

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

Recipient:	Division of Ratepayer Advocates		
PG&E Data Request No.:	PGE_DRA025		
PG&E File Name:	GRC2011-Ph-I_DR_PGE_DRA025		
Request Date:	May 13, 2010	PG&E Witness:	Redacted
Due Date:	May 27, 2010	PG&E Witness Phone No.:	
Topic:	Electric Distribution Operations and Maintenance Expenses		

Subject: MWC BF, Line Patrols and Inspections

Reference: Exhibit DRA-5

DRA Witness: Tamera Godfrey

- Q1: In DRA-5, pg. 16, line 8, DRA states “PG&E’s forecast request of \$40.712 million...is not justified when compared to historical levels.” By what method does DRA determine “justification”? What is DRA’s process for determining whether one method of forecasting is more justified than another?
- Q2: In DRA-5, pg. 17, line 9, DRA states “PG&E did not provide any documentation or studies that demonstrate that its equipment count or equipment inventory increased maintenance work...during the five year historical period or in 2009.” PG&E indicated increased historical equipment counts in its GRC testimony and work papers (Exhibit (PG&E-3), Chapter 2, page 2, lines 1-2 and workpapers 2-62) and provided a response to data request DRA-186, Questions 3f and 3i. In light of the testimony and data response, is DRA willing to revise the above-quoted statement?
- Q3: In DRA-5, pg. 21, lines 25-26, DRA quotes the Commission as saying “errors in forecasting occur and we do not go back and fix those errors”. In relation to PG&E’s load growth and customer growth, would DRA support PG&E’s need to amply fund those areas that create the need to reprioritize work such as load and customer growth, and emergency response work?
- Q4: In DRA-5 pg. 25, line 6, DRA asserts that PG&E’s increase is not justified. By what method does DRA determine “justification”? What is DRA’s process for determining whether one method of forecasting is more justified than another?
- Q5: In DRA-5, pg. 26, line 9, DRA states that it “discovered that PG&E’s costs associated with implementing its hand-held device are also being requested in

its Information Technology Exhibit (PG&E-7) Chapter 2.” PG&E’s GRC testimony (Exhibit (PG&E-3), Chapter 2, pg 2-39, lines 3-7) and response to data request DRA 206-Question 08e clearly indicated the information technology forecasted costs in Exhibit (PG&E-3), Chapter 2 are for costs not covered in or by PG&E’s Information System Technology Services bases services (Exhibit (PG&E-7), Chapter 2). Please provide the reference and detail information for the program that is being referred to in the DRA’s IT Exhibit and describe how it was determined that this was the same project as what is being requested here.