

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

PG&E Data Request No.:	CalAdvocates_037-Q003		
PG&E File Name:	WMP-Discovery2023-2025_DR_CalAdvocates_037-Q003		
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 003**

Provide a copy to Cal Advocates of all your confidential responses to WMP discovery requests, on the same business day that you send the documents to the issuer of the discovery request. This includes:

- a) Confidential responses to WMP discovery requests issued by Energy Safety.
- b) Confidential responses to WMP discovery requests issued by other entities.

**ANSWER 003**

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.