

**PACIFIC GAS AND ELECTRIC COMPANY
General Rate Case 2011 Phase I
Data Response**

PG&E Data Request No.:	TURN_008-03		
PG&E File Name:	GRC2011-Ph-I_DR_TURN_008-Q03		
Request Date:	December 23, 2009	Requester DR No.:	TURN_PG&E_8
Date Sent:	January 22, 2010	Requesting Party:	TURN
PG&E Witness:	Redacted	Requester:	Hayley Goodson

SUBJECT: GAS DISTRIBUTION O&M (EX. PG&E-3)

QUESTION 3

Please provide workpapers supporting the "1.3% system growth" factor used by PG&E throughout its gas distribution O&M filing. Specifically identify the actual "system growth" rates on a recorded year by year basis from 1996-2008, calculated using a methodology that is consistent with the 1.3% estimate of future growth in its GRC filing, and provide supporting working papers.

ANSWER 3

Attachment GRC2011-Ph-I_DR_TURN_008-Q03-Atch01 shows the system growth rates from 1996-2008 for mains, services, and estimated total miles of gas distribution facilities. The estimated total miles of gas distribution facilities value is calculated as the known miles of main plus an estimated miles of services. The estimated miles of services value is calculated as the known number of services multiplied by a systemwide average service length assumption of 58 feet.

The 1.3% average system growth rate assumed in the GRC filing is based on the 10 year average system growth rate in total estimated miles of gas distribution facilities from 1998-2008, which is calculated as 1.29%.

Response to TURN Data Request 8- Question 3

	Total Miles of Main	Total Gas Services	Total Estimated Miles of Gas Distribution Facilities	Annual Growth Rate in Miles of Main	Annual Growth Rate in Number of Services	Annual Growth Rate in Total Estimated Miles of Gas Distribution Facilities	10 year Average Annual Growth Rate in Total Estimated Miles
1996 Recorded	36,316	2,856,236	67,691				
1997 Recorded	36,726	2,888,040	68,451	1.13%	1.11%	1.12%	
1998 Recorded	37,023	2,917,292	69,069	0.81%	1.01%	0.90%	
1999 Recorded	37,487	2,952,116	69,916	1.25%	1.19%	1.23%	
2000 Recorded	37,958	2,983,941	70,736	1.26%	1.08%	1.17%	
2001 Recorded	38,410	3,024,331	71,632	1.19%	1.35%	1.27%	
2002 Recorded	38,944	3,067,556	72,641	1.39%	1.43%	1.41%	
2003 Recorded	39,510	3,115,148	73,729	1.45%	1.55%	1.50%	
2004 Recorded	40,123	3,170,023	74,945	1.55%	1.76%	1.65%	
2005 Recorded	40,704	3,209,231	75,957	1.45%	1.24%	1.35%	
2006 Recorded	41,275	3,257,464	77,057	1.40%	1.50%	1.45%	1.30%
2007 Recorded	41,804	3,301,989	78,076	1.28%	1.37%	1.32%	1.32%
2008 Recorded	42,016	3,319,431	78,480	0.51%	0.53%	0.52%	1.29%