

Proceeding No.: I.08-11-006
Exhibit No.: _____
Witness: Chris Thompson

DIRECT TESTIMONY OF
CHRIS THOMPSON
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 **CHRIS THOMPSON**
3 **SAN DIEGO GAS & ELECTRIC COMPANY**

4 Q: Please state your name and title.

5 A: Chris Thompson. I am an Area Forester at SDG&E. My detailed qualifications
6 are appended to this testimony.

7 Q: Are you familiar with the sycamore tree in the Rice Canyon area with SDG&E Tree
8 ID FF1090?

9 A: Yes.

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

11 A: I visited the site of tree FF1090 on October 19, 2007, just a few days before the
12 Rice Fire occurred. I am providing testimony regarding that site visit and also regarding the
13 events of October 22, 2007 and my observations at the Rice Fire scene.

14 Q: Was anybody else present for that site visit on October 19, 2007?

15 A: Yes. My Assistant Area Forester at that time, Greg Peck, who was employed by
16 Western Environmental Consultants, Inc. ("WECI").

17 Q: Can you describe the circumstances of the October 19, 2007 site visit?

18 A: I visited the site of tree FF1090 at the request of Davey Tree Surgery to determine
19 if time and equipment ("T&E") billing was appropriate for the trimming of that tree. T&E is
20 work compensated at an hourly crew rate as opposed to the contract unit rate and can be requested
21 by the contractor when it believes additional compensation is warranted (e.g., for work that
22 requires traffic control or special equipment, or in difficult access areas). T&E requests require
23 review and approval by me and/or my Assistant Area Forester. My recollection is that Davey
24 Tree Surgery had raised the T&E request relating to tree FF1090 at the October 16, 2007 weekly
25 General Foremen's meeting, and that they requested T&E for trimming the overhang. On
26 October 19, 2007, I was doing a ride-along with Greg Peck. We were headed out to Rice Canyon
27 Road to investigate an outage, so I suggested that we stop at tree FF1090 on the way to evaluate
28 Davey's T&E request. We parked just off Rice Canyon Road, on a dirt access road to the north of
Rice Canyon Road. I walked along the dirt access road and looked at tree FF1090 but could not

1 see the entire canopy from that area. The tree appeared to be healthy, with dense foliage. I then
2 walked out onto Rice Canyon Road and observed the canopy of the tree, looking for any
3 significant, structural overhanging branches. I observed that the overhanging branches were just
4 small limbs and that the overhang was slight, so I determined that T&E billing was not warranted
5 for trimming the overhang. I believe I was at the site for about 5 or 10 minutes that day.

6 Q: Do you have any record of the site visit on October 19, 2007?

7 A: I took notes during the site visit on a tree trim map given to me by Davey Tree
8 Surgery. I am attaching a copy of this map with my notes as Exhibit 1. I wrote down the
9 following observations regarding my October 19, 2007 site visit: “10-19-07 small limbs just over
10 pri[mary], can trim w/ 70’ Lift. T+E for flag crew only.” These notes refer to my observation
11 during the October 19, 2007 site visit that the overhanging limbs on tree FF1090 were small limbs
12 just over the lines, so I did not think T&E billing was warranted for trimming the slight overhang.
13 The notes also reference my determination that SDG&E would approve T&E for a “flag crew”
14 based on my observation that the tree is near a double-blind corner and the crew would need to
15 block a lane of traffic to access the tree with a 70-foot lift truck. I should clarify that I did not
16 write the note that states “REMOVE DIRECT OVERHANG” with an arrow toward the tree – that
17 was written on the map when Davey gave it to me.

18 Q: When you observed tree FF1090 on October 19, 2007, do you recall noting any
19 concerns about the tree?

20 A: No. I observed the tree that day to determine if it had the kind of significant
21 branching overhanging the lines that would warrant T&E billing, and I determined that it did not
22 and that the overhang could be trimmed in the normal scope of work by Davey Tree Surgery. I
23 had not communicated this to Davey Tree Surgery prior to the start of the Rice Fire because our
24 site visit was on Friday (October 19, 2007), and the Rice Fire ignited in the early morning hours of
25 the following Monday (October 22, 2007).

26 Q: To your knowledge, had Davey been out to the site of tree FF1090 prior to making
27 the T&E request?

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1 A: I know that somebody from Davey Tree Surgery had already been out to the site of
2 tree FF1090 when they raised the T&E request, but I do not know on what date. I believe
3 somebody from Davey Tree Surgery may have actually showed me photographs of the tree when
4 they raised the T&E request.

