Application No.: A.25-06-XXX
Exhibit No.: SDGE-6
Witness: Kevin M. Counts

PREPARED DIRECT TESTIMONY OF

KEVIN M. COUNTS

ON BEHALF OF

SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

JUNE 2, 2025

TABLE OF CONTENTS

PREPARED DIRECT TESTIMONY OF KEVIN M. COUNTS ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

I. INTRODUCTION

This testimony presents San Diego Gas & Electric Company's ("SDG&E") compliance with the California Public Utility Commission's ("Commission") Good Utility Practice, as discussed below, and reasonable manager standards as defined in Decision ("D.") 02-12-069,[1] with respect to Utility Owned Generation ("UOG") resources planned and unplanned outages during the record year period of January 1, 2024, through December 31, 2024.

II. DESCRIPTION OF SDG&E-OWNED GENERATION

SDG&E owns and operates two combined-cycle generating facilities: the Palomar Energy Center in Escondido, California and the Desert Star Energy Center in Boulder City, Nevada. SDG&E owns and operates two peaking plants: Miramar Energy Facility in San Diego, California and Cuyamaca Peak in El Cajon, California. SDG&E also owns and operates multiple battery energy storage system projects: 30 MW/120 MWh Escondido Battery Energy Storage System ("BESS"), 7.5 MW/30 MWh El Cajon BESS, 30 MW/120 MWh Top Gun Energy Storage, 20 MW/80 MWh Kearny BESS, 2 MW/8 MWh Miguel Vanadium Redox Flow ("VRF"), 40 MW/160 MWh Fallbrook BESS, 131 MW/524 MWh Westside Canal BESS, 0.47 MW/1.88 MWh Ramona Air Attack Base BESS, 10MW/60MWH Pala-Gomez Creek BESS, 20 MW/80 MWh Melrose BESS, 10MW/40MWH Elliott BESS, 10MW/50.5MWH Paradise BESS, 10MW/50.5MWH Paradise BESS, 10MW/50.5MWH Boulevard BESS and 9MW/29MWH Clairemont BESS.[2] Lastly, SDG&E owns and operates a solar energy project located in

[1] *See* D.02-12-069, Attachment A-3 at 5.

[2] The MW ratings used is this Testimony are electric generation ratings and may differ from plant interconnect ratings used elsewhere.

Ramona, California that can produce up to 4.32 MW using smart inverters and fixed photovoltaic panels.

A. Palomar Energy Center ("PEC")

The PEC is a 588 megawatt gas-fired combined-cycle plant with 2 GE 7FA model combustion turbines and a GE steam turbine. The plant is equipped with inlet-air chillers and a thermal energy storage tank that allows the plant to produce energy at its capacity during the summer months. Recycled water is used for cooling plant equipment.

B. Desert Star Energy Center ("DSEC")

The DSEC[3], located in Boulder City, NV, is a 480 megawatt gas-fired combined-cycle plant with 2 Siemens 501-FC model combustion turbines and a Westinghouse steam turbine. This plant was acquired by SDG&E in October 2011 pursuant to D.07-11-046. This Decision permitted SDG&E to exercise an option to purchase the facility from El Dorado Energy, LLC, a subsidiary of Sempra Energy.

C. Miramar Energy Facility ("MEF")

The MEF is a peaking plant with two GE LM6000 model turbines that together produce 92 megawatts (MEF-1 and MEF-2). This site also provides black start services used for restoration of the electric grid. Operations and maintenance personnel based out of the Palomar Energy Center provide all plant services to this facility.

D. Cuyamaca Peak Energy Plant ("CPEP")

The CPEP is a peaking plant with a Pratt & Whitney FT8 model turbine generator set that produces 45 megawatts. This site also provides black start services used for restoration of the

[3] The current lease agreement expires in 2027, but SDG&E is exploring a potential lease extension, along with alternatives to convert the plant to a clean dispatchable resource. If these initiatives move forward, additional filings would be made in the future to seek applicable regulatory approvals.

electric grid. Operations and maintenance personnel based out of the Palomar Energy Center provide all plant services to this facility.

