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

Recipient:	DRA		
PG&E Data Request No.:	PGE_DRA031		
PG&E File Name:	GRC2011-Ph-I_DR_PGE_DRA031		
Request Date:	May 14, 2010	PG&E Witness:	Redacted
Due Date:	May 28, 2010	PG&E Witness Phone No.:	
Topic:	DRA-5 & DRA-6		

Subject: Substation Asset Strategy

Reference: Exhibit 3, Chapter 8

DRA Witness: Tamera Godfrey

1. **In DRA-6, pg 28, lines 21-22, DRA states it "does not believe that such a large change (more than a 3 fold increase over 2010) is justified."**

   Provide all calculations, assumptions, analysis, documents, and references used in support of this statement.

2. **In DRA-6, pg 28, lines 22-23 DRA states, "In DRA's judgment, an increase of 50% (from 20 replacements in 2010 to 30 in 2011) is more reasonable."**

   a. Provide all calculations, assumptions, analysis, documents, and references used to determine "reasonable" as used in this statement.

   b. What is the basis for the recommended percentage of 50%?

   c. Describe all calculations, assumptions, analysis, documents and references used to determine that a 50% increase was more appropriate.

3. **In DRA-6, pg 30, lines 12, DRA states, "In DRA's judgment, 50 replacements in 2011 is a more reasonable forecast."**

   a. What is the basis for the recommended 50 replacements?

b. Describe all calculations, assumptions, analysis, documents and references used to determine that 50 replacements "is a more reasonable forecast."

4. **In DRA-6, pg 30, lines 22 - 24, DRA states, "This is a higher project total than any previous year listed in Table 8-3, with a related higher expenditure total. All of this being proposed during the costly Hunters Point rebuild...for 2011, DRA recommends that the Oakland D4-kV study . . . be postponed."**

   a. What is the relevance of the Hunters Point project on the Oakland D4-kV study?

   b. Describe all calculations, assumptions, analysis, documents and references used in support of DRA's apparent position that the Oakland D 4-kV study should be postponed at least in part because of the Hunters Point project.

   c. Provide all calculations, assumptions, analysis, studies and related documents used to identify Oakland D 4-kV as the specific project to be postponed.

In DRA-6, pg 31, line 3, DRA recommends a "$4.0 million reduction".

   a. Provide all calculations, assumptions, analysis, studies and related documents used to determine the figure of $4.0 million as the appropriate reduction.

5. **In DRA-6, pg 31, line 16, DRA states "DRA recommends installing five"...on-line monitors.**

   a. Provide all calculations, assumptions, analysis, studies and related documents used to determine the recommendation of five units.

6. **In DRA-5, pg 62, line 19, DRA states "these activities are not new".**

   a. Please For each of the activities described on page 62, lines 16 -18, provide support for the statement that such activities are "not new", including any supporting documents.

7. **On page 60, lines 16 to 19 of DRA-5, DRA states that is "utilizing 2008 recorded adjusted expenses, which is $7.030 million less than PG&E's forecast." As a result DRA appears to be disallowing compliance work that is not captured in 2008 recorded adjusted expenses. DRA does not**

explain why the requested increase for compliance work is being disallowed.

    a. Please explain why DRA is disallowing PG&E's forecast for increases in support safety and regulatory compliance, including the compliance required by the CPUC.

    b. Is DRA asserting that any new CPUC compliance requirement established from now until the end of 2013 need not be performed? If so, on what grounds?

8. **Does DRA's estimate for Substation Asset Strategy account for growth, new initiatives, new safety and compliance requirements, escalation, and aging related work drivers. If so, describe in detail how these factors are accounted for. If they are not accounted for, please explain why not in detail.**

9. In DRA-5, pg 61, table 5-8 under 2009 recorded please explain why the $29.6 million amount does not match the reference stated as the source on line 5.