



FILED

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Richard G. Wilbur as Trustee for the Richard
G. Wilbur Revocable Trust,

Complainant,

Vs.

Pacific Gas and Electric Company (U39E),

Defendant

Case No. C.11-05-014
Filed May 11, 2011

RICHARD G. WILBUR AS TRUSTEE FOR THE
RICHARD G. WILBUR REVOCABLE TRUST

**DECLARATION OF LINDSEY E. READ IN SUPPORT OF OPPOSITION AND
RESPONSE TO PACIFIC GAS & ELECTRIC COMPANY'S
AMENDED MOTION TO FILE UNDER SEAL**

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Dated: April 19, 2012

Attorneys for
RICHARD G. WILBUR AS TRUSTEE FOR THE
RICHARD G. WILBUR REVOCABLE TRUST

I, Lindsey E. Read, declare:

1. I am an attorney at law duly licensed to practice before all the courts of the State of California and I am associated with the Law Offices of Jones & Dyer, attorneys of record for Complainant Richard G. Wilbur as Trustee for the Richard G. Wilbur Revocable Trust. The matters stated herein are true of my personal knowledge, except as to matters that are stated on information or belief and as to those matters I believe them to be true. If called as a witness, I would testify to the same as stated hereafter. I submit this declaration in Support of Opposition and Response to Pacific Gas & Electric Company's Motion to File Under Seal.
2. I have reviewed the documents on PG&E's website which are referenced in Complainant's Opposition and Response to Pacific Gas & Electric Company's Motion to File Under Seal. Upon information and belief, the descriptions of said documents which can be found on PG&E's website are accurate.
3. Attached hereto and incorporated herein by reference as Exhibit "A" is a true and correct copy of correspondence dated November 6, 2008 addressed to All Californians from Laura Manz, Vice President Market & Infrastructure Development, CAISO
4. Attached hereto and incorporated herein by reference as Exhibit "B" are true and correct copies of CAISO Maintenance Coordination Committee Meeting Minutes dated April 15, 1999, May 20, 1999, September 16, 1999, April 15, 2004, and April 20, 2006.
5. Attached hereto and incorporated herein by reference as Exhibit "C" are true and correct copies of articles published in the San Joaquin Farm Bureau News in October 2005, January 2006 and October 2007
6. Attached hereto and incorporated herein by reference as Exhibit "D" is a true and correct copy of correspondence dated September 24, 2010 addressed to Richard G. Wilbur from Mark Gibson, Technical & Land Services, PG&E.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date 04/19/12 Signature /s/ Lindsey E. Read

EXHIBIT A



California ISO
Your Link to Power

California Independent System Operator Corporation

Laura J. Manz
Vice President, Market & Infrastructure Development

November 6, 2008

All Californians:

In 1996, the California Legislature passed a law that requires the CAISO to adopt standards for the maintenance of transmission facilities to provide for reliable electric service. As part of adopting these standards, the CAISO has adopted the specific transmission maintenance practices of transmission owners Pacific Gas & Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Western Area Power Administration, Sierra Nevada Region. These transmission owners are required to comply with the CAISO adopted maintenance practices. The transmission owners are also subject to mandatory North American Electric Reliability Corporation Reliability Standards approved by the Federal Energy Regulatory Commission.

To ensure reliable service in California, it is important that transmission owners adhere to these standards and practices. This requires cooperation from affected landowners and governmental agencies to ensure that the transmission owners have access to the transmission facilities and nearby area to trim or remove vegetation, or perform other maintenance. CAISO requests all landowners and agencies to cooperate in allowing the performance of these maintenance standards and practices for the benefit of the CAISO transmission system and the entire State of California.

If you have any questions please feel free to contact our current Grid Assets Manager through our website location: <http://www.caiso.com/contact.html>

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Laura Manz'.

