

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



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09-21-11
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Application of Pacific Gas and Electric
Company to Recover Costs Recorded in the
Catastrophic Event Memorandum Account
Pursuant to Public Utilities Code Section 454.9
Associated with Certain Declared Disasters
Between August 2009 and March 2011

Application No. 11-09-____
(filed September 21, 2011)

A1109014

(U 39 E)

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY

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Dated: September 21, 2011

TABLE OF CONTENTS

| | Page |
|--|------|
| I. INTRODUCTION | 2 |
| II. OVERVIEW OF TESTIMONY | 5 |
| III. AUTHORIZATION TO ESTABLISH THE CEMA | 6 |
| IV. DESCRIPTION OF THE SEVEN CEMA EVENTS AT ISSUE IN THIS APPLICATION | 8 |
| A. The August 2009 Fires..... | 8 |
| B. The October 2009 Storm..... | 8 |
| C. The January 2010 Earthquake..... | 9 |
| D. The January 2010 Storms..... | 9 |
| E. The November 2010 Storm..... | 10 |
| F. The December 2010 through January 2011 Storms..... | 10 |
| G. The March 2011 Storms..... | 10 |
| V. STATUTORY AND PROCEDURAL REQUIREMENTS..... | 11 |
| A. Statutory Authority | 11 |
| B. Categorization, Hearings, and Issues to be Considered (Rules 2.1(c), 7.1)..... | 11 |
| 1. Proposed Category | 11 |
| 2. Need for Hearing..... | 11 |
| 3. Issues to be Considered..... | 11 |
| C. Proposed Schedule | 12 |
| D. Legal Name and Principal Place of Business (Rule 2.1(a))..... | 12 |
| E. Correspondence and Communications Regarding this Application (Rule 2.1(b))..... | 13 |
| F. Article of Incorporation (Rule 2.2) | 13 |
| G. Balance Sheet and Income Statement (Rule 3.2(a)(1))..... | 14 |
| H. Statement of Presently Effective/Proposed Rates (Rule 3.2(a)(2), (3))..... | 14 |
| I. Summary of Earnings (Rules 3.2(a)(5))..... | 14 |
| J. Exhibit List and Statement of Readiness | 14 |
| K. Most Recent Proxy Statement (Rule 3.2(a)(8)) | 15 |
| L. Type of Rate Change Requested (Rule 3.2(a)(10)) | 15 |

TABLE OF CONTENTS
(continued)

| | Page |
|---|-------------|
| M. Service and Notice of Application (Rule 3.2(b-d))..... | 15 |
| VI. CONCLUSION..... | 16 |

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

Application of Pacific Gas and Electric Company to Recover Costs Recorded in the Catastrophic Event Memorandum Account Pursuant to Public Utilities Code Section 454.9 Associated with Certain Declared Disasters Between August 2009 and March 2011.

Application No. 11-09-____
(filed September 21, 2011)

(U 39 E)

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY

Pursuant to Public Utilities Code Section 454.9, Resolution E-3238^{1/} and the Rules of Practice and Procedure of the California Public Utilities Commission (CPUC or Commission), Pacific Gas and Electric Company (PG&E) submits this Application to recover incremental electric costs recorded in its Catastrophic Event Memorandum Account (CEMA) and incurred in responding to the following seven declared disasters (hereinafter, “the CEMA Events”) that occurred between August 2009 and March 2011:

- August 2009 Fires

^{1/} Public Utilities Code Section 454.9 states:

- (a) The commission shall authorize public utilities to establish catastrophic event memorandum accounts and to record in those accounts the costs of the following:
 - (1) Restoring utility services to customers.
 - (2) Repairing, replacing, or restoring damaged utility facilities.
 - (3) Complying with governmental agency orders in connection with events declared disasters by competent state or federal authorities.
- (b) The costs, including capital costs, recorded in the accounts set forth in subdivision (a) shall be recoverable in rates following a request by the affected utility, a commission finding of their reasonableness, and approval by the commission. The commission shall hold expedited proceedings in response to utility applications to recover costs associated with catastrophic events.

