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July 19, 2011

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Subject: Rulemaking 10-05-006, Track 1  
First Set of Discovery Requests

Dear Parties:

The attached questions comprise the first set of discovery requests to Investor Owned Utilities (IOUs) Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) from L. Jan Reid (Reid) relative to Track I of Rulemaking 10-05-006. Please provide responses by electronic mail to janreid@coastecon.com no later than Friday, July 29, 2011. If a response is not available in electronic form, please provide a paper copy of the response by overnight delivery to L. Jan Reid, Coast Economic Consulting, 3185 Gross Road, Santa Cruz, CA 95062.

Please contact me as soon as possible if any question is unclear or objectionable, or if the IOUs will be unable to respond by the requested date. Thank you for your cooperation in this matter.

Sincerely,

/s/

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First Set of Discovery Requests  
to the IOUs

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- Q 1. The IOUs state that “The IOU Common Scenarios assume projected transmission constraints limit Helms pumping to one unit in the summer months and two units in other months.” (IOU Testimony, p. 4-1) For the year 2010, please provide the number of gigawatt hours of electricity generated by the Helms Pumped Storage Facility.
- Q 2. The IOUs state that “The PG&E load forecast used in the IOU Common Scenarios is based on recent economic projections supplied to PG&E by Moody’s Analytics in December 2010.” (IOU Testimony, p. 5-3) Please provide an electronic copy of the economic projections supplied by Moody’s Analytics.
- Q 3. The IOUs state that “The future generic mix contains 45% solar, 45% wind, 5% geothermal and 5% biomass.” (IOU Testimony, p. 5-9) Please provide the current mix for each IOU.
- Q 4. Please provide a searchable version of the testimony of Environmental and Energy Economics (E3), as required by Rule 1.10 of the Commission’s Rules of Practice and Procedure.
- Q 5. Please provide an electronic copy of any workpapers produced by the IOUs in the preparation of their testimony.
- Q 6. Please provide an electronic copy of any workpapers produced by E3 in the preparation of its testimony.

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