

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

PG&E Data Request No.:	DRA_186-02e		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_186-Q02e		
Request Date:	March 9, 2010	Requester DR No.:	DRA-186-TLG
Date Sent:	March 23, 2010	Requesting Party:	DRA
PG&E Witness:	Redacted	Requester:	Tamera Godfrey

SUBJECT: ELECTRIC DISTRIBUTION OPERATIONS AND MAINTENANCE EXPENSES FOR MWC BF, BG, AND BK

QUESTION 2F

PG&E forecasted \$40.712 million for MWC BF. This is an increase of \$7.487 million or 22.53% over 2008 recorded adjusted expenses of \$33.225 million. PG&E's MWC BF includes individual forecasts for ten subaccounts/line items. The questions below relate to the following five subaccounts/line items and forecast: \$4.984 million for Poles Patrolled, \$11.122 million for Poles Inspected, \$2.398 million for Enclosures Patrolled, \$10.464 million for Enclosures Inspected, and \$0.857 million for Poles Infrared Inspected.

- e) PG&E's poles inspected between 2004 and 2008 have fluctuated each year and in the test year PG&E forecasts an increase in units. Provide the documentation that explains in detail the reasons for the fluctuation between 2004 and 2008 and the specific reason for the increase in 2011.

ANSWER 2F

Recorded historical recorded units for 2004 through 2008 and forecasted units for 2011 for Pole Inspections are as follows.

Year	Units	% of Total Poles	PG&E GRC Exhibit 3, Chapter 2 Workpaper Reference
2004	479,790	21%	Table 2-16, Workpaper page WP 2-21
2005	451,879	20%	
2006	471,551	21%	
2007	453,437	20%	
2008	429,237	19%	
2011	458,264	20%	Table 2-26, Workpaper page WP 2-39

The difference between the 2008 recorded units and 2011 forecasted units is an increase of 29,027 (7%).

The reason for the fluctuation from year-to-year is that PG&E manages its poles inspected work by use of plat maps to meet its compliance to General Order (GO) 165 for inspection cycle requirements. The 2011 forecasted units represent known pole counts for inspection for the specified year plus a 2% growth factor for poles counts (Exh (PG&E-3), Chapter 2, page 2-2, lines 1-2 and Workpapers Table 2-33, page WP 2-62).

PG&E has approximately 2.3 million poles in its service territory. Per GO 165, poles in urban areas need to be inspected on a five-year cycle. The plat maps provide PG&E with a means to manage work geographically to meet its GO 165 compliance. The mix of plat maps and their corresponding unit counts from year-to-year differ. Plat maps are comprised of different numbers of circuits and facilities, e.g., one plat map may include 100 poles while another plat map may include 400 poles.

As a result, there are fluctuations in the historical recorded units and the year-to-year variation shown in the table above is normal. The percent of poles inspected/to be inspected range year-to-year consistently range from 19% to 21%.