Resolution E-3238, adopted July 24, 1991, predated the 1994 enactment of Public Utilities Code Section 454.9, and originally authorized the establishment of the CEMA and the requirement to file an application to seek recovery of reasonable costs recorded in the CEMA.

- October 2009 Storm
- January 2010 Earthquake
- January 2010 Storms
- November 2010 Storm
- December 2010 through January 2011 Storms
- March 2011 Storms

I. INTRODUCTION

PG&E requests authorization to recover \$32.4 million in electric revenue requirements that are associated with \$48.9 million in CEMA-eligible incremental costs incurred in response to the seven CEMA Events. As a result of the seven CEMA Events, PG&E incurred damage across its service territory, with total system-wide costs totaling \$225.3 million. However, consistent with Commission Decision 07-07-041, PG&E is seeking cost recovery only for those damages incurred in counties that were declared a state of emergency by a competent state or federal authority. Consistent with past CEMA applications and Commission decisions, PG&E has adjusted its CEMA-eligible costs to exclude employee benefits associated with labor expense and capitalized Administrative and General (A&G) costs charged to capital orders and to reflect any insurance claim proceeds.

Table 1-1 provides a summary of system-wide, CEMA-eligible, and CEMA-eligible incremental costs incurred for each of the seven CEMA Events.

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**TABLE 1-1
PACIFIC GAS AND ELECTRIC COMPANY
SUMMARY OF AUGUST 2009 – JULY 2011 CEMA COSTS
(IN THOUSANDS OF DOLLARS)**

| Line No. | | System-Wide Costs | CEMA-Eligible Costs | CEMA-Eligible Incremental Costs ² |
|----------|---|-------------------|---------------------|--|
| 1 | Electric Distribution (Chapter 2) | | | |
| 2 | <u>Event</u> | | | |
| 3 | August 2009 Fires | \$2,136 | \$892 | \$801 |
| 4 | October 2009 Storm | 27,067 | 2,988 | 2,706 |
| 5 | January 2010 Earthquake | 306 | 306 | 277 |
| 6 | January 2010 Storms | 61,144 | 2,592 | 2,394 |
| 7 | November 2010 Storm | 28,758 | 6,503 | 6,223 |
| 8 | December 2010 Through January 2011 Storms | 19,622 | 2,974 | 2,775 |
| 9 | March 2011 Storms | 62,798 | 31,945 | 30,996 |
| 10 | Total Electric Distribution | \$201,831 | \$48,200 | \$46,173 |
| 11 | Hydroelectric Generation (Chapter 3) | | | |
| 12 | <u>Event</u> | | | |
| 13 | January 2010 Storms | \$200 | \$ - | \$ - |
| 14 | December 2010 Through January 2011 Storms | 1,263 | \$483 | \$437 |
| 15 | March 2011 Storms | 11,846 | 1,095 | 1,008 |
| 16 | Total Hydroelectric Generation | \$13,309 | \$1,578 | \$1,445 |
| 17 | Electric Distribution and Hydroelectric Generation Subtotal | \$215,140 | \$49,777 | \$47,618 |
| 18 | Customer Contact Center (Chapter 4) | | | |
| 19 | Total Customer Contact Center | \$10,123 | \$1,331 | \$1,331 |
| 20 | Total | \$225,263 | \$51,108 | \$48,949 |

Table 1-2 provides a summary of the CEMA-eligible incremental capital and expense costs incurred for each of the seven CEMA Events.

² Chapter 5 determines CEMA-eligible incremental costs for electric distribution and hydroelectric generation, Chapters 2 and 3, respectively. Customer contact center costs were derived as incremental and are discussed in Chapter 4.

