

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

PG&E Data Request No.:	CalAdvocates_037-Q001		
PG&E File Name:	WMP-Discovery2023-2025_DR_CalAdvocates_037-Q001		
Request Date:	March 20, 2024	Requester DR No.:	CalAdvocates-PGE-2025WMP-01
Date Sent:	April 3, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

QUESTION 001

Please provide a copy of each WMP Update-related document, submission, or report you submit to the Office of Energy Infrastructure Safety (Energy Safety) in 2024 or 2025 that is related to your 2025 WMP Update. Provide the copy to Cal Advocates within one business day of the document's submittal to Energy Safety. (If you have submitted a document to Energy Safety prior to this data request, please provide a copy as soon as possible and no later than 10 business days from the issuance of this data request.)

This request is limited to materials or documents that (1) are related to work plans, initiative targets, risk models, risk spend efficiency (RSE) calculations, cost-benefit ratio (CBR) calculations, or WMP change orders; and (2) are provided to Energy Safety to provide additional details or context concerning information or statements in your WMP (and any subsequent revisions or change orders affecting your WMP).

GENERAL OBJECTIONS TO THIS SET OF DATA REQUESTS

PG&E objects to the instructions or definitions in the set of data requests entitled CalAdvocates-PGE-2025WMP-01 that purport to impose any obligations greater than those provided by the applicable rules and decisions of the Commission or and any other statutes, orders, rules, or laws limiting the regulatory authority and jurisdiction of the Commission. In particular, PG&E objects to the instruction that purports to place a burden on the responding party to reach out to the requesting party to clarify any unclear questions, definitions, or instructions. The duty to prepare precise and well-written instructions, definitions, and requests is on the party seeking the information and cannot be shifted to the responding party. Additionally, PG&E objects to the instruction that PG&E must "[p]rovide the name and title of the responding individual" as burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Our responses to data requests are not the product of a single individual but of numerous individuals working together from different departments of the company. If the requesting party wishes to contact PG&E with questions or concerns about a data request, it may do so by contacting the appropriate individuals in the Regulatory Relations or Law Department upon whom the request was served.

PG&E also objects to the following definitions:

- The definitions of "[r]elate to" or "concern" which are overbroad and burdensome to the extent they request materials that "mention, or be connected with, in any

way” the subject of the data requests.

- The definitions of the terms “document,” “documents,” and “documentary material,” which include “correspondence” and “communications,” making these terms overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.
- The definition of the phrase “state the basis,” which is overbroad and burdensome to the extent it requests “every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, report, and analysis....”

ANSWER 001

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.

Additionally, with the exception of confidential and spatial data, please note that we post our WMP-related submissions on our website, www.pge.com/wildfiremitigationplan, generally on the same business day that the documents are provided to Energy Safety. Furthermore, all submissions to Energy Safety are also posted to the relevant docket on the Energy Safety website, <https://efiling.energysafety.ca.gov/>, and are nearly always publicly available within one business day of submission. Public email notifications of the availability of these documents are sent to all parties who subscribe to the service lists for those dockets.