E. Escondido Battery Energy Storage System ("Escondido BESS")

The Escondido BESS is a 120 megawatt-hour energy storage system with a maximum output of 30 megawatts for up to 4 hours. The energy storage system uses lithium-ion batteries. Pursuant to Resolution ("Res.") E-4791 on May 26, 2016[4], SDG&E developed expedited energy storage projects to alleviate reliability issues associated with Aliso Canyon. CPUC approval was requested via Tier 3 Advice Letter ("AL") 2924-E. The AL was approved in its entirety in Res. E-4798 on August 18, 2016. Personnel based out of the Palomar Energy Center operate the site while maintenance is provided by a long-term service agreement.

F. El Cajon Battery Energy Storage System ("El Cajon BESS")

The El Cajon BESS was developed and constructed under the same authorization as the Escondido battery project and uses lithium-ion technology for the energy storage system. This energy storage system is rated at 30 megawatt-hours with a maximum output of 7.5 megawatts for up to 4 hours. Personnel based out of the Palomar Energy Center operate the site while maintenance is provided by a long-term service agreement.

G. Top Gun Battery Energy Storage System ("Top Gun BESS")

The Top Gun BESS was constructed pursuant to Assembly Bill ("AB") 2514 and uses lithium-ion battery technology energy storage.[5] This energy storage system is rated at 120

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[4] Res. E-4791.

[5] AB Stats. 2009-2010, Ch. 469 (Cal. 2010), amended by AB 2227 (AB Stats. 2011-2012, Ch. 606 (Cal. 2012)), as codified at Cal. Pub. Util. Code § 2835-2839 and § 9506, was designed to encourage California to incorporate energy storage into the electricity grid,. Energy storage can provide a multitude of benefits to California, including supporting the integration of greater amounts of renewable energy into the electric grid, deferring the need for new fossil-fueled power plants and

megawatt-hours with a maximum output of 30 megawatts for up to 4 hours. Personnel based out of the Palomar Energy Center operate the site while maintenance is provided by a long-term service agreement.

H. Kearny Battery Energy Storage System ("Kearny BESS")

The Kearny BESS was developed and constructed as part of SDG&E's Integrated Resource Plan. This energy storage system uses two lithium-ion battery systems each rated at 40 megawatt-hours with a maximum output of 10 megawatts for up to 4 hours. The combination provides a total of 80 megawatt-hours with a maximum output of 20 megawatts for up to 4 hours. Personnel based out of the Palomar Energy Center operate the site while maintenance is provided by a long-term service agreement.

I. Miguel Vanadium Redox Flow ("Miguel VRF")

The Miguel Vanadium Redox Flow (VRF) BESS was constructed as a demonstration project in partnership with Sumitomo, Japan's New Energy, and Industrial Technology Development Organization (NEDO) and GO-Biz and uses flow technology. This energy storage system is rated at 8 megawatt-hours with a maximum output of 2 megawatts for up to 4 hours. Operations and maintenance personnel based out of the Palomar Energy Center provide all plant services to this facility.

J. Fallbrook Battery Energy Storage ("Fallbrook BESS")

The Fallbrook BESS was constructed pursuant to AB 2514 and uses lithium-ion technology. This energy storage system is rated at 160 megawatt-hours with a maximum output

transmission and distribution infrastructure, and reducing dependence on fossil fuel generation to meet peak loads.

of 40 megawatts for up to 4 hours. Operations and maintenance personnel based out of the Palomar Energy Center provide all plant services to this facility.

K. Westside Canal Battery Energy Storage ("Westside Canal BESS")

The Westside Canal BESS was constructed to support the Emergency Reliability OIR R.20-11-003. This energy storage system uses lithium-ion technology and is rated at 524 megawatt-hours with a maximum output of 131 megawatts for up to four hours. Operations and maintenance personnel based out of the Palomar Energy Center provide all plant services to this facility.

L. Ramona Air Attack Base Battery Energy Storage ("Ramona AA Base BESS")

The Ramona AA Base BESS was constructed under the Wildfire Mitigation Plan. This energy storage system uses lithium-ion battery systems rated at 1.88 megawatt-hours with a maximum output of 0.47 megawatts for up to 4 hours. Personnel based out of the Palomar Energy Center operate the site while maintenance is provided by a long-term service agreement.

M. Pala-Gomez Creek Battery Energy Storage System ("Pala-Gomez Creek BESS")

The Pala-Gomez Creek BESS was constructed under Res. E-5193. This energy storage system uses lithium-ion technology and is rated at 60 megawatt-hours with a maximum output of 10 megawatts for 6 hours. Personnel based out of the Palomar Energy Center operate the site while maintenance is provided by a long-term service agreement.

