

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

PG&E Data Request No.:	MGRA_011-Q001		
PG&E File Name:	WMP-Discovery2023-2025_DR_MGRA_011-Q001		
Request Date:	April 16, 2024	Requester DR No.:	4
Date Sent:	April 19, 2024	Requesting Party:	Mussey Grade Road Alliance
PG&E Witness:		Requester:	Joseph Mitchell

SUBJECT WDRM v4

QUESTION 001

Please provide non-confidential versions of any responses to Cal Advocates data requests if the responses to Cal Advocates are confidential.

ANSWER 001

PG&E objects to this request on the grounds that it seeks to impose a continuing discovery obligation on PG&E. Continuing discovery obligations are not permitted under California law. *Biles v. Exxon Mobile Corp.*, 124 Cal.App.4th 1315, 1328 (2004); Code Civ. Proc. § 2030.060(g).

Additionally, PG&E objects to this request on the grounds that it is overbroad and unduly burdensome. PG&E receives an enormous volume of data requests in the window of time between submitting its WMP and the deadline to submit public comments. This burden is exacerbated by the default three business day turnaround period for all responses. Imposing this continuous discovery obligation on PG&E during this period is not tenable. Furthermore, any effort to provide the requested information would be further exacerbated because MGRA has refused to sign a confidentiality or non-disclosure agreement, and providing this information would require manually redacting all confidential information from each response.

PG&E notes that the Public Advocates Office is a government agency that has broad statutory authority that exceeds this single regulatory proceeding and allows the Public Advocates Office to obtain information that exceeds what MGRA, as a private organization, would be able to obtain through this proceeding.

Lastly, MGRA may obtain non-confidential versions of PG&E responses to Cal Advocates data requests at the following website: <https://www.pge.com/en/outages-and-safety/safety/community-wildfire-safety-program.html#accordion-6b52828ca7-item-a47a0617be>.

If you would like to discuss this request and our response, please do not hesitate to reach out as we are happy to meet and confer on this issue.