

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

PG&E Data Request No.:	DRA_178-04		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_178-Q04-Supp01		
Request Date:	March 5, 2010	Requester DR No.:	DRA-178-DFB
Date Sent:	April 8, 2010	Requesting Party:	DRA
PG&E Witness:	Sanford Hartman	Requester:	Donna Fay Bower

**SUBJECT: LAW DEPARTMENT – INJURIES AND DAMAGES (ACCOUNT 925)**

**QUESTION 4**

On Attachment 1 a number of Settlements are labeled “Lit-Employment” please provide a more detail description of these Employment settlements:

- a. For 2005, Settlement Numbers 29 through 41;
- b. For 2006, Settlement Numbers 17 through 26;
- c. For 2007, Settlement Numbers 26 through 34; and,
- d. For 2008, Settlement Numbers 38 through 46.

**ANSWER 4 - ORIGINAL**

As stated in response to Data Request DRA\_051-01, PG&E’s settlement information is highly confidential. The public release of settlement amounts and details has the potential to place the Company and its ratepayers at a disadvantage in pending and future litigation. Additionally, some settlements have confidentiality agreements. PG&E has not sought and does not have permission from the plaintiffs or other parties to these lawsuits to disclose this information. Moreover, while such permission may not be required, PG&E is cognizant of the privacy concerns of other parties.

Notwithstanding the foregoing, and consistent with the practice in previous General Rate Cases, PG&E is willing to meet in person with Ms. Bower to provide additional details about the settlements. Please contact PG&E’s attorney, Redacted to arrange for such a meeting.

**ANSWER 4 – SUPPLEMENTAL**

In an email dated March 30, 2010, DRA’s counsel clarified the scope of the request as follows:

For the settlements enumerated in DRA-178, Q. 4, DRA is asking for a description of the allegations or causes of action that led to the "Lit-Employment" settlements. DRA is not seeking the names of the plaintiffs, or any terms of the settlement that have been deemed confidential.

If PG&E can provide Donna-Fay Bower and me with a written breakdown of the causes of action/ allegations for each of the Lit-Settlements enumerated in DRA-178, Q. 4, please let me know when we can expect that. If PG&E cannot provide such a list, then I will be at your offices this Friday. If that is the case, the files I would like to see first are the following:

For 2005: Settlement Numbers 32, 34, 37, 39,40, 41;  
For 2006: Settlement Numbers 17, 19, 20, 21, 22, 24, 25;  
For 2007: Settlement Numbers 26, 33, 34; and  
For 2008: Settlement Numbers 39, 41, 42, 44.

Based on this clarification, PG&E has compiled the attached listing of settlements by number and cause of action. See Attachment GRC2011-Ph-1\_DR\_DRA\_178-Q04-Supp-CONF.

**Please note that this attachment is highly confidential and being provided to DRA pursuant to Public Utilities Code Section 583 and General Order 66-C. No unauthorized copying or distribution.**