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Exhibit No.:
Witness: David L. Geier

DIRECT TESTIMONY OF

DAVID L. GEIER

SAN DIEGO GAS & ELECTRIC COMPANY

(WITCH AND RICE FIRES)

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

SDGE

DIRECT TESTIMONY OF
DAVID L. GEIER
SAN DIEGO GAS & ELECTRIC COMPANY

I. INTRODUCTION

Q: Please state your name and title.

A: David L. Geier. I am the Vice President of Electric Transmission and Distribution for San Diego Gas & Electric Company ("SDG&E").

Q: Please describe your experience and responsibilities with SDG&E.

A: I have worked at SDG&E for just over 29 years, and I am currently Vice President – Electric Transmission and Distribution, a position I have had since 2004. I oversee the operation of SDG&E's distribution and transmission system and substations, including design and engineering for new and existing distribution, transmission and substation facilities. I also oversee the civil and structural engineering and licensing of new facilities. Prior to my current role, I served as Director of Electric Grid Services for SDG&E. Other roles have included Director of Electric Distribution Services, Manager of Direct Access Implementation and manager and supervisor at several of SDG&E's operations and maintenance facilities.

Q: What is the purpose of your testimony?

A: There are three primary issues that I will address in my testimony. First, related to the Witch Fire, I am providing a general overview of the faults that occurred on Tie Line 637 on October 21, 2007 and SDG&E's response to those faults. Second, related to both the Witch and Rice Fires, I am providing testimony to address CPSD's allegations that SDG&E did not provide adequate cooperation with CPSD's investigation of the fires, including access to witnesses and obtaining relevant information. As part of the cooperation discussion in my testimony and in order to understand the context of the time in which CPSD began its investigation, I have also included a description of the extreme circumstances that were in effect during the time of the fires. Third, I will address SDG&E's reporting of the fires to the CPUC.

II. THE OCTOBER 21, 2007 FAULTS ON TIE LINE 637 (WITCH FIRE)

Q: On October 21, 2007, how did SDG&E's transmission system operate when faults occurred?

A: Similar to other electric utilities across the country, SDG&E uses protection devices on all of its transmission lines to ensure that the electric system detects and responds to fault activity and isolates the faulted line. These protection devices measure currents and voltage and detect any abnormal system conditions, or faults, on the associated lines. If a transmission line faults, the protective relays operate to open the circuit breakers (de-energizing the line), and the circuit breakers remain open for ten seconds before the reclosers attempt to reclose them. If the circuit breakers do not reclose successfully, which would indicate that the fault has not cleared after 10 seconds, the recloser "locks out" and prevents further automatic reclose attempts. If the circuit breakers reclose successfully, the circuit is restored. As an additional protection, even if the circuit breakers reclose successfully after 10 seconds, the recloser will lockout if the line faults again within 120 seconds of the initial fault. If no additional faults occur in that 120-second period, the recloser resets. My understanding is that these operations are consistent with standard industry practice.

Q: Did SDG&E have specific procedures in effect on October 21, 2007, to be followed in the event that a transmission line faulted and reclosed successfully?

A: Yes. Pursuant to SDG&E's Transmission Monitoring & Control ("TMC") Procedure 1100 ("Transmission Line Fault Patrol") in effect on October 21, 2007, when a line tripped and reclosed successfully and the cause for the trip was unknown, the lines would be patrolled at the discretion of the field supervisor. In practice, the line would generally be patrolled within one business day.

Q: Are you aware that faults occurred on Tie Line 637 on October 21, 2007?

A: Yes. According to SDG&E records, faults occurred at 8:53 a.m., 11:22 a.m., 12:23 p.m., and 3:25 p.m. Relay target information subsequently retrieved from the substations indicated that the first fault involved the C Phase and A Phase conductors and the other faults involved the B Phase and C Phase conductors. SDG&E was not aware on October 21, 2007 that

the faults occurred in the span between poles Z416675 and Z416676. SDG&E was able to determine the location of those faults along Tie Line 637 only after it subsequently retrieved and analyzed relay event records from the substations.

Q: Did the line protection devices associated with Tie Line 637 operate on October 21, 2007 in accordance with the process you described above?