TABLE 1-2
PACIFIC GAS AND ELECTRIC COMPANY
SUMMARY OF CEMA-ELIGIBLE INCREMENTAL COSTS (CAPITAL AND EXPENSES)
(IN THOUSANDS OF DOLLARS)

| Line No. | CEMA-Eligible Incremental Costs | Capital | Expense | |
|----------|---|----------|----------|----------|
| 1 | Electric Distribution | | | |
| 2 | <u>Event</u> | | | |
| 3 | August 2009 Fires | \$801 | \$591 | \$210 |
| 4 | October 2009 Storm | 2,706 | 1,454 | 1,252 |
| 5 | January 2010 Earthquake | 277 | 60 | 217 |
| 6 | January 2010 Storms | 2,394 | 1,464 | 930 |
| 7 | November 2010 Storm | 6,223 | 3,450 | 2,773 |
| 8 | December 2010 Through January 2011 Storms | 2,775 | 1,529 | 1,246 |
| 9 | March 2011 Storms | 30,996 | 16,606 | 14,390 |
| 10 | Total Electric Distribution | \$46,173 | \$25,154 | \$21,019 |
| 11 | Hydroelectric Generation | | | |
| 12 | <u>Event</u> | | | |
| 13 | January 2010 Storms | \$ - | \$ - | \$ - |
| 14 | December 2010 Through January 2011 Storms | \$437 | \$ - | \$437 |
| 15 | March 2011 Storms | 1,008 | 950 | 58 |
| 16 | Total Hydroelectric Generation | \$1,445 | \$950 | \$495 |
| | Electric Distribution and Hydroelectric Generation Subtotal | \$47,618 | \$26,104 | \$21,514 |
| 17 | Customer Contact Center | | | |
| 18 | Total Customer Contact Center | \$1,331 | \$ - | \$1,331 |
| 19 | Total | \$48,949 | \$26,104 | \$22,844 |

PG&E proposes to collect the authorized CEMA expenses and to amortize the authorized CEMA capital costs in rates beginning on January 1, 2013, as part of its Annual Electric True-Up (AET) filing, or as soon as possible following a decision in this proceeding. Such amortization of capital costs shall continue until PG&E's next General Rate Case (GRC), currently slated for a Test Year 2014. Thereafter, the recovery of capital-related costs (such as return, taxes, and depreciation) would be included in PG&E's next GRC base rates. The annual amount PG&E proposes to recover in rates will consist of the CEMA account balance as of the end of the prior

year, along with the current year activity, interest, and franchise fees and uncollectibles in order to approximate a zero balance by year-end.

Prior to the next GRC, the cost recovery will occur through the Distribution Revenue Adjustment Mechanism (DRAM) and the Utility Generation Balancing Account (UGBA) and will be updated annually through the AET filing. Rates set to recover CEMA costs will be set in the same manner as rates that are set to recover other distribution (i.e., DRAM) and generation (i.e., UGBA) costs, using adopted methodologies for revenue allocation and rate design.

Table 1-3 provides a summary of PG&E’s annual 2009 – 2013 annual revenue requirements by CEMA events. The total 2009 – 2013 CEMA revenue requirements will be collected in rates beginning on January 1, 2013. The CEMA capital revenue requirement will be included in rate base as part of PG&E’s 2014 GRC.

**TABLE 1-3
PACIFIC GAS AND ELECTRIC COMPANY
2009 – 2013 REVENUE REQUIREMENTS BY CEMA EVENT
(IN THOUSANDS OF DOLLARS)**

| Line No. | CEMA Event | 2009 | 2010 | 2011 | 2012 | 2013 | Total |
|----------|---|---------|---------|----------|---------|---------|----------|
| 1 | August 2009 Fires | \$292 | \$100 | \$91 | \$90 | \$87 | \$661 |
| 2 | October 2009 Storm | 1,335 | 255 | 232 | 229 | 220 | 2,271 |
| 3 | January 2010 Earthquake | | 263 | 10 | 10 | 9 | 292 |
| 4 | January 2010 Storms | | 1,279 | 230 | 227 | 223 | 1,959 |
| 5 | November 2010 Storm | | 2,398 | 920 | 452 | 448 | 4,217 |
| 6 | December 2010 Through January 2011 Storms | | 1,146 | 885 | 199 | 199 | 2,429 |
| 7 | March 2011 Storms | | | 17,036 | 1,747 | 1,832 | 20,615 |
| 8 | Total | \$1,627 | \$5,441 | \$19,404 | \$2,954 | \$3,018 | \$32,444 |

