January 8, 2008

VIA TELEPHONIC FACSIMILE and CERTIFIED MAIL

Dean Le Brecht
Claims Department
San Diego Gas & Electric
9965 Carroll Canyon Rd., SD1386
San Diego, CA. 92131-1105

Re: Guejito Fire
CDF Case: CA-MVU-010484

Dear Mr. Le Brecht,

The California Department of Forestry and Fire Protection (CAL FIRE) is mandated to investigate all wildland fire incidents to determine both potential criminal liability, if any, as well as any civil liability for potential reimbursement of the cost of wildland fire suppression in the above-referenced fire. CAL FIRE is the law enforcement authority that is investigating the above-referenced fire, and considers the area of the origin of the above-referenced wildland fire to be a potential crime scene containing tangible, relevant evidence. The area of origin of that wildland fire has preliminarily been determined to be in Guejito Creek, south of the Hwy 78 in San Pasqual Valley.

THEREFORE, PLEASE TAKE NOTICE that, as the investigative law enforcement agency, CAL FIRE is asserting its authority to control that crime scene. Please do not attempt to tamper with or alter the area in any manner whatsoever or attempt to obstruct our investigation, including, but not limited to, seizing, replacing, or disposing of any poles, conductors, guys, insulators, or appurtenant equipment.

PLEASE TAKE FURTHER NOTICE that CAL FIRE field personnel have no authority to allow access to the crime scene, and, further, that any such prior permission to enter the crime scene is hereby revoked.

Inasmuch as a number of issues remain to be addressed in CAL FIRE's investigation of the above-referenced fire, CAL FIRE also requests that within 10 days of receipt of this letter that Southern California Edison and/or Edison International, as well as their officers, employees, contractors, agents and/or their assigns, produce the following information, items and documents which are relevant to the completion of said investigation:

1. Any and all witness statements that were taken by representatives of SDG&E/SEMPRA regarding to the Rice Fire.

2. Any and all SDG&E/SEMPRA photos of the fire origin area, and any photos of the area prior to the fire.

3. Any and all aerial photos of the fire scene during 2004, 2005, 2006, and 2007.

4. Any and all fire scene photos, which were taken at or near the area of origin.

5. Circuit map for the circuit adjacent to the point of origin.

6. The construction "Estimate" and "Work Order" for the construction of the circuit and pole the area adjacent to the point of origin.

7. Any construction records regarding the circuit, poles, and equipment in the area adjacent to the point of origin, including any after the fire on October 22, 2007.

8. A copy of SDG&E/SEMPRA's equivalent of SCE's System Operating Bulletin #22 for 2003, 2004, 2005, 2006, and 2007.

9. An admission by SDG&E/SEMPRA that the point of origin was a Bulletin 22-type area?

10. Any and all records of Bulletin 22-type inspections on the circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

11. The wind loading tables for the circuit in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

12. The utility's definition of a "heavy loading area."

13. SDG&E/SEMPRA high wind area maps.

14. SDG&E/SEMPRA engineering policies, practices, and standards for all facilities and equipment in high wind areas.

15. An admission by SDG&E/SEMPRA that the pole was located in an area governed by the California Public Resources Code.

16. Any and all records of post-audit inspections of the circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

17. Inspection records for 2004, 2005, 2006, and 2007 for the aforementioned circuit.

18. Any maintenance records for 2004, 2005, 2006, and 2007 for the aforementioned circuit.

19. Any and all records of any and all inspections on the circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

20. Any and all grid/circuit reports for the circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

21. The operation and maintenance policy and procedures manual in effect at the time of the fire.

22. Any and all SDG&E/SEMPRA documents relating to the cause of the fire.

23. Name the jurisdiction in which the circuit, poles, and equipment in the area adjacent to the point of origin of the respective fire are located.

