

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

PG&E Data Request No.:	DRA_210-04		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_210-Q04		
Request Date:	March 15, 2010	Requester DR No.:	DRA-210
Date Sent:	March 29, 2010	Requesting Party:	DRA
PG&E Witness:	Redacted	Requester:	Dao Phan

**EXHIBIT REFERENCE: PG&E-3, CHAPTER 18**

**SUBJECT: GAS O&M EXPENDITURES, SYSTEM GROWTH, MWC DG**

**QUESTION 4**

In PG&E's response to DRA-58, Q.6(b), PG&E states, "The forecasted work volume in 2011 and 2012 of 110,000 locations per year would still leave the program slightly short of the estimated program scope but this difference may become irrelevant as the division specific unit counts are validated."

- a. Please explain what is meant by "...the difference may become irrelevant as the division specific unit counts are validated."
- b. How does PG&E "validate" the unit counts?
- c. With regard to the 337,000 locations requiring evaluation, how many of these locations are validated? How often are these locations validated?

#### ANSWER 4

- a. As PG&E prepares maps and completes inspections in the field occasionally field conditions do not align with estimated work volume. PG&E's gas distribution system is dynamic and between the time the total program volume of 337,000 locations was determined and the time field inspections are completed system conditions may change. For example, in the course of other work including leak repairs, capital replacement programs, or modifications to facilities at customer request, PG&E may restore cathodic protection to a single service or section of distribution main and associated services. Therefore, this work would have the collateral affect of removing these locations from the previous program scope. Therefore, our experience shows that the estimated volume of work is subject to change but, regardless of the final number of locations that need to be field checked, PG&E is committed to completing the program by 2012.
- b. In order to ensure that PG&E has identified and corrected all isolated service locations, the original estimate for the volume of potential locations in each division intentionally included all possible locations regardless of how remote the possibility. However, recognizing that the original estimate may have been overly inclusive or that field conditions may have changed (as described in the response to subpart a of this question), the mapping department validates the actual field locations to be checked before the crews are dispatched. Therefore, when field work is dispatched and the latest maps are provided to field forces the locations on those maps requiring inspection may not match, particularly in overall volume, the locations from the 2003 estimate. Then, PG&E crews check all the identified field locations by physically inspecting each location and measuring the pipe to soil reading to determine whether it is cathodically protected or isolated. If it is found to be isolated, the location is either remediated immediately (using a drivable anode where possible) or scheduled for remediation.
- c. As of the beginning of 2009, approximately 40% of the 337,000 locations had been validated through a mapping review at some point between 2003 and 2009. Mapping reviews were ongoing for the remaining 60% throughout 2009. Once the mapping review is complete, the count of locations to be inspected is not validated again until the work is dispatched to and completed in the field.