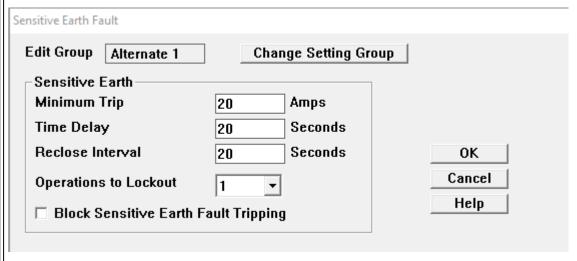
EXHIBIT D

1 2 3 4	JENNER & BLOCK LLP Reid J. Schar (pro hac vice) RSchar@jenner.com 353 N. Clark Street Chicago, IL 60654-3456 Telephone: (312) 222-9350 Facsimile: (312) 527-0484					
56789	CLARENCE DYER & COHEN LLP Kate Dyer (Bar No. 171891) kdyer@clarencedyer.com 899 Ellis Street San Francisco, CA 94109-7807 Telephone: (415) 749-1800 Facsimile: (415_749-1694 CRAVATH, SWAINE & MOORE LLP					
10 11 12	Kevin J. Orsini (pro hac vice) korsini@cravath.com 825 Eighth Avenue New York, NY 10019 Telephone: (212) 474-1000 Facsimile: (212) 474-3700					
13 14	Attorneys for Defendant PACIFIC GAS AND ELECTRIC COMPANY UNITED STATES DISTRICT COURT					
15 16	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION					
17 18	UNITED STATES OF AMERICA,	Case No. 14-CR-00175-WHA				
19	Plaintiff, vs.	DECLARATION OF INSUPPORT OF RESPONSE TO ORDER REQUESTING INFORMATION ON DIXIE AND BADER FIRES				
21	PACIFIC GAS AND ELECTRIC COMPANY,	Judge: Hon. William Alsup				
22	Defendant.					
23						
24						
25 26						
20 27						
28						
- 1	1					

1	I, declare at follows:			
2	1. I make this declaration based upon personal knowledge and if called as a witness I			
3	could and would testify competently to the matters set forth herein.			
4	2. I am a Senior Distribution Engineer at Pacific Gas and Electric Company			
5	("PG&E"). In the course of my duties at PG&E, I have become familiar with the operation of the			
6	line reclosers used by the company, the electronic data they transmit and store, and the use of			
7	appropriate software tools to read and analyze the stored data.			
8	3. I have reviewed the electronic data files provided to me by , Senior			
9	Manager of PG&E's Distribution Planning Group.			
0	downloaded on July 21, 2021 from the electronic controller on the Cooper line recloser located at			
1	the substation for PG&E's Bucks Creek 1101 12kV Line. I reviewed these data files using			
2	Cooper Proview 5.0 software.			
3	4. One data file I reviewed is labeled "bucks creek 1101_2_asfound_07212021.f6s".			
4	This data file contains the line recloser's settings at the time the file was downloaded. The file			
5	label indicates that the data is from the line recloser for the Bucks Creek 1101 line and that it was			
6	downloaded on July 21, 2021.			
7	5. The following is a true and correct screenshot of the setting group selector data in			
8	the "bucks creek 1101_2_asfound_07212021.f6s" file:			
9	Settings Group Selection X			
20	Active Profile Alternative #1 OK			
21	Edit Profile Normal Cancel Help			
22				
23	This data shows that "Alternative #1" was the active setting group profile when the "bucks creek			
24	1101_2_asfound_07212021.f6s" file was downloaded on July 21, 2021.			
25				
26				
27				
28	-2-			

fault setting data in the "bucks creek 1101 2 asfound 07212021.f6s" file:



7. The following is a true and correct screenshot of the "Alternate 1" operations sequence setting data in the "bucks creek 1101 2 asfound 07212021.f6s" file:

Simplified Setup	×				
Operations Sequence TCC1 TCC2 Min Trip #1 Trip #2 Trip #3 Trip #4 Ph 133 v 133 v 100 TCC2 v TCC2 v TCC2 v TCC2 v Ph Rcls Interval #1, #2, #3 10 15 5 Gd 165 v 165 v 50 TCC2 v TCC2 v TCC2 v TCC2 v TCC2 v Gd Rcls Interval #1, #2, #3 10 15 5 Trips to Lockout 3 v Reset Time 90 Complex TCC Time Multiplier Time Adder Min Rsp Time TCC1 Ph 1 En 0 En 0.01 En 0.01 En CTR [1A] 1000 v A-C-B Phase Sequence TCC2 Ph 1 En 0 En 0.01 En CTR [5A] 1200 Disable Phantom Phase					
High Current Trip Complex TCC Following Pole Mounted System Frequency 60 ▼					
TCC1 Ph En 8 0.01 15 Disk 1e-006 Disk 15 Disk	High Current Lockout Pickup Trip #1 Trip #2 Trip #3 Ph 1440				
Gd En 14 0.01 1e-006 Disk Cold Load Pickup TCC Min Trip Time Mult. Time Adder Min Rsp Time TCC Min Trip Time Mult. Time Adder Min Rsp Time					
Ph 133 + 180 1 En 0 En 0.013 En Gd 165 + 100 1 En 0.1 Fn 0.013 En Fn En En En En En En	Ph A% 6.28334				