24. Any and all SDG&E/SEMPRA-generated investigation reports for the cause of the subject fire.

25. Who inspected the area at and around the circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007?

26. Any and all written reports by the troubleman in relation to the events surrounding the fire at the circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

27. Any and all outage reports for the circuit in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

28. The location and number of any Automatic Recloser (AR), if any, on the circuit for the distribution line which caused the fire

29. Any and all "Automatic Recloser" ("AR") records for the circuit in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

30. The Ground and Phase settings for the aforementioned AR.

31. The location and number of any Source Side Device on the distribution line which caused the fire.

32. The location and number or name of the Circuit Breaker that controlled the distribution line which caused the fire.

33. The Ground and Phase setting for the aforementioned Circuit Breaker.

34. Any and all SDG&E/SEMPRA-generated metallurgy reports regarding the subject fire.

35. Any SDG&E/SEMPRA origin and cause investigation report for the subject fire.

36. Any and all records of measurements taken by SDG&E/SEMPRA or its contractors at the area of origin of the fire

37. SDG&E/SEMPRA business and performance reports for 2004, 2005, 2006, and 2007.

38. Any and all SDG&E/SEMPRA reports to shareholders regarding profit/loss due to payment of fire suppression costs, during 2004, 2005, 2006, and 2007.

39. Any and all reports by SDG&E/SEMPRA to the CPUC regarding the subject fire.

40. Any and all press releases by SDG&E/SEMPRA regarding the subject fire.

41. Any and all e-mails, letters, or other communications by SDG&E/SEMPRA to the Governor of the State of California, including, but not limited to his staff, employees or agents; the Attorney General of the State of California, including but not limited to his staff, employees or agents; any member of the United States House of Representatives, including, but not limited to his/her staff, employees or agents; any member of the United States Senate, including, but not limited to his/her staff, employees or agents; any member of the California Legislature, including, but not limited to his/her staff, employees or agents; the San Diego County Board of Supervisors, the Mayor and City Council of the City of San Diego, including, but not limited to his/her staff, employees or agents; or any other elected official, regarding the subject fire.

42. Any and all communications between SDG&E/SEMPRA and the San Diego County fire agencies regarding the subject fire.

43. SDG&E/SEMPRA operations and maintenance policy and procedures manual.

44. Any SDG&E/SEMPRA accident prevention manuals dated November 1997 to present.

45. Any and all SDG&E/SEMPRA fire reporting manuals.

46. SDG&E/SEMPRA Claims Department policy and guidelines for handling fire suppression cost claims and requests for information and documents relating to a fire incident for the circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

47. Listing of any and all maintenance-related budget increases allowed by the CPUC during 2004, 2005, 2006, and 2007.

48. Any and all SDG&E/SEMPRA memos or reports during 2004, 2005, 2006, and 2007, regarding SDG&E/SEMPRA's grid, circuit, line, and pole maintenance obligations.

49. Any and all SDG&E/SEMPRA inspection reports for the circuit, poles, and equipment in the area adjacent to the point of origin, during 2004, 2005, 2006, and 2007.

50. Any and all computer generated reports regarding grid, circuit, line, and pole maintenance report schedules and maintenance information for the circuit adjacent to the origin of the subject fire.

51. 2006 maintenance report with supporting documents for the circuit, poles, and equipment in the area adjacent to the point of origin.

52. Daily record of events dated 10/19/07 – 10/31/07, for the circuit, poles, and equipment in the area adjacent to the point of origin.

53. Any and all reports/records of maintenance performed on the circuit, poles, or equipment in the area adjacent to the point of origin, during 2004, 2005, 2006, and 2007.

54. Any and all reports/records from 10/19/07 through 10/31/07 that may reasonably indicate faults on the circuit, poles, and equipment in the area adjacent to the point of origin.

55. Any and all right-of-way/easements, and agreements, current or expired, within one-half mile radius of the circuit, poles, and equipment in the area adjacent to the point of origin.

