

Application No.: A.21-09-001  
Exhibit No.: SDG&E-06  
Witness: April Bernhardt

**PREPARED REBUTTAL TESTIMONY OF**  
**APRIL BERNHARDT**  
**ON BEHALF OF**  
**SAN DIEGO GAS & ELECTRIC COMPANY**

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



**FEBRUARY 11, 2022**

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