PACIFIC GAS AND ELECTRIC COMPANY 2014 General Rate Case Phase I Application 12-11-009 Data Request

Recipient:	Lindsay Laserson		
PG&E Data Request No.:	PGE-DRA_052		
PG&E File Name:	GRC2014-Ph-I_DR_PGE_DRA052		
Request Date:	May 29, 2013	PG&E Witness:	Shilpa Ramaiya
Due Date:	June 5, 2013	PG&E Witness Phone No .:	415-973-3186

SUBJECT: REGULATORY RELATIONS DEPARTMENT COSTS

EXHIBIT: DRA-17

FOLLOW UP TO PG&E-DRA-022

DRA's answers to the following questions in data request PG&E-DRA-022 are nonresponsive. PG&E is resubmitting these questions and asks that DRA respond within 5 business days. Please respond earlier if possible.

Q1. Data Request PG&E-DRA-22, Question 2 asked:

On p. 48 of DRA-17, DRA states, "In fact, even PG&E admits that "No cost savings or avoidance is expected."

a. Does DRA contend that projects that provide necessary functionality can be reasonable for ratemaking purposes only if they also lower costs?

DRA's response did not answer this question, but explained more generally the basis for its recommended disallowance. Please provide a "yes" or "no" answer to the specific question set forth above, which is, "[d]oes DRA contend that projects that provide necessary functionality can be reasonable for ratemaking purposes only if they also lower costs?"

- Q2. Data Request PG&E-DRA-22, Question 3 asked:
 - On p. 48 of DRA-17, DRA states, [i]f this is a new type of cost, then Ordering Paragraph 37 in the Commission's decision on PG&E's last GRC requires PG&E to estimate and include in the revenue requirement the cost savings to be achieved by the new type of cost or an explanation of the reasons there will be no cost savings."
 - a. On p. 48 of DRA-17, DRA acknowledges that "PG&E has always had a budget for rate design and analysis projects." Does DRA contend that this

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project constitutes a "new type of cost"?

b. If so, state all facts and provide all documents upon which DRA relies to support that contention.

DRA responded:

- a. As DRA notes in its testimony, since PG&E did not provide information showing why its current rates are insufficient to fund this project, it appears PG&E considers it to be a "new" project. If it is a new project then Ordering Paragraph 37 requires PG&E to include an estimate of cost savings or an explanation of why there will be no cost savings.
- b. See response to Q.3.a.
- DRA did not answer the question asked, which is: "[d]oes DRA contend that this project constitutes a "new type of cost"?" Please provide a "yes" or "no" response to this question. If DRA responds "yes" to subpart a., then state all facts and provide all documents upon which DRA relies to support that contention in the response to subpart b.