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July 19, 2011

Charles Middlekauf
Pacific Gas and Electric Company
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Subject: Rulemaking 10-05-006, Track 1
First Set of Discovery Requests

Dear Mr. Middlekauf,

The attached questions comprise the first set of discovery requests to Pacific Gas and Electric Company (PG&E) 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 PG&E will be unable to respond by the requested date. Thank you for your cooperation in this matter.

Sincerely,

/s/

L. Jan Reid
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First Set of Discovery Requests
to PG&E

- Q 1. Please provide an electronic copy of the document referred to in footnote 5 of PG&E's testimony.
- Q 2. Please define the term "violations" as used in footnote 6 of PG&E's testimony.
- Q 3. PG&E states that "As an example, PG&E does not believe that the distributed generation resources included in all modeled scenarios would result in only savings with minimal or no additional cost on the distribution system." Please provide an electronic copy of any studies regarding the distribution system costs related to distributed generation resources.
- Q 4. Please provide a citation to any Commission decisions where the Commission adopted the values given in Table 1 of PG&E's testimony.
- Q 5. Please provide the capacity (in MW) of each plant listed in Table 2 of PG&E's testimony.
- Q 6. Please provide an electronic copy of any workpapers produced by PG&E in the preparation of its testimony.
- Q 7. For the period February 1, 2011 through July 19, 2011, please provide an electronic copy of the monthly convergence bidding reports that PG&E has provided to the Energy Division. (See D.10-12-034, pp. 40-42)

Note: I consider the above question (Q7) to be in scope because the Commission has identified procurement oversight rules as an issue in this proceeding. (See Administrative Law Judge's Ruling Denying Motion for Reconsideration and Motion Regarding Track I Schedule and Addressing Rules Track III Issues, June 10, 2011, p. 6)

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