

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

PG&E Data Request No.:	DRA_186-03o-Supp01		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_186-Q03o-Supp01		
Request Date:	March 9, 2010	Requester DR No.:	DRA-186-TLG
Date Sent:	March 23, 2010 April 6, 2010 (revised)	Requesting Party:	DRA
PG&E Witness:	Redacted	Requester:	Tamera Godfrey

**SUBJECT: ELECTRIC DISTRIBUTION OPERATIONS AND MAINTENANCE EXPENSES FOR MWC BF, BG, AND BK**

**QUESTION 30**

PG&E forecasted \$40.712 million for MWC BF. This is an increase of \$7.487 million or 22.53% over 2008 recorded adjusted expenses of \$33.225 million. PG&E's MWC BF includes individual forecasts for ten subaccounts/line items. The questions below relate to the following five subaccounts/line items and forecast: \$5.641 million for Overhead Line Equipment Inspected and Tested, \$1.131 million for Underground Line Equipment Inspected and Tested, \$2.923 million for Network Transformers Inspected, \$0.311 million for Special Patrols, and \$0.881 million for Miscellaneous Maintenance Items.

- o) Prior to 2009 PG&E performed the patrols and recorded/charged these special patrols to OH Patrols, OH Infrared, or to OH Notifications. Provide the documentation that explains in detail and demonstrates why PG&E's recorded adjusted 2008 expenses in the above three categories is insufficient to address its maintenance program needs in the test year to fully justify the forecast of \$0.311 million.

**ANSWER 30 - SUPPLEMENTAL**

The 2011 forecast for OH Patrols, OH Infrared, and OH Notifications was primarily based on using a "bottoms-up" approach taking into account projected work and forecasted unit costs to forecast for each of the three above-referenced categories (as opposed to basing the forecasts primarily on historical costs). While there may have been some special patrol costs embedded in the historical costs for OH Patrols, OH Infrared, and OH Notifications, PG&E believes that the amounts would have been insignificant. Therefore, the 2008 recorded expenses are insufficient to address PG&E's maintenance program needs for special patrols in the test year.