

Application No.: A.24-06-001
Exhibit No.: SDGE-10
Witness: Kevin Counts

**PREPARED REBUTTAL TESTIMONY OF
KEVIN COUNTS
ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY**

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



February 21, 2025

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I. INTRODUCTION

5 My prepared rebuttal testimony addresses the December 20, 2024 testimony of Michael
6 Yeo of the California Public Utilities Commission’s (“Commission”) Office of Public
7 Advocate’s (“Cal Advocates”) who sponsored Chapter 2 of Cal Advocates’ testimony: Utility-
8 Owned Generation. Cal Advocates’ testimony responds to my June 3, 2024 Prepared Direct
9 Testimony in the subject proceeding, which demonstrates that San Diego Gas & Electric
10 Company (“SDG&E”) complied with the Commission’s Good Utility Practice and reasonable
11 manager standards with respect to Utility Owned Generation (“UOG”) resources planned and
12 unplanned outages.

13 My testimony addresses the following recommendation set forth in Cal Advocates'
14 testimony: Cal Advocates' recommendation that SDG&E install a backup server to its Miramar
15 Energy Facility ("MEF") Data Acquisition Handling System ("DAHS") computer so that all
16 emissions data can be recovered in the event of another DAHS computer failure.

17 In the following testimony, I rebut this recommendation. SDG&E's failure to address
18 any individual fact or issue in this rebuttal testimony does not imply agreement by SDG&E with
19 any argument, assertion, position, or proposal asserted by Cal Advocates.

II. SDG&E'S REBUTTAL TO CAL ADVOCATES' TESTIMONY REGARDING UTILITY-OWNED GENERATION

22 In its testimony, Cal Advocates recommends that SDG&E “install a backup server to its
23 MEF DAHS computer so that all emissions data can be recovered in another DAHS computer

1 failure.”¹ SDG&E appreciates Cal Advocates’ feedback and notes that, as Cal Advocates
2 recognized, SDG&E already purchased a spare Continuous Emissions Monitoring System
3 (“CEMS”) DAHS computer to have as a backup in case of any future DAHS computer failure.
4 SDG&E additionally has a system in place to perform nightly backups of DAHS to a separate
5 USB drive to help ensure preservation of the data from the system. SDG&E further performs a
6 daily inspection of the CEMS system that includes interfacing with the DAHS to check for
7 alarms and review the previous day’s data, which can assist SDG&E with identification of
8 potential issues with the CEMS system so that SDG&E can respond accordingly. Finally,
9 SDG&E recently implemented remote access to the CEMS DAHS at MEF to allow SDG&E to
10 monitor CEMS data and alarms in real time from the control room at Palomar Energy Center.
11 This additional measure allows the operators and environmental representatives to remotely view
12 the CEMS DAHS without having to be on site, reducing SDG&E’s response time to any CEMS
13 issues and alarms, including any alarms concerning the database. Given all of these measures
14 SDG&E has in place for the preservation of data on the CEM DAHS system, the installation of a
15 backup server as recommended by Cal Advocates is unnecessary and unwarranted.

16 **III. CONCLUSION**

17 This concludes my prepared rebuttal testimony.

¹ Cal Advocates’ Prepared Testimony on Application of SDG&E for Compliance Review of Utility Owned Generation Operations [...] and other Activities for the Period January 1 through December 31, 2023 (Public Version) (December 20, 2024), p. 2-38.

1 **IV. QUALIFICATIONS**

2 My name is Kevin M. Counts. My business address is 2300 Harveson Place, Escondido,
3 CA 92029. I am currently employed by SDG&E as Production Manager for Palomar Energy
4 Center, Miramar Energy Facility and Cuyamaca Peak Energy Plant. My responsibilities include
5 overseeing a staff that operates these power plants.

6 I began employment at SDG&E in 2005 as an Operations Technician for Palomar Energy
7 Center and Miramar Energy. My experience prior to employment at SDG&E (approximately 11
8 years) includes various positions in the US Nuclear Navy and with Reliant Energy at the Bighorn
9 Generating Station.

10 I hold a Bachelor of Science degree in Business from the University of Phoenix.

11 I have previously testified before the Commission.