

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

PG&E Data Request No.:	DRA_206-03j		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_206-Q03j		
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 3J

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%.

- j) 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, and an increase of \$2.483 million or 347.76% over 2008 recorded expenses of \$0.714 “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”. DRA is having difficulty understanding PG&E’s 347.76% expense increase request for streetlight group replacements when DRA compares PG&E’s request mentioned on page 2-50 and 2-51 in Exhibit (PG&E-3) for its streetlight LED replacement project which “PG&E proposes to replace 162,000 existing PG&E-owned, high–pressure sodium vapor and mercury vapor streetlights with new LED fixtures” which are “projected to operate without burning out for greater than 10 years which is significantly longer than the current estimated life of about four years” and should “reduce direct maintenance”.

Provide the documentation that explains in detail both requests to fully justify PG&E’s maintenance request for an increase in expenses of 347.76% in streetlight group replacements when it is requesting funding of \$20.5 million per year to install LED lights which PG&E states will last over ten years and will significantly reduce maintenance costs.

ANSWER 3J

PG&E is requesting approval and funding from the Commission to replace 162 thousand existing HPSV street lights with new, energy efficient LED street lights over a 5-year period beginning in 2011. Documentation for that request can be found in PG&E's GRC Application testimony.

Documentation that explains in detail PG&E's request for an increase in expenses of 347.76% in streetlight group replacements does not exist. For additional information, see PG&E's response to question 3h of this data request.

In 2011, assuming a half-year LED replacement benefit, only 16 thousand HPSV street lights will be removed from the pool of lights that require burnout and group replacement maintenance dollars, which leaves over 200 thousand street lights that do require maintenance funding.

After PG&E has most or all the street lights replaced with LED lamps, PG&E anticipates a reduction in street lights group replacements that need to be performed, however this will not occur until after 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 Group Replacements and Street Light LED Replacement Project are reflected separately and independent of one another.