

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

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| PG&E Data Request No.: | CalAdvocates_001-Q003 | | |
| PG&E File Name: | WMP-Discovery2023_DR_CalAdvocates_001-Q003 | | |
| Request Date: | February 7, 2023 | Requester DR No.: | CalAdvocates-PGE-2023WMP-01 |
| Date Sent: | February 14, 2023 | Requesting Party: | Public Advocates Office |
| DRU Index #: | DRU11411 | Requester: | Holly Wehrman |

This data request pertains to your 2023-2025 Wildfire Mitigation Plan (WMP) and all related documents and submissions (including but not limited to data submissions, tables, GIS data, attachments, and appendices).

This data request covers the entirety of calendar year 2023.

QUESTION 003

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) on the same business day that the document is sent to Energy Safety.

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.

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, 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.