

**PACIFIC GAS AND ELECTRIC COMPANY
General Rate Case 2011 Phase I
Application 09-12-020
Data Response**

PG&E Data Request No.:	DRA_204-05		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_204-Q05		
Request Date:	March 12, 2010	Requester DR No.:	DRA-204-DFB
Date Sent:	March 24, 2010	Requesting Party:	DRA
PG&E Witness:	Mark Hughes	Requester:	Donna-Fay Bower

EXHIBIT REFERENCE: PG&E-6, CHAPTER 7

SUBJECT: SAFETY, HEALTH AND CLAIMS DEPARTMENT AND OTHER COSTS

QUESTION 5

On page 7-5, PGE states: "PG&E currently has one safety and health professional for every 310 employees." How did PG&E determine this ratio? How many employees did PG&E have in each year from 2004 through 2009? What is the forecasted total number of employees for 2010 and 2011?

ANSWER 5

PG&E objects to this request on the grounds that the question asks for actual 2009 data, while PG&E's request is based on 2008 recorded data. Notwithstanding the foregoing, and without waving PG&E's right to object to the admissibility of the requested information into evidence, PG&E responds as follows:

PG&E determined the ratio using this formula:

20,800 employees / 67 Safety Professionals = 310.

The best source for the recorded number of employees 2004 to 2008, and the forecasted headcount for 2009 to 2011 is Master Data Request 01, Question 8. Also, in Data Request 132, Question 2, part d, the following response was given:

d) In PG&E's response to the Master Data Request 01, Question 8, in July 2009, PG&E provided forecasted headcount numbers for 2009-2011. These numbers were collected from the various Lines of Business within PG&E during the Operating Plan and Quarterly Business Review process. Since that time, PG&E has discontinued the process of collecting headcount forecasts as part of the Operating Plan and Quarterly Business Reviews. Below are the numbers provided in the Master Data Request.

Total	2009	2010	2011
PL1	5,676	5,804	5,949
PL2	803	834	890
PL3	209	210	214
Lawyer	91	84	84
A&T	547	536	538
ESC	2,395	2,407	2,425
Executive	42	42	42
IBEW	10,682	10,476	10,440
SEIU	156	156	156
Hiring Hall	670	518	339
Unknown	2	2	2
Total	21,273	21,069	21,079

Since the time this data was provided, PG&E has severed approximately 500 employees. However, this reduction in employees does not correspond to a similar reduction in positions, since some new positions have been created to fulfill new organizational needs. Therefore, PG&E believes that the 2011 forecast headcount numbers provided in the Master Data Request and again above are the most accurate forecast numbers currently available.