A: Yes. When TL 637 faulted on October 21, 2007, the protection devices at each end of the line operated and opened the circuit breakers, which remained open for ten seconds before the reclosers attempted to reclose them. The circuit breakers reclosed successfully after each of the faults because the fault had cleared within ten seconds. TL637 did not trip to lockout on October 21, 2007 because the circuit breakers reclosed successfully after each of the faults and the line did not fault again within 120 seconds of the faults.

Q: Do you agree with the CPSD testimony that the circuit breakers on TL637 remained open for only about .09-.12 seconds after the faults on October 21, 2007?

A: No. After each of the faults on October 21, 2007, the circuit breakers remained open for 10 seconds after the relay operated before reclosing successfully, which was consistent with SDG&E's procedures. The CPSD appears to have misunderstood the data provided – the shorter durations the CPSD is citing refer to the length of time it took the circuit breaker to open after the fault occurred.

Q: What did SDG&E do in response to the faults that occurred on Tie Line 637 on October 21, 2007?

A: After the first fault at 8:53 a.m., troubleshooters were dispatched to the Creelman and Santa Ysabel substations to investigate the faults and report back regarding the fault indicators, which provide information regarding the type of fault that occurred. Troubleshooters are first responders and are among SDG&E's most highly skilled personnel; they are qualified electric workers trained to recognize obvious safety hazards and to make conditions safe for the public and employees. My understanding is that the troubleshooters reported back to Grid Operations at approximately 10:00 a.m. that the circuit breakers had operated one time and that one of the indicators specified that there had been one fault involving the C and A phase

conductors. Troubleshooters were again dispatched to the substations following the second fault at 11:22 a.m., and they reported back to Grid Operations at approximately 12:23 p.m. (Santa Ysabel) and 12:56 p.m. (Creelman) that the circuit breakers had operated two additional times. At 12:59 p.m., SDG&E's Transmission Construction & Maintenance ("TCM") group reported that TL637 would be patrolled as soon as possible, and my understanding is that John Hotta, an SDG&E Construction Supervisor, was dispatched to the site.

Q: Was TL637 de-energized on October 21, 2007?

A: Yes, TL637 was de-energized at 3:27 p.m. at the request of John Hotta, the first responder at the Witch Fire site. My understanding is that Mr. Hotta requested that the line be de-energized at that time for the safety of the firefighters in the area and because the fire was still burning under and around the line in that area.

Q: Did SDG&E operate its system in accordance with the transmission line fault procedures in effect at the time?

A: Yes. As described above, the protection devices associated with Tie Line 637 operated as intended, and SDG&E promptly dispatched troubleshooters to the substations and initiated a patrol within a matter of hours after the first fault occurred. I believe that SDG&E's procedures at that time were prudent, in accordance with good utility practice and consistent with industry standards.

III. SDG&E'S COOPERATION WITH CPSD'S INVESTIGATION (WITCH AND RICE FIRES)

Q: Do you agree with CPSD's representations that SDG&E demonstrated a lack of cooperation with CPSD's investigation of the fires, including preventing the CPSD from obtaining relevant information and access to witnesses?

A: No. SDG&E acted in good faith and to the best of its ability to provide accurate and prompt information to the CPSD during the immediate aftermath of the fires, as well as since that time. Furthermore, I see no indication that CPSD was somehow harmed in its investigation based on SDG&E's alleged lack of cooperation. As the following discussion and timeline demonstrate, CPSD received timely information and access to witnesses, particularly given the

demanding circumstances that existed during and after the fires. It is important to understand that when first contacted by CPSD regarding the fires, SDG&E was still in the midst of restoring service to customers and in fact the fires in San Diego County were not completely extinguished at that point, so SDG&E was still in emergency response mode. In spite of those huge demands on SDG&E during and after the fires, SDG&E nevertheless acted diligently to assist CPSD and to provide the access and information that CPSD requested.

For example, CPSD Utilities Engineer Mahmoud (Steve) Intably first contacted SDG&E on November 6, 2007 to arrange a site visit, even though SDG&E personnel, contract employees, and mutual aid workers were still fully immersed in fire response activities at that time. At least one fire was still burning on November 6, 2007 (the Poomacha fire), and SDG&E's Emergency Operations Center (EOC) was not de-activated until November 12. Intably was nonetheless escorted by an SDG&E claims representative to the fire origination sites of the Witch, Guejito, and Rice fires on November 9, just three days after his request. CPSD was also able to interview the only two employees it requested to speak with in November and December 2007. CPSD did not contact SDG&E about any additional employee interviews until late March 2008. SDG&E also responded to all discovery from CPSD during this period in a timely manner, often within days of the request. Where more voluminous productions were involved, responses were provided generally within 10 to 14 days. Following Mr. Intably's site visits on November 9, he sent CPSD's first data requests to SDG&E on November 15. SDG&E responded to those on December 6. Not until January 16, 2008, did Mr. Intably send a second set of data requests, to which SDG&E responded on January 24, 2008. That same date SDG&E received Mr. Intably's third set of data requests, to which it responded on January 31, 2008.

