

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

PG&E Data Request No.:	DRA_206-03g		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_206-Q03g		
Request Date:	March 12, 2010	Requester DR No.:	DRA-206-TLG
Date Sent:	April 2, 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 3G**

PG&E states that it “owns and operates approximately 220,000 streetlights and provides maintenance (preventative and corrective) for approximately 30,000 additional streetlights owned by others”. PG&E forecasted \$3.197 million in 2011 for street light group replacement which is an increase of \$2.483 million or 347.76% over 2008 recorded expenses of \$0.714 million. PG&E forecasted 49,329 units in 2011 over 2008 units of 13,294 which is an increase of 36,035 units or 271.06%. PG&E forecasted \$4.851 million in 2011 for street light burnouts which is an increase of 16.64% over 2008 recorded expenses of \$4.159 million. PG&E forecasted 21,000 units in 2011 over 2008 units of 16,556 which is an increase of 4,444 units or 26.84%.

- g) Provide the documentation that explains in detail if PG&E’s request in its 2007 GRC included funding to perform streetlight group replacements which is embedded in its 2008 recorded expenses.

**ANSWER 3G**

PG&E objects to this question on the grounds that it is vague and ambiguous and PG&E does not understand the question.

PG&E interprets this question to request whether PG&E’s 2007 GRC forecast included street light group replacements, and whether these costs are included in PG&E’s 2008 GRC historical 2004 through 2008 recorded costs.

A forecast for this type of work was include in PG&E’s 2007 GRC (see Exhibit (PG&E-4), Chapter 2, page 2-46, line 3). Also, this type of work was included in PG&E’s 2011 GRC , 2004 through 2008 historical recorded costs (Exhibit (PG&E-3), Workpapers, WP 2-22, line 6).