

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

PG&E Data Request No.:	DRA_211-03		
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Date Sent:	March 30, 2010	Requesting Party:	DRA
PG&E Witness:	Redacted	Requester:	Dao Phan

**SUBJECT: GAS O&M EXPENDITURES, MWC FH**

**QUESTION 3**

Provide a copy of the work procedures for Regulator Station Maintenance before GEEM and after GEEM. Please highlight the differences in work procedures that are necessary going forward as a result of GEEM.

**ANSWER 3**

Attachment GRC2011-Ph-I\_DR\_DRA\_211-Q03-Atch01 includes a copy of UO Standard S5351 "District Regulator Station Maintenance" (effective August 2001). Please refer to attachment GRC2011-Ph-I\_DR\_DRA\_211-Q03-Atch02 for a copy of Utility Work Procedure WP 4540-01 "District Regulator Station Maintenance" which replaced UO Standard S5351 in August 2009.

WP 4540-01 includes some changed procedures for performing maintenance such as filter inspections (II.A.3 and II.B.2) and regulator operating tests (II.A.6,7 and II.B.9,10), which required some stations to be rebuilt or retrofitted to accommodate the new requirements. When compared to UO Standard S5351, WP 4540-01 throughout the document provides relatively more clarity on what maintenance is required, how to perform various tasks and how to properly document. GEEM efforts that developed WP 4540-01 and provided system-wide refresher training have increased the amount of time to maintain some regulator stations, because of the clarified and sometimes more comprehensive work procedures.