During this same late January time period, Mr. Intably informed SDG&E that he desired to make another visit to the three fire sites. SDG&E advised Mr. Intably by phone that Cal Fire had assumed full control over the Witch site and that he would need to obtain written permission from Cal Fire Chief Pete Marquez for CPSD and SDG&E to access the site. Mr. Intably stated he would contact Cal Fire and request that permission be faxed or e-mailed to SDG&E. On or about February 5, SDG&E reminded Mr. Intably that, prior to the scheduled February 8 site visit,

Cal Fire's written permission would need to be received. On February 7, not having heard from either CPSD or Cal Fire, SDG&E itself contacted Chief Marquez directly to make sure the CPSD site visit could go forward. On February 8, Chief Marquez faxed a letter permitting CPSD and SDG&E access to the site that same day so long as certain conditions were met. On that same date, Mr. Intably made visits with SDG&E and Cal Fire personnel to the sites of the Witch, Guejito and Rice fires.

Attached to my testimony (Exhibit 1) is a timeline of relevant events that amply illustrates these and other points (including but not limited to prompt responses to subsequent data requests) and demonstrates that SDG&E cooperated fully with CPSD, even under the extraordinary conditions that were in effect at the time of the fires all the way through the CPSD issuing its report on September 2, 2008.

Q: Did you become aware of a statement by Richard Clark to the Commission about CPSD providing assistance to Cal Fire?

A. Yes. That was in January 2008. SDG&E learned that on January 10, 2008, Mr. Clark informed 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."

Q. Was that of concern to SDG&E?

A. Yes, so much so that on January 22, 2008, one of our attorneys wrote a letter to CPSD counsel in which he, in part, noted that Mr. Clark's comments about CPSD acting as expert witnesses for any Cal Fire prosecutions, together with Cal Fire's declaration of the Witch fire origination site as a crime scene, placed SDG&E and its 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. The first civil lawsuits against SDG&E were filed November 13, 2007. In furtherance of our concern, on January 23, 2008, SDG&E representatives met with Mr. Clark, CPUC General Counsel Randy Wu, CPSD counsel Ed

Moldavsky, and Raffy Stepanian of CPSD and explained in more detail the awkward position for SDG&E and its employees vis-à-vis potential criminal and civil actions. However, SDG&E representatives did commit to be as cooperative as possible with CPSD's investigation, and as the timeline reflects, SDG&E was in fact cooperative.

Q: You earlier referenced the severe demands that SDG&E was under during the fires and when CPSD first made contact with SDG&E for information. Can you please summarize the demands that were placed on SDG&E's system and its employees during the fires of October and November 2007?

A: Yes. The wildfires burned through large portions of San Diego County and SDG&E's service territory beginning on October 21, 2007, with the last fire being fully controlled on December 1, 2007. SDG&E's immediate response to this emergency required an enormous effort to restore service to customers. At the peak of the fires, thousands of employees were committed to this effort, together with an additional 203 mutual assistance personnel, plus 78 contract electric crews and 129 digging crews. The Harris fire, reported first on October 21, 2007, started in the border community of Potrero. It was followed in order by the Witch, McCoy, Guejito, Coronado Hills, Rice, Poomacha, and Ammo fires. The Witch and Guejito fires became the largest of the 2007 California fires, burning areas north and northeast of San Diego. The last fire, the Poomacha fire, was the last to be fully controlled.

While service to all SDG&E customers was restored by November 12, 2007, work on the system understandably continued at an intense level even after that date. Following restoration, additional inspections were required, and additional pole replacements and system repairs occurred. The Governor's incident summaries show these eight fires burned an estimated combined area of more than 360,000 acres of land, damaged or destroyed over 1,700 residential structures, and caused the evacuation of an estimated 513,000 people. In 2003, there were three major fires burning simultaneously, whereas in 2007, five coincident major fires spread resources further and created greater logistical challenges and tremendous manpower demands. During the restoration process for the 2007 fires, a total of 1,605 distribution and 211 transmission poles were replaced. As of December 31, 2008, the total pole count for

replacement associated with the fires had reached over 1,900 distribution poles and more than 270 transmission poles. SDG&E also replaced approximately 341 spans of distribution wire, 338 transformers, and numerous associated pieces of equipment.

