

General Objections to Public Advocates Office Data Request Instructions and Definitions in Rulemaking 18-10-007 (2021 Wildfire Mitigation Plan)

Pacific Gas and Electric Company ("PG&E") respectfully provides the following general objections to instructions and definitions in discovery requests propounded in this proceeding. These general objections are incorporated by reference into each specific data request propounded by the Public Advocates Office of the California Public Utilities Commission ("Cal Advocates") and to any further responses to data requests in this proceeding propounded by Cal Advocates.

1. Identifying Witnesses or others who prepared the responses:
 - a. PG&E objects to the general instruction to identify a witness for each data response and provide that individual's contact information. PG&E has not designated witnesses in this proceeding and no hearings are currently scheduled.
2. Verified Responses: PG&E is providing responses that are accurate, correct and complete to the best of its knowledge consistent with the California Public Utilities Commission's Rules of Practice and Procedure (Rules). The responses are not verified or provided under oath as this is not required by the Rules.
3. Bates Numbering: PG&E will produce documents primarily in electronic form. PG&E objects to instruction to bates stamp PG&E's document production and provide an index if the production is voluminous as unduly burdensome and not required by the Rules.
4. Definitions: PG&E objects to definitions that are overbroad and burdensome including:
 - a. The definition of "PG&E" as including former employees, agents, or consultants.
 - b. The definition of "communications" with regard to requesting all memoranda, notes and documents relating to a communication.
 - c. The definition of "document" with regard to all electronic records.
 - d. Definitions of "relate to" or "concern."
 - e. Definitions of "identify" for individuals that ask PG&E to provide the business address and telephone number of that individual.
 - f. Definition of the word "identification" which purports to require PG&E to create lists of additional information about a document as overbroad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

5. Attorney-Client Privilege or Work Product: PG&E objects to each data request to the extent it purports to require the production of documents exempt from production by the attorney-client privilege, work-product doctrine or any other applicable privilege or legal obligation to not produce such documents ("Privileged Documents"). PG&E will not produce Privileged Documents. The inadvertent production of any such Privileged Document is not intended and shall not be deemed to waive or abridge any applicable privilege and, upon discovery by the recipient or notice by PG&E, such inadvertently produced material shall be returned (along with all copies) to PG&E.
6. Relevance: PG&E submits its data request responses without conceding the relevance or materiality of the subject matter of any specific data requests or documents. Further, PG&E reserves the right to object to the admissibility in evidence of any part of the documents produced pursuant to the data requests or any information contained therein.
7. Incorporation by reference: These objections are incorporated into each response by this reference. Notwithstanding and subject to these objections, PG&E will provide a substantive response to the requests unless otherwise indicated.