56. Any and all records of post-audit inspections of the circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

57. Any and all SDG&E/SEMPRA inspectors' reports with any follow-up reports identifying any unsatisfactory maintenance issues, or improper construction or engineering techniques for the aforementioned SDG&E/SEMPRA circuit in the area adjacent to the point of origin during 2004, 2005, 2006, and 2007.

58. Any and all Cox Cable inspectors' reports with any follow-up reports identifying any unsatisfactory maintenance issues, or improper construction or engineering techniques for the aforementioned SDG&E/SEMPRA circuit in the area adjacent to the point of origin during 2004, 2005, 2006, and 2007.

59. Any and all SDG&E/SEMPRA inspectors' reports with any follow-up reports identifying any unsatisfactory maintenance issues, or improper construction or engineering techniques for the aforementioned Cox Cable TV cable circuit in the area adjacent to the point of origin during 2004, 2005, 2006, and 2007.

60. Any and all SDG&E/SEMPRA line inspector referrals to SDG&E/SEMPRA maintenance employees, contractors, or agents for necessary maintenance, construction or engineering corrections on the aforementioned SDG&E/SEMPRA circuit in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

61. Any and all Cox Cable line inspector referrals to SDG&E/SEMPRA maintenance employees, contractors, or agents for necessary maintenance, construction or engineering corrections

on the aforementioned SDG&E/SEMPRA circuit in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

62. Any and all evidence that is exculpatory.

CAL FIRE greatly appreciates your anticipated assistance and cooperation in providing the foregoing information, items and documents. If there is a problem in providing particular information, items or documents within 10 days of receipt of this letter, CAL FIRE is prepared to be flexible provided that you contact me immediately and establish an acceptable schedule for providing the aforementioned information, items and documents. Any information or materials provided in response to this communication will remain within the context of the investigation unless otherwise required by law.

Please deliver the following requested information, items and documents, together with Southern California Edison's bill for the reasonable cost of reproduction of such documents, to:

Pete J. Marquez, Deputy Chief
CAL FIRE
Southern Region Fire Prevention/Law Enforcement
1234 E. Shaw Ave. Fresno CA 93710
Office: (559) 243-4117
Cell: (559)779-8692
Fax :(559)222-3409

If you have any comments or inquiries, please do not hesitate to contact me at your earliest convenience.

Most cordially,

PETE J. MARQUEZ
Southern Region Fire Prevention/Law Enforcement
California Department of Forestry
and Fire Protection

cc: D. Hillman
T. Hoffman
G. Chandler, Esq.
R. Harrington, Esq.
B. Darrington
bcc: T. Cronin

January 18, 2007

VIA TELEPHONIC FACSIMILE and CERTIFIED MAIL

Don Stryszko
Senior Director of Risk Management
Cox Enterprises, Inc.
6205 Peachtree Dunwoody Rd.
Atlanta, Georgia. 30328

Re: Guejito Fire
CDF Case: CA-MVU-010484

Dear Mr. Stryszko,

The California Department of Forestry and Fire Protection (CAL FIRE) is mandated to investigate all wildland fire incidents to determine both potential criminal liability, if any, as well as any civil liability for potential reimbursement of the cost of wildland fire suppression in the above-referenced fire. CAL FIRE is the law enforcement authority that is investigating the above-referenced fire, and considers the area of the origin of the above-referenced wildland fire to be a potential crime scene containing tangible, relevant evidence. The area of origin of that wildland fire has preliminarily been determined to be in Guejito Creek, south of the Hwy 78 in San Pasqual Valley.

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Inasmuch as a number of issues remain to be addressed in CAL FIRE's investigation of the above-referenced fire, CAL FIRE also requests that within 10 days of receipt of this letter that Southern California Edison and/or Edison International, as well as their officers, employees, contractors, agents and/or their assigns, produce the following information, items and documents which are relevant to the completion of said investigation:

1. A copy of the franchise agreement, permits, and business license granted Cox Cable from the City of San Diego and/or the County of San Diego.

