



**DRA**  
Division of Ratepayer Advocates  
California Public Utilities Commission  
State of California

505 Van Ness  
Avenue  
San Francisco, CA  
94102

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**DRA-PG&E SPECIAL DATA REQUEST**

<http://dra.ca.gov>

APPLICATION OF PG&E TO IMPLEMENT AND RECOVER IN RATES THE  
COSTS OF ITS SOLAR PHOTOVOLTAIC (PV) PROGRAM

A. 09-02-019

**Date:** February 22, 2010

**To: Mark R. Huffman**  
Pacific Gas and Electric Company  
P.O. Box 7442  
San Francisco, CA 94120  
(415) 973-3842  
mrh2@pge.com

**From: Joe Como**  
CPUC, DRA  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102  
(415) 703-2381  
joc@cpuc.ca.gov

**Response Due:** March 1, 2010

Please accept the following data request pursuant to your participation as an applicant in A.09-02-019 or under DRA's power to compel the production of documents under Public Utilities Code Section 309.5(e).<sup>1</sup> If any of these responses are modified subsequent to PG&E's response, DRA also requests that PG&E submit the updated responses as they become available. If you have any questions regarding this data request, please call Joe Como immediately at the above phone number. If PG&E

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<sup>1</sup> (e) The division may compel the production or disclosure of any information it deems necessary to perform its duties from any entity regulated by the commission, provided that any objections to any request for information shall be decided in writing by the assigned commissioner or by the president of the commission, if there is no assigned commissioner.

*Ratepayer Advocates in the Gas, Electric, Telecommunications and Water Industries*

has any objections to any of the data requests, please contact DRA Chief Counsel Joe Como immediately, at 415-703-2381.

The term, “DOCUMENTS”, as used below shall mean writing as defined under California Evidence Code §250.

**All of the following data requests address questions related to PG&E’s Application 09-02-019 (SPVP), but pertain specifically to Page 3 of the document entitled “PG&E’s 500 MW Solar Photovoltaic Program” that was the attachment to Notice of Ex Parte Communication filed on February 12, 2010 that reported the ex parte meeting between PG&E representatives and Andrew Schwartz, Advisor to Commission President Peevey that occur on February 9, 2010.**

**The above referenced “Page 3” is entitled “PD Ratemaking Proposal – Illustrative” and appears to represent a graph of information. All questions below pertain specifically to information presented on that page. Therefore, any reference to “page” refers to page 3 of the above referenced attachment of the February 12, 2010 Notice of Ex Parte Communication.**

Please answer the following questions or data requests:

1. Define “COS”, “PPA-1”, and “PPA-2” that are printed in the upper right hand corner of the page.
2. What is the range of Y-axis of the graph?
3. What does the “\$” represent on the Y-axis?
4. Provide all data that was used to construct the three lines entitled “COS”, “PPA-1”, and “PPA-2.”
5. Provide the explanation for how the data was selected to construct the three lines entitled “COS”, “PPA-1”, and “PPA-2, including the slopes of each line.
6. Provide all supporting information to justify the points of intersections between the three lines entitled “COS”, “PPA-1”, and “PPA-2. For instance, lines COS and PPA-1 appear to cross at about year 6.5 and line COS and line PPA-2 appear to intersect at about year 24.5.