N. Melrose Battery Energy Storage System ("Melrose BESS")

The Melrose BESS was constructed under Res. E-5193. This energy storage system uses two lithium-ion battery systems, each rated at 40 megawatt-hours with a maximum output of 10 megawatts for up to 4 hours. The combination provides a total of 80 megawatt-hours with a

maximum output of 20 megawatts for up to 4 hours. Personnel based out of the Palomar Energy Center operate the site while maintenance is provided by a long-term service agreement.

O. Elliott Battery Energy Storage System ("Elliott BESS")

The Elliott BESS was constructed under Res. E-5193. This energy storage system uses lithium-ion technology and is rated at 50.5 megawatt-hours with a maximum output of 10 megawatts for 5.5 hours. Personnel based out of the Palomar Energy Center operate the site while maintenance is provided by a long-term service agreement.

P. Paradise Battery Energy Storage System ("Paradise BESS")

The Paradise BESS was constructed under Res.E-5193. This energy storage system uses lithium-ion technology and is rated at 50.5 megawatt-hours with a maximum output of 10 megawatts for 5.5 hours. Personnel based out of the Palomar Energy Center operate the site while maintenance is provided by a long-term service agreement.

Q. Boulevard Battery Energy Storage System ("Boulevard BESS")

The Boulevard BESS was constructed under Res. E-5193. This energy storage system uses lithium-ion technology and is rated at 50.5 megawatt-hours with a maximum output of 10 megawatts for 5.5 hours. Personnel based out of the Palomar Energy Center operate the site while maintenance is provided by a long-term service agreement.

R. Clairemont Battery Energy Storage System ("Clairemont BESS")

The Clairemont BESS was constructed under Res. E-5193. This energy storage system uses lithium-ion technology and is rated at 29 megawatt-hours with a maximum output of 9 megawatts for 3.2 hours. Personnel based out of the Palomar Energy Center operate the site while maintenance is provided by a long-term service agreement.

S. Ramona Solar Energy Project ("RSEP")

The RSEP was developed and constructed pursuant to D.10-09-016 and SDG&E's AL 2374E-A. The project is built with fixed photovoltaic panels and can produce up to 4.32 megawatts. Operations and maintenance personnel based out of the Palomar Energy Center provide all plant services to this facility.

III. COMMISSION STANDARDS RELATED TO SDG&E-OWNED GENERATION

During the record period, SDG&E operated and maintained its UOG resources (Palomar, Desert Star, Miramar, and Cuyamaca; collectively, SDG&E's "UOG units") in a reasonable and prudent manner, consistent with "Good Utility Practice" and the reasonable manager standard. [6] The Commission defined "Good Utility Practice" in D.02-12-069:[7]

> [A]ny of the practices, methods and acts engaged in or approved by a significant portion of the electric utility industry during the relevant time period, or any of the practices, methods and acts which, in the exercise of reasonable judgment in light of the facts known at the time the decision was made, could have been expected to accomplish the desired result at a reasonable cost consistent with good business practices, reliability, safety and expedition. Good Utility Practice does not require the optimum practice, method, or act to the exclusion of all others, but rather is intended to include acceptable practices, methods, or acts generally accepted in the Western Electric Coordinating Council region.

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[6] The Commission has explained the "reasonable manager" standard in ERRA compliance cases, as follows: Under the "reasonable manager standard, utilities are held to a standard of reasonableness based on the facts that are known or should have been known at the time. The act of the utility should comport with what a reasonable manager of sufficient education, training, experience, and skills using the tools and knowledge at his or her disposal would do when faced with a need to make a decision and act." D.14-05-023 at 15. By meeting the "Good Utility Practice" standard and other Commission requirements stated herein, SDG&E maintains that likewise has met the "reasonable manager" standard during the 2024 record period. The Appendices to this testimony further provide SDG&E's primary showing with respect to both standards. In addition, the Commission recently has confirmed that the compliance review to which various SDG&E accounts are subject in ERRA compliance proceedings are not "reasonableness reviews." D.17-03-016 at 3 and Findings of Fact 2.

[7] *See* D.02-12-069, Attachment A-3 at 5.

