Company:San Diego Gas & Electric Company (U 902 E)Proceeding:Real Time Pricing Pilot RateApplication:A.21-12-006/A.21-12-008Exhibit:SDG&E-XX

## PREPARED REBUTTAL TESTIMONY OF

# **CORY ILLEMAN (CHAPTER 2)**

## **ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

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

January 30, 2023



### TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	EDF PROVIDES NO SUPPORT FOR ITS ALLEGATION THAT THE EXPORT COMPENSATION RATE FAILS TO COMPLY WITH COMMISSION DIRECTIVES	1
III.	SUMMARY AND CONCLUSION	2
IV.	STATEMENT OF QUALIFICATIONS	3

1	PREPARED REBUTTAL TESTIMONY OF
2	CORY ILLEMAN (CHAPTER 2)
3	I. INTRODUCTION
4	The purpose of my rebuttal testimony is to address intervenors' prepared direct testimony
5	served on December 30, 2022 in San Diego Gas & Electric Company's (SDG&E) Applications
6	(A.) 21-12-006 and 21-12-008 (consolidated). Specifically, my rebuttal testimony will address
7	the Environmental Defense Fund's (EDF) false allegation that SDG&E's Commodity Export
8	Compensation Pilot rate fails to comply with Commission Decision (D.) 20-12-023.
9	SDG&E's failure to address any individual issue in this rebuttal testimony does not imply
10	agreement by SDG&E with any argument, position, or proposal asserted by parties.
11 12 13	II. EDF PROVIDES NO SUPPORT FOR ITS ALLEGATION THAT THE EXPORT COMPENSATION RATE FAILS TO COMPLY WITH COMMISSION DIRECTIVES
14	In D.20-12-023, the Commission directs SDG&E to propose "an optional dynamic rate
15	designed to encourage commercial EV charging." <sup>1</sup> SDG&E's Export Compensation Pilot
16	rate encourages commercial EV charging "by sending appropriate price signals that incentivize
17	grid exports during periods of peak demand for electrification" and compensates participating
18	customers for those exports. <sup>2</sup> EDF's testifying consultant, Steven Moss, however, argues that he
19	doesn't believe the rate complies with the Commission's directive and that "SDG&E's proposed
20	tariff, by its own admission, would fail to catalyze [Commercial Electric Vehicle] charging." <sup>3</sup>
21	SDG&E makes no such admission and EDF fails to point to any testimony or other support for

<sup>&</sup>lt;sup>1</sup> D.20-12-023, Ordering Paragraph 9 at 38.

<sup>&</sup>lt;sup>2</sup> Prepared Supplemental Direct Testimony of Kirstie C. Raagas on Behalf of SDG&E (Chapter 2) (August 15, 2022) at KCR-3.

<sup>&</sup>lt;sup>3</sup> Opening Testimony of Steven Moss on Behalf of EDF at 8.

1 this position. Instead, Mr. Moss quotes a number of paragraphs of the withdrawn testimony of 2 Taylor Marvin, which makes the point that the proposed optional dynamic rate to encourage commercial EV charging would not necessarily be profitable for all CEV customers.<sup>4</sup> Mr. 3 4 Marvin notes that whether a customer is able to benefit from the rate will depend on variable 5 energy prices, the customer's ability to respond to pricing signals, and whether any benefit is 6 greater than the expenses necessary to take advantage of the rate (e.g., cost of bidirectional 7 capability, potential disruption to operations for exporting to the grid, etc.). In no way does this 8 testimony amount to any kind of admission that SDG&E's rate design will fail to catalyze CEV 9 charging; rather, it addresses factors potential customers will need to consider before adopting 10 the proposed rate.

11 12

#### III. SUMMARY AND CONCLUSION

This concludes my prepared rebuttal testimony.

<sup>&</sup>lt;sup>4</sup> The testimony of SDG&E witness Marvin Taylor has been withdrawn and is no longer valid. The Prepared Supplemental Direct Testimony of Kirstie C. Raagas on Behalf of SDG&E (Chapter 2) (August 15, 2022) at KCR-1 (internal footnote excluded) states that:

Due to the unique procedural history in this proceeding, as described further below, SDG&E is submitting this supplemental direct testimony to address revisions to SDG&E's consolidated Real Time Pricing Pilot Application and Commercial Electric Vehicle Dynamic Rate Application (A.21-12-006 et al.), including recommendations by Energy Division (ED). Because the revisions are extensive and include both adding new testimony and removing previously served testimony, SDG&E is withdrawing previously served testimony and will rely solely on this supplemental direct testimony as its direct testimony in this consolidated proceeding.

1 2

3

4

5

6

7

8

9

### IV. STATEMENT OF QUALIFICATIONS

My name is Cory M. Illeman, and my business address is 8690 Balboa Avenue, Suite 101, San Diego, California 92123. I am employed by SDG&E as the Clean Transportation policy manager, a position I have held for over approximately one and a half years. I am currently responsible for leading a team to develop workable developing policy strategies, positions and mechanisms that support Clean Transportation's business plans and in SDG&E's Clean Transportation department. Prior to joining the Clean Transportation department, I held positions within SDG&E of increasing responsibility in the areas of Commercial and Industrial Services, Wildfire Mitigation, and Public Safety Power Shutoffs.

I earned a Bachelor of Arts degree in Business and Economics with an emphasis in
Accounting from the University of California, Santa Barbara.

I have not previously testified before the California Public Utilities Commission.

12