

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

PG&E Data Request No.:	DRA_210-09		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_210-Q09		
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 9

How many hours will be allocated to perform the “instant off” P/S read for the CPA resurveys? Please explain how the number of hours was determined and include a copy of the guidelines and/or any calculations used to derive the hours.

ANSWER 9

PG&E does not allocate a specific number of hours to perform each of the different steps of the Cathodic Protection Area (CPA) resurvey process, and therefore does not allocate a specific number of hours to perform the “instant off” P/S read for the CPA resurveys. PG&E forecasts an average length of time to perform a CPA resurvey but does not break out the forecast any lower because of the large number of variables that would impact such a more detailed forecast. For example, the amount of field work will vary depending on the size, configuration, and age of each CPA. Similarly, the amount of documentation will vary depending on the condition of existing maps or significant changes to the system. Given the variables and numerous steps involved in CPA resurveys PG&E forecasts the average unit cost for the entire process, encompassing all subtasks, but does not break down the forecast any further.

PG&E plans to develop a work procedure later in 2010 that identifies all the “instant off” requirements, which may include guidelines for time allocation.