Q: Can you describe SDG&E's initial response efforts with respect to these wildfires?

A: Building on SDG&E's experience with the 2003 fires, SDG&E quickly moved to mobilize personnel. Initially, emergency responders were dispatched, and on-duty personnel from Electric Distribution Operations (EDO) and the EOC began monitoring the fires and SDG&E system conditions. Anticipating the rapidly moving fires would cause severe damage and service interruptions, requests were made at 4:22 a.m. on October 22, 2007 for districts to retain their crews. The EOC was fully activated on Monday, October 22, 2007 at 5:00 a.m. The total number of customers without power had risen to approximately 19,000 at that time. By 5:36 a.m., a control center notification canceled all routine work. At 6:45 a.m., the EOC, EDO, six Construction and Operations (C&O) Centers, Grid Control, and Kearny Maintenance and Operations conducted a conference call to brief staff on system status and to begin outlining a detailed plan for potential resource requirements. By 7:30 a.m., SDG&E had 55 outages with 24,000 customers out of power. SDG&E raised its alert status, and estimates of customers out of service were growing rapidly and predicted to get much worse. Field personnel were reporting extensive damage to both distribution and transmission facilities, and it quickly became apparent that the extent of the damage caused by the multiple fires was greater than could be managed with available SDG&E resources and additional assistance would be required. Therefore, mutual aid, contractor and helicopter services were placed on standby to aid in responding to the developing emergency.

Q: Can you please provide more detail about SDG&E's field response?

A: SDG&E called on all qualified field resources to respond to the fires. The first priority was to make the system safe for the public and agency emergency personnel. From the outset, crews began working around the clock to clear hazards, assess damage, and make repairs. Damage assessment was a high priority for SDG&E, but it could not begin until the areas were deemed safe for entry by Cal Fire. As home inspections were performed by fire, police, and local

agencies, and utility personnel were allowed in a burned area, the next priority was to make the area safe by removing both electrical and structural hazards. Since the fires affected some densely populated residential areas, a "Street Safe" procedure was utilized for the first time, in coordination with fire and police departments, to ensure public safety from damaged electric facilities. Service crews and larger primary and secondary crews removed services from burned homes, cleared wires and poles that had fallen, tested structural integrity, reinforced compromised poles, and also completed an assessment of the area to determine what repairs were needed to restore service. After crews were allowed access by Cal Fire, it took approximately two full days to examine every street in each of the fire damaged communities, remove the hazards, and assess for damage to begin system repair and restoration. As part of the Street Safe effort, SDG&E worked closely with impacted communities and fire and police departments to determine when it was safe for residents to return to their homes.

As these areas were made safe and assessed, restoration was prioritized and estimated. The prioritization was designed to restore service to as many customers as possible, and as quickly as possible. Work ceased on all routine construction and maintenance activities, including new business. Local contractors already working for SDG&E were also taken off routine projects and assigned to fire damage restoration.

Q: Were SDG&E's own resources sufficient to deal with the level of response and emergency required under these circumstances?

A: No. SDG&E also invoked mutual assistance agreements with other utilities, which responded in the days and weeks following the onset of the fires. The mutual assistance agreement provides for reciprocal emergency restoration services during any declared emergency or disaster affecting member utilities. On October 22, 2007, activation of the EOC triggered the formation of SDG&E's mutual assistance management team. Communications immediately began about crew availability, response timing, and related logistics and contracts. SDG&E's operations personnel were assigned as mutual assistance coordinators and qualified SDG&E electrical technicians were assigned as mutual assistance crew liaisons. To ensure safety and operating efficiency, an SDG&E liaison was assigned to every mutual assistance crew. Once

mobilized, the combined mutual assistance workforce totaled 203 mutual assistance utility workers, 29 electric transmission and distribution overhead electric crews, nine heavy equipment operators, four gas crews, and seven fleet utility specialists.