II. OVERVIEW OF TESTIMONY

PG&E’s CEMA Application is supported by prepared Testimony. Chapter 1 of the Testimony (Introduction and Policy) provides a summary of PG&E’s dollar request, an overview

of the other chapters of testimony, background information about the establishment of the CEMA, a description of the CEMA Events, and an explanation of the adjustment of CEMA costs for insurance proceeds. Chapters 2, 3, and 4 present PG&E’s capital and expense-related costs incurred as a result of the CEMA Events by functional categories—electric distribution, hydroelectric generation, and customer contact service centers, respectively. Chapter 5 describes PG&E’s methodology to determine which CEMA Event costs are eligible for cost recovery. Chapter 6 describes the revenue requirements associated with the incremental CEMA-eligible costs.

In total, PG&E seeks recovery of \$32.4 million in electric revenue requirements incurred as a result of the seven CEMA Events, to be collected in rates beginning in 2013.^{3/}

III. AUTHORIZATION TO ESTABLISH THE CEMA

In response to the Loma Prieta earthquake that struck northern California in October 1989, the Commission adopted Resolution E-3238, which authorized regulated public utilities to establish catastrophic event memorandum accounts and to record in those accounts the costs of: “(a) restoring utility service to its customers; (b) repairing, replacing or restoring damaged utility facilities; and (c) complying with government agency orders resulting from declared disasters.”^{4/} Pursuant to Resolution E-3238, Ordering Paragraph 2, should a declared disaster occur, each affected utility that has previously established a CEMA shall, if possible, inform the Executive Director by letter within 30 days after the catastrophic event if it has started booking costs in the CEMA. In addition to direct expenses, Resolution E-3238 authorizes

^{3/} PG&E is not seeking recovery of costs associated with its electric transmission facilities since these facilities are not subject for cost recovery under CPUC jurisdiction and were not severely impacted by the CEMA Events.

^{4/} Resolution E-3238, p. 1 and p. 5, Ordering Paragraph 1.

utilities to record “capital-related costs such as depreciation and return on capitalized [plant] additions” resulting from the restoration activities into such memorandum accounts.^{5/}

Section 454.9 of the Public Utilities Code established the statutory authority for public utilities to establish catastrophic event memorandum accounts and to recover any reasonable costs incurred when responding to catastrophic events. Pursuant to Section 454.9, PG&E is allowed to seek cost recovery for all direct expenses and capital-related costs for “restoring utility service to customers” and “repairing, replacing, or restoring damaged utility facilities.”^{6/} Direct expenses include straight-time labor, overtime labor, contract labor, and materials and supplies expenses. Capital-related expenditures result when the utility spends funds on capital projects that are necessary to replace, augment, or support its existing utility plant.

Consistent with this regulatory and statutory authority, PG&E established its CEMA (Electric Preliminary Statement Part G and Gas Preliminary Statement Part AC) to “recover the costs associated with the restoration of service and PG&E facilities affected by a catastrophic event declared a disaster or state of emergency by competent federal or state authorities.” PG&E’s CEMA authorizes PG&E to record Operations and Maintenance and Administrative and General expenses and capital costs to the CEMA associated with the restoration of service and PG&E facilities affected by a declared disaster. Insurance proceeds received as a result of the disaster are to be credited to the CEMA. Interest accrues on the average monthly CEMA balance at a rate equal to 1/12 the annual interest rate on 3-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, G.13, or its successor.

^{5/} Resolution E-3238, p. 2.

^{6/} P.U.C. Section 454.9(a).

IV. DESCRIPTION OF THE SEVEN CEMA EVENTS AT ISSUE IN THIS APPLICATION

The following section briefly describes the seven CEMA Events that are the subject of this CEMA Application and testimony. Greater detail about these CEMA Events is provided in the accompanying Testimony.

A. The August 2009 Fires

In August 2009, multiple wildland fires started in northern and central California.

