

# **EXHIBIT 1**

## TIMELINE

### 2007

- 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. 11 In response to a specific request from CPSD, SDG&E provides separate notifications for the Rice and Guejito fires (despite the fact that SDG&E's initial notification on October 22 referenced several fires).
- Nov. 12 SDG&E Emergency Operations Center de-activated. CPUC Assistant General Counsel calls Davis this week to request 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 given the circumstances 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 data requests for all three 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 data request 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."
- 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. 16 Intably sends SDG&E a second set of data requests relating to the Guejito Fire.
- 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.

- Jan. 22 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 SDG&E responds to CPSD's second set of data requests relating to the Guejito Fire.
- Jan. 24 Intably sends SDG&E a third set of data requests relating to the Guejito Fire.
- Jan. 31 SDG&E responds to CPSD's third set of data requests relating to the Guejito Fire.
- Feb. 1 In response to a request from Intably for another visit to the three fire sites, SDG&E informs him that Cal Fire has assumed full control over the Witch site and that CPSD will need to obtain written permission from Cal Fire Chief Pete Marquez (as required by Cal Fire's Nov. 30 letter) for CPSD and SDG&E to access the site. Intably states he will contact Cal Fire and request that permission be faxed or emailed to SDG&E.
- Feb. 5 On or near this date, SDG&E reminds Intably that, prior to the scheduled February 8 site visit, Cal Fire's written permission will need to be received.
- Feb. 7 Not having heard from either CPSD or Cal Fire, Davis contacts Chief Marquez directly to make sure the CPSD February 8 site visit can go forward.
- 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 for CPSD and SDG&E 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 data request seeking voluminous amounts of information to Davis.
- 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 data request from CPSD counsel 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 10 Intably and SDG&E representatives inspect transmission down guys on SDG&E's system.
- 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.
- 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.
- May 23 In response to May 8 data request 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 previously provided on February 28.
- May 28 Davis notifies Intably of upcoming Witch fire evidence removal effort led 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 fifth set of data requests relating to the Guejito Fire.
- June 6 Intably sends SDG&E a sixth set of data requests relating to the Guejito 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 16 Intably sends SDG&E a seventh set of data requests relating to the Guejito Fire.

June 17 SDG&E responds to CPSD's fifth set of data requests relating to the Guejito Fire.

June 17 SDG&E responds to CPSD's sixth set of data requests relating to the Guejito Fire.

June 18 SDG&E responds to CPSD's seventh set of data requests relating to the Guejito Fire.

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 Intably sends SDG&E an eighth set of data requests relating to the Guejito Fire.

July 31 CPSD requests and receives an extension of time to file its report on Sept. 2.

July 31 CPSD sends SDG&E a sixteenth set of data requests relating to the Guejito Fire.

August 14 SDG&E responds to CPSD's eighth set of data requests relating to the Guejito Fire.

August 21 Intably sends SDG&E a ninth set of data requests relating to the Guejito Fire.

August 22 SDG&E responds to CPSD's ninth set of data requests relating to the Guejito Fire.

August 22 Intably sends SDG&E a tenth set of data requests relating to the Guejito Fire.

August 22 Intably sends SDG&E an eleventh set of data requests relating to the Guejito Fire.

August 22 Intably sends SDG&E a twelfth set of data requests relating to the Guejito Fire.

August 22 Intably sends SDG&E a thirteenth set of data requests relating to the Guejito Fire.

- August 26 SDG&E responds to CPSD's tenth set of data requests relating to the Guejito Fire.
- August 27 SDG&E responds to CPSD's eleventh set of data requests relating to the Guejito Fire.
- August 28 SDG&E responds to CPSD's twelfth set of data requests relating to the Guejito Fire.
- Sept. 2 CPSD issues its report regarding the Guejito, Witch, and Rice Fires.
- November 6 CPSD sends SDG&E a fourteenth set of data requests relating to the Guejito Fire, the OII.
- November 6 CPSD sends SDG&E a fifteenth set of data requests relating to the Guejito Fire.
- November 12 The Commission issues two Orders Instituting Investigation relating to the Guejito Fire and the Witch/Rice Fires.
- December 17 SDG&E responds to CPSD's thirteenth set of data requests relating to the Guejito Fire.

**2009**

- January 6 Intably sends SDG&E a seventeenth set of data requests relating to the Guejito Fire.
- January 8 SDG&E responds to CPSD's fourteenth set of data requests relating to the Guejito Fire.
- January 8 SDG&E responds to Order Instituting Investigation relating to the Guejito Fire.
- January 13 Intably sends SDG&E an eighteenth set of data requests relating to the Guejito Fire. SDG&E verbally responded to this data request the same day.
- January 22 SDG&E responds to CPSD's seventeenth set of data requests relating to the Guejito Fire.
- February 25 SDG&E responds to CPSD's fifteenth set of data requests relating to the Guejito Fire.
- February 25 SDG&E responds to CPSD's sixteenth set of data requests relating to the Guejito Fire.
- February 25 CPSD sends SDG&E a nineteenth set of data requests relating to the Guejito Fire.

- March 2 SDG&E responds to CPSD's nineteenth set of data requests relating to the Guejito Fire.
- March 6 CPSD provides Supplemental Direct Testimony of the Consumer Protection and Safety Division Regarding the Formal Guejito Fire Investigation.



**GUEJITO FIRE DATA REQUESTS AND RESPONSE DATES**

<b>REQUEST NO.</b>	<b>DATE ISSUED</b>	<b>DATE RESPONDED</b>
First	11/15/07	12/6/07
Second	1/16/08	1/24/08
Third	1/24/08	1/31/08
Fourth	2/11/08	2/28/08
Fifth	6/2/08	6/17/08
Sixth	6/6/08	6/17/08
Seventh	6/16/08	6/18/08
Eighth	7/31/08	8/14/08
Ninth	8/21/08	8/22/08
Tenth	8/22/08	8/26/08
Eleventh	8/22/08	8/27/08
Twelfth	8/22/08	8/28/08
Thirteenth	8/22/08	12/17/08 (corrected)
Fourteenth	11/6/08	1/8/09
Fifteenth	11/6/08	2/25/09 (corrected)
Sixteenth	7/31/08	2/25/09 (corrected)
Seventeenth	1/6/09	1/22/09
Eighteenth	1/13/2009	Verbal Response Given
Nineteenth	2/25/09	3/2/09

## **EXHIBIT 2**

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**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.

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-----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  
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619-743-5785 (cell)