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July 27, 2011

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

Dear Parties,

The attached questions comprise the second 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/

L. Jan Reid
3185 Gross Road
Santa Cruz, CA 95062
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Second Set of Discovery Requests
to the IOUs

- Q 8. 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) In your response to Reid Discovery Question 2, you state, “Please note that these are comprehensive series meant to convey at a high level the economic forecast as Moody’s Analytics’ sees it, and aren’t necessarily the driver variables that PG&E uses in developing its load forecast.”
- A. Please explain the discrepancy between your testimony and your response to Reid Question 2. Specifically, did you use the Moody’s Analytics’ estimates in your load forecast?
 - B. If you answered affirmatively to Question 8A, did you use the Moody’s forecast qualitatively or quantitatively in your load forecast?
 - C. Please explain how you used the Moody’s forecast in the PG&E load forecast.
- Q 9. In your response to Reid Discovery Question 2, you provide a table taken from Moody’s Analytics.
- A. Are all of the numbers in the table relative to the Metro Area as used in the Gross Metro Product?
 - B. Please define the Metro Area as used in the Gross Metro Product (e.g., San Francisco, San Francisco and Alameda Counties, nine Bay Area counties, etc.).

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