2. Any and all witness statements that were taken by representatives of Cox Cable regarding to the Guejito Fire.

3. Any and all Cox Cable photos of the fire origin area, and any photos of the area prior to the fire.

4. Circuit map for the Cox Cable TV cable circuit adjacent to the point of origin.

5. The construction "Estimate" and "Work Order" for the construction of the Cox Cable TV cable circuit adjacent to the point of origin.

6. Any construction records regarding the Cox Cable TV cable circuit, poles, and equipment in the area adjacent to the point of origin, including any after the fire on October 20-21, 2007.

7. A copy, if any, of Cox Cable's equivalent of SCE's System Operating Bulletin #22 for 2003, 2004, 2005, 2006, and 2007.

8. Any and all records of Bulletin 22-type inspections on the Cox Cable TV cable circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

9. The wind loading tables for the Cox Cable TV cable circuit in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

10. Cox Cable's definition of a "heavy loading area."

11. Cox Cable high wind area maps.

12. Cox Cable engineering policies, practices, and standards for all facilities and equipment in high wind areas.

13. Any and all Cox Cable records of post-audit inspections of the TV cable circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

14. Inspection records for 2004, 2005, 2006, and 2007 for the aforementioned circuit.

15. Any maintenance records for 2004, 2005, 2006, and 2007 for the aforementioned circuit.

16. Any Troubleman Reports for the Cox Cable circuit, poles, and equipment in the area adjacent to the point of origin in 2004, 2005, 2006, and 2007.

17. Any and all line patrol records for the Cox Cable circuit adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

18. Any and all records of any and all inspections on the Cox Cable circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

19. Any and all grid/circuit reports for the Cox Cable circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

20. The Cox Cable operation and maintenance policy and procedures manual in effect at the time of the fire.

21. Any and all Cox Cable documents relating to the cause of the fire.

22. Name the jurisdiction in which the Cox Cable circuit, poles, and equipment in the area adjacent to the point of origin of the respective fire are located.

23. Any and all Cox Cable-generated investigation reports for the cause of the subject fire.

24. Who inspected the area at and around the Cox Cable circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007?

25. Any and all written reports by the Cox Cable troubleman in relation to the events surrounding the fire at the circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

26. Any and all outage reports for the Cox Cable circuit in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

27. Any and all Cox Cable-generated metallurgy reports regarding the subject fire.

28. Any Cox Cable origin and cause investigation report for the subject fire.

29. Any and all records of measurements taken by Cox Cable or its contractors at the area of origin of the fire

30. Cox Cable business and performance reports for 2004, 2005, 2006, and 2007.

31. Any and all reports by Cox Cable to the CPUC regarding the subject fire.

32. Any and all press releases by Cox Cable regarding the subject fire.

33. Any and all e-mails, letters, or other communications by Cox Cable to the Governor of the State of California, including, but not limited to his staff, employees or agents; the Attorney General of the State of California, including but not limited to his staff, employees or agents; any member of the United States House of Representatives, including, but not limited to his/her staff, employees or agents; any member of the United States Senate, including, but not limited to his/her staff, employees or agents; any member of the California Legislature, including, but not limited to his/her staff, employees or agents; the San Diego County Board of Supervisors, the Mayor and City Council of the City of San Diego, including, but not limited to his/her staff, employees or agents; or any other elected official, regarding the subject fire.

34. Any and all communications between Cox Cable and the San Diego County fire agencies regarding the subject fire.

35. Cox Cable operations and maintenance policy and procedures manual.

36. Any Cox Cable accident prevention manuals dated November 1997 to present.

37. Any Cox Cable hazard reduction guide dated November 1997 to present.

38. Any and all Cox Cable fire reporting manuals.

39. Cox Cable Claims Department policy and guidelines for handling fire suppression cost claims and requests for information and documents relating to a fire incident for the circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

40. Listing of any and all maintenance-related budget increases allowed by the CPUC during 2004, 2005, 2006, and 2007.

41. Any and all Cox Cable memos or reports during 2004, 2005, 2006, and 2007, regarding Cox Cable's grid, circuit, line, and pole maintenance obligations.