Specifically:

- On August 14, 2009, a wildfire started in Yuba County. On August 20, 2009, Governor Arnold Schwarzenegger issued a State of Emergency proclamation for Yuba County.
- On August 26, 2009, a wildfire started in the Big Meadow area of Mariposa County. On August 29, 2009, Lieutenant Governor John Garamendi as Acting Governor issued a State of Emergency proclamation for Mariposa County.
- On August 27, 2009, the “Gloria” wildfire started in Monterey County. On August 28, 2009, Governor Schwarzenegger issued a State of Emergency proclamation for Monterey County.
- On August 30, 2009, the “49” wildfire started in Placer County. On August 30, 2009, Governor Schwarzenegger issued a State of Emergency proclamation for Placer County.

On September 15, 2009, PG&E submitted a letter to the Commission’s Executive Director providing notice that costs associated with the restoration of service following the series of wildland fires in Yuba, Mariposa, Monterey, and Placer Counties were being recorded in its CEMA.

B. The October 2009 Storm

From October 12, 2009 through October 14, 2009, Santa Cruz County experienced high winds and significant rainfall in an area that had burned during the summer wildfires. The

severe weather caused mudslides and flooding in and around these areas. On November 20, 2009, Governor Schwarzenegger issued a State of Emergency proclamation for Santa Cruz County.

On December 4, 2009, PG&E submitted a letter to the Commission's Executive Director providing notice that costs associated with the restoration of service following severe weather in Santa Cruz County were being recorded in its CEMA.

C. The January 2010 Earthquake

On January 9, 2010, a 6.5 magnitude earthquake struck the northern coast of California near the town of Ferndale. The earthquake damaged electric and gas facilities in PG&E's Humboldt Division, which encompasses the County of Humboldt. On January 12, 2010, Governor Schwarzenegger issued a State of Emergency proclamation for Humboldt County.

On February 5, 2010, PG&E submitted a letter to the Commission's Executive Director providing notice that costs associated with the restoration of service following the Ferndale earthquake were being recorded in its CEMA.

D. The January 2010 Storms

On January 17, 2010, a series of winter storms began in California, bringing high winds and significant amounts of precipitation statewide. On January 21, 2010, Attorney General Edmund G. Brown, Jr. as Acting Governor issued a State of Emergency proclamation for Los Angeles, Orange, Riverside, San Francisco, and Siskiyou Counties. On January 27, 2010, Governor Schwarzenegger issued a State of Emergency proclamation for Calaveras and Imperial Counties.

On February 12, 2010, PG&E submitted a letter to the Commission's Executive Director providing notice that costs associated with the restoration of service following the winter storms that began on January 17, 2010, were being recorded in its CEMA.

E. The November 2010 Storm

On November 20, 2010, a series of winter storms swept through Calaveras and Tuolumne Counties, respectively, bringing high winds and significant amounts of precipitation. On November 30 and December 9, 2010, Governor Schwarzenegger issued State of Emergency proclamations for Tuolumne and Calaveras Counties, respectively.

On December 30, 2010, PG&E submitted a letter to the Commission's Executive Director providing notice that costs associated with the restoration of service following a series of winter storms that began on November 20, 2010, were being recorded in its CEMA.

F. The December 2010 through January 2011 Storms

Beginning on December 18, 2010 through January 4, 2011, a series of severe winter storms swept through California, bringing high winds and significant amounts of precipitation. On December 21, 23, 24 and 30, 2010, and January 27, 2011, Governor Schwarzenegger, Lieutenant Governor Abel Maldonado as Acting Governor, and Governor Edmund G. Brown Jr. issued State of Emergency proclamations for Inyo, Kern, Kings, Los Angeles, Madera, Mariposa, Orange, Riverside, San Bernardino, San Diego, San Luis Obispo, Santa Barbara, and Tulare Counties.

On December 30, 2010, January 20 and 28, and February 25, 2011, PG&E submitted letters to the Commission's Executive Director providing notice that costs associated with the restoration of service following a series of winter storms that began on December 18, 2010 were being recorded in its CEMA.