5 Q: To your knowledge, was the October 16, 2007 weekly meeting with Davey Tree
6 Surgery the first time Davey raised the T&E request relating to tree FF1090?

7 A: Yes.

8 Q: Do you have any documents relating to the October 16, 2007 meeting with Davey
9 Tree Surgery?

10 A: Yes. I received a copy of the “Davey Tree Schedule” dated 10/16/2007 at the
11 meeting. I am attaching a copy of this document as Exhibit 2 to this testimony. My handwritten
12 notes appear on the document. Underneath the table, I noted Davey Tree Surgery’s T&E request
13 relating to tree FF1090. My notes refer to the relevant Vegetation Management Area (“VMA
14 379”), the address associated with the tree (“1548 Rice Canyon Rd”), the tree ID (“FF1090” –
15 syc” indicates the tree species as a sycamore), and the nature of Davey Tree Surgery's request.
16 My notes indicate that we were to “Review FF1090 (Syc) for T+E for overhang poison oak.”
17 This was not an emergency request from Davey Tree Surgery, so there was no urgency to visit the
18 site and view the tree. I took these notes to help me remember what to look for when I went out
19 in the field to review the tree.

20 Q: When did you first learn about the Rice Fire?

21 A: I believe it would have been by a blast page on my cell phone.

22 Q: Did you go to the site of the Rice Fire on October 22, 2007?

23 A: Yes. I received a call from Don Akau, SDG&E’s Vegetation Program Manager,
24 asking me to come to the Rice Fire site. I do not recall exactly what time I arrived at the site, but
25 it would have been around mid-morning.

26 Q: What did you understand to be your responsibilities at the Rice Fire site on October
27 22, 2007?

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1 A: Don Akau instructed me to supervise the Davey Tree Surgery crew on-site because
2 he had to leave. Don instructed me to make sure that the Davey crew cleared the area around the
3 power lines so that the lines could be safely restored and to preserve the downed power lines if
4 possible. Don also instructed me to preserve the limb that had broken out of tree FF1090 because
5 he believed it may have been involved in the fire.

6 Q: Please describe the timeline of events on the day of the fire, October 22, 2007.

7 A: I met up with Don Akau about ¼ mile away from the site, and we discussed my
8 instructions for taking over the site. I then drove to the site to supervise the Davey Tree Surgery
9 crew. When I first arrived at the site, Dave Kracha and his climber were there from Davey Tree
10 Surgery. A second crew, James Crowley and his helper, arrived later to assist with traffic control.
11 I saw that the power lines in the area were down but the joint-user facilities were not. I also saw
12 that a large leader had broken-out from tree FF1090 and was laying across the area where the
13 power lines would have been and into another tree on the opposite side of the power lines. A
14 leader is a substantial tree limb that is part of the canopy structure. It was very smoky and several
15 cuts had already been made on the tree by the Davey crew.

16 As the trimming progressed and I could see more of the canopy of tree FF1090 and the
17 failure point, I became concerned about the structural integrity of the remaining portions of the
18 canopy, especially with the high winds in the area. I observed that the broken-out leader was part
19 of a co-dominant situation with included bark. This typically occurs when two separate leaders
20 start growing together and pushing against each other as they grow in diameter. As the leaders
21 grow together, a deformity in the union structure forms, encompassing the bark of the two leaders,
22 which is called an inclusion. The other co-dominant leader was still in the canopy, and I know
23 that co-dominant leaders often fail partially or entirely once another co-dominant leader fails. I
24 saw that the remaining leaders in the canopy were significantly bending in the high winds. Once
25 I observed this, I determined that the remaining canopy needed to be reduced in height due to the
26 initial limb failure in order to protect against additional failures. I called Don Akau to inform him
27 that I intended to reduce the canopy. I instructed Dave Kracha to trim the canopy so that it would
28 be below his best estimate of where the power lines had been and would be re-installed. As I just

1 described, I determined that reducing the canopy was necessary to minimize the risk of any
2 additional failures in the tree, and also to ensure public safety because there were ongoing fire
3 suppression efforts in the area and residents in the process of evacuating. The tree was close to
4 the road, and I was concerned that additional failures could cause the road to be blocked or prevent
5 restoration efforts.

