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

Recipient:	Tamara Godfrey		
PG&E Data Request No.:	PGE_DRA021		
PG&E File Name:	GRC2011-Ph-I_DR_PGE_DRA021		
Request Date:	May 13, 2010	PG&E Witness: Redacte Redacted	
Due Date:	May 27, 2010	PG&E Witness Phone No.:	Redacted
Topic:	2004- 2009 Recorded Data		

Subject:

Reference: Exhibit DRA-5

DRA Witness: Tamara Godfrey

Q 1: Referencing Table 5-11 on page 69 of Exhibit DRA-5, the totals for the years 2004, 2005 and 2008 do not add up to the numbers shown in the table. Please provide a revised table with the correct numbers.

Q 2: In Table 5-1 on page 69 for the year 2009, recorded costs of $33,937 for BA and $433 for HG are shown. These amounts are the 2009 recorded costs in 2008 dollars as provided in attachment 01 in PG&E's supplemental response to DRA-122, question 01. Please explain why the 2009 recorded cost in 2008 dollars was used in Table 5-1 and the recorded costs for the years for 2004 – 2008 remained in the nominal dollars for the year they were recorded.

Q 3: On page 70, lines 17 through 19, DRA states that PG&E's 2009 recorded adjusted expense of $33.937 million was less than its 2009 forecast of $35.081 million. The 2009 recorded cost in 2009 dollars is $35.089 million as noted in attachment 01 in PG&E's supplemental response DRA-122, question 01. Please explain why the 2009 recorded cost of $33.937 million in 2008 dollars was compared to the 2009 forecast of $35.081 million in 2009 dollars.

Q 4: On page 70, lines 20 though 22, DRA states that PG&E should not have embedded historical expenses to address recurring costs for "routine" on-going activities and ratepayers should not be charged twice for these activities. Please provide the documentation, analysis and calculations of these recurring costs for "routine" on-going activities and where/how the ratepayers are being charged twice for these activities.

Q 5: On page 71, lines 1 through 4, DRA cites a five year average for 2004 – 2008 of $30.319 million and a three year average for 2007-2009 of $33.049 million.

Using the 2009 recorded cost in nominal dollars (consistent with the costs recorded in the years 2004-2008), what is the three year average for 2007-2009?

Q 6: On page 71, lines 4 through 6, DRA states that utilizing PG&E's recorded adjusted expense is a reasonable method to address PG&E's test year needs. Why does the DRA not include escalation in their test year estimate? Why does DRA not include the wage increase as agreed between PG&E and International Brotherhood of Electricians (IBEW 1245) in DRA's test year estimate?

Q 7: Please provide all workpapers, documentation, analysis and calculations that DRA used to determine that PG&E's increase for MWC BA is not justified based on its recent historical expenses (page 70, line 14 and 15). If DRA has no workpapers, documentation, analysis or calculations, please so state.

Q 8: Please provide any documents, analysis and calculations that demonstrate that PG&E's employee training related to the consolidation project is double counted in PG&E's Information Technology (IT) Support testimony as asserted on page 71, lines 9 through 17. If DRA has no such workpapers, documentation, analysis or calculations, please so state.

Q 9: Please provide any documents, analysis and calculations used in DRA's recommendation that PG&E's distribution control center consolidation proceed in two phases (page 77, line 7). If DRA has no such workpapers, documentation, analysis or calculations, please so state.

Q 10: Please provide any other documents, workpapers, analysis or calculations that DRA used in support of the testimony Exhibit DRA-5. If DRA has no such workpapers, documentation, analysis or calculations, please so state.