EXHIBIT D

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

DECLARATION OF [redacted] IN SUPPORT OF RESPONSE TO ORDER REQUESTING INFORMATION ON DIXIE AND BADER FIRES

Judge: Hon. William Alsup

I, [redacted], declare at follows:

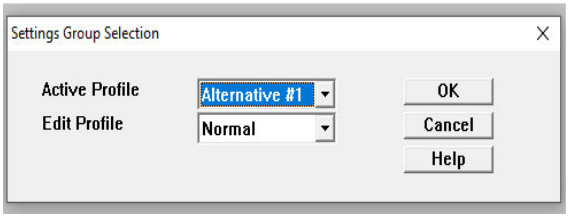
1. I make this declaration based upon personal knowledge and if called as a witness I could and would testify competently to the matters set forth herein.

2. I am a Senior Distribution Engineer at Pacific Gas and Electric Company ("PG&E"). In the course of my duties at PG&E, I have become familiar with the operation of the line reclosers used by the company, the electronic data they transmit and store, and the use of appropriate software tools to read and analyze the stored data.

3. I have reviewed the electronic data files provided to me by [redacted], Senior Manager of PG&E's Distribution Planning Group. [redacted] advised me that these files were downloaded on July 21, 2021 from the electronic controller on the Cooper line recloser located at the substation for PG&E's Bucks Creek 1101 12kV Line. I reviewed these data files using Cooper Proview 5.0 software.

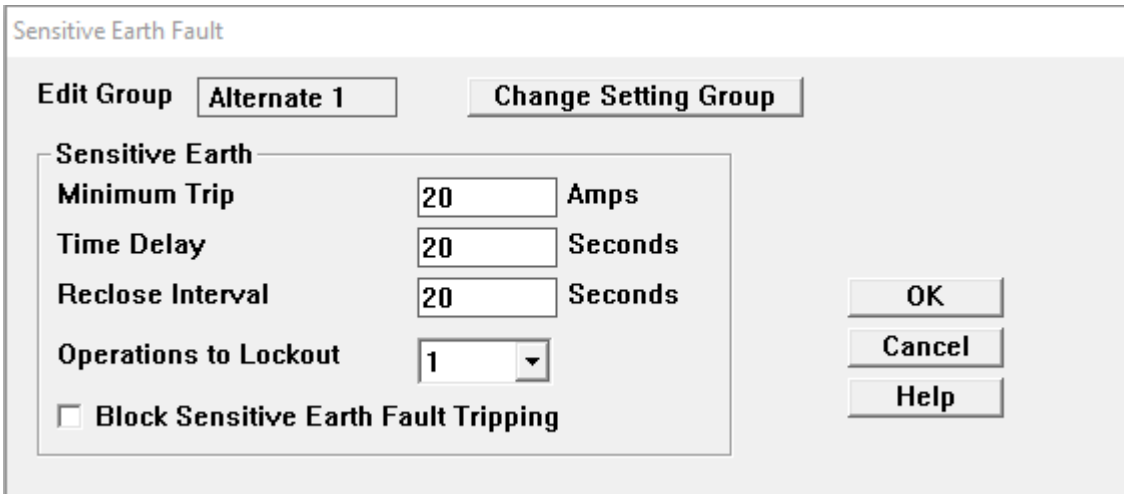
4. One data file I reviewed is labeled "bucks creek 1101_2_asfound_07212021.f6s". This data file contains the line recloser's settings at the time the file was downloaded. The file label indicates that the data is from the line recloser for the Bucks Creek 1101 line and that it was downloaded on July 21, 2021.

5. The following is a true and correct screenshot of the setting group selector data in the "bucks creek 1101_2_asfound_07212021.f6s" file:

