND RESPONSES

WITCH CREEK FIRE

TAB NO.	REQUEST NO.	DATE ISSUED	DATE RESPONDED
1.	First	11/15/07	12/6/07
2.	Second	1/24/08	1/31/08
3.	Third	2/11/08	2/28/08
4.	Fourth	2/19/08	3/4/08
5.	Fifth	3/13/08	3/28/08
6.	Sixth	6/13/08	6/18/08
7.	Seventh	6/19/08	6/20/08
8.	Eighth	8/21/08	8/22/08
9.	Ninth	8/22/08	8/25/08
10.	Tenth	8/25/08	8/27/08
11.	Eleventh	11/6/08	1/8/09
12.	OII	1/29/09	2/5/09
13.	OII	1/29/09	2/13/09
14.	OII	1/29/09	2/24/09
15.	OII	3/12/09	3/16/09
16.	OII	3/17/09	3/19/09



From: Kloberdanz, Joseph R.

Sent: Wednesday, October 24, 2007 2:50 PM

To: EOC EXTERNAL AFFAIRS SL (SD); Fussell, Ken; Mitchell, Eugene

Cc: Schavrien, Lee; Faber, Clay; Overturf, Billie J.; Mills, Pamela; Cahill, Todd; Williams, Steven; Lansinger Jr.,

William; Lorenz, Lad; Blattner, William; VanMidde, Pat; Manz, Laura; Sakarias, Wayne P.

Subject: 10/24/2007 2:44:21 PM

In addition, I also updated Linda Serizawa of the CPUC's Consumer Services and Information Division (left voicemail message), with the same message points.

----Original Message-----

From: EOC REGULATORY REP (SD)

Sent: Wednesday, October 24, 2007 12:21 PM

To: Cc: Subject: Regulatory Audiences Updated October 24, 2007 AM.

Between 7:45 am and 8:45 am on October 24, I provided updates (see message points below) to the following:

- · Billy Blattner, San Francisco Regulatory Affairs
- Lee Schavrien
- CPUC Energy Division, using their Emergency Phone mail System
- CPUC Safety Division (Fade Daye)
- DOE (Brian Copeland)
- FERC (left message with Steve Harvey, Market Oversight Division)

UPDATES ON WHO NOT TO CONTACT

- Fade Daye, CPUC Safety Division, confirmed that we do not need to separately update him. He is satisfied to receive the updates he is receiving from the Energy Division.
- NERC does not need to be updated by the Regulatory/External Affairs EOC team. NERC is updated and
 informed by Transmission Operations, until the CAISO declares a transmission emergency. Once that
 happens, CAISO keeps NERC informed, and CAISO has been in that mode since sometime on Monday,
 October 22. There is no need for the Regulatory/External Affairs EOC team to contact NERC. (Source:
 Pat Van Midde)
- DOT is only interested in significant GAS issues. Jeff Koskie (SoCalGas) has confirmed that. Also, he will
 be the contact with DOT for any gas system updates. DOT does not need updates on electric issues.
 Because the updates I provided this morning are focused on electric, we did not update DOT at this time.

MESSAGE POINTS

- We have approximately 22,000 electric customers out of service (some were told 23,000, as an update
 occurred while I made calls).
- Our tie lines to the bulk transmission grid are out due to fire, or threatened. The Southwest Power link (500 kv) has not been available since the fires began on Sunday October 21. The tielines to the north (230 kv) have been either out of service due to fire or threatened by the same fire for the past several hours. The ISO declared a transmission emergency this morning, and we are standing by for possible load curtailment at the direction of the ISO.

ADDITIONAL UPDATE - CPUC

At approximately noon Colleen Sullivan of the CPUC Energy Division phoned. She thanked the regulatory team for keeping her so well informed.

- I reviewed for her the situation regarding possible load curtailment, which has remained the same since earlier this morning.
- I reminded her that mutual assistance has been requested, and that approximately 34 crews from seven utilities are expected to start arriving October 26-28.

- I informed Colleen that we have activated all same-day demand response and interruptible programs, to minimize the need to curtail load should that become necessary.
- I informed her that we are washing insulators on SWPL, and we hope to restore that to service this
 afternoon.

Joe Kloberdanz EOC (858-636-6979) 858-654-1771 (office) 619-743-5785 (cell)