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

PG&E Data Request No.:	DRA_207-01d								
PG&E File Name:	GRC2011-Ph-I_DR_DRA_207-Q01d								
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 by 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 break down 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 break down shown in Table 6-3 and Table 6-24 on pages 6-7 and 6-10 as compared to 2007 GRC forecast.

Answer 1D

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.

d. Although DRA asked for a comparison to 2007 GRC *forecast* amounts for 2008 and 2009, PG&E believes DRA intended to request a comparison to 2007 GRC *imputed* amounts. The table below shows imputed settlement amounts and recorded expenditures for MWCs EV and EW for 2008 and 2009.

Pacific Gas and Electric Company Comparison of Imputed Settlement and Actual Expenditures 2008 and 2009 - MWC EV and MWC EW (Thousands of Nominal Dollars)

	2008				2009			
	Imputed		Recorded		Imputed		Recorded	
MWC EV - New Business Expense	\$	11,507	\$	20,061	\$	11,507	\$	13,647
MWC EW - WRO Expense	\$	12,491	\$	19,942	\$	12,491	\$	22,896