

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

|                        |                              |                   |                |
|------------------------|------------------------------|-------------------|----------------|
| PG&E Data Request No.: | DRA_206-03h                  |                   |                |
| PG&E File Name:        | GRC2011-Ph-I_DR_DRA_206-Q03h |                   |                |
| 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 3H**

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%.

- h) PG&E states that its 2011 forecasted units of 49,329, which is an increase of 36,035 units or 271.06% over 2008 units of 13,294, “are based on re-instituting a preventive maintenance program for replacing lamps or associated components on a proactive basis where the replacement is performed over a 5-year basis”...
- 1) Provide all source documentation PG&E’s management relied upon to determine that it needed to re-institute this program and increase units by 271.06% in 2011 (i.e. breakdown of contract costs and source/basis for estimates, copies of vendor contracts for studies, annual salary breakdown for new positions and basis/source for estimated salary, etc.) in order to fully justify the request. 2) Also provide copies of PG&E’s cost benefit analysis performed and all documentation that PG&E’s management relied upon to determine that this change in streetlight group replacements work was required in the test year and other documentation that shows PG&E’s step by step management approval process for each project (i.e. person(s) requesting project, project preparation, scope, research performed for need/requirements, design, test, implementation, review and communication of needs and expectations, defined deliverables, etc.

**ANSWER 3H**

There is no “source documentation PG&E’s management relied upon to determine that it needed to re-institute the group streetlight replacement program.”

A cost-benefit analysis specifically performed by PG&E does not exist, however, PG&E relied on industry publications to determine the costs and benefits of re-instituting the group streetlight replacement. One such publication, “Design Guide for Roadway Lighting Maintenance”, published and copyrighted by the Illuminating Engineering Society of North America, is available for inspection at PG&E headquarters at 77 Beale Street, San Francisco, California.