G. The March 2011 Storms

Between March 15 and 27, 2011, a series of severe winter storms swept across California, bringing high winds and excessive precipitation and flooding. On April 15, 2011, Governor Brown issued a State of Emergency proclamation for Alameda, Amador, Butte, Contra Costa, Del Norte, Humboldt, Madera, Mariposa, Mendocino, Monterey, San Luis Obispo, Santa Barbara, Santa Cruz, Sierra, Stanislaus, Sutter, Trinity, Tuolumne, and Ventura Counties. On July 13, 2011, Governor Brown issued a State of Emergency proclamation for Marin County.

On May 13, 2011, PG&E submitted a letter to the Commission's Executive Director providing notice that costs associated with the restoration of service following a series of winter storms that occurred in 19 California counties between March 15 and 27, 2011 were being recorded in its CEMA. On August 4, 2011, PG&E submitted a supplemental letter to the Commission's Executive Director providing notice that costs associated with the restoration of service following a series of winter storms that occurred in Marin County between March 15 and 27, 2011 were being recorded in its CEMA.

V. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Statutory Authority

This application is pursuant to Public Utilities Code Section 454.9 and Commission Resolution E-3238.

B. Categorization, Hearings, and Issues to be Considered (Rules 2.1(c), 7.1)

1. Proposed Category

The purpose of this Application is to request authorization to recover \$32.4 million in electric distribution and generation revenue requirements that are associated with \$48.9 million in CEMA-eligible incremental costs incurred in response to the seven CEMA Events. PG&E proposes that this Application be categorized as rate-setting.

2. Need for Hearing

PG&E anticipates that hearings may be requested by other parties to this proceeding.

3. Issues to be Considered

The issues presented in this Application are:

- a. Whether PG&E's request to recover \$32.4 million in electric revenue requirements that are associated with \$48.9 million in CEMA-eligible incremental costs incurred in response to the seven CEMA Events is reasonable;

- b. Whether PG&E's proposal to collect the authorized CEMA expenses and to amortize the authorized CEMA capital costs in rates beginning on January 1, 2013, as part of its Annual Electric true-up filing, or as soon as possible following a decision in this proceeding, should be adopted.

C. Proposed Schedule

PG&E proposes the following schedule for processing this Application:

| | |
|---|--|
| Application Filed and Accompanying Testimony Served | September 21, 2011 |
| Protests or Responses | +30 days from Notice of Application in Daily Calendar (approx. October 24, 2011) |
| Reply to Protests or Responses | + 10 days (approx. November 3, 2011) |
| Prehearing Conference | November 7, 2011 |
| Intervenor Testimony | January 6, 2012 |
| Rebuttal Testimony | January 27, 2012 |
| Hearings | February 6-7, 2012 |
| Concurrent Opening Briefs Due | February 24, 2012 |
| Concurrent Reply Briefs Due | March 9, 2012 |
| Proposed Decision Issued | May 9, 2012 |
| Final Decision Issued | June 2012 |

D. Legal Name and Principal Place of Business (Rule 2.1(a))

Since October 10, 1905, PG&E has been an operating public utility corporation, organized under California law. It is engaged principally in the business of furnishing electric and gas service in northern and central California. Its principal place of business is in San Francisco, California. Its mailing address for this matter is Post Office Box 7442, San Francisco,

California 94120. Its attorneys for this matter are Ann H. Kim (415-973-7467) and Peter Van Mieghem (415-973-2902).

E. Correspondence and Communications Regarding this Application (Rule 2.1(b))

Communications regarding this application should be addressed to:

Ann H. Kim
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F. Article of Incorporation (Rule 2.2)

A certified copy of PG&E's Restated Articles of Incorporation, effective April 12, 2004, was filed with the Commission on May 3, 2004 with PG&E's Application 04-05-005. These Articles are incorporated herein by reference.

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G. Balance Sheet and Income Statement (Rule 3.2(a)(1))

PG&E's most recent balance sheet and income statement are contained in Exhibit A of this Application.

H. Statement of Presently Effective/Proposed Rates (Rule 3.2(a)(2), (3))

PG&E's presently effective rates are set forth in Exhibit B of this Application. PG&E's current rates and charges for electric service are in its electric tariffs and schedules on file with the Commission. These tariffs and schedules are filed with and made effective by the Commission in its decisions, orders, resolutions, and approvals of advice letter filings pursuant to Commission General Order 96-A. The proposed increase in revenue is less than one percent.

