

PG&E HEARING EXHIBIT PGE-79

A.20-04-023

PG&E'S SECURITIZATION 2020

Wild Tree Foundation's Response to PG&E Data Request 5

Wild Tree Foundation Response to PG&E Data Request 005

Pursuant to California Code of Regulations Title 20, Division 1, Chapter 1, Rule 10.1, Wild Tree objects to these discovery requests on the following grounds: the requests do not seek information relevant to the subject matter involved in the pending proceeding; the intrusiveness and burden of the discovery requests clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence; the discovery requests seek privileged information.

Notwithstanding these objections, Wild Tree provides the following response:

Q1: Wild Tree and Mr. Rothschild learned of Attachment A from Joseph Fichera of Saber Partners. Wild Tree and Mr. Rothschild obtained Attachment A from Saber Partners. Attachment A was attached to Mr. Rothschild's testimony submitted in A.20-07-008 on behalf of the Wild Tree Foundation. The document is clearly labeled www.saberpartners.com on every page.

Q2: Wild Tree has no information responsive to this request although it will note that the information summarized in Attachment A can be found in various documents posted on the publicly available Saber Partners website: <https://saberpartners.com/rocbonds-ratepayer-back-bonds/> as well, of course, on the publicly available websites of state legislatures and state utility regulatory bodies.

Q3: Wild Tree objects to this request as described above.

Q4: Wild Tree objects to this request as described above.