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

PG&E Data Request No.:	DRA_206-03d		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_206-Q03d		
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 3D

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%.

d) Provide the documentation that explains the relationship between PG&E's request for maintenance for streetlight burnouts and its request for its streetlight LED replacement program that proposes to use streetlights that will not burnout for ten or more years thus significantly reducing the need to replace streetlights which should also reduce maintenance expenses in the test year.

ANSWER 3D

PG&E's 2011 GRC forecast provides the documentation for the GRC test year relationship between street light burnouts (MWC BG expense) and the proposed street light LED replacement program (MWC 57 capital).

Although after PG&E has most or all the street lights replaced with LED lamps, PG&E anticipates a reduction in street lights burnouts that need to be addressed, this will not occur during the next GRC cycle, because the proposed plan for the Street Light LED Replacement Project is based on a 5-year time frame starting in 2011. As a result, PG&E's 2011 GRC forecast for Street Light Burnouts and Street Light LED Replacement Project are reflected separately and independent of one another.