Consistent with "Good Utility Practice," during 2024, SDG&E followed an established maintenance program to maximize the availability of the units as a primary "desired result." Specifically, this maintenance program factors in a number of considerations, including manufacturer guidelines, appropriate power industry practices, safety considerations, and good engineering and technical judgment to allocate resources most effectively to maximize availability of its UOG resources. Additionally, the SDG&E maintenance program incorporates practices that are generally accepted within the electric power generation industry and the Western Electricity Coordinating Council ("WECC") and the North American Electric Reliability Corporation ("NERC").

Additionally, SDG&E is required to comply with the Commission's General Order ("GO") 167 - Enforcement of Maintenance and Operation Standards for Electric Generating Facilities.[8] Sections 10.0 and 11.0 of GO 167 specifically outline each generator owner's obligation to provide information and cooperate with Commission audits, investigations and inspections. In addition, each outage may warrant the creation of internal documentation, including but not limited to, equipment affected, parts replaced, work required to accomplish outage-related tasks, costs of repairs, other recommended actions that may be taken to mitigate a repeat of the failure, change to operating procedures required to address component or plant issues, changes to maintenance practices to improve reliability, communications with an original equipment manufacturer, and implementation of upgrades to improve reliability. Evidence of the above may be found in parts of the Computerized Maintenance Management System ("CMMS") ordering documents, as well as work orders, vendor invoices, investigation reports, management of change documents, and communications with vendors.

[8] GO 167.

GO 167 also requires SDG&E to meet specific maintenance and operations standards, which also suggest guidance detailed for maintenance and operations programs. These standards and guidance are based on accepted power industry good practices. SDG&E is required to document and certify to these standards every two years and submit the documentation to the Commission Electric Safety and Reliability Branch ("ESRB"). The certification documentation includes a summary list of maintenance, operations and safety procedures that describe the programs and processes used in generation.

IV. ADDITIONAL REVIEW OF UOG OPERATIONS

Additional review of SDG&E's UOG operations is provided through Sempra Energy Internal Audit Department's audits of SDG&E's generating facilities. Consistent with auditing standards and industry best practices, the frequency and nature of such audits is determined based on the Internal Audit Department's annual risk assessment, which determines the areas of the company, including utility operations, to be audited. This risk-based analysis may change from year to year.

Further, SDG&E's Insurance Risk Consultants conduct site inspections to review and evaluate the plant's physical condition, maintenance, and operations processes. These inspections are performed from a risk perspective and cover maintenance practices, operations practices, material condition, and fire protection. The report may offer recommendations for improvement to systems, facilities, and processes.

SDG&E is also required to meet certain electric reliability standards from the NERC and WECC. NERC and WECC perform periodic audits of SDG&E to ensure compliance with the reliability standards.

Furthermore, SDG&E generation plants are subject to site visits from various regulators concerning implementation of permits. There are periodic onsite inspections and data requests concerning the implementation of requirements for air permits, water permits, and water discharge permits. SDG&E's Palomar Energy Center is also required to meet permit conditions detailed in the California Energy Commission ("CEC") Operating Permit.

SDG&E's Generation personnel have communicated with the following agencies in 2024:

- California Energy Commission ("CEC")
- California Public Utilities Commission ("CPUC")
- California Air Resource Board ("CARB")
- U.S. Energy Information Administration ("US EIA")
- Environmental Protection Agency ("EPA") Region 9
- Clark County Department of Air Quality ("DAQ")
- Nevada Division of Environmental Protection ("NDEP")
- San Diego Air Pollution Control District ("APCD")
- Regional Water Quality Control Board ("RWQCB")
- CA-EPA State Water Board
- City of Escondido
- Western Electricity Coordinating Council ("WECC")
- North American Electric Reliability Corporation ("NERC")
- Certified Unified Program Agencies ("CUPA")

V. OUTAGES - UTILITY OWNED GENERATION

Many preventive and corrective maintenance work activities require planned outages, whereas unplanned corrective maintenance is performed under short-notice or forced outages.

Appendix A, below, provides narratives for forced outages greater than 24 hours for all facilities 25 MW or larger. Appendix B, below, provides narratives for planned outages that are greater than 24 hours for all facilities 25 MW or larger, where the outage was extended by two

weeks or fifty percent longer, whichever is greater, from its planned schedule. The narratives address, as applicable, the following points:

1. The nature of the outage.
2. The cause(s) of the outage, if known.
3. Possible steps to prevent similar occurrences.
4. Whether the outage may have prevented (or minimized the duration of) a future outage.