Laura Manz
Vice President Market & Infrastructure Development

EXHIBIT B



CALIFORNIA ISO

FINAL
Released: May 24, 1999

MINUTES

MAINTENANCE COORDINATION COMMITTEE MEETING

April 15, 1999

Offices of the California ISO

Folsom, California

Phil Pettingill, Acting Chairperson of the Committee, called the meeting to order.

ATTENDANCE

The following Committee members were in attendance:

Edward LaBranch
Jim McHan
Scott Hanlon
Ken Lewis
Ray Valaitis
Landis Marttila
Frank Johnson

Dean Landers was in attendance as a non voting representative for Terrie Jones.
Oscar Alvarez was in attendance as a non voting representative for Richard Schweiner.

The following Committee members were not in attendance:

Terrie Jones
Richard Schweiner
Neil Barry
Linda Davis

GENERAL SESSION

PUBLIC COMMENT

There was no public comment.

The following agenda items were discussed:

CAISO-INFO-009-0201
3/3/09 Resp. to Keen
12/31/08 Information Request

APPROVAL OF MINUTES

The Committee's suggested changes to the January and February Committee Meeting Minutes were announced as completed.

The Committee unanimously approved the minutes for the March 18, 1999 meeting as presented. The Committee requested Phil Pettingill to ask CAISO management if there is a legal concern in using the term "Benchmarking" in the FAA study discussed in the March 18, 1999 meeting.

The Committee discussed and requested that a proxy procedure be clarified or established for use by stand-in representatives to vote at these meetings.

RECOMMENDATIONS FOR APPROVAL OF GRID RELIABILITY/OPERATIONS COMMITTEE

The Committee reviewed Maintenance Procedure No. 2 (Outage Data File Format for the CAISO) as a finalized proposed procedure to be submitted to the Grid Reliability/Operations Committee (Grid Ops) for its recommendation to the Board of Governors. The Committee members in attendance voted 8 to 0 to submit this document with agreed upon changes to the Grid Ops for its approval at the May 26, 1999 meeting. The changes were to the header and footer formats (i.e. Title block, paginating, date clarification, and document number).

The Committee reviewed Maintenance Procedure No. 3 (Standard Maintenance Reporting System) as a finalized proposed procedure to be submitted to the Grid Ops for its recommendation to the Board of Governors. The Committee members in attendance voted 7 to 1 with one dissenting opinion to submit this document with suggested changes to the Grid Ops for its approval at the May 26, 1999 meeting. The changes included establishing a report schedule with specific due dates of January 1, March 1, and September 1, respectively, for the current year planning, previous year annual, and current year interim Standard Maintenance Reports. Other changes were the same header and footer modifications addressed under the Maintenance Procedure No. 2 paragraph above.

DRAFT FOR CLASSIFYING FORCED OUTAGES

The Committee discussed Maintenance Procedure No. 5 (Classifying Forced Outages) submitted to the Committee members for review the week prior to the April 15, 1999 meeting by Ed LaBranch. At the March 18, 1999 meeting it became apparent that revisions were necessary to clarify the focus of this document to assist only in the calculation of the Availability Measure as defined in Appendix C. The Committee made changes that were primarily to the listing of outage or non-outage examples. The Committee requested the CAISO to make the suggested changes, place in the same format environment as Maintenance Procedures No. 2 and No. 3, and resubmit as a new draft to Committee members for their comment prior to the May 20, 1999 meeting.

VEGETATION MANAGEMENT PRACTICES

The Committee members accepted the task to gather information necessary to develop an outline for addressing the specific criteria requested in the AB1890 Reliability Report for PTO Vegetation Management Practices. Clarification is needed for clearance criteria, procedures, processes, historical data, schedule, reports, and trimming and removal activities. Pages H-20 thru H-26 of the AB1890 Reliability Report were referenced to the members as the basis for starting this work prior to the May 20, 1999 meeting.