42. Any and all Cox Cable inspection reports for the circuit, poles, and equipment in the area adjacent to the point of origin of the Guejito Fire, during 2004, 2005, 2006, and 2007.

43. Any and all computer generated reports regarding Cox Cable grid, circuit, line, and pole maintenance report schedules and maintenance information for the circuit adjacent to the origin of the subject fire.

44. Cox Cable's 2006 maintenance report with supporting documents for the circuit, poles, and equipment in the area adjacent to the point of origin.

45. Daily record of events dated 10/19/07 – 10/31/07, for the Cox Cable circuit, poles, and equipment in the area adjacent to the point of origin.

46. Any and all reports/records of maintenance performed on the Cox Cable circuit, poles, or equipment in the area adjacent to the point of origin, during 2004, 2005, 2006, and 2007.

47. Any and all reports/records from 10/19/07 through 10/31/07 that may reasonably indicate faults on the Cox Cable circuit, poles, and equipment in the area adjacent to the point of origin.

48. Any and all Cox Cable right-of-way/easements, and agreements, current or expired, within one-half mile radius of the circuit, poles, and equipment in the area adjacent to the point of origin.

49. Any and all records of post-audit inspections of the Cox Cable circuit, poles, and equipment in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

50. Any and all Cox Cable inspectors' reports with any follow-up reports identifying any unsatisfactory maintenance issues, or improper construction or engineering techniques for the aforementioned Cox Cable circuit in the area adjacent to the point of origin during 2004, 2005, 2006, and 2007.

51. Any and all Cox Cable inspectors' reports with any follow-up reports identifying any unsatisfactory maintenance issues, or improper construction or engineering techniques for the SDG&E/SEMPRA circuit in the area adjacent to the point of origin during 2004, 2005, 2006, and 2007.

52. Any and all SDG&E/SEMPRA inspectors' reports with any follow-up reports identifying any unsatisfactory maintenance issues, or improper construction or engineering techniques for

the aforementioned Cox Cable circuit in the area adjacent to the point of origin during 2004, 2005, 2006, and 2007.

53. Any and all Cox Cable line inspector referrals to maintenance employees, contractors, or agents for necessary maintenance, construction or engineering corrections on the aforementioned Cox Cable circuit in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

54. Any and all Cox Cable line inspector referrals to maintenance employees, contractors, or agents for necessary maintenance, construction or engineering corrections on the SDG&E/SEMPRA circuit in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

55. Any and all SDG&E/SEMPRA line inspector referrals to Cox Cable maintenance employees, contractors, or agents for necessary maintenance, construction or engineering corrections on the aforementioned Cox Cable circuit in the area adjacent to the point of origin, for 2004, 2005, 2006, and 2007.

56. Any and all evidence that is exculpatory.

CAL FIRE greatly appreciates your anticipated assistance and cooperation in providing the foregoing information, items and documents. If there is a problem in providing particular information, items or documents within 10 days of receipt of this letter, CAL FIRE is prepared to be flexible provided that you contact me immediately and establish an acceptable schedule for providing the aforementioned information, items and documents. Any information or materials provided in response to this communication will remain within the context of the investigation unless otherwise required by law.

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Office: (559) 243-4117
Cell: (559)779-8692
Fax :(559)222-3409

If you have any comments or inquiries, please do not hesitate to contact me at your earliest convenience.

Most cordially,

PETE J. MARQUEZ
Southern Region Fire Prevention/Law Enforcement
California Department of Forestry
and Fire Protection

cc: D. Hillman
T. Hoffman
G. Chandler, Esq.
R. Harrington, Esq.
B. Darrington

bcc: T. Cronin