

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans
Rulemaking 18-10-007
Data Response

PG&E Data Request No.:	CalAdvocates_052-Q01		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_052-Q01		
Request Date:	March 10, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-18
Date Sent:	March 12, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Tyler Holzschuh

The following questions relate to PG&E's responses to the Public Advocates data requests 2021 wildfire mitigation plan (WMP).

QUESTION 01

- a) Please provide a redacted copy of WildfireMitigationPlans_DR_CalAdvocates_047-Q03-Atch01_CONF as provided in response to CalAdvocates-PGE-2021WMP-13 Question 3. Please redact the minimum amount necessary to ensure the new document is not confidential.
- b) Please provide a redacted copy of WildfireMitigationPlans_DR_CalAdvocates_038-Q03-Atch01_CONF as provided in response to CalAdvocates-PGE-2021WMP-04 Question 3. Please redact the minimum amount necessary to ensure the new document is not confidential.
- c) Please provide a redacted copy of Section 1 Exhibit O_CONF as provided in response to CalAdvocates-PGE-2021WMP-14 Question 2. Please redact the minimum amount necessary to ensure the new document is not confidential.

ANSWER 01

- a) PG&E objects to this request on the grounds that the referenced document contains confidential, proprietary, and trade secret information or other intellectual property and protected market sensitive/competitive data. It also contains third-party information subject to non-disclosure or confidentiality agreements or obligations. These objections were raised in the March 9, 2021 Confidentiality Declaration served with the response to the data request identified above.

PG&E does not possess a "public version" of this document. After further review, we have determined that redaction of portions of the document to create a meaningful "public version" is not practicable in response to this request because the proprietary methodology and analysis, as well as the protected third-party information, run throughout the document.

If the California Public Advocates Office (CalPA) has general questions relating to the potential costs and benefits of different types of poles and structures, PG&E invites CalPA to submit the questions as data requests and we will endeavor to provide non-confidential responses, where possible.

- b) PG&E objects to this request on the grounds that the referenced document contains confidential, proprietary, and trade secret information or other intellectual property and protected market sensitive/competitive data. These objections were raised in the February 19, 2021 Confidentiality Declaration served with the response to the data request identified above. The document also contains confidential physical facility or critical infrastructure information.

PG&E does not possess a “public version” of this document. After further review, we have determined that redaction of portions of the document to create a meaningful “public version” is not practicable in response to this request because the proprietary and trade secret information representing significant investments of business time and resources, as well as critical infrastructure information, run throughout the document.

If CalPA has general questions relating to time delays or protective devices, PG&E invites CalPA to submit the questions as data requests and we will endeavor to provide non-confidential responses, where possible.

- c) PG&E objects to this request on the grounds that the referenced document contains confidential, proprietary, and trade secret information or other intellectual property and protected market sensitive/competitive data. These objections were raised in the March 8, 2021 Confidentiality Declaration served with the response to the data request identified above. The document also contains confidential physical facility or critical infrastructure information that should not be made available to the general public.

PG&E does not possess a “public version” of this document. After further review, we have determined that redaction of portions of the document to create a meaningful “public version” is not practicable in response to this request because the proprietary and trade secret information representing significant investments of business time and resources, as well as critical infrastructure information, run throughout the document.

If CalPA has general questions relating to time delays or protective devices, PG&E invites CalPA to submit the questions as data requests and we will endeavor to provide non-confidential responses, where possible.