

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

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|------------------------|-----------------------------|-------------------|----------------|
| PG&E Data Request No.: | DRA_230-03 | | |
| PG&E File Name: | GRC2011-Ph-I_DR_DRA_230-Q03 | | |
| Request Date: | March 23, 2010 | Requester DR No.: | DRA-230-TLG |
| Date Sent: | April 6, 2010 | Requesting Party: | DRA |
| PG&E Witness: | Redacted | Requester: | Tamera Godfrey |

SUBJECT: ELECTRIC DISTRIBUTION OPERATIONS AND MAINTENANCE EXPENSES FOR MWC BH AND IF

QUESTION 3

PG&E's 2009 recorded expenses of \$31.199 million is an increase over 2008 recorded adjusted expenses. DRA is having difficulty determining the 2008 recorded adjusted expenses for MWC IF: of \$11.468 million or \$38.547 million or \$44.689 million. Provide the 2008 recorded adjusted expenses for MWC IF (after the removal of ALL CEMA related expenses including the recovered amount and the amount of CEMA left in the 2008 expenses).

- a) Provide the documentation that explains in detail if PG&E's 2009 recorded expenses of \$31.199 million is the recorded adjusted figure. If the 2009 recorded figure has not been adjusted, provide the detail on all amounts that will be adjusted out (CEMA related expenses) or allocated to other accounts and/or filings.
- b) Provide a detailed and itemized listing (line item breakdown of expenses) for all labor and non labor expenses for 2009.
- c) Provided a detailed explanation and identify the specific labor (including positions, job titles, and annual salary) and non labor expenses that caused the increase over 2008 recorded adjusted expenses.
- d) Provide a detailed and itemized listing (line item breakdown of all major emergency expenses) for all labor and non labor recorded to MWC IF that caused the increase between 2008 and 2009.

ANSWER 3

PG&E objects on the grounds that the question asks for actual 2009 data while PG&E's request is based on 2008 recorded data. Notwithstanding the foregoing, and without waiving PG&E's right to object to the admissibility of the requested information into evidence, PG&E responds as follows.

- a. PG&E has reserved the right to seek recovery through CEMA for some costs recorded in 2009, however, PG&E has not yet decided if the Company will make a CEMA filing, the amount of cost recovery PG&E will request and what the CPUC decision will be.
- b. Attachment GRC2011-Ph-I_DR_DRA_230-Q03-Atch01 provides a detailed and itemized listing of all labor and non-labor expenses for 2009.
- c. As provided in PG&E's response to DRA 079, Q 004b, emergency work or major emergency work varies by outage or event, what specific population of units or expenditures is included in the increase over 2008 recorded adjusted expenses cannot be identified.
- d. The costs recorded in MWC IF vary from year to year and are primarily driven by the number and intensity of extreme weather events (e.g., low snow, wind, rain, lightning, wildland fires, heat waves, etc) that result in the activation of Operations Emergency Centers.

Attachment GRC2011-Ph-I_DR_DRA_230-Q03-Atch01 provides a detailed and itemized listing of all labor and non-labor expenses for 2009.