NEW BUSINESS AND FUTURE AGENDA ITEMS

The Committee discussed the following topic:

WSCC

The WSCC is developing maintenance practices based on the CAISO Transmission Control Agreement Appendix C, but doesn't include the work the Committee has developed over the past months. WSCC is aware of the concern the involved utilities have with regard to having to make two different filings (WSCC and CAISO). WSCC is also concerned about staff growth to handle the extra work involved with regional correction factors, individual circuits, 36 grid paths, or all facilities.

CLOSING

Upon the Committee's unanimous consent, the Chairman adjourned the meeting.

EXECUTIVE SESSION

No executive session was held.



MAINTENANCE COORDINATION COMMITTEE MEETING
May 20, 1999
Offices of the California ISO
Folsom, California

Phil Pettingill, Acting Chairperson of the Committee, called the meeting to order.

ATTENDANCE

The following Committee members were in attendance:

Neil Barry
Linda Davis
Scott Hanlon
Frank Johnson
Edward LaBranch
Ken Lewis
Landis Marttila
Jim McHan
Phil Pettingill
Richard Schweiner
Ray Valaitis

Dean Landers was in attendance as a representative for Terrie Jones.

The following Committee members were not in attendance:

Terrie Jones

The following members of the public were in attendance:

E. Deno Dimuzio representing SDG&E
Colleen Sullivan representing CPUC
Richard Cashdollar representing PG&E

GENERAL SESSION

The following agenda items were addressed:

PUBLIC COMMENT

There was no public comment.

APPROVAL OF MINUTES

The minutes for the April 1999 Committee Meeting were approved without revision.

Phil Pettingill reported on questions raised by the Committee during the previous meeting. Mr. Pettingill stated that CAISO management was comfortable using the term "Benchmarking" in the FAA study presented during the March Committee meeting.

Further, it was stated a proxy procedure could not be established for use by stand-in representatives at Committee meetings. The Committee is set up to run like the ISO Board of Governors. Therefore, Committee members need to be present to place their votes. In lieu of the proxy, Committee members will be given notification for any voting by the posted Committee agenda items. Additionally, it was suggested to strive for a sequence that included the establishment of a consent agenda and then at the following meeting a vote on that agenda. Finally, there was a request by the Committee to list those items which could be categorically exempt from any prior voting announcement (i.e. wordsmithing and aesthetics). CAISO will investigate the resolution to these issues.

For future meetings the Committee decided to have a half hour lunch to allow for the meetings to be adjourned before 2:30pm. This allows out-of-town members to catch earlier flights back to their home bases.

STATUS OF MAINTENANCE PROCEDURE DEVELOPMENT

Mr. Pettingill announced that the final package for Maintenance Procedures 1, 2 & 3 was proceeding as scheduled to be submitted to the Grid Reliability/Operations Committee (GRID OPS) at the May 27, 1999 meeting for its recommendation to the Board of Governors. Any changes to those procedures would need to occur after May 27, 1999, as the package to be delivered to the Board was already completed. The Committee discussed and agreed that a change was required to Maintenance Procedure 2, "Outage Data File Format". The Committee recommended the removal of the Direct Current Transmission (DC) from the secondary cause listing.

CLASSIFYING FORCED OUTAGES

Maintenance Procedure No. 5, "Classifying Forced Outages", was modified to address the issue of safety. The Committee decided that if an eminent hazard to personnel or general public would occur then the outage should be granted by ISO real-time personnel and therefore not counted as a forced outage in the availability measure. Jim McHan and Phil Pettingill agreed to draft a paragraph addressing this issue and present to the Committee at the next meeting. Additionally, the Primary Cause Code section of Maintenance Procedure 2, "Outage Data File Format", will be modified to add a code entitled "SAFE" to cover those outages where safety is an overriding

issue. CAISO will incorporate the proposed changes into another draft for the Committee members to review before the June 1999 Committee meeting.

