

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

PG&E Data Request No.:	DRA_186-02j		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_186-Q02j		
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 2J

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.

- j) PG&E did not provide the specific details to fully explain and justify its new work on poles inspected that will cause increases in the test year and instead provides examples "such as obtaining asset manufacturing information or facility information". Provide the documentation that explains in detail the specifics of the new work. Also provide copies of PG&E's cost benefit analysis performed and all documentation that PG&E's management relied upon to determine that this work was required in the test year and other documentation that shows PG&E's step by step management approval process for each project (i.e. person(s) requesting project, project preparation, scope, research performed for need/requirements, design, test, implementation, review and communication of needs and expectations, defined deliverables, etc).

ANSWER 2J

PG&E's forecast for poles inspected include the following new projected work:

- Cost for handling of special field (for a description of the work and the forecasted cost, see the response to questions 2h, 2j, and 2i, for more information).

- Cost for attaching a pole number and obtaining the global position system location for poles where an abnormal condition is identified and documented (see the response to question 2k of this data request for more information).

PG&E did not perform a cost benefit analysis that PG&E's management relied upon to determine that this work was required in the test year. Rather, PG&E relied on the judgment of its Electric Distribution Maintenance (EDM) program managers to determine the most cost effective and efficient way to perform the proposed new work.

Since PG&E Maintenance Inspectors are qualified to identify and address field conditions, they frequently perform these non-urgent special requests related to poles during their routine inspections. Therefore the forecast for the projected new work is included in the forecasted inspection costs.