VI. CONCLUSION

My testimony describes SDG&E's UOG resources located in San Diego County and Nevada. SDG&E consistently followed the Commission's guidance and "Good Utility Practice" and met the "reasonable manager" standard during the 2024 record period.

This concludes my prepared direct testimony.

VII. QUALIFICATIONS

My name is Kevin M. Counts. My business address is 2300 Harveson Place, Escondido, CA 92029. I am currently employed by SDG&E as Plant Manager for Generation. My responsibilities include overseeing a staff that operates these power plants and energy storage sites.

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

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

I have previously testified before the Commission.

APPENDIX A

SDG&E'S 2024 UOG FORCED OUTAGES GREATER THAN 24 HOURS FOR FACILITIES 25 MW OR LARGER

1. Palomar Energy Center ("PEC") CT2 Motor Control Center ("MCC") Feeder Breaker Failed – January 7, 2024, through January 8, 2024 – 1.25 Days.

On January 7, 2024, while the plant was shut down, MCC feeder breaker tripped due to a failed ground trip unit. The breaker was removed, and repairs were performed on it. The repaired breaker was reinstalled and the MCC was energized. Following the repair, CT2 was made available again. The trip unit installed is a more robust upgraded unit purchased to mitigate future outage issues.

2. Cuyamaca Peak Energy Plant ("CPEP") Air Compressor Failure – January 21, 2024, through January 23, 2024 – 2.20 Days.

On January 21, 2024, while the plant was offline, the site air compressors failed to run due to a high outlet temperature caused by failed unloader valves. New unloader valves were installed in the site air compressors, and the system was placed back in service. With air back on, the site was released from the outage. SDG&E has added unloader valves to inventory to reduce outage time in the future.

3. PEC CT1 LP Superheater Leak – February 23, 2024, through February 24, 2024 – 1.46 Days.

On February 22, 2024, while the plant was shut down, a leak was discovered on the Low-Pressure Superheater section of the Unit 2 boiler. Plant conditions were set to access the area, and a weld repair was conducted on the leak area. Following the repair, the unit was released from the outage. It is unlikely that this outage prevented or minimized the duration of a future outage.

4. PEC CT2 Vibration Probe Fault – March 11, 2024, through March 12, 2024 – 1.12 days.

On March 11, 2024, during a plant startup, CT2 tripped due to a vibration probe fault. The problem with the vibration probe was attributed to a faulty cable. The cable was replaced, and the unit was returned to service. SDG&E will continue to perform preventative maintenance on the vibration systems to help ensure proper operation and minimize outages due to failures.

5. CPEP CEMS Computer Failure – May 21, 2024, through May 24, 2024 – 2.90 Days

On May 21, 2024, while the plant was shut down, a routine inspection of the Continuous Emissions Monitoring System ("CEMS") noted that the database was not backing up. The plant was placed in a forced outage due to the emissions data not being backed up. The hard drive of the computer was changed out and the plant was released for operation. SDG&E is keeping spare CEMS computers in inventory to minimize outage time if a similar event were to occur.

6. Desert Star Energy Center ("DSEC") Unit 2 Forced Outage – July 16, 2024, through December 31, 2024 – 168.40 Days.

On July 16, 2024, CT2 was shut down due to high generator bearing vibrations. During the rest of 2024, several iterations of testing and repair were attempted, but the issue with the generator vibration was not resolved. At the end of 2024, CT2 was still in a forced outage due to high generator vibrations, and the forced outage has continued into 2025. The cause of the high generator bearing vibration has not yet been identified. It is unlikely that this outage prevented or minimized the duration of a future outage, and until the cause of the outage is identified and repaired, it is not known if this outage may have prevented a future outage.

7. Miramar Energy Facility ("MEF") Hydraulic Hose Leak – July 22, 2024, through July 23, 2024 – 1.21 Days.

On July 22, 2024, while the plant was shut down, a leak was identified coming from a hose on the MEF hydraulic system. The plant was placed into a forced outage while a new hose

was procured, and plant conditions were set to perform the replacement. Following the hose replacement, the unit was released for operation. SDG&E will continue to perform recommended preventative maintenance on hydraulic hoses to help ensure proper operation and minimize outages due to failures.

