

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigations Plans Discovery 2026-2028
Data Response**

PG&E Data Request No.:	SPD_002-Q002
PG&E File Name:	WMP-Discovery2026-2028_DR_SPD_002-Q002
Request Date:	April 17, 2025
Requester DR No.:	SPD-PGE-WMP2026-002
Requesting Party:	Safety Policy Division
Requester:	Edwin Schmitt
Date Sent:	April 18, 2025

**SUBJECT: NON-COMMISSION DATA REQUESTS RELATED TO THE 2026-2028 WMP
(SPD-PGE-WMP2026-022)**

QUESTION 002

Every Friday by noon, provide SPD with any responses to data requests that PG&E sent to Energy Safety or any other party within the previous seven days. Include any attachments, appendices or datasets in the native format that were sent to Energy Safety or any other party with the data requests.

ANSWER 002

PG&E objects to this request on the grounds that 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 this objection, PG&E responds as follows.

Discovery provided to Energy Safety and other requesting parties is publicly posted and available on PG&E's website at [Community Wildfire Safety Program](#). The native format version (Excel) of PG&E's WMP DR Summary is updated on our website each Thursday.

We will provide confidential versions of any confidential responses and/or attachments submitted to Energy Safety or any other party every Friday. We will do our best to provide such responses by noon each Friday, or as soon as is reasonably possible.