PACIFIC GAS AND ELECTRIC COMPANY

Advanced Meter Infrastructure (SmartMeter™) Program
Data Response

PG&E Data Request No.:	SM_DRA_01/SM_ED_01		
PG&E File Name:	SM_DRA_01 and SM_ED_01		
Request Date:	April 30, 2010	Requester DR No.:	DRA-012/ED-XX
Date Sent:	June 9, 2010	Requesting Party:	DRA
		Requester:	Mr. Chris Danforth

SUBJECT: COST OF A MORATORIUM ON THE SMART METER DEPLOYMENT

QUESTION 1

Attachment A *(not included)* contains excerpts from the rebuttal testimony of Stephen Lechner in PG&E's Smart Meter Upgrade proceeding. It discusses various costs and types of penalties associated with suspending the Smart Meter deployment. The following questions are based on that testimony.

1. Please separately quantify, as best as PG&E is able, all the costs associated with suspending the AMI deployment for each of the following scenarios: (a) Three-month moratorium, (b) Six-month moratorium, and (c) Nine-month moratorium.
2. For each scenario in Question #1, please separately itemize the following costs:
    a. For each vendor contract, the suspension costs that PG&E is contractually obligated to pay for delaying the installation;
    b. The costs of suspending the PG&E project management office operations;
    c. Possible loss of personnel knowledgeable about the project;
    d. The costs related to suspending and re-starting the equipment supply chain;
    e. The costs for contractor re-mobilization and ramping up deployment;
    f. Vendor inefficiency costs resulting from starting and stopping work;
    g. Costs for renegotiating existing vendor contracts, if necessary;
    h. Costs for identifying new vendors and negotiating new contracts if existing vendors should choose to leave the project during an extended suspension; and
    i. Any other costs not listed above that PG&E believes should be included.
    Provide a written explanation of each of the above costs and how they are calculated. Provide the calculations in an Excel spreadsheet.

3. Please provide a list of all vendor contracts specifying: (a) The name of the contractor, (2) What the contract covers, and (3) Whether or not there are suspension or labor escalation costs built into the contract.
4. Provide excerpts from contract language specifying the costs incurred owing to suspending the project that are used in the calculations for Question #2 above.

ANSWER 1

This Data Request and its attachment contain confidential information and is being submitted under CPUC Code Section 583.

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Table 1
Summary of the Relative Impact of Suspension on Benefits Realization
($000)

Redacted