8. CPEP Failed Oil Line – July 23, 2024, through July 26, 2024 – 2.84 Days

On July 23, 2024, while the plant was running, a lube oil line failed and released lube oil from the system. The hose was found to have worn through due to contact with another hose. Following the failure, the hose was replaced, and the unit was released for operation. To help minimize future outages, SDG&E will continue to perform recommended preventative maintenance on lube oil hoses to help ensure proper operation and minimize outages due to failures.

9. DSEC Steam Turbine Forced Outage – August 12, 2024, through August 17, 2024 – 4.49 Days

On August 12, 2024, the steam turbine was being started after an economic shutdown. The steam turbine field breaker failed to close, and a steam turbine forced outage began. Troubleshooting included inspection of the entire field breaker circuitry. During this inspection, several wires were found damaged due to overheating or grounding. While the plant team continued investigating the issue, a Siemens automatic voltage regulator specialist was mobilized to site. Damaged wires and components were replaced, and on August 17, the steam turbine was restarted. The likely cause of the outage was sharp edge rub points of critical wiring that led to cable insulation failure and grounding of field breaker circuits. This caused various cables to overheat and melt, which led to an inoperable field breaker and automatic voltage regulator system. All wiring was either rerouted to avoid sharp edge contact or protected with hard plastic inserts to prevent this type of damage in the future. The repair may have prevented future

outages due to the care taken in rerouting and protecting the wiring. To prevent similar outages, the other automatic voltage regulators were inspected, and wiring was rerouted or protected as necessary.

10. PEC Exciter Trip – September 10, 2024, through September 14, 2024 – 4.01 Days

On September 10, 2024, during operation, CT2 tripped due to the exciter breaker tripping open. SDG&E performed a physical inspection of the system and reviewed the control logic for abnormalities. The inspection of the system did not reveal a definite cause of the trip, and SDG&E could not reproduce the faulty condition. Following the inspection and control logic review, the unit was released for operation. It is unlikely that this outage prevented or minimized the duration of a future outage.

11. CPEP CEMS DAHS Failure – October 10, 2024, through October 16, 2024 – 5.96 Days.

On October 10, 2024, while the plant was shut down, the CEMS computer was found to have failed. The plant was placed in a forced outage due to the emissions data not being collected. SDG&E replaced the computer, and the plant was released for operation. SDG&E is keeping spare CEMS computers in inventory to minimize outage time if a similar event were to occur.

APPENDIX B

PLANNED OUTAGES DURING 2024 THAT WERE 24 HOURS OR LONGER FOR ALL FACILITIES 25 MW OR LARGER THAT WERE EXTENDED BY TWO WEEKS OR FIFTY PERCENT LONGER, WHICHEVER IS GREATER, FROM ITS PLANNED SCHEDULE

There were no Appendix B outages in this reporting period.

ACRONYM GLOSSARY

APCD	San Diego Air Pollution Control District
BESS	Battery Energy Storage System
CARB	California Air Resource Board
CEC	California Energy Commission
CMMS	Computerized Maintenance Management System
CPEP	Cuyamaca Peak Energy Plant
CPUC	California Public Utilities Commission
CT	Combustion Turbine
CTG	Combustion Turbine Generator
CUPA	Certified Unified Program Agencies
GE	General Electric
D	Decision
DAQ	Clark County Department of Air Quality
DSEC	Desert Star Energy Center
ERRA	Energy Resource Recovery Account
ESRB	Electric Safety and Reliability Branch
GO	General Order
HRSG	Heat Recovery Steam Generator
LP	Low Pressure
MEF	Miramar Energy Center
MW	Megawatt
MWh	Megawatt hour
NDEP	Nevada Division of Environmental Protection
NERC	North American Electric Reliability Corporation
NOx	Nitrous Oxides
OEM	Original Equipment Manufacturer
ORA	Office of Ratepayer Advocates
PEC	Palomar Energy Center
RSEP	Ramona Solar Energy Plant
RWQCB	Regional Water Quality Control Board
SCR	Selective Catalytic Reduction
SDG&E	San Diego Gas & Electric
STG	Steam Turbine Generator
UOG	Utility Owned Generation
US EIA	U.S. Energy Information Administration
WECC	Western Electricity Coordinating Council