

Company: San Diego Gas & Electric Company (U902M)  
Proceeding: 2016 General Rate Case  
Application: A.14-11-003  
Exhibit: SDG&E-232

**SDG&E**  
**REBUTTAL TESTIMONY OF ROSE-MARIE PAYAN**  
**(CUSTOMERS)**

June 2015

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





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1 **SDG&E REBUTTAL TESTIMONY OF ROSE-MARIE PAYAN**  
2 **(CUSTOMERS (GAS))**

3 **I. SUMMARY OF DIFFERENCES**

4 The Office of Ratepayer Advocates (ORA) was the only party to comment on the  
5 Customer forecast for gas customers for SDG&E. Generally speaking, the forecasts for  
6 Residential Customers and Commercial and Industrial Customers are very similar when  
7 comparing SDG&E's forecast and ORA's forecast.

- 8 • SDG&E forecasts residential gas customers of 838,671 in 2014, 848,964 in 2015,  
9 and 861,283 in TY 2016. ORA forecasts slightly lower residential gas customers  
10 of 836,758 in 2014, 846,823 in 2015, and 857,029 in TY 2016.
- 11 • SDG&E forecasts combined commercial and industrial gas customers of 30,085  
12 in 2014, 30,067 in 2015, and 30,121 in TY 2016. ORA forecasts commercial and  
13 industrial gas customers of 30,176 in 2014, 30,294 in 2015, and 30,451 in TY  
14 2016.

15 **II. INTRODUCTION**

16 **A. ORA**

17 ORA issued its report on SDG&E – Customer, Sales, Cost Escalation relating to Gas  
18 Customers on April 24, 2015.<sup>1</sup> The following rebuttal testimony regarding SDG&E's gas  
19 customer forecast for Test Year 2016 addresses the intervenor testimony dated April 24, 2015.

20 • **Office of Ratepayer Advocates (ORA)**

21 ORA's forecast does not vary more than one percentage point from the forecast provided  
22 by SDG&E. In fact, ORA used a methodology very similar to SDG&E's to forecast total gas  
23 customers for Test Year 2016. This resulted in a combined residential and commercial and  
24 industrial customer count of 887,582, only 3,924 less (0.44%) than SDG&E's forecast of  
25 891,506.  
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<sup>1</sup> Exhibit (Ex.) ORA-03, Report on the Results of Operations for San Diego Gas & Electric Company and Southern California Gas Company, Test Year 2016 General Rate Case, Customer, Sales, Cost Escalation, pp. 16-17.

1           It appears the difference driving the numbers is in the details of the regression analysis  
2 performed by each party. Neither SDG&E nor ORA appear to point out that the other party is  
3 wrong, merely that the results are different. SDG&E maintains that its forecast of gas customers  
4 is a fair, reasonable and conservative forecast. Given the essentially similar forecasts, SDG&E's  
5 gas customer forecast should be adopted.