

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

PG&E Data Request No.:	CalAdvocates_001-Q004		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_001-Q004		
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 004

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 004

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.