Case No. 14-CR-00175-WHA

8. A second data file I reviewed is labeled "bucks creek 1101_2_SOE_07212021.f6s.txt". This data file contains the line recloser's recording of certain events, including (1) a change in the active group setting profile, (2) a change in the control to a mode in which the line recloser will not automatically reclose after being opened, and (3) the opening of the line recloser. Once again, the file label indicates that the data is from the line recloser for the Bucks Creek 1101 line and that it was downloaded on July 21, 2021.

9. The following is a true and correct screenshot of the sequence of events data in the "bucks creek 1101_2_SOE_07212021.f6s.txt" file from the date of download back to February 16, 2021:

July bu	cks creek 1101_2_SOE_0	7212021.f6s.txt - Notepad									
File E	dit Format View	Help									
User	device name = B	ucks 1101 F6 Rev 2	8								
Evt	Date	Time	Type	IA	IB	IC	310	VA	VB	VC	
001	21/07/14	19:09:24.322	MAN/EXT TRIP/LO	0	0	0	0	119	120	118	
002	21/07/14	19:09:24.322	CONTROL LOCKOUT	0	0	0	0	119	120	118	
003	21/06/24	08:13:55.557	no control alarm	0	0	0	0	113	115	107	
004	21/06/24	04:16:52.628	CONTROL ALARMS	0	0	0	0	0	0	0	
005	21/05/06	13:39:30.988	NON-RECLOSE ON	2	3	2	0	117	119	117	
006	21/05/03	07:00:34.314	no control alarm	2	2	2	0	117	118	116	
007	21/05/03	07:00:28.512	CONTROL ALARMS	0	0	0	0	0	0	0	
800	21/02/17	17:20:45.231	ALT PROFILE #1	0	0	0	0	99	98	98	
009	21/02/16	10:46:08.572	NORMAL PROFILE	0	0	0	0	113	113	113	

This data shows that the "Alternate #1" setting group was selected on February 17, 2021 and was not changed through the date the data was downloaded. This data also shows that the mode in which the line recloser will not automatically reclose after being opened was selected on May 6, 2021 and was not changed through the date the data was downloaded. This data further shows that no events that should be recorded in this file if they occurred—including an opening of the line recloser—were recorded on July 13, 2021.

10. A third data file I reviewed is labeled "2021-07-13 05.57.18.414.evt". This data file was created because the recloser detected a phase to phase fault event that involved current in excess of the "minimum to trip" amperage setting for such faults in the "Alternate #1" operations sequence setting.

5

11

9

1213

1415

16

17

18 19

20

22

21

23

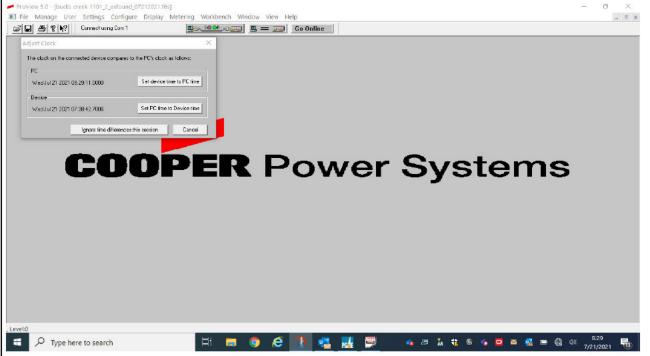
24

2526

262728

11. The file name indicates that current in excess of the "minimum to trip" was detected at 5:57:18.414 on July 13, 2021 as reported by the line recloser's internal clock.

However, I received from the following screen shot which he advises was taken at the time the data I reviewed was downloaded from the line recloser:



This shows that the internal clock on the recloser is running 50 minutes and 28.3 seconds behind the time reported by the internal clock on the laptop used to download the data. Adjusting for this fact would make the time when the current exceeded the "minimum to trip" approximately 6:47:46.714 a.m. on July 13, 2021.

12. The event file contains the recorded oscillography data for that phase to phase fault event. The following is a true and correct screen shot reflecting the time and amperage recorded in the oscillography data when I placed my cursor at the time interval where the phase to phase fault event begins:

This indicates that the phase to phase fault event involved just two of the three phases and began at approximately 22:57:18.4000 on July 12, 2021. The oscillography, however, uses Coordinated Universal Time ("UTC"), which is seven hours behind Pacific Daylight Time. Adjusting for this fact and for the difference between the internal clock of the line recloser and the internal clock on the laptop downloading the data would make the time when the current exceeded the "minimum to trip" approximately 6:47:46.7000 a.m. on July 13, 2021.

