

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

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| PG&E Data Request No.: | SPD_002-Q004 |
| PG&E File Name: | WMP-Discovery2026-2028_DR_SPD_002-Q004 |
| 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 004

Every Friday by noon, submit all of the materials requested in Questions 1-3 to Kiteworks. Each weekly response should be packaged in a single zip file and organized according to the following folder structure:

- a. Party Name (i.e., Energy Safety, Cal Advocates, etc.)
- b. DR Name (i.e., SPD-PGE-WMP2026-001)
 - i. Place the data request responses in this folder.
- c. Attachments
 - i. Place any attachments to the data request responses in this folder

ANSWER 004

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.