I. Summary of Earnings (Rules 3.2(a)(5))

Exhibit C shows PG&E's revenues, expenses, rate bases, and rate of return for the recorded years 2009-10.

J. Exhibit List and Statement of Readiness

Attached to this Application are the following exhibits:

- Exhibit A: Balance Sheet and Income Statement
- Exhibit B: Present Rates
- Exhibit C: Recorded Revenues, Expenses, and Rate of Return
- Exhibit D: Affected Governmental Entities

PG&E is contemporaneously serving its prepared direct testimony on the parties to PG&E's last CEMA application, and on the Chief Administrative Law Judge. PG&E's workpapers will be provided to the Division of Ratepayer Advocates, and will be provided to any other interested parties upon request.

PG&E is ready to proceed with this case based on the testimony of the witnesses regarding the facts and data contained in the testimony, workpapers, and exhibits in support of the revenue request set forth in this Application.

K. Most Recent Proxy Statement (Rule 3.2(a)(8))

Because this submittal is not a general rate application, this requirement is not applicable.

L. Type of Rate Change Requested (Rule 3.2(a)(10))

The rate change sought in this Application passes through to customers increased costs to the utility of (1) Restoring utility services to customers; (2) Repairing, replacing, or restoring damaged utility facilities; (3) Complying with governmental agency orders in connection with events declared disasters by competent state or federal authorities.

M. Service and Notice of Application (Rule 3.2(b-d))

A list of the cities and counties affected by the rate changes resulting from this Application is attached as Exhibit D. The State of California is also a customer of PG&E whose rates would be affected by the proposed revisions. As provided in Rule 3.2(b), a notice describing in general terms the proposed revenue increases and rate changes will be mailed to the officials identified in Exhibit D. The notice will state that a copy of this Application and related attachments will be furnished by PG&E upon written request.

Within twenty days after the filing of this Application, PG&E will publish a notice of the proposed increases in rates in a newspaper of general circulation in each county in its service territory. That notice will state that a copy of this Application and related attachments may be examined at the Commission's offices and such offices of PG&E as specified in the notice. A similar notice will be included in the regular bills mailed to PG&E's customers within 45 days of the filing date of this Application.

PG&E will e-mail a copy of this Application and the testimony being served concurrently with the Application on the service list for Application 09-02-020, PG&E's 2008 Wildland Fires CEMA application.

VI. CONCLUSION

WHEREFORE, PG&E respectfully requests that the Commission issue a final decision:

1. Approving PG&E's request to recover \$32.4 million in electric revenue requirements that are associated with \$48.95 million in CEMA-eligible incremental costs incurred in response to the seven CEMA Events as reasonable;
2. Adopting PG&E's proposal to collect the authorized CEMA expenses and to amortize the authorized CEMA capital costs in rates beginning on January 1, 2013, as part of its Annual Electric true-up filing, or as soon as possible following a decision in this proceeding.
3. Granting such other and further relief as the Commission deems appropriate.

Dated this 21st day of September, 2011.

Respectfully submitted,

By: _____ /s/
BRIAN K. CHERRY
Vice President – Regulation and Rates

ANN H. KIM
PETER VAN MIEGHEM

By: _____ /s/
ANN H. KIM

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VERIFICATION

I, the undersigned, say:

I am an officer of PACIFIC GAS AND ELECTRIC COMPANY, a corporation, and am authorized to make this verification for that reason.

I have read the foregoing “Application Of Pacific Gas And Electric Company To Recover Costs Recorded In The Catastrophic Event Memorandum Account Pursuant To Public Utilities Code Section 454.9 Associated With Certain Declared Disasters Between August 2009 And March 2011 Recorded In The Catastrophic Event Memorandum Account” and I am informed and believe the matters therein are true and on that ground I allege that the matters stated therein are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at San Francisco, California this 21st day of September, 2011.

/s/
BRIAN K. CHERRY
Vice President – Regulation and Rates