

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

PG&E Data Request No.:	DRA_207-01b		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_207-Q01b		
Request Date:	March 15, 2010	Requester DR No.:	DRA-207-TLG
Date Sent:	March 30, 2010	Requesting Party:	DRA
PG&E Witness:	Redacted	Requester:	Tamera Godfrey

SUBJECT: NEW BUSINESS AND WORK REQUESTED BY OTHERS FOR MWC EV AND EW.

QUESTION 1

PG&E forecasted \$42.784 million for its New Business and Work Requested by Others Operations and Maintenance expenses. PG&E's forecast for New Business - MWC EV of \$17.488 million is lower than its recorded 2008 expenses. PG&E's forecast of \$25.296 million for Work Requested by Others - MWC EW is an increase of \$5.354 million or 26.85% over 2008 recorded expenses.

- a. Provide a detailed and itemized listing of all costs incurred for one-time, unusual, or non-recurring costs for the years 2004-2008, including but not limited to studies, special projects/programs, surveys, training, contract expenses, campaigns, employee contests, etc.
- b. If PG&E's forecast includes new positions provide a detailed explanation and supporting documentation for each relating to the specific line item/subaccount and state why PG&E's current staffing level in each impacted area is inefficient in order to justify the new position. Identify all requested positions (job title, job descriptions, breakdown of annual salary (exclude employee incentives, bonuses, benefits, overhead, fleet, and taxes from salary).
- c. Provide the actual recorded expenses for 2004 through 2009 for the expense breakdown shown in Table 6-27 through Table 6-29 on pages 6-42 and 6-43 for MWC EV. Provide the actual recorded expenses for 2008 and 2009 for the expense breakdown shown in Table 6-39 through Table 6-42 on pages 6-57 through 6-59 for MWC EW (PG&E Exhibit (PG&E-3)).
- d. Provide the actual recorded expenses for 2008 and 2009 for the expense breakdown shown in Table 6-3 and Table 6-24 on pages 6-7 and 6-10 as compared to 2007 GRC forecast.

ANSWER 1B

PG&E objects on the grounds that the question asks for actual 2009 data, which is not the basis for PG&E's 2011 GRC request. Notwithstanding the foregoing, and without waiving PG&E's right to object to the admissibility of the requested information into evidence, PG&E responds as follows.

- b. The forecasts for both MWCs EV and EW do not include any specific staffing level changes for the forecast period. These forecasts are primarily based upon indexes to capital components of the New Business and WRO programs, or other external factors described in Exhibit (PG&E-3), Chapter 6. Labor-related costs in these programs cover a wide spectrum of activity types including service planning, construction, field services, land, and GIS services, with no specific connection to staffing changes in those groups.