

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023-2025
Data Response

PG&E Data Request No.:	CalAdvocates_037-Q002		
PG&E File Name:	WMP-Discovery2023-2025_DR_CalAdvocates_037-Q002		
Request Date:	March 20, 2024	Requester DR No.:	CalAdvocates-PGE-2025WMP-01
Date Sent:	April 3, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

QUESTION 002

Provide a copy of all documents or files that are referenced in your WMP Quarterly Data Reports and submitted to Energy Safety (including but not limited to all PDFs, spatial data files, non-spatial data files, and confidential attachments), within one business day of the document's submission to Energy Safety.

ANSWER 002

In addition to all general objections, PG&E specifically objects to this request on the grounds that it is unduly burdensome. PG&E further objects to this request as the information requested is vague, ambiguous, and overbroad. Lastly, PG&E objects to this request on the grounds that it seeks to impose a continuing response obligation on the responding party. Continuing discovery obligations are not permitted under California law. *Biles v. Exxon Mobil Corp.*, 124 Cal.App.4th 1315, 1328 (2004); Code Civ. Proc. § 2030.060(g). Notwithstanding and without waiving these objections, PG&E responds as follows:

We will do our best to provide the requested information within the requested timeframe, or as soon as possible thereafter. However, please note that due to the timing and voluminous nature of our submissions to Energy Safety, it may not always be possible to provide the information sought within the requested timeframe. In these instances, we will provide the requested information as soon as it is reasonably possible.

Additionally, with the exception of confidential and spatial data, please note that we post our WMP-related submissions on our website, www.pge.com/wildfiremitigationplan, generally on the same business day that the documents are provided to Energy Safety. Furthermore, all submissions to Energy Safety are also posted to the relevant docket on the Energy Safety website, <https://efiling.energysafety.ca.gov/>, and are nearly always publicly available within one business day of submission. Public email notifications of the availability of these documents are sent to all parties who subscribe to the service lists for those dockets.