

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

PG&E Data Request No.:	DRA_206-03c		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_206-Q03c		
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 3C**

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%.

- c) DRA is having difficulty understanding PG&E’s statement regarding its forecast being “based on historical actuals plus an estimate for anticipated additional units due to group streetlight replacements not being performed in prior years. Provide the documentation that fully explains the statement above, particularly the statement regarding “anticipated additional units due to group streetlight replacements not being performed”. Explain why more maintenance would need to be done in regards to replacing streetlight burnouts than during the historical period.

**ANSWER 3C**

PG&E’s 2011 forecast related to street light burnouts is based on Electric Distribution Maintenance Program Management professional judgment. PG&E forecasts an increase in Street Light Burnouts based on the following:

- As indicated in Exhibit (PG&E-3), Chapter 1, page 1-35, lines 8-17 due to higher priority T&D work, some electric maintenance work was rescheduled. As a result Street Light Group Replacement work completed was lower than planned.

- Street lights lamps that would have been replaced in the street light group replacement program, but were not, will naturally burn out and need to be replaced.