

CLARENCE

DYER &

COHEN LLP

ATTORNEYS AT LAW

RECEIVED

NOV 30 2021

CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

Nanci L. Clarence
Kate Dyer
Josh A. Cohen
Shaneeda Jaffer
Adam F. Shearer

November 30, 2021

VIA HAND DELIVERY

The Honorable William H. Alsup
United States District Court
450 Golden Gate Avenue, 19th Floor
San Francisco, CA 94102

Re: *United States v. Pacific Gas and Electric Company*
No. 3:14-CR-00175-WHA

Your Honor,

Pursuant to the Court's request of October 29, 2021 and Order at docket 1510, enclosed please find a USB drive containing electronic copies of redacted versions of documents previously produced to the Court. The redacted documents are Bates range PGE-DIXIE-NDCAL-000000001-000023220, referenced at docket numbers 1444, 1461, 1472, 1489, 1491, 1505 and 1520.

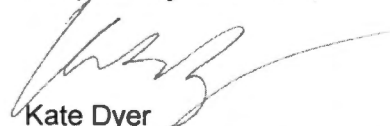
We note that, as before, we have redacted personally identifying information for employees, contractors, customers, and other third parties. In addition, in the productions referenced at dockets 1444, 1461, and 1472, which include the documents relating to the system hardening project for the Bucks Creek 1101 distribution circuit approved by the Wildfire Risk Governance Steering Committee in January 2021, we have also redacted sensitive infrastructure information such as detailed schematics for planned underground facilities as well specific financial and contractor-related information that is competitively sensitive (such as unit costs broken down by cost category/equipment and certain contractor information).

We further note that 33 native files (.kmz/.kml, .csv, .pplx and .dwg files) which cannot be redacted and 437 native Excel files referenced at dockets 1444 and 1445, which are in the process of being redacted, are designated here with "Confidential Native File" slip sheets and account for approximately 6% of the 7,678 documents in the total production. Redacting the native Excel files has been highly labor intensive as many of the spreadsheets have many hundreds of rows of data, with confidential information buried in notes and comment cells. We apologize for the delay and anticipate being able to deliver 150-200 of the redacted Excels by December 6 and the remainder on or before December 13, 2021.

Honorable William H. Alsup
November 30, 2021
Page 2 of 2

Finally, because the Court is making these files available to the public, we respectfully request these redacted versions be used, as some personally identifying information inadvertently was contained in redacted versions previously provided.

Respectfully submitted,



Kate Dyer
Attorney for Pacific Gas and
Electric Company

Encl.

cc: AUSA Noah Stern (Via email w/o enclosure)
Noah.Stern@usdoj.gov