In addition to mutual assistance, local and out of state contract crews were utilized. SDG&E requested that each electrical contractor that was already in the region doing business with SDG&E assemble additional resources. Within the first week, linemen from other utilities and out-of-state contractors also arrived. Contractors were used to clear downed power lines and remove debris, dig pole holes, reconstruct the electric transmission and distribution systems, and clean up destroyed facilities. At peak periods, contractors provided 78 electric crews and 129 digging crews, along with heavy equipment to pull electric line trucks into difficult locations. SDG&E's Construction Services department, working in coordination with efforts directed from SDG&E's C&O Centers, dispatched contract crews to fire damaged locations, generally concentrating on specific geographical areas or electric distribution circuits. Contract Administrators were assigned to each location to provide field coordination, tracking, and oversight. Additional qualified resources from other parts of SDG&E served as Contract Administrators, due to the large number of crews utilized during this crisis. Construction Services supervisors and administrative employees provided 24 hours per day back office support, as the field personnel worked to repair the damaged electric infrastructure. This work continued until the mutual assistance effort was deemed complete and power for all but a few customers had been restored. For SDG&E crews, the effort continued until all customers were back in service, damage was repaired, and the scheduling of new business work was restored to near normal.

Q: Can you please describe some of the unique demands that were placed on SDG&E's crews during the emergency and service restoration process?

A: Within urban areas, many of the electric distribution facilities affected by the fire were mainly underground subsurface and pad-mounted equipment. Unlike an overhead system where the damage is visible, fire damage to the electric distribution underground system is not as easily detectable. As a result, SDG&E expended a great deal of effort testing and locating

damaged facilities. Damage to the underground system included melted cable near the entry of a service to a burned building, heat damaged transformers, and melted conduit. An additional challenge was that in some neighborhoods the location of burned homes was intermittent. Given these conditions, SDG&E had to quickly reconfigure the system to make safe and cut loose connections to damaged homes so that the circuits could be re-energized to serve the habitable homes.

In some areas, such as Fallbrook and Palomar Mountain, damage to the electric distribution feeder infrastructure was very extensive, cutting off electric supply to outlying portions of communities that were outside of a burn area. Early on, SDG&E recognized the needs of these customers and connected large generators to the undamaged and isolated sections of circuits feeding these areas, thus providing power to these communities during the weeks that crews needed to repair the electric systems. These generators were installed by electric distribution crews and maintained 24 hours-a-day by substation electricians. SDG&E was able to restore power to hundreds of customers days and weeks ahead of rebuilding facilities.

Q: Please describe other parts of SDG&E that were involved with the service restoration effort.

A: In addition to SDG&E's electric distribution crews, there were many other people involved in coordinating and supporting the assessment and restoration efforts. Kearny personnel completed switching operations in the substations for crew safety and operated equipment supporting construction. Planners and designers from Project Management assessed damage and wrote work orders for rebuilding the electrical system. Several district storeroom workers served as tool and equipment "runners" for SDG&E, contract, and mutual aid crews. Supervisors and Contract Administrators supported SDG&E crews and served as liaisons for mutual aid and contract crews. Gas and street repair crews also served as equipment operators and built access roads for electric crews. Managers and engineers supported the effort by organizing the work, coordinating support for field personnel, and providing timely updates to Electric Distribution and Grid Operations, and ultimately to SDG&E's customers.

SDG&E, mutual assistance, and contract crews provided the experience, skill, direct

labor, and equipment necessary to replace the damaged poles, wire, and other infrastructure. For these crews to be as effective as possible, it was necessary that a host of other support organizations work behind the scenes to ensure that the crews had everything they needed to complete work safely, efficiently, and according to plan. Logistical support was one of the most important undertakings during this extended emergency restoration effort. Basic necessities, such as food, lodging, and sanitation facilities, had to be provided, especially since many of those assisting in the restoration effort were from outside of the local area. Transportation, communication devices, safety equipment, and a continuous supply of materials were essential to completing repairs.

Also, during major emergencies, SDG&E's Strategic Lead position within the Business Support team at the EOC has functional oversight of various support areas including fleet mobilization, facility management, human resources, safety, environmental, material supply and delivery, information technology, security, food service, hotels, and staging areas. SDG&E's logistics team coordinated these essential behind-the-scenes functions for crews constantly on the move, and met material requirements sometimes identified only hours before they were needed for repairs in the field. SDG&E Logistics personnel forecasted needs for materials and services based on gathered information from field assessments. To meet the initial requests for material, local storeroom personnel were called out and assigned to shifts to provide 24-hour-a-day support. All 10 SDG&E storerooms were staffed and operational continuously throughout the first three weeks.

