

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

PG&E Data Request No.:	MGRA_011-Q002		
PG&E File Name:	WMP-Discovery2023-2025_DR_MGRA_011-Q002		
Request Date:	April 16, 2024	Requester DR No.:	4
Date Sent:	April 19, 2024	Requesting Party:	Mussey Grade Road Alliance
PG&E Witness:		Requester:	Joseph Mitchell

SUBJECT WDRM v4

QUESTION 002

Please provide a non-confidential version of documentation containing a description of WDRM v4, including testing and validation.

ANSWER 002

PG&E objects to this request on the grounds that it is overbroad and unduly burdensome to provide what can be interpreted as all “documentation containing a description of WDRM v4.” Gathering and providing all “documentation containing a description of WDRM v4” could take many weeks of work and require reviewing many thousands of documents. PG&E also objects to this request on the grounds that it is vague and ambiguous as to what is included in all “documentation containing a description of WDRM v4.” PG&E further objects to this request insofar as it seeks information protected by the attorney-client privilege and attorney work product privilege. PG&E also objects to the request on the grounds that it exceeds the scope of this regulatory proceeding, as PG&E’s 2025 WMP notes that WDRM v4 has not yet been used for any wildfire mitigation work.

Notwithstanding and without waiving these objections, PG&E responds as follows: we anticipate that WDRM v4 model documentation, including a validation report, will be available by the end of Q2 2024.