6 My recollection is that the Davey crew could not reach the top of the tree with the 70-foot
7 lift to remove the final leader in the canopy, so they wanted to climb the tree to secure a rope to
8 use as a tip line. I was concerned about that because of the high winds in the area and the
9 potential that the canopy could fail or break-out again, injuring the crew members, so we agreed to
10 tie off the remaining top of tree FF1090 to another tree so that the remaining leader could be
11 removed. Ultimately, the canopy of tree FF1090 was reduced so that the tree height was below
12 the height of the power lines (as estimated by the Davey crew). Once the trimming was
13 completed, we placed the wood trimmed from tree FF1090 on the far embankment opposite Rice
14 Canyon Road and cleaned up the site as best we could. Randy Lyle of SDG&E arrived at the site
15 at some point during the trimming. I turned the site over to Randy and called Don Akau to let
16 him know that I was leaving. The Davey Tree Surgery crews followed me out of the area.

17 Q: Based on your observations on October 19, 2007 or October 22, 2007, did tree
18 FF1090 appear to be healthy?

19 A: Yes, the tree appeared to be healthy. There was dense foliage on the tree and the
20 broken-out leader.

21 Q: What do you recall about the weather conditions at the Rice Fire site on October
22 22, 2007?

23 A: I recall that there were extremely high wind gusts. I observed that the winds were
24 bending the vegetation in the area and causing branch break-outs in other trees in the area as well.

25 Q: Were there any other individuals in the area while tree FF1090 was being trimmed?

26 A: As I mentioned, there were fire crews and property owners and residents.

27 Q: Were any other trees in the Rice Fire area trimmed on October 22, 2007?

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1 A: An oak tree adjacent to tree FF1090 was also trimmed because it had a broken
2 branch as a result of the work done on FF1090.

3 Q: Were any steps undertaken to preserve the portions of FF1090 that were trimmed?

4 A: Yes. As stated above, the wood removed from tree FF1090 was placed on the far
5 embankment opposite Rice Canyon Road on October 22, 2007. I visited the site the next day and
6 contacted Don Akau to see if he wanted me to request that a Davey crew collect the wood. He
7 instructed me to tag the wood with a note identifying it as SDG&E property, which I did. A day
8 or so later, I went back to the site and worked with Don to reconstruct the broken-out leader from
9 the preserved portions of the wood. He marked the wood so that it could be easily reconstructed
10 again, and we then loaded the wood into an SDG&E claims truck.

11 Q: To your knowledge, were any photographs or videos of the Rice Fire site taken on
12 October 22, 2007? Who took photographs and what was photographed?

13 A: Yes. I took photographs and so did Don Akau (he also took some video of the
14 area). My understanding is that these photographs have been provided to the CPSD.

15 Q: Do you agree with the CPSD's allegation that the trimming of tree FF1090 on
16 October 22, 2007 was excessive?

17 A: No. Safety was my first priority. I determined in an emergency situation that the
18 tree needed to be trimmed after the first leader had failed, in order to prevent any more of the tree
19 from failing in the high winds and potentially falling onto the lines in this span again once service
20 had been restored. San Diego was experiencing extreme Santa Ana wind conditions and a
21 county-wide fire catastrophe at that time, and I believe we undertook appropriate measures to
22 ensure the safety of firefighters, other individuals in the area and SDG&E crews working on safely
23 restoring service to customers. It's easy to "second guess" decisions on a hindsight basis.
24 However, I believe that I exercised good judgment in my determinations regarding trimming tree
25 FF1090 on October 22, 2007, and steps were taken to preserve the broken-out limb so that it could
26 be examined in any investigation.

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1 **QUALIFICATIONS**

2 My name is Chris Thompson. I am employed by San Diego Gas & Electric Company
3 (“SDG&E”) as the Northern Area Forester for the Vegetation Management Department. My
4 business address is 8315 Century Park Ct, CP22C, San Diego, California 92123. I received a
5 Bachelor of Science degree in Forest Resources and Conservation with a specialization in Urban
6 Forestry from the University of Florida in 2001. I am a Certified Arborist with the International
7 Society of Arboriculture (“ISA”). I have held various positions throughout my 20 years of
8 experience in Arboriculture, including Climber for Thompson Tree Service, Climber and Foreman
9 for Farrens Tree Surgeons, Foreman and General Foreman for Asplundh Tree Expert Company,
10 Pre-Inspector for Gainesville Regional Utilities and Davey Resource Group, and Supervisor of
11 Right-of-Way Maintenance for Tampa Electric Company. I have been employed by SDG&E
12 since 2006. In my current capacity, I am responsible for overseeing the vegetation management
13 activities of Davey Tree Surgery Company in the northern area of SDG&E’s service territory. In
14 addition, I field customer and internal/external stakeholder requests.

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