

Application No: A.15-06-020
Exhibit No.: _____
Witness: Tuan Nguyen

Application of Southern California Gas Company
(U 904 G) and San Diego Gas & Electric Company
(U 902 G) for Authority to Revise their Curtailment
Procedures

A.15-06-020
(Filed June 26, 2015)

PREPARED REBUTTAL TESTIMONY OF
TUAN NGUYEN
SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

March 4, 2016

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1 **PREPARED REBUTTAL TESTIMONY**
2 **OF TUAN NGUYEN**

3 **I. PURPOSE**

4 The purpose of my prepared rebuttal testimony on behalf of Southern California Gas
5 Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) is to respond to one
6 issue—the assertion by the Southern California Generation Coalition (SCGC) that "electric
7 generators should not be required to specify CBQs (Curtailment Baseline Quantities) in their
8 contracts."¹

9 **II. CURTAILMENT BASELINE QUANTITIES ARE NOT NECESSARY TO**
10 **EFFECTUATE CURTAILMENTS OF ELECTRIC GENERATORS**

11 SCGC correctly points out in its testimony that "CBQs would not be used to determine
12 the level of electric generator consumption during a Step 2 or Step 4 curtailment."² Instead, the
13 electric generators in Steps 2 and 4 are curtailed based on a percentage of the aggregate load at
14 the time of the curtailment order. CBQs are only used in Step 3 for effectuating curtailments of
15 Cogeneration and non-EG noncore usage. Accordingly, SoCalGas and SDG&E do not oppose
16 eliminating the requirement that electric generators specify CBQs in their contracts. However,
17 for the purpose of valuing the contracts, SoCalGas and SDG&E will require the inclusion of
18 expected monthly consumption quantities, which is the current practice.

19 This concludes my prepared rebuttal testimony.

¹ Direct Testimony of Catherine E. Yapp at 31.

² *Id.*