SDG&E also formed an Inventory Management team, which estimated sizes and quantities of poles, cross-arms, transformers, and hardware. Inventory levels were checked and purchases expedited, ensuring the flow of material for a restoration effort that was continuously changing as the event unfolded. In total, over 1,800 purchase order lines were placed with 18 suppliers. Large quantities of wood poles were purchased during the event, which came from plants in Canada, Washington, and Oregon, as well as California storage sites in Fresno and the Imperial Valley. As the poles arrived on approximately 150 trucks from these locations, they had to be unloaded, sorted, and reloaded for the delivery of appropriate sizes and lengths to as many as 15

different locations. Employees dedicated to this effort placed the purchase orders, directed each delivery, processed goods receipts, accepted requests from the field, specified reloading for delivery to the field, and coordinated the routing and unloading of the poles.

For the storerooms to process and issue large quantities of material, SDG&E established a team dedicated to expediting material requests. This team gathered information on material needs from a variety of sources including damage assessment reports, repair orders, and communications from crew leaders and liaisons in the field. Material requests were organized and consolidated by type, timing, and location, and quickly compared to what stock was available or scheduled to arrive from other sources. Employees were recruited and SDG&E trucks assembled into a team of special "runners" capable of immediately dispatching to retrieve materials, assembling them into an order, and then delivering the materials directly to the field for installation by the crews. Establishing this process minimized delays by relieving crews from having to return to staging areas or C&O Centers for additional parts, thus helping reduce overall restoration time.

At the same time that SDG&E was managing the ongoing effort in the field, it was also making a strong effort to communicate the situation to customers. For example, SDG&E's customer service staff initially called all customers who had outages that were expected to last 48 hours or more by telephone to apprise them of the situation, and then updated them regularly as additional information became available on the status of their restoration. Thousands of phone calls were made, including calls to customers on restored circuits to identify any residual problems. In addition, after fire agencies declared a burned area safe to enter, SDG&E assembled a team to go door-to-door distributing information, and leaving door hangers at the homes of customers who could not be reached. Included on the hangers were basic contact information, estimated restoration times, and safety information concerning downed power lines and back-up generation. Over 10,000 door hangers were distributed during the emergency: 6,000 for fire-safety and 4,000 for long-term outages.

SDG&E employees were also deployed to Public Evacuation Centers across the fire-affected areas to assist wherever possible. The teams answered questions about safety, billing,

restoration of service, the process of having gas and electric service reestablished for homes that needed to be rebuilt, and other related topics. Materials were provided in English and Spanish, and bilingual speakers were made available to assist wherever possible. SDG&E employees from Customer Service, Project Management, and the executive team also attended town hall community meetings and answered questions. SDG&E staff also handled customer inquiries at crew staging areas and distributed the same materials as available at the resource centers.

SDG&E's Safety staff organized and conducted key safety orientation meetings for mutual assistance crews and contractors before any of the crews deployed to the field. The 11 members of the field safety team provided construction crews with daily safety tailgates at staging areas, command centers, and/or work sites to inform them of changing fire hazards and the means to deal with them. Additionally, SDG&E placed two Industrial Hygienists in the field along with three Occupational Health Nurses to provide on-site safety and health services at the restoration command centers. The 16 safety professionals deployed throughout the region kept safety awareness at high levels during restoration activities.

IV. REPORTING OF THE FIRES TO CPSD (WITCH AND RICE FIRES)

Q: Are you also aware that the CPSD is taking the position that SDG&E "failed" to meet the accident reporting requirements for the above mentioned fires?

A: Yes.

Q: Can you please respond to this claim?

A: The SDG&E Claims Department initially notified CPSD of the fires on October 22, 2007 at 1430 hours. The notice specifically stated that extreme Santa Ana winds had caused several fires in the San Diego County area.

Q: Do you believe that this initial notification covered one fire or several fires?

A: Several. The notice indicates "several fires."

Q: Did SDG&E have any discussions with the CPSD after the initial notification?

A: Yes. My understanding is that SDG&E's Claims staff in San Diego had several phone conversations with Fadi Daye and/or Raffy Stepanian to arrange visits to the Witch, Rice and Guejito sites. Steve Intably was escorted to the Guejito site on November 9, 2007 (and again

on February 8, 2008). Although SDG&E's initial notice referenced several fires, CPSD nonetheless asked that separate notices be provided for the Rice and Guejito fires, which SDG&E did on November 11, 2007.

