

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

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|------------------------|---|-------------------|----------------------------|
| PG&E Data Request No.: | MGRA_013-Q001 | | |
| PG&E File Name: | WMP-Discovery2023-2025_DR_MGRA_013-Q001 | | |
| Request Date: | April 30, 2024 | Requester DR No.: | Data Request #6 |
| Date Sent: | May 1, 2024 | Requesting Party: | Mussey Grade Road Alliance |
| PG&E Witness: | | Requester: | Joseph Mitchell |

QUESTION 001

The PG&E response supplied to MGRA in WMP-Discovery2023-2025_DR_MGRA_009-Q015Atch01-IngitionsAT was incomplete and non-responsive because:

- a. It contained on ID that could be crossed-referenced to PG&E's reported ignition data base.
- b. It contained only ignition date, not ignition time, which makes it impossible to distinguish them, since many ignitions often occur on the same day.

The existing response therefore has not been made usable for any potential investigation regarding cause or whether and is of limited utility.

Please provide an updated version containing standard ignition IDs and times.

ANSWER 001

PG&E objects to, and disagrees with, the categorization of its responses to the referenced data requests as being "incomplete and non-responsive." PG&E notes that the requesting party could have participated in the meet and confer process—as the parties have done multiple times in the past—if it was unhappy with the responses provided and PG&E would have done its best to accommodate the requesting party.

- a. PG&E objects to subpart (a) on the grounds that it is vague, ambiguous, and confusing. PG&E interprets this subpart as requesting clarification regarding the index number that was included in Column A of "*WMP-Discovery2023-2025_DR_MGRA_009-Q015Atch01.xlsx*." Please note, the index number is the unique identifier for the event in PG&E's ignitions database. The index number represents the year the ignition occurred and its unique identification number (ID). For example, Index "20220142" represents a year 2022 ignition with the unique id of 0142.
- b. Please see attachment "*WMP-Discovery2023-2025_DR_MGRA_013-Q001Atch01.xlsx*" for an updated spreadsheet which includes the time the ignition was reported in Column "C." Please note, PG&E is unable to confirm the exact start time of an ignition, however, is providing the timestamp for when the first responder reported the incident.