

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

PG&E Data Request No.:	DRA_178-04		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_178-Q04		
Request Date:	March 5, 2010	Requester DR No.:	DRA-178-DFB
Date Sent:	March 19, 2010	Requesting Party:	DRA
PG&E Witness:	Sanford Hartman	Requester:	Donna Fay Bower

SUBJECT: LAW DEPARTMENT – INJURIES AND DAMAGES (ACCOUNT 925)

QUESTION 4

On Attachment 1 a number of Settlements are labeled “Lit-Employment” please provide a more detail description of these Employment settlements:

- a. For 2005, Settlement Numbers 29 through 41;
- b. For 2006, Settlement Numbers 17 through 26;
- c. For 2007, Settlement Numbers 26 through 34; and,
- d. For 2008, Settlement Numbers 38 through 46.

ANSWER 4

As stated in response to Data Request DRA_051-01, PG&E’s settlement information is highly confidential. The public release of settlement amounts and details has the potential to place the Company and its ratepayers at a disadvantage in pending and future litigation. Additionally, some settlements have confidentiality agreements. PG&E has not sought and does not have permission from the plaintiffs or other parties to these lawsuits to disclose this information. Moreover, while such permission may not be required, PG&E is cognizant of the privacy concerns of other parties.

Notwithstanding the foregoing, and consistent with the practice in previous General Rate Cases, PG&E is willing to meet in person with Ms. Bower to provide additional details about the settlements. Please contact PG&E’s attorney, Redacted to arrange for such a meeting.