



January 5, 2009

Miriam Raftery

Please find below an itemized response to each point made by SDG&E.

Page 1

Bullet point #1:

“SDG&E has been grounding the down guy with a separate wire and ground rod for more than 25-years.

This statement is technically incorrect and obviously intended to attempt to confuse the reader for the following reasons:

1. If the ground rod was placed in the ground to “ground” the down guy wire and not rely on the contact between the down guy wire and the anchor, then there would be a separate bonding wire running from the ground rod to the down guy wire. This connection would have to be above ground where you could see it. Please see exhibit 1 slide titled “Various ground rods.” There is not a connection from the ground rod to the down guy wire. Additionally, look at each slide that shows a down guy anchor into the ground. Ground rods are rarely utilized as indicated by SDG&E statement.

SDG&E makes a correct statement that ground rods are not required. The fact that they are installed is evidence that SDG&E has identified that arcing is occurring and it was a failed effort (cover up) to attempt to stop the arcing in lieu of just fixing the design mistake for fear of admitting guilt.

2. If SDG&E has adopted adding a ground rod for 25 years, “FOR ADDED SAFETY”, why is it not at all pole locations throughout their system. Look through slides of exhibit 1. There is not even a ground rod at each pole location where there are anchors. Consequently this statement is a direct lie about the utilization of ground rods on SDG&E system.

Bullet Point #2:

“The grounding system we employ is widely used by other Utilities, including Southern California Edison, whose system is considerably larger than ours”.

This statement is a bold face lie by SDG&E!!!

SCE has a specific Construction standard in their Transmission Construction Methods book identified as TO201 that specifically states that the two down guys Must be attached by a distance of 12” apart on the pole. See exhibit #5 at www.theelecticalexpert.com

This is not an industry wide problem! It is a design error by SDG&E.



Bullet Point #3:

Raffy Stepanian, Manager of CPUC Consumer protection & Safety Division: Please refer to exhibit #2 on my website. I specifically reference Mr Stepanians and his staffs lack of expertise in Electrical utilities. Mr. Stepanian sent a member of his staff, Mahmoud (Steve) Antabli to join me in a field visit to show the PUC evidence of arcing. Please refer to Exhibit #3 on my website. Following our field visit, Mr. Antabli had a phone conversation with Jeff McDonald of the Union Tribune and admitted to seeing evidence of arcing.

Despite Mr. Stepanian having full knowledge of a report by a member of his own staff who physically was shown evidence of arcing, Mr. Stepanian has ignored the evidence and failed to educate himself on why arcing is occurring. Mr. Stepanian intentionally omitted this critical information from the PUC report published.

PAGE 2

Bullet Point #4:

“Despite numerous wild fires in California over many years, and many governmental investigations into their causes, there have been no indications that these fires were caused by the scenario outlined by Mr. Clark”.

I physically showed Mr. Antabli from the Puc and Mr. Jim Garrett from Cal Fire the arcing. Both organizations blamed the other and refused to address this problem despite the public danger. See exhibit 7 meeting minutes with Jim Garrett of Cal Fire.

Bullet Point #5

“At least one of the changes in the guy wires that Mr. Clark has suggested is specifically prohibited by GO-95 ie. Adding insulators”.

I do agree that this suggestion would require a rule change, but SDGE already utilizes this design and utilizes insulators which prevents arcing in some locations and by its own admission is a violation. Hence the reason for the suggestion. Although it solves the arcing problem, it could cause other problems.

Bullet Point #6

“It’s vital for safety that all hardware at the pole top is at the same voltage potential to reduce the chance of electrical shock). The common bolt ensures the attachment hardware for both down guys are at the same voltage potential.

This is just an ignorant comment by SDG&E since any of their own protection Engineers can explain that both down guys are already at the same potential, since they are both tied to the own guy anchor. There is no need to “ensure”.



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Bullet Point #7:

“GO 95 Rule 56.4D-3 allows the attachment of the two down guy wires to a common bolt, **unless the guys are parallel or close to parallel**”. The guys in question (in Mr. Clarks presentation) are 180 degrees from each other and not even close to being parallel. If ones goal were to try to create an argument to hide behind, you could look at this rule strictly in the physical sense and make an argument. However this is a PUBLIC “Electrical” UTILITY who is suppose to know how electricity works. SDG&E Engineers understand that the physical direction of the wire does not make any difference. A common bolt makes up a circuit that allows current to flow, which in this application causes arcing to occur at ground level. This rule if properly applied is for an ELECTRICAL APPLICATION. The actual physical direction of the conductor does not change the electrical characteristics of the design. If the conductors were physically in parallel as described, and physically were installed on the same side of the pole, and the rule does not allow them to be tied together with a common bolt (**SDG&E agrees with this**), Ironically, if any of SDG&E Electrical Engineers honestly believes that moving one of the anchors to the opposite side of the pole somehow changes the “electrical circuit”, thus resulting from this rule not being applicable should go back to school. This is BASIC ELECTRICITY at the high school level.

Bullet Point #8:

Federal government does not apply to California, the CPUC rule in Bullet Point #7 does. I have not reviewed the federal rules. If you have a copy, please send them to me for comment.

Bullet Point #9:

Other than two separate site visits with each organization (PUC & Cal Fire) provided an investigator with non electrical utility experience, all three parties, the California PUC, Cal Fire, and SDG&E has denied my participation in any investigation, joint meeting of the minds etc. I have not been given any opportunity to provide any further evidence.

Bullet Point #10:

Please look at my exhibit #2 at www.theelectricalexpert.com where I clearly documented the puc level of Electrical Utility Design Experience as deficient in this area. SDG&E has in house personnel that understands this design is wrong. For SDG&E to utilize Raffy Stepanian as an excuse or an argument who himself does not have any Electrical Utility Experience, is irresponsible.

Following my initial meeting with the PUC back in January of 2008, the PUC has never invited me to sit in and educate, discuss, question or make any effort to validate what I shared with them or to understand what was causing arcing that Mr. Antabli witnessed himself and confirmed with the Union Tribune.



Conclusion: The irresponsible actions by the California PUC, Cal Fire and SDG&E, should prompt a Federal Investigation where all involved including the lawyers are questioned under oath with the full understanding of the consequences if they lie to a federal prosecutor. I presented my findings to Larry Davis (attorney for SDG&E) along with three other employees of SDG&E who fully understood and agreed with my findings. Once the employees agreed with me, Larry Davis would not let there be any more discussions with me and I was asked to leave. All SDG&E employees, executives, Cal fire employees, and CPUC employees who have acted with intentional negligence on a matter that involves the safety of the general public, should be penalized to the maximum extent of the law.

For the two public agencies to not take this serious and try to blame the other for not addressing, and not disclosing and concealing from the public, should also be prosecuted.

Please feel free to contact me should you have any questions.

Edward L. Clark Jr.