

Company: San Diego Gas & Electric Company (U902M)
Proceeding: 2019 General Rate Case
Application: A.17-10-007/-008 (cons.)
Exhibit: SDG&E-247

SDG&E

**REBUTTAL TESTIMONY OF JOSEPH VELASQUEZ
(MOBILEHOME PARK UTILITY UPGRADE PROGRAM)**

JUNE 18, 2018

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



A  Sempra Energy utility®

1 **SDG&E REBUTTAL TESTIMONY OF JOSEPH S. VELASQUEZ**
2 **MOBILEHOME PARK UTILITY UPGRADE PROGRAM**
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4 **I. SUMMARY OF DIFFERENCES**

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TOTAL O&M - Constant 2016 (\$000)	
	Costs Incurred Through 2016
SDG&E	\$200
ORA	\$200

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TOTAL CAPITAL - Constant 2016 (\$000)	
	Costs Incurred Through 2016
SDG&E	\$11,300
ORA	\$11,300

7 **II. INTRODUCTION**

8 This rebuttal testimony regarding SDG&E establishing the reasonableness of costs
9 incurred for its Mobilehome Park Utility Upgrade Program (MHP Program) addresses the
10 testimony of the Office of Ratepayer Advocates (ORA) as submitted by Mr. Lambert (Exhibit
11 ORA-32), dated April 13, 2018.¹

12 As a preliminary matter, the absence of a response to any particular issue in this rebuttal
13 testimony does not imply or constitute agreement by SDG&E with the proposal or contention
14 made by these or other parties.

15 In my direct testimony,² I presented SDG&E's costs for the MHP Program through 2016
16 for reasonableness review in this General Rate Case as directed in and in compliance with
17 Decision (D.) No. 14-03-021. ORA was the only party that filed testimony regarding SDG&E's
18 showing of reasonableness of costs for its MHP Program. ORA's recommendation stated that
19 ORA has reviewed SDG&E's showing of reasonableness and does not object.³
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¹ April 13, 2018, ORA Report on the Results of Operations for San Diego Gas and Electric company and Southern California Gas Company Test Year 2019 General Rate Case Mobilehome Park Utility Upgrade Program Exhibit – ORA 32 (Lambert).

² SDG&E Direct Testimony of Joseph S. Velasquez (Mobilehome Park Utility Upgrade Program) Exhibit SDG&E-47.

³ ORA-32 (Lambert) at 1.

1 **III. REBUTTAL TO PARTIES' O&M PROPOSALS**

2 **A. Disputed Cost**

3 **1. ORA**

4 ORA does not take issue with SDG&E's showing of reasonableness.

6 **IV. REBUTTAL TO PARTIES' CAPITAL PROPOSALS**

7 **A. Disputed Cost**

8 **1. ORA**

9 ORA does not take issue with SDG&E's showing of reasonableness.

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11 **V. CONCLUSION**

12 To summarize, no party other than ORA submitted testimony addressing SDG&E's
13 Mobilehome Park Utility Upgrade Program. ORA did not contest SDG&E's cost showing or
14 recommendations regarding the Master Meter Balancing Account (MMBA). SDG&E
15 recommends the Commission find that SDG&E's costs incurred in management of its
16 Mobilehome Park Utility Upgrade Program were reasonable, and that SDG&E's recommended
17 disposition of the MMBA be adopted.

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19 This concludes my prepared rebuttal testimony.