

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

PG&E Data Request No.:	DRA_186-03i		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_186-Q03i		
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 3I

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: \$5.641 million for Overhead Line Equipment Inspected and Tested, \$1.131 million for Underground Line Equipment Inspected and Tested, \$2.923 million for Network Transformers Inspected, \$0.311 million for Special Patrols, and \$0.881 million for Miscellaneous Maintenance Items.

- i) PG&E states that its forecast for its underground distribution line equipment inspected and tested for "2011 are based on actual equipment counts in 2009 plus a four percent growth factor". Table 2-33 on page WP 2-62 in the workpapers shows equipment counts for 2005 through 2008, and PG&E's Table 2-16 on page WP 2-21 shows that its recorded units for 2004 through 2008 have been decreasing between 2006 through 2008. Provide the documentation that explains in detail, in particular as it relates to equipment counts or equipment inventory, exactly how PG&E utilized its equipment count/inventory to perform maintenance and calculate the units shown for 2004 through 2008 and which demonstrates how the equipment counts are expected to cause an increase in units of 189.66% in 2011 over 2008 units of 1,074 to fully justify the increase in units.

ANSWER 3I

PG&E's Centralized Electric Distribution System Analysis (CEDSA) System is the basis for the forecasted unit counts for line equipment inspections and testing (Exhibit (PG&E-3, Chapter 2, page 2-23, lines 20 and 28). PG&E division personnel query CEDSA to identify the underground line equipment requiring inspection and maintenance.

The recorded unit counts for 2004 through 2008 represent the actual number of units completed. During this period, due to PG&E's need to provide resources to higher priority work such as emergency, safety, compliance, new customer connections and new capacity work (Exhibit (PG&E-3), Chapter 1, page 1-35, lines 8-17), the operating budget for programs such as Electric Distribution Maintenance (EDM) were reduced. As a result, within the EDM program a lower number of inspections and testing units were completed as opposed to the total number of units needing inspections and testing. However, please note that a lower number of inspections and unit testing does not create a backlog of work. That is because S-2302 requires annual or bi-annual inspection or testing. If a unit is not inspected/tested in one year, it is simply missed. In other words, a unit that is missed is not inspected/tested twice the next year. That is why it is reasonable to base the forecast for the number units on the CEDSA data.

See the response to Question 3g of this Data Response for the forecasted units for 2011.