13. The following is a true and correct screen shot reflecting the time and amperage recorded in the oscillography data when I placed my cursor at the time interval when the above "minimum to trip" element in the controller asserts:

Volts, Amps (Unfiltered Waveforms) 23 0 3000 Mon Jul 12 2021 22:57:18.365 Bucks 1101 F6 Rev 28 IA=[5.31379] IB=[359.757] IC=[355.351] (Pri Amps) 18.5377 A:unf:8.19806 1000 IB:unf:-491.767 IC:unf:480.512 -2000 -3000 18.4695 - -23 Protection Status TCC1 Phase Trip:0 | 2021 22:57:18.3656 18.5377 TCC2 Phase Trip:0 TCC1 Ground Trip:0 TCC2 Ground Trip:0 Frequency:Trip:0 79:Locked Out 0 Ground > Min Trip:0 Phase > Min Trip:1 Voltage Trip:0 HLT Trip:0 CLPU Phase Trip:0 CLPU Ground Trip:0 External Trip Initiate:0

28

27

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

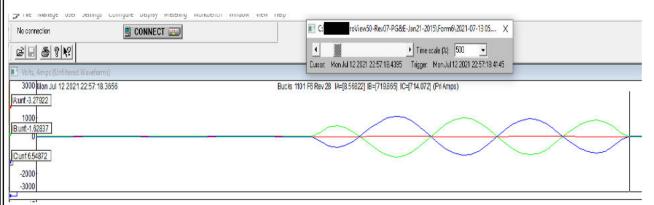
25

26

14. The following is a true and correct screen shot reflecting the time and amperage recorded in the oscillography data when I placed my cursor at the time interval when the amperage in the phase to phase fault event is at its maximum:

Volts, Amps (Unfiltered Waveforms)	
3000 Mon Jul 12 2021 22:57:18.365@uc/s 1101 F6 Rev 28	IA=[8.56822] IB=[726.084] IC=[721.424] (Pri Amps) 18.5377
IA:unf:12.2971	190 April 200 Ap
1000 B:unf:-926.542 C:unf:914.365	
-2000	
	18.4695
■ Protection Status	
TCC1 Phase Trip:0 2021 22:57:18.3656	18.5377
TCC2 Phase Trip:0	
TCC1 Ground Trip:0	
TCC2 Ground Trip:0	
Frequency:Trip:0	
79:Locked Out 0	
Ground > Min Trip:0	
Phase > Min Trip:1	
Voltage Trip:0	
HLT Trip:0	
CLPU Phase Trip:0	
CLPU Ground Trip:0	
External Trip Initiate:0	
[]	18.4695

15. The following is a true and correct screen shot reflecting the time and amperage recorded in the oscillography data when I placed my cursor at the time interval where the phase to phase fault event ends:



This indicates that the phase to phase fault event ended at approximately 22:57:18.4395 on July 12, 2021. The oscillography, however, uses Coordinated Universal Time ("UTC"), which is seven hours behind Pacific Daylight Time. Adjusting for this fact and for the difference between the internal clock of the line recloser and the internal clock on the laptop downloading the data would

make the time when the current exceeded the "minimum to trip" approximately 6:47:46.7395 a.m. 1 2 on July 13, 2021 (0.0395 seconds after it began). The following is a true and correct screen shot reflecting the time and amperage recorded 3 16. in the oscillography data when I placed my cursor at the time interval when the above "minimum 4 5 to trip" element in the controller de-asserts: ProView50 Rev07 PG&E-Jan21-2015\Form6\2021-07-13 05.... X 6 Time scale (%): -7 Cursor: Mon Jul 12 2021 22:57:18.4645 Trigger: Mon Jul 12 2021 22:57:18.4145 olls, Amps (Unfiltered Vsavelu 3000 Mon Jul 12 2021 22:57:18.3785 Bucks 110 1 F6 Rev 28 IA=[2 3764] IB=[2,5781] IC=[1.72908] (PriAmps) 8 A:unf:3.27922 1000 9 IB:unf:-4.07092 IC:unf: 1.63718 10 -2000 18.4695 3000 11 TCC1 Phase Trip:0 | 2021 22:57:18.3785 12 TCC2 Phase Trip:0 TCC1 Ground Trip:0 13 TCC2 Ground Trip:0 Frequency:Trip:0 14 79.Locked Out 0 Ground > Min Trip:0 Phase > Min Trip:0 15 Voltage Trip:0 HLTTrip:0 16 CLPU Phase Trip:0 CLPU Ground Trip:0 External Trip Initiate:0 17 18.4695 18 19 I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. 21 Executed this 28th day of July, 2021, in the City of Atascadero, County of San Luis Obispo, State of California. 23

27

26

24

25

28

DECLARATION OF