

## Question 6 RQ25001

Describe in detail the search methods and search criteria used by Phoenix to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.

### Phoenix Response

In response to this request, Phoenix and its employees conducted a diligent search for electronic and hard copies of the requested information relating to Request 5. This included a search of certain ServiceMax, SmartSheets and potential hard file locations in the Greenville, South Carolina location. The specific search terms included:

a) a number of Labor Op System codes:

*“CB - HV Battery Cooling*

*CC - Cooling System*

*CE - Cooling System Electrical*

*CP - Power Cooling Loop*

*CZ - Misc. Cooling*

*EN - Controller/ Module*

*EZ - Misc. Electrical*

*HA - HV A-Bay Components*

*HB - HV Battery*

*HC - HV Controllers*

*HE - High Voltage Junction Box (HVJB)*

*HZ - Misc. High Voltage Electrical*

*LE - Bus Charging LV, LH - Bus Charging HV*

*LI - Charging Interface: Inverted Pantograph*

*LM - Charging Interface: Manual Plug*

*LP - Charging Interface: Pantograph*

*LZ - Misc. Bus Side Charging*

*MC - Charger Controls/Communications*

*MD - Vehicle Interface: Plug In*

*ME - Charger Low Voltage Electrical*

*PZ - Misc. Propulsion”*

b) a list of key terms comprising:

*“battery, pack, HV, isolation, short, internal short, electrical short, fire, thermal, thermal*

*event, thermal runaway, smoke, burning, burnt, overheated, overheating, heat, hot, smell, odor, scorched, charred, melt, melted, coolant, leak, leaking, leaked, liquid, fluid, glycol, coolant leak, coolant intrusion, coolant ingress, coolant contamination, moisture, humidity, humid, high humidity, condensation, condensate, water ingress, water intrusion, vapor, vapor buildup, vapor condensation, internal moisture, internal humidity, internal condensation, water inside, moisture detection, humidity spike, elevated humidity, bell curve, temperature spike, high temp, abnormal temp, module failure, battery failure, thermal incident.”*

c) a list of battery pack part numbers comprising:  
“022300, R022300, 036290, and R036290”

Note that Phoenix used the following Billing Types (as a filter) for the above searches:  
“*Work Order Type equals Standard Warranty, Extended Warranty, Goodwill, Phoenix Owned, Field Supplies, Post Delivery Inspection, Pre-Acceptance*”

Also note that Phoenix used the following battery type (as a filter) for the above searches:  
“*Installed Product: Battery Type equals 400V 18650*”