

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company for Compliance Review of Electric Energy Resource Recovery Account Entries, Contract Administration, Economic Dispatch of Electric Resources, and Utility Retained Generation Fuel Procurement Activities for the Period January 1 through December 31, 2012

A. 12-02-023

(U 39-E)

**SECOND SET OF DISCOVERY REQUESTS OF
PACIFIC GAS AND ELECTRIC COMPANY TO
THE DIVISION OF RATEPAYER ADVOCATES**

Date Sent: September 6, 2013

Date Due: September 13, 2013

General Instructions

The following general instructions apply to all data requests propounded by Pacific Gas and Electric Company ("PG&E") on the Division of Ratepayer Advocates ("DRA") in this proceeding.

1. Responses to this discovery request should be transmitted to PG&E as they become available, but **no later than Friday, September 13, 2013**.
2. Responses to these discovery requests should be transmitted via email to the following recipients of PG&E's 2012 ERRR Compliance Review project management team: Reda
Redacted; Counsel for PG&E, Charles Middlekauff (charles.middlekauff@pge.com) and Matt Fogelson (matthew.fogelson@pge.com).
3. As to any discovery request consisting of a number of separate subdivisions, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate discovery request.

4. Any objection to a discovery request should clearly indicate to which part or portion of the discovery request the objection is directed.
5. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it.
6. If, in answering any of these discovery requests, there is deemed to be any ambiguity in interpreting either the discovery request or a definition or instruction applicable thereto, promptly contact PG&E's case manager or counsel to obtain a clarification.
7. If you have any questions regarding this data request, please email the Case Manager immediately Redacted. If DRA objects to any of the data requests, please contact the assigned PG&E attorneys, Charles Middlekauff (charles.middlekauff@pge.com) and Matt Fogelson (matthew.fogelson@pge.com), as soon as possible.

Definitions

- A. As used herein, the term "you," "your(s)" and "DRA" mean the Division of Ratepayer Advocates and any and all of its respective present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.
- B. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these discovery requests any information or documents which might otherwise be considered to be beyond their scope.
- C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these discovery requests any information or documents which might otherwise be considered to be beyond their scope.
- D. The term "communications" includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- E. The term "document" shall include, without limitation, all writings and records of every type in your possession, control, or custody, including but not limited to the following

items, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery: computer data files, information stored in electronic media, including on computer tapes, disks, or diskettes, tapes, inputs, outputs, and printouts; notes; letters; correspondence; communications; telegrams; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports (including any and all draft, preliminary, intermediate, and final reports); surveys; studies (including, but not limited to, load flow, engineering, general economic, and market studies; comparisons; tabulations; budgets; workpapers; charts; plans; maps; drawings; engineering and other diagrams (including “one-line” diagrams); photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of meetings; transcripts; stenographic records; testimony and exhibits, including workpapers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of consultants; reports and summaries of negotiations; press releases; newspaper clippings; drafts and revisions of draft of documents; and any and all other records, written, electrical, mechanical, and otherwise. “Documents” shall also refer to copies of documents (even though the originals thereof are not in your possession, custody, or control), every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all attachments or appendices to any documents.

- F. “Identification” of a document includes stating: (a) the identity of each person who wrote, dictated, or otherwise participated in the preparation of the document; (b) the location of the document; and (c) the identity of each person having custody of or control over the document.
- G. “Identification” of a person includes stating his or her full name, most recent known business address and telephone number, present position, and prior connection to or association with any party to this proceeding, including position at the time of connection to the information requested.
- H. “Justify,” “explain,” “support,” “state,” and similar terms call for a full explanation of all reasoning involved, identification of all documents, information, studies and reports relied upon, used or referred to, and a summary of all facts relied upon, stating the basis therefore.
- I. “Party” and “person” refer to, without limiting the generality of their meaning, every natural person, corporate entity, partnership, association (whether formally organized or

ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body, or agency.

- J. “Policy” or “position” means each rule, procedure, or directive, formal or informal, written or unwritten, and each common understanding or course of conduct which was recognized as such by you.
- K. “Providing copies” or similar phrases shall include the full identification of all requested documents, to the extent not already identified therein, as well as to the physical production of all such documents.
- L. “Relate to,” “concern,” and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these discovery requests.
- M. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.
- N. “Study,” “studies,” or “report(s)” denotes any document, as defined above, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of information in connection with the subject referred to.

Data Request

Chapter 5 – Least Cost Dispatch (Ravinder Mangat)

- 1. In A.12-06-023 (SDG&E’s 2012 ERRA Compliance Application), did SDG&E include a “performance evaluation or other type of quantitative analysis that demonstrated [SDG&E’s] effectiveness in achieving the least-cost dispatch standard in the record year”, as DRA suggests in this proceeding that PG&E should have included (*see* DRA testimony, p. 5-1, lines 20-22)?
 - a. If your response to this question is anything other than an unequivocal “No,” describe in detail, without revealing market sensitive information, the performance evaluation or other type of quantitative analysis included by SDG&E that demonstrated its effectiveness in achieving least-cost dispatch.

- b. If your response to this question is anything other than an unequivocal “No,” describe in detail how SDG&E demonstrated that it had achieved least-cost dispatch.
2. Is the formula $A*(P-F)$ on page 3-15 line 14 and 3-16 line 16 missing a component H? There is a description of H on page 3-16 line 5 and 6 stating that “ H = the duration of the forced outage in hours from the beginning of the subject outage until the end,” but there is no H in the formula.
3. Please provide the calculation, methodology, or data source of the average locational marginal price (LMP) of energy per MWh, described as “P” on page 3-16 line 7 to 9.
4. Please provide the calculation, methodology, or data source of the average unit fuel costs for the resource, described as “F” on page 3-16 line 10 to 11.
5. Please provide calculation spreadsheets used for the five foregone energy costs on page 3-19, totaling \$86,900.
6. Please provide the calculation, methodology, or data source for the analysis of the average total net award that HGBS would have reasonably been able to receive for each hour during the duration of the outage.
7. Please provide the calculation, methodology, or data source for the derivation of the probability that a resource will be dispatched during a timeframe derived from the capacity factor.

Chapter 6 – Diablo Canyon Seismic Studies Balancing Account (Grant Novack)

8. At page 6-4, lines 15-16, DRA states that “DRA concluded that there should have been a reasonable expectation the CCC may deny such authorization”, referring to the authorization to conduct the 3-D HESS.
 - a. What is the basis for DRA’s conclusion that “there should have been a reasonable expectation the CCC may deny such authorization”?
 - b. Is DRA’s conclusion based simply on the fact that the CCC had discretion to deny the permit or is DRA aware of specific facts or circumstances that should have led PG&E to reasonably expect that the CCC might deny the permit application?
 - c. If DRA is aware of such specific facts or circumstances, please describe them.

9. At page 6-4, lines 16-18, DRA states that “PG&E should have waited until the CCC granted the permit to proceed before incurring the \$3.76 million costs for survey vessel contracting and NQA.” DRA further asserts at page 6-4, lines 20-23, that “PG&E’s expenditures in the amount of \$3.76 million to prepare for seismic studies that were contingent on obtaining the CDP were not incurred in the ordinary and prudent course of business.”
 - a. Is it DRA’s position that it is never prudent for a utility to incur any project implementation costs until such time as all permits are obtained from all agencies of jurisdiction?
 - b. In the alternative, is it DRA’s position that there might be circumstances when it would be prudent to incur certain project implementation costs in advance of receiving all required permits?
 - c. If the latter, in what types of circumstances would it be prudent to incur certain project implementation costs in advance of receiving all required permits and what types of costs would it be prudent to incur?