

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

PG&E Data Request No.:	DRA_178-01		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_178-Q01		
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 1**

Ex. PG&E-6, p. 5-4, PG&E states that it forecasts costs of \$16 million for settlements and judgments and \$17.3 million for third party claims payments in 2011. PG&E says this forecast is based on the average of the adjusted actual costs for 2005-2008.

- a. Please provide the adjusted actual costs for settlements and judgments payments for 2009.
- b. Please provide the adjusted actual costs for third party claims payments in 2009.

**ANSWER 1**

PG&E objects to this data request to the extent it asks for 2009 actual data while PG&E's 2011 GRC request is based on 2008 recorded data. Notwithstanding the foregoing and without waiving PG&E's right to object to the admissibility of such data, PG&E responds as follows:<sup>1</sup>

- b. The adjusted actual cost for third party claims payments in 2009 is \$27,548,400.

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<sup>1</sup> Please note that PG&E has received an extension until April 5 to respond to part a.