

Application No.: A.20-04-014
Exhibit No.: _____
Witness: April Bernhardt

UPDATED PREPARED DIRECT TESTIMONY OF
APRIL BERNHARDT
ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY

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



November 6April 15, 2020

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1 **UPDATED PREPARED DIRECT TESTIMONY OF**
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3 **ON BEHALF OF**
4 **SAN DIEGO GAS & ELECTRIC COMPANY**

5 **I. PURPOSE**

6 This updated testimony outlines San Diego Gas & Electric Company’s (“SDG&E’s”)
7 projected ongoing education and outreach costs related to the crediting of greenhouse gas
8 (“GHG”) allowance revenues on customers’ bills in the year 2021, as part of the Energy Resource
9 Recovery Account (“ERRA”) forecast proceeding.

10 This updated testimony is based on recorded costs and projections set forth in SDG&E’s
11 prior GHG testimony, submitted on August 1, 2013 and September 1, 2013, April 15, 2014, and in
12 prior ERRA testimony, submitted on April 15, 2015, April 15, 2016, April 14, 2017, April 13,
13 2018, ~~and~~ April 15, 2019 and April, 15 2020.

14 **II. EDUCATION AND OUTREACH COSTS OVERVIEW**

15 Beginning in 2013, education and outreach activity has included working with the Energy
16 Division and outside consultants to define those activities. The education and outreach activity
17 was administered by the Center for Sustainable Energy (“CSE”) under the statewide marketing,
18 education and outreach effort known as Energy Upgrade California. The utilities were tasked with
19 implementing support communications, such as email, direct mail and bill inserts, and these costs
20 were designated as administrative.

21 After a major statewide media effort in the first half of 2014, local communications have
22 continued those efforts since, with a focus on the use of bill inserts, direct mail and email, which
23 have been accounted for as administrative costs per direction from the California Public Utilities
24 Commission (“CPUC” or “Commission”). These communications have been implemented by the

1 utilities and feature the logo of the CPUC. No additional statewide education and outreach
2 activity has taken place since that initial effort.

3 In 2016, the Commission issued Decision (“D.”) 16-06-041, providing continued direction
4 for the utilities to focus on the following activities:

- 5 1. twice annually notify Climate Credit recipients¹ via on-bill communications when a
6 credit has been provided, and distribute the CPUC letter via email or bill insert;²
- 7 2. ensure that call center and customer service staff members are provided with
8 sufficient information to answer questions, and direct customers to a statewide
9 webpage for more information about the credit;³ and
- 10 3. notify the Director of Energy Division or his designee if there are any barriers in
11 executing these activities.⁴

12 The Decision further states that a separate statewide awareness campaign is very expensive
13 (“\$20 million per year expense would achieve a 40% to 60% awareness level”⁵) and that the
14 Energy Upgrade California program should include climate credit messaging instead.⁶ Thus,

¹ D.16-06-041 at 17, Ordering Paragraph (“OP”) 1. SDG&E electric only customers receive the electric bill Climate Credit while SDG&E gas only customer receive the gas Climate Credit. If an SDG&E customer has both gas and electric service, they receive both Climate Credits.

² On March 29, 2019, SDG&E filed a Petition for Modification (“PFM”) of D.13-12-003 requesting to change the months in which the semi-annual Climate Credit is distributed – from April and October to August and September. The PFM was granted per D.19-12-002, effective December 5, 2019.

³ D.16-06-041 at 17, OP 2.

⁴ *Id.* at 17, OP 3.

⁵ *Id.* at 8 (citing R.11-03-12 August 21, 2013 Targetbase report findings included in D.16-06-041).

⁶ *Id.* at 9 (“[m]essaging related to the climate credit has already been incorporated into the request for proposals for a statewide marketing campaign that was considered in A. [Application] 12-08-007 et al.”).

1 SDG&E is no longer reserving any funds for statewide media efforts to promote the Climate
2 Credit but will solely focus on the local communication activities.

3 **III. 2021 COST PROJECTIONS**

4 For 2021, I have included in the Application the Detail of Outreach and Administrative
5 Expense costs (Attachment G) – costs ~~at a higher level than the~~ at the same level of the 2020
6 ERRA Forecast Application. The forecast for 2021 takes into account the Commission’s
7 December 5, 2019 Decision granting SDG&E’s Petition for Modification of D.13-12-003 that
8 shifts the California Climate Credit electric distribution from April and October to August and
9 September in 2020 and 2021.⁷

10 In accordance with D.16-06-041, as mentioned above, the approved Decision granting
11 SDG&E’s Petition for Modification of D.13-12-003 requires an additional touchpoint with
12 customers in April along with the new distribution months, August and September:

- 13 1. SDG&E must coordinate with Energy Division staff to develop new language to
14 modify twice-annual written communications required under D.16-06-041 to
15 include points 1-4, above, when appropriate. New communication materials must
16 also present a timetable clearly showing the distribution months for both the
17 electric and natural gas credits for that year. The April timing of the natural gas
18 credit is not affected by this Decision. Anticipated communication materials
19 include:

- 20 a. An April customer bill insert/letter/email explaining that the April electric
21 Climate Credit will be distributed in August for 2020 and 2021; and

⁷ D.19-12-002 at 20, OP 1.

1 b. August and September customer bill inserts/letters/emails providing
2 information about the Climate Credit as required in D.16-06-041. SDG&E
3 must include information about the change in timing of Climate Credit
4 distribution.⁸

5 Therefore, I have included \$59,000 for the required administrative costs as stated above.
6 My total cost projection of the expenses to be incurred in 2021 is \$59,000. This concludes my
7 updated prepared direct testimony.

⁸ D.19-12-002 at 10-11.

1 **IV. QUALIFICATIONS**

2 My name is April Bernhardt. I am employed by SDG&E as a marketing manager. My
3 business address is 8306 Century Park Court, CP-62C, San Diego, California, 92111.

4 I graduated from San Diego State University with a degree in Liberal Arts and Science. I
5 have more than 15 years of experience working for two Fortune 250 companies in San Diego in
6 the areas of communications and media, and most recently marketing.

7 I have been employed by SDG&E as a communications manager since 2010 with
8 increasing areas of responsibility. As the marketing manager of pricing plans, my responsibilities
9 include collaborating with internal and external stakeholders on Marketing, Education & Outreach
10 (“ME&O”) and as the conduit of information to ensure stakeholders are informed on critical
11 ME&O developments. Additionally, I am responsible for developing marketing strategies to
12 increase customer satisfaction and awareness of rate changes and pricing plan options.

13 Prior to my current role, I served as a senior project manager in communications at
14 SDG&E. Prior to that, I served as a senior communications manager in Media and Employee
15 Communications at SDG&E. I previously held communication roles at Sempra Energy and
16 Qualcomm Inc.

17 I have previously testified before the California Public Utilities Commission.