

PACIFIC GAS AND ELECTRIC COMPANY
PG&E Ref. DRU14469-Case-EUP-SB 884
Data Request CPUC Safety Policy Division
Requester DR No. PG&E Mini-RO Model (SPD-PGE-SB884-012)
Supplemental

Requester: Schmitt, Edwin; Hanes, Fred
Request Date: October 03, 2024
Response Date: October 28, 2024

Question No. 001:

In Question 11 of SPD-PGE-SB884-011, PG&E was asked to list the Applications where it submitted a depreciation study with a Non-GRC Application for rate recovery and provide a hyperlink to the testimony. The data request response EUP_DR_SPD_011_Q001-012.pdf has listed the Applications, but the blue text that PG&E designated as having a hyperlink is broken. PG&E must send SPD a response that includes active links to the Applications listed on pg. 7 of EUP_DR_SPD_011_Q001-012.pdf.

Response to Question No. 001 Response No. 001 [Submitted on October 07, 2024]:

PG&E is providing the hyperlinks for Question 11 of EUP_DR_SPD_011 (page 7) that were inadvertently removed during production of the response and sent to the CPUC on 10/1/2024.

FERC Transmission Owner rate case submitted depreciation studies:

TO21 – See Exhibit PGE-0025 WP Supporting PGE-0013 (case in progress - 1/1/2024 - current)
[eLibrary](#) | [File List \(ferc.gov\)](#)
https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20231013-5108&optimized=false

TO20 – See Exhibit PGE-0024 Workpapers Supporting PGE-0011 (5/1/2019 - 12/31/2023)
[eLibrary](#) | [File List \(ferc.gov\)](#)
https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20181001-5238&optimized=false

TO19 – See Exhibit PGE-0036 Workpapers Supporting PGE-0018 (3/12/2018 - 4/30/2019)
[eLibrary](#) | [File List \(ferc.gov\)](#)
https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20170727-5008&optimized=false

TO18 – See Exhibit PGE-29 Workpapers Supporting PGE-10A (3/1/2017 - 2/28/2018)
[eLibrary](#) | [File List \(ferc.gov\)](#)
https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20160729-5100&optimized=false

Question No. 002:

In Question 12 of SPD-PGE-SB884-011, PG&E was asked to provide SPD with testimony, workpapers and data request responses related to the mini-RO model and Pole Replacement Program. In Question

12.viii. SPD also asked PG&E to provide a table that lists the name of each document, where in the document the mini-RO model or Pole Replacement Program is discussed, and a summary of each document. The table PG&E provided, *EUP_DR_SPD_011_Q012Atch14.xlsx*, was completed correctly for the testimony and workpapers, but PG&E did not complete the table for data requests. For the individual data requests, the table does not include the document name, where in the document we could find the information discussed or a summary of the document. PG&E must complete this table and include as an attachment to its response to this data request.

Response to Question No. 002 Response No. 001 [Submitted on October 07, 2024]:

In response to SPD's request, we have provided updated attachment "*EUP_DR_SPD_012_Q02Atch01.xlsx*" which includes lists of data request responses with individual document summaries for each request, as set forth below:

- Worksheet "WGSC DRs" – data request responses relating to mini-RO model or Pole Replacement for A.23-06-008
- Worksheet "2020 GRC DRs" – data request responses relating to mini-RO model or Pole Replacement for A.18-12-009

Response to Question No. 002 Response No. 002 [Submitted on October 10, 2024]:

In response to SPD's request, we have provided updated attachment "*EUP_DR_SPD_012_Q02Atch01_Delivery 2.xlsx*". Ten additional data responses have been identified during our review of A.18-12-009 discovery and have been added to the '2020 GRC DRs' worksheet of this attachment.

Question No. 003:

PG&E was asked to provide any responses to data requests from A.23-06-008 and A.18-12-009 that discuss PG&E's Pole Replacement Program. PG&E provided SPD with the compressed file SPD-PGE-SB884-011_Q12b-ix.zip.

- a) For every data request response sent to TURN, CalAdvocates or CUE that was included in the DR Response folder of SPD-PGE-SB884-011_Q12b-ix.zip, provide SPD with the entire data request including all attachments.
- b) PG&E must follow the same folder structure found within the DR Response folder of SPD-PGE-SB884-011_Q12b-ix.zip. These folders should be repackaged as a new .zip file to be included in its response to this data request.
- c) To comply with Question 2 above, PG&E must provide the document name, where in the document the Pole Replacement Program is discussed and write a summary for every document included in its response to 3a. that does discuss the Pole Replacement Program.

Response to Question No. 003 Response No. 001 [Submitted on October 10, 2024]:

a-b) Please see attachment "*EUP_DR_SPD_012_Q03Atch01.xlsx*" which includes a list of the requested A.23-06-008 documents and links to the files, which is hosted on PG&E's discovery website, <https://pgera.azurewebsites.net>. Users can establish a free account to download linked documents.

PG&E is also providing the requested data request responses for both A.23-06-008 and A.18-12-009 in a zip folder directly to SPD staff: "*EUP_DR_SPD_012_Q03Atch02.zip*". Note, PG&E has also included the responses and attachments that were previously provided in the DR Response folder of SPD-PGE-SB884-011_Q12b-ix.zip. Please also note that some of the data response attachment documents contain confidential information as noted on the confidentiality declarations which were included with the responses to the original data requests and are also included with this response.

- c) The data request responses that pertain to pole replacements have been identified, described, and provided in attachment "*EUP_DR_SPD_012_Q02Atch01_Delivery 2.xlsx*", in compliance with Q2 above. The other responses and their attachments provided do not contain content related to pole replacements and therefore are not included in the document summary.

Response to Question No. 003 Response No. 002 [Submitted on October 28, 2024]:

- a-b) Please see attachment "*EUP_DR_SPD_012_Q03Atch01_Delivery 3.xlsx*" which includes an updated list of the requested data request documents (from both A.23-06-008 and A.18-12-009) and links to the files, which is hosted on PG&E's discovery website, <https://pgera.azurewebsites.net>. Users can establish a free account to download linked documents.

The links for A.18-12-009 data request documents were not available at the time of the previous responses to this data request but have since been obtained and collected in this response.