Application No.: A.22-05-002 et al.

Exhibit No.:

Witness: <u>Brenda Gettig</u>

PREPARED REBUTTAL TESTIMONY OF

BRENDA GETTIG

ON BEHALF OF

SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



AUGUST 3, 2022

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PREPARED REBUTTAL TESTIMONY OF BRENDA GETTIG ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

I. INTRODUCTION

The purpose of this testimony is to respond to issues raised by intervenors related to San Diego Gas & Electric Company's (SDG&E) 2023 Bridge Year Funding Requests. Three intervenors submitted direct testimony: the California Public Advocates Office (Cal Advocates), the Small Business Utility Advocates (SBUA) and OhmConnect, Inc. My testimony will address SBUA's recommendation to prioritize the Societ Cost Test (SCT) and Program Administrator Cost (PAC) test of the Total Resource Cost (TRC) test.

SDG&E's failure to address any particular intervenor testimony or individual issue in this

SDG&E's failure to address any particular intervenor testimony or individual issue in this rebuttal testimony does not imply agreement by SDG&E with any argument, position or proposal asserted by the intervenors.

II. SBUA'S RECOMMENDATION TO PRIORITIZE THE SCT AND PAC TEST OVER THE TRC TEST IS OUT OF SCOPE OF THIS PROCEEDING

SBUA proposed the following recommendation in their testimony: "Looking forward, I recommend application of the Societal Cost Test (SCT) as the primary cost effectiveness test, supplemented by the PAC test as a secondary cost effectiveness test."

In its 2023 Bridge Year Funding Request, SDG&E provided cost effectiveness test results for the four approved tests in the 2016 Demand Response Cost Effectiveness Protocols (Protocols) along with supporting testimony and workpapers. The four tests provided include the TRC test, the PAC test, the Ratepayer Impact Measure (RIM), and the Participant Cost Test (PCT) as specified in the Demand Response Cost Effectiveness Report.² At the time of this

Direct Testimony of Ted Howard on behalf of SBUA, p. 9.

The Demand Response Cost Effectiveness Report is the approved tool for calculating the test results.

filing, the SCT test was not one of the approved tests for demand response and therefore SDG&E did not submit it.

Generally speaking, SDG&E agrees the Protocols are in need of a review and update process that will align the Protocols and cost effectiveness tools with approved updates occurring in other proceedings, notably the Integrated Distributed Energy Resources (IDER) proceeding. Although SDG&E supports the Commission leading such a process, SDG&E suggests that it occur separate and apart from the approval process of the Bridge Year Funding Request for program year 2023 as well as the Budget Application for program years 2024 through 2027, as these filings were submitted using the cost effectiveness tests and protocols that were approved for use at the time of the filings. It would be unduly burdensome, inefficient, and would cause unnecessary delay in the proceeding to require the IOUs to submit new cost effectiveness calculations utilizing SCT at this juncture. Also, prioritizing one test over another would be a challenging issue to tackle and is outside the scope of this proceeding, which only seeks to approve funding for the IOUs' demand response portfolios. Again, issues regarding which tests to conduct, what emphasis or priority one test should have over another, etc. are issues that are best suited for resolution in a separate venue.

III. CONCLUSION

SDG&E supports a review and revision process of the Demand Response Cost Effectiveness Protocols and the Demand Response Cost Effectiveness Report to be led by the Commission and to proceed separate and apart from the approval process for the budget filings for program years 2023 through 2027.

IV. WITNESS QUALIFICATIONS

My name is Brenda Gettig. My business address is 8335 Century Park Court, San Diego, California 92123. I have been employed by SDG&E as a Senior Business Analyst in the Measurement and Evaluation Group for Customer Programs since 2006. My responsibilities include the evaluation and cost effectiveness analysis of SDG&E's demand response and low-income programs. I have a Masters in Economics from the University of California San Diego and a Master of Business Administration from the University of South Florida.

I have previously testified before the California Public Utilities Commission.