Q: Was a 20 day follow-up letter sent to the CPSD pursuant to CPUC electric reporting requirements for the Witch, Rice and Guejito Fires?

A: No, follow-up letters were not sent out for any of the fires.

Q: Why wasn't this done?

A: Regrettably, the Claims Department did not follow through and send the 20 Day follow-up letters. At this time, the Claims Department was investigating three confirmed significant wild fires wherein SDG&E electric equipment was alleged to have been involved. Additionally, staff was investigating several other significant wild fires. Due to the unprecedented amount of investigation activity and despite a reminder notice to responsible staff, the 20 Day CPUC follow-up letters did not go out as required.

Q: To the best of your knowledge, prior to these fire incidents, had SDG&E failed to notify CPSD of an "electric related" incident and provide a 20 Day follow-up letter as required?

A: No. We have researched our CPUC "electric related" reporting files and found that from 2001 to the present we reported 235 electric incidents to the CPSD pursuant to CPUC reporting requirements. With the exception of the 20 Day follow-up letters following the October 2007 Fires, SDG&E has not missed a deadline.

Q: Have you reviewed your internal process to ensure SDG&E will not miss an electric reporting requirement in the future?

A: Yes. We have reviewed our internal processes and have increased the internal SDG&E "electric related" notifications to ensure compliance. Additionally, an electric reportable incident will now be documented in our Outlook calendar system instead of our Claims Riskmaster system. This will allow us to have electronic automatic reminders that will be received by four individuals, thus reducing the likelihood of a reporting deadline being missed.

Q: Does SDG&E report fire incidents to the CPUC other than by the Claims Department

process described above?

A: Yes. In instances such as the October 2007 fires, SDG&E activates its EOC as noted above. The around-the-clock EOC team includes a Regulatory representative whose responsibilities include communicating ongoing status to the CPUC regarding the fires and the electric system status.

Q: Are you aware of the reporting practices that are undertaken by the EOC Regulatory representative?

A: Yes. The Regulatory representative provides periodic updates to the CPUC's Energy Division and the CPSD with key status information, such as the number of customers out of service, status of SDG&E's major transmission lines, and communications from the CAISO. In addition to those two CPUC divisions, periodic updates are provided to the CPUC's Customer Services Information Division, Department of Energy, the Federal Energy Regulatory Commission and the North American Electric Reliability Corporation (NERC).

Q: Are you aware of EOC regulatory reporting activities specific to the October 2007 fires?

A: Yes. I have reviewed an internal e-mail status report prepared by Joe Kloberdanz, EOC Regulatory representative, on October 24, 2007 (see Exhibit 2). Mr. Kloberdanz reported that he contacted and provided updates on that date to a number of individuals and entities, including the CPUC Energy Division through their emergency phone mail system and Fadi Daye with CPSD. Mr. Kloberdanz' report further states that Mr. Daye informed him that CPSD did not need to receive further updates directly due to the updates he was receiving indirectly through the Energy Division updates. The report states: "Fad[i] 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."

Q: Does it appear to you that the communications to the Energy Division were satisfactory?

A. Yes. Mr. Kloberdanz' report states that Colleen Sullivan of the Energy Division called on October 24, 2007 and commended SDG&E for "keeping her so well informed."

QUALIFICATIONS

My name is David L. Geier. My business address is 8330 Century Park Court, CP33, San Diego, California. I am employed by SDG&E as Vice President – Electric Transmission and Distribution and have held this position since 2004. In this role, I oversee the operation of SDG&E's distribution and transmission system and substations and design and engineering for new and existing distribution, transmission and substation facilities, including civil and structural engineering and licensing of new facilities. Prior to my current role, I served as Director of Electric Grid Services for SDG&E. Other roles have included Director of Electric Distribution Services (in 2002), Manager of Direct Access Implementation and manager and supervisor at several of SDG&E's operations and maintenance facilities. I joined SDG&E in 1980 and have held a variety of positions of increasing responsibility since that time. I hold a Bachelor of Science degree in Electrical Engineering from the University of Illinois and a Master of Science in Electrical Engineering from San Diego State University. I am a registered Professional Electrical Engineer in the state of California.