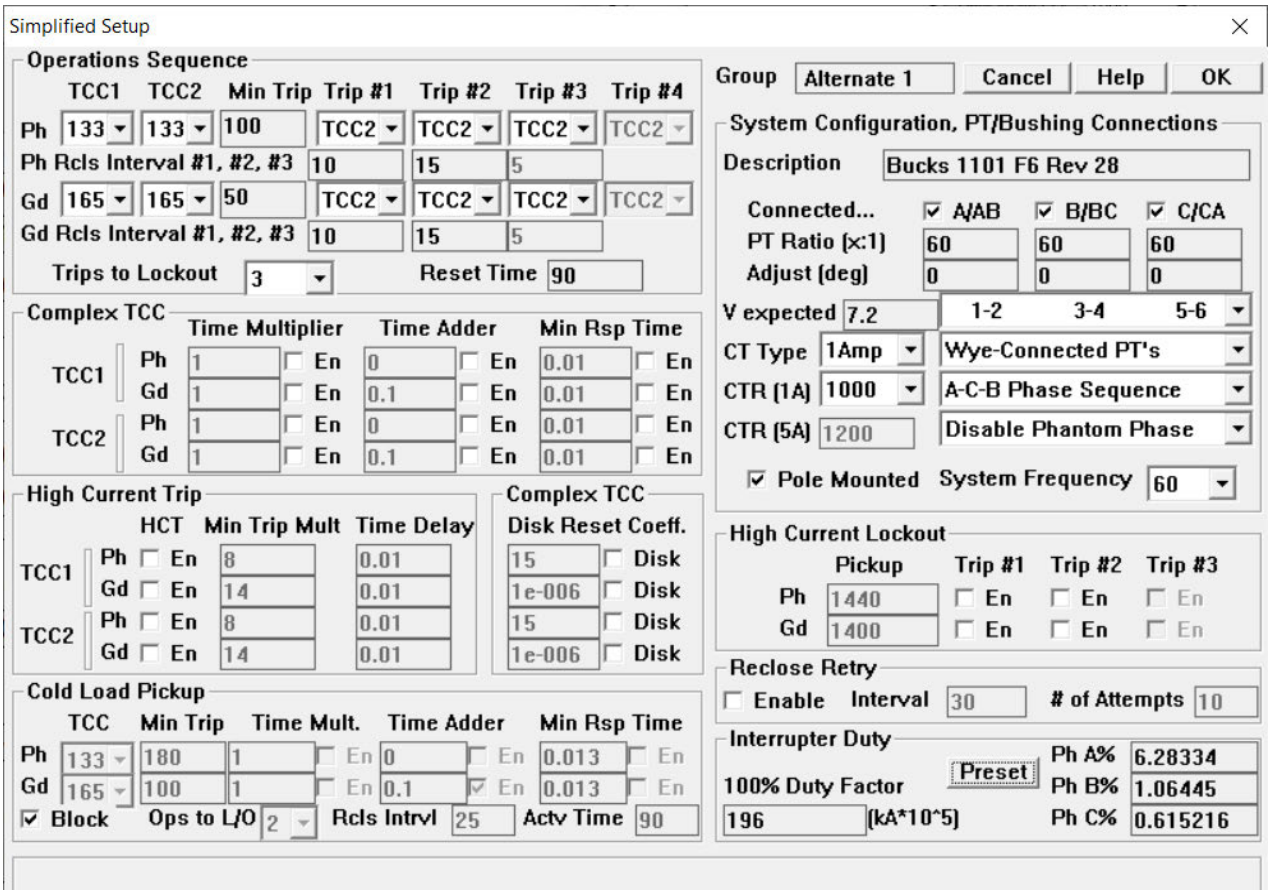


This data shows that "Alternative #1" was the active setting group profile when the "bucks creek 1101_2_asfound_07212021.f6s" file was downloaded on July 21, 2021.

6. The following is a true and correct screenshot of the "Alternate 1" sensitive earth fault setting data in the "bucks creek 1101_2_asfound_07212021.f6s" file:

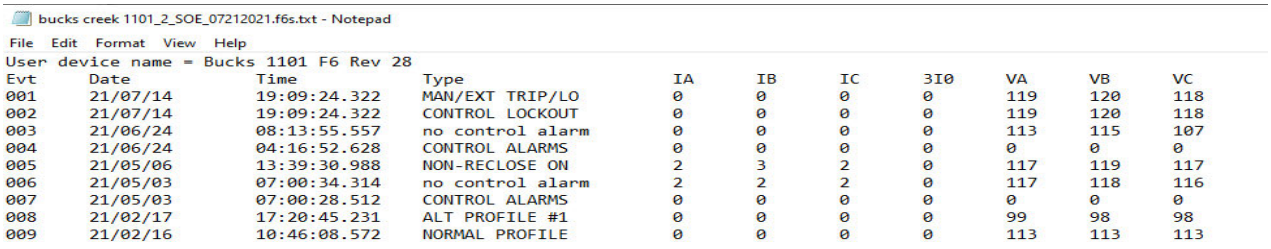


7. The following is a true and correct screenshot of the "Alternate 1" operations sequence setting data in the "bucks creek 1101_2_asfound_07212021.f6s" file:



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:



bucks creek 1101_2_SOE_07212021.f6s.txt - Notepad

File Edit Format View Help

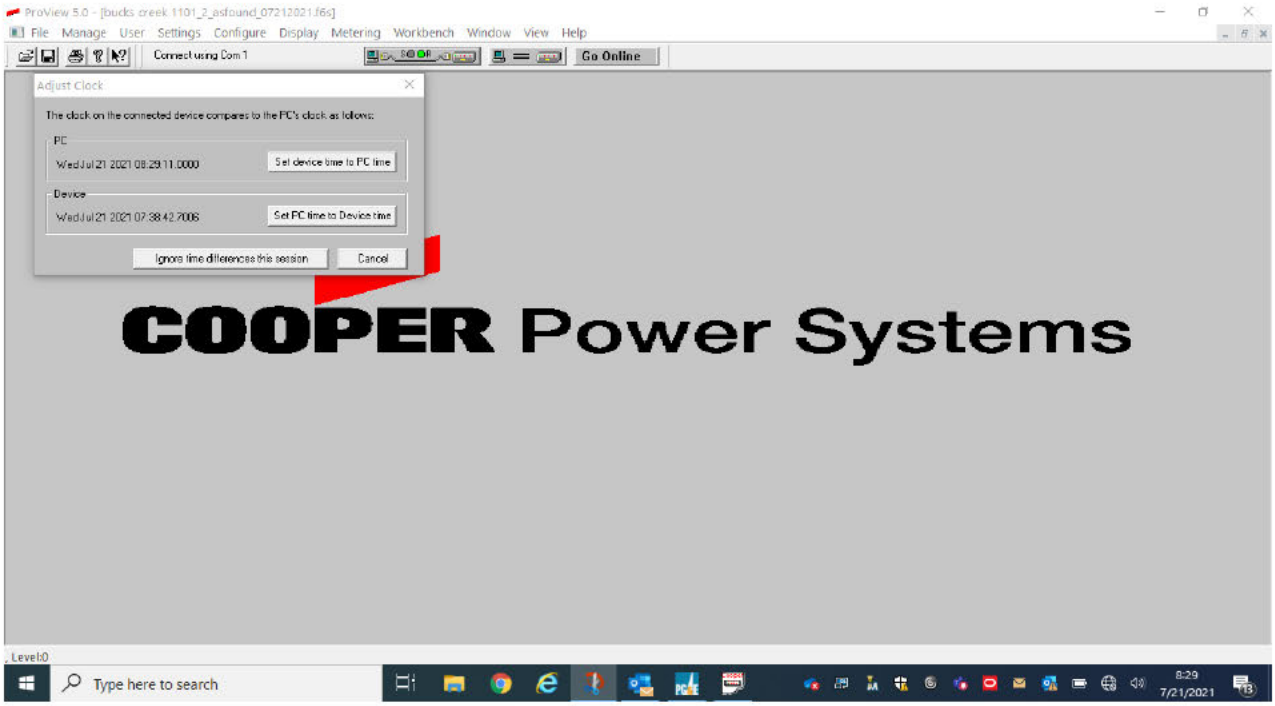
User device name = Bucks 1101 F6 Rev 28

Evt	Date	Time	Type	IA	IB	IC	3I0	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
008	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.

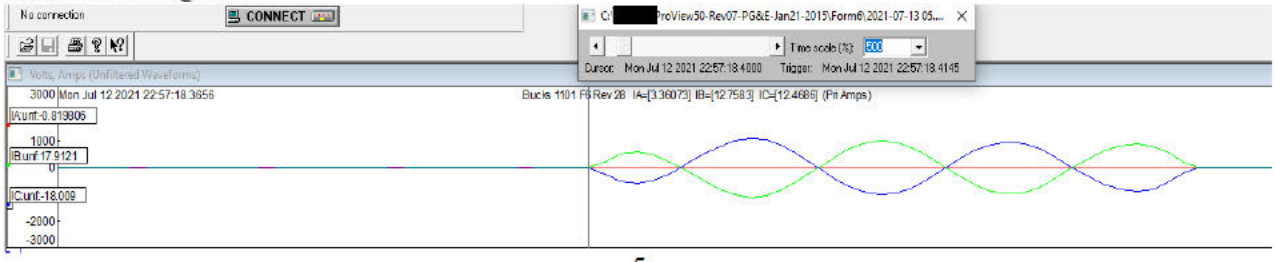
10. A third data file I reviewed is labeled "2021-07-13 05.57.18.414.evt". This data file was created because the recloser detected a phase to phase fault event that involved current in excess of the "minimum to trip" amperage setting for such faults in the "Alternate #1" operations sequence setting.

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 [redacted] the following screen shot which he advises was taken at the time the data I reviewed was downloaded from the line recloser:



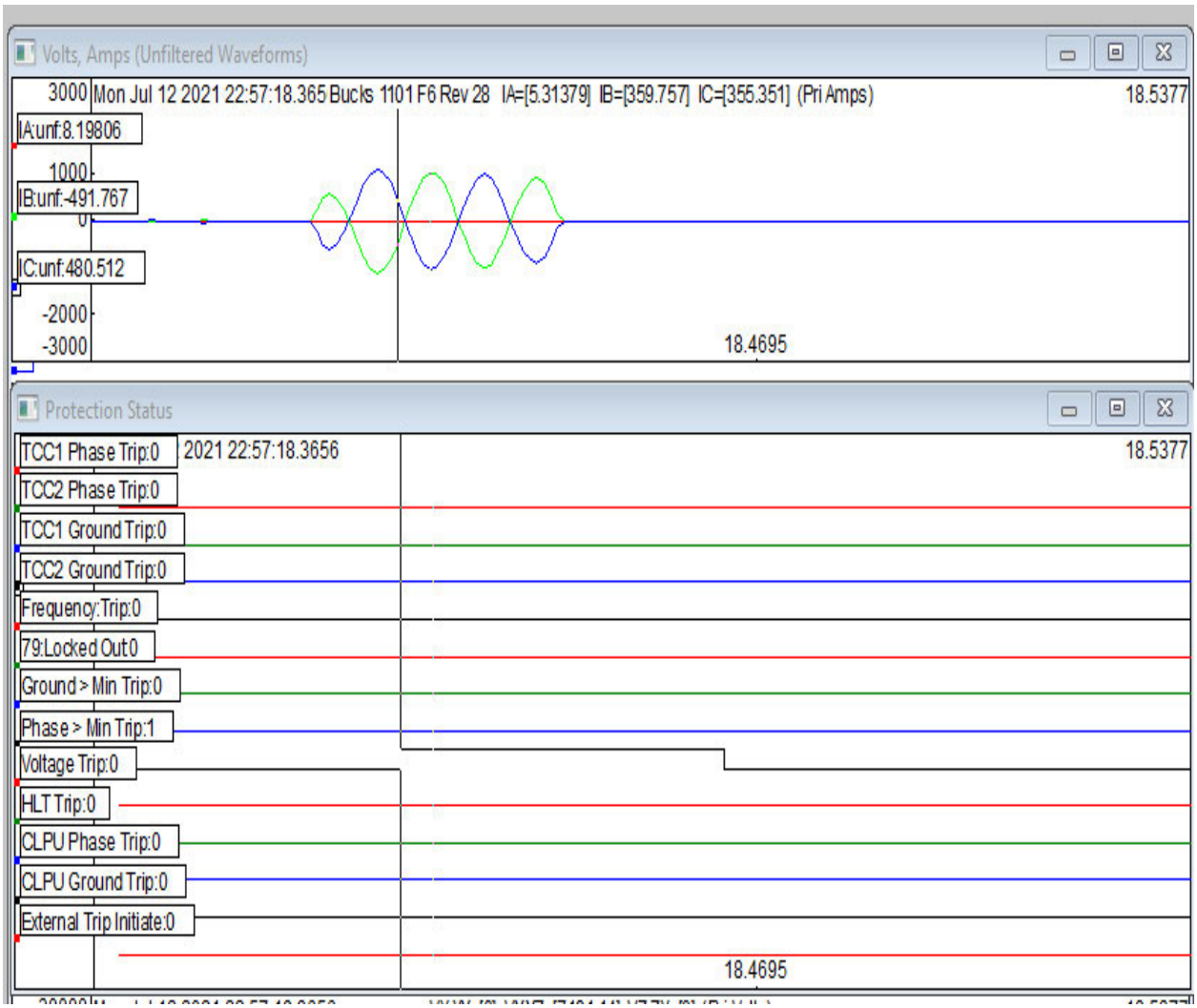
This shows that the internal clock on the recloser is running 50 minutes and 28.3 seconds behind the time reported by the internal clock on the laptop used to download the data. Adjusting for this fact would make the time when the current exceeded the "minimum to trip" approximately 6:47:46.714 a.m.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

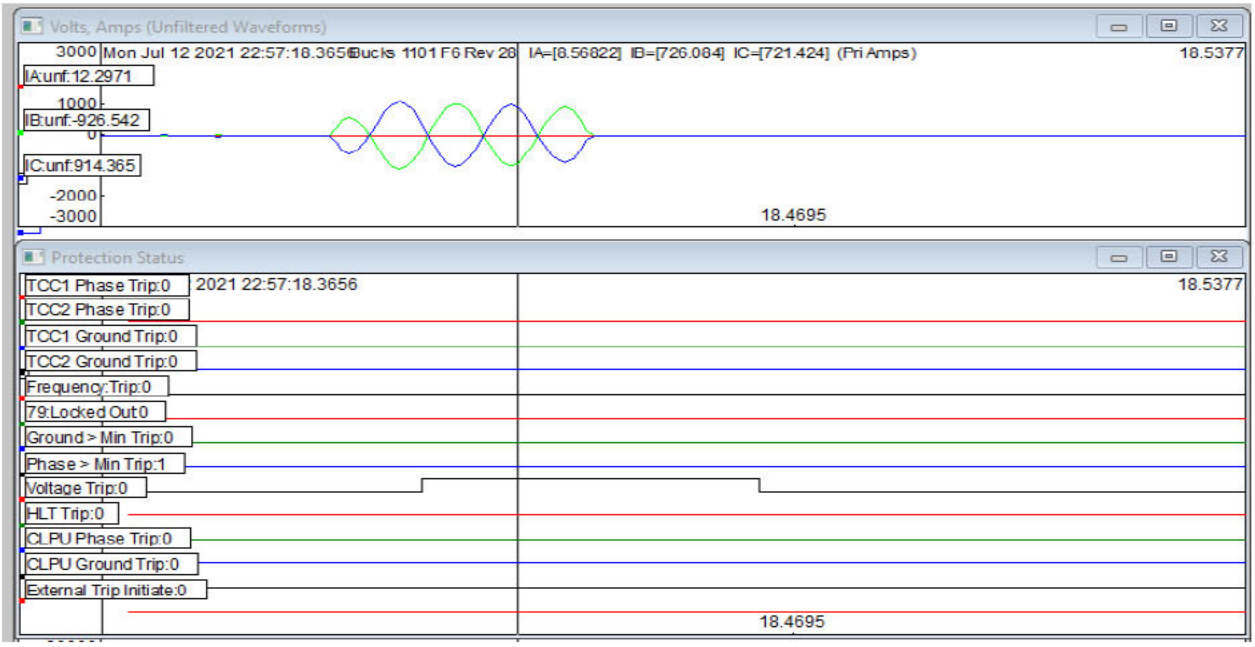


This indicates that the phase to phase fault event involved just two of the three phases and began at approximately 22:57:18.4000 on July 12, 2021. The oscillography, however, uses Coordinated Universal Time ("UTC"), which is seven hours behind Pacific Daylight Time. Adjusting for this fact and for the 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.

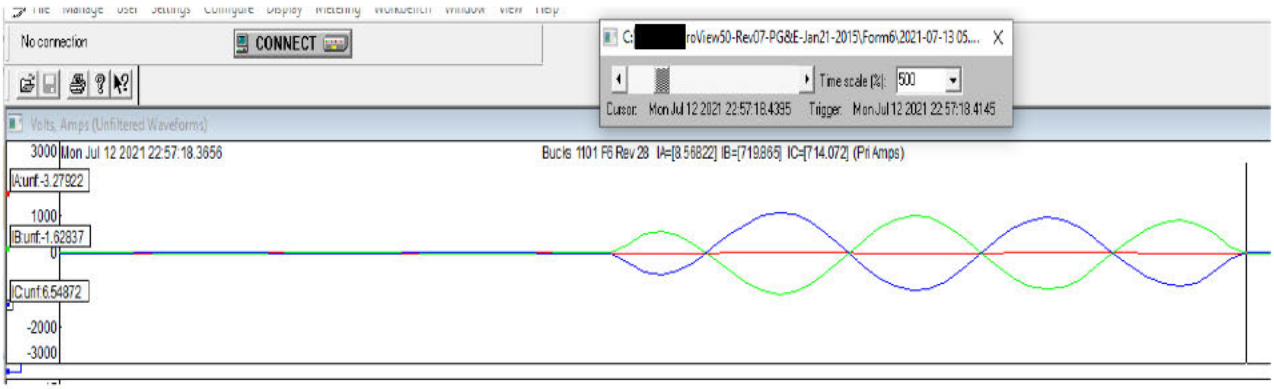
13. The following is a true and correct screen shot reflecting the time and amperage recorded in the oscillography data when I placed my cursor at the time interval when the above "minimum to trip" element in the controller asserts:



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:



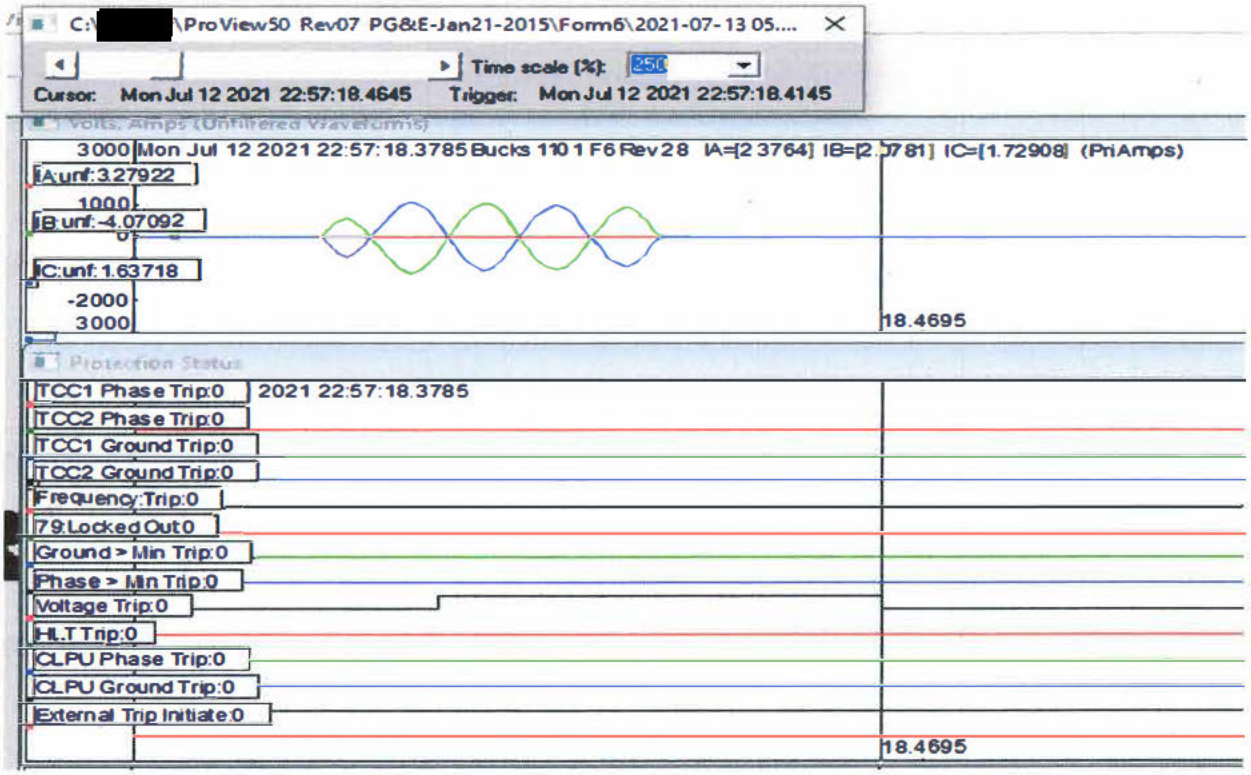
15. The following is a true and correct screen shot reflecting the time and amperage recorded in the oscillography data when I placed my cursor at the time interval where the phase to phase fault event ends:



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. on July 13, 2021 (0.0395 seconds after it began).

16. 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 de-asserts:



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.

Executed this 28th day of July, 2021, in the City of Atascadero, County of San Luis Obispo, State of California.

[redacted]