

Proceeding No.: I.08-11-007
Exhibit No.: _____
Witness: Larry Hall

DIRECT TESTIMONY OF
LARRY HALL
SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA
May 18, 2009



1 **DIRECT TESTIMONY OF**
2 **LARRY HALL**
3 **SAN DIEGO GAS & ELECTRIC COMPANY**

4 Q: Please state your name and your involvement with the investigation relating to the
5 Guejito Fire.

6 A: Larry Hall. I have been retained by SDG&E in connection with the Guejito Fire,
7 including possible electrical involvement.

8 Q: What is your background?

9 A: I am now retired, but I spent 37½ years in the utility business. I am a registered electrical
10 engineer in the state of California and was a principal engineer at SDG&E when I retired. I had
11 previously been a supervisor of substation construction and maintenance, and I also served as
12 SDG&E's fire coordinator for about ten years, from 1993 to 2002.

13 Q: What is the purpose of your testimony in this proceeding?

14 A: To describe the circumstances in which SDG&E first became aware of the Guejito Fire
15 scene on November 1, 2007, and to describe the efforts undertaken by SDG&E to document and
16 preserve relevant information from the scene.

17 Q: When did you first visit the Guejito Fire scene, or more specifically, the span between
18 SDG&E poles 196394 and 196387?

19 A: November 1, 2007. Between October 22 and November 1, 2007, SDG&E employee
20 Randy Lyle and I had been looking at SDG&E transformers and fuses in the area believed burned
21 by the Guejito Fire in an effort to identify any transformer that may have been involved in the fire
22 based on statements made by a Cal Fire employee that he believed an SDG&E transformer was
23 involved. On the afternoon of November 1, 2007, I returned to the San Pasqual Valley to further
24 inspect the SDG&E facilities in an attempt to determine the source of the reports of a flash or
25 transformer explosion (this was my third visit to the area). While in the area, we encountered Cal
26 Fire Investigator Gary Eidsmoe. He informed us that he placed the point of origin in the creek bed
27 under the 12kV span between SDG&E poles 196387 and 196394. He further stated that a Cal Fire
28 battalion chief had observed a flash in the subject span at or about the time of the fire ignition. He

1 also informed us that there was possible damage to the Cox cable in the span. We went to the
2 span, and I observed what appeared to be damaged lashing wire on the Cox fiber optic cable,
3 portions of the lashing wire on the ground, and portions of the lashing wire affixed to SDG&E's
4 southerly conductor. In viewing the portions of the lashing wire on the ground, it was observed
5 that some sections appeared to have electrical arc damage on the ends. We discussed our
6 respective observations, and I concurred with Eidsmoe's conclusion that the Cox lashing wire had
7 contacted the 12kV conductor while it was energized. Because of pending darkness, we made
8 arrangements to return to the site the following day to photo-document the scene.

9 Q: Did you do anything else on November 1, 2007?

10 A: That evening, I made arrangements for SDG&E Senior Claims Advisor Dean Le Brecht to
11 come to the site on November 2, 2007, to photo-document the scene.

12 Q: Were you present at the Guejito Fire scene on November 2, 2007 when SDG&E's south
13 conductor was replaced?

14 A: I was at the scene on November 2, 2007, but I had to leave before the south conductor
15 was actually removed.

16 Q: Do you know why the south conductor was replaced at that time?

17 A: While I was at the scene on November 2, 2007 (along with Gary Eidsmoe of Cal Fire and
18 Randy Lyle of SDG&E), I was inspecting SDG&E's conductors with binoculars and a telephoto
19 lens. During that inspection, I saw a significantly damaged area on the south conductor. The
20 conductor at issue was made up of three strands, and I saw that one of the strands was missing
21 and a second strand appeared to be damaged. I determined that the south conductor presented an
22 immediate safety hazard because of this damage and contacted the SDG&E district construction
23 and operations yard to inform them that the south conductor would need to be replaced right
24 away.

25 Q: What did you do after making the determination that the south conductor needed to be
26 replaced?

27 A: As I just described, I contacted the responsible SDG&E district construction and
28 operations yard to inform them that the conductor needed to be replaced immediately. The

1 district dispatched Butch Belshee, who I understand to be a construction supervisor, to the scene
2 to coordinate the crew efforts. I also discussed with Gary Eidsmoe the steps that would be taken
3 to document the scene, including the sag of SDG&E's conductors, prior to any replacement
4 activities. When Butch Belshee arrived, I discussed with him how to preserve the south
5 conductor and related evidence while still ensuring safe and proper construction procedures. I
6 discussed with individuals from Nolte & Associates, who came out on November 2, 2007 to
7 survey the scene, the documentation that I believed would be required prior to any construction
8 activities. I also discussed with Dean LeBrecht the photo-documentation that would be
9 necessary prior to and during the conductor removal procedure.

10 Q: Was anybody from Cal Fire present when the determination was made to replace the
11 south conductor?

12 A: Yes. As I said, Gary Eidsmoe was at the scene on November 2, 2007.

13 Q: What was Cal Fire's involvement?

14 A: When I informed Gary Eidsmoe that the south conductor was an immediate safety hazard
15 and would need to be replaced, he informed me that he wanted to take possession of the south
16 conductor once it was removed.

17 Q: Do you know what was done with the south conductor once it was removed?

18 A: I had to leave the scene before the conductor was removed. My understanding is that the
19 conductor was spooled onto a large reel at the time of removal, and that because the reel was too
20 large for Cal Fire to accommodate, Gary Eidsmoe accompanied the reel to SDG&E's Northeast
21 District, where it was subsequently transferred to a smaller reel and taken into Cal Fire custody.

22 Q: To your knowledge, did SDG&E undertake any efforts to document the scene before the
23 south conductor was removed?

24 A: Yes. Nolte & Associates conducted a survey of the span on November 2, 2007, to
25 document the scene and the physical parameters of the SDG&E and Cox facilities as they existed
26 at the time before the commencement of any replacement activities.

27 Q: Did you have any discussions with Nolte on November 2, 2007?
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1 A: Yes. I told Nolte that I wanted them to document all apparent points of contact between
2 the SDG&E and Cox facilities, the location of any damaged lashing or damaged stranding and
3 anything else Nolte observed in the span with respect to SDG&E or Cox facilities that it
4 considered to be significant. I also told Nolte that they needed to collect sufficient data to be
5 able to document the sag on all of the SDG&E conductors and Cox's facilities. I requested that
6 the poles and insulator locations be documented.

7 Q: Are you aware of any other efforts undertaken by SDG&E to document the scene at that
8 time?

9 A: Yes. Dean LeBrecht took photographs of the scene with a high-quality camera. Randy
10 Lyle, Gary Eidsmoe, Butch Belshee and I also took photographs of the scene on November 2,
11 2007. It is my understanding that all of these photographs have been produced to CPSD and Cox
12 in connection with these proceedings.

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QUALIFICATIONS

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3 My name is Larry Hall. I am a registered electrical engineer in the state of California
4 (E 7412). I was employed by San Diego Gas & Electric Company (“SDG&E”) for over 37
5 years. All but two years of that time were spent in the operations, construction, and maintenance
6 part of the electric system. For over 20 years, I was involved in the construction and
7 maintenance of electric substations. At the same time, I worked on many power plant projects,
8 including the testing and start-up of 14 gas turbines. For over 20 years, I was also the system
9 start-up engineer and was responsible for the energizing and placing in service of substation
10 equipment and transmission lines. In that capacity, I reviewed and coordinated line construction
11 activities. During the last 10 years of my career I served as Principal Engineer and SDG&E Fire
12 Coordinator. In that role, I interfaced with fire agencies, responded to fires threatening SDG&E
13 equipment or facilities, investigated fires with responsible agencies, and assumed responsibility
14 for determining operational constraints for specific fire areas. Over my entire career, I responded
15 to all types of trouble on the electric system including substation, transmission, overhead
16 distribution, and underground distribution. I also served as a resource for the various design
17 groups responsible for the design of the electric system.