VEGETATION MANAGEMENT PRACTICES

The Committee discussed the vegetation management recommendations in Task H of the 1998 Reliability Report. The Committee concluded that the maintenance practices previously submitted by each PTO and adopted by the CAISO would need to be supplemented for each PTO's vegetation management practices. The amended version will provide five areas of information. The five are:

1. Policy Statement
2. Process and Procedures Description
3. Clearance Criteria
4. Schedules and Plans
5. Recordkeeping Practices

The Committee decided to allow 2 months for the PTO's to draft this document and present it to the July 1999 MCC subcommittee. Each PTO will address flora and tree-trimming practices, thus excluding such activities as roadwork and drainage. The final product will be presented and thoroughly discussed by the Committee.

NEW BUSINESS AND FUTURE AGENDA ITEMS

Topics addressed at the meeting:

Maintenance Procedure 3 Overhaul (SMRS)

The MCC subcommittee presented an alternative on the frequency of SMRS interim reports. The alternative consisted of a letter from the PTO's upper management certifying the status of the planned SMRS. The alternative also called for the CAISO to report back to the PTO's on what circuits required more attention with regard to maintenance or design.

Maintenance Procedures 4A, 4B, 4C, and 4D

The Committee requested the ISO to proceed with the language previously agreed upon for 4A and 4B and place into the standard format used for Maintenance Procedures 1, 2, & 3. Maintenance Procedures 4A and 4B were approved by the Committee for use on a trial basis in completing the annual records review for each PTO during 1999. The newly formatted documents for 4A and 4B will be sent out to the Committee members by ISO staff prior to the June Committee meeting for one last review and approval.

Procedures 4C and 4D address PTO visitation for cause or no cause and site visits. These procedures will be drafted by the MCC subcommittee and then presented to the Committee for a thorough discussion.

EXECUTIVE SESSION

No Executive session was held.



MAINTENANCE COORDINATION COMMITTEE MINUTES
September 16, 1999
Host Hotel @ Sacramento International Airport

Phil Pettingill, Acting Chairperson of the Committee, called the meeting to order.

ATTENDANCE

The following Committee members were in attendance:

Neil Barry
Frank Johnson
Edward LaBranch
Ken Lewis
Landis Marttila
Jim McHan
Phil Pettingill
Richard Schweiner
Ray Valaitis

Robin Furrer was in attendance as a non-voting representative for Terrie Jones.

The following Committee members were not in attendance:

Terrie Jones
Linda Davis
Scott Hanlon

The following members of the public were in attendance:

Chuck Kokoska representing LADWP
Roger Berry representing SDG&E
Richard Cashdollar representing PG&E
Bill Gibson representing CPUC
David K. Lee representing CPUC
Jerry Nishizaki representing SMUD

Ean O'Neill representing EOB

GENERAL SESSION

The following agenda items were addressed:

Public Comment

There was no public comment.

Approval of Minutes

The minutes for the August 1999 MCC Meeting were unanimously approved by the Committee with minor changes.

Current Grounding Practices within CAISO Control Area

The Committee voted unanimously to adopt, with minor changes, the language crafted by Phil Pettingill and Ed LaBranch to not have the CAISO implement a standard policy for use by all PTOs in tagging grounds. The recommendation language after approved changes is as shown on the attachment with subject titled: "MCC Recommendation on Policy of Tagging all Grounds".

Vegetation Management Practices

The Committee completed it's review of the PTO-submitted vegetation practices to ensure they were in compliance with Task H requirements. It was decided that PG&E had fulfilled all the requirements and SCE and SDG&E had minor changes to make before final submittal. Items to be included in the final submittal are:

Characterization of priority policy for removal, replacement, and trim;

Statement on general program for trimming (e.g. 10 foot separation to 69kV, 20 foot separation to 138kV, exceeds G.O. 95 requirements, or G.O.95 clearance plus one year's growth);

Statement clarifying what inspection cycles are used (e.g. 9 months cycle for system-wide, 6 months cycle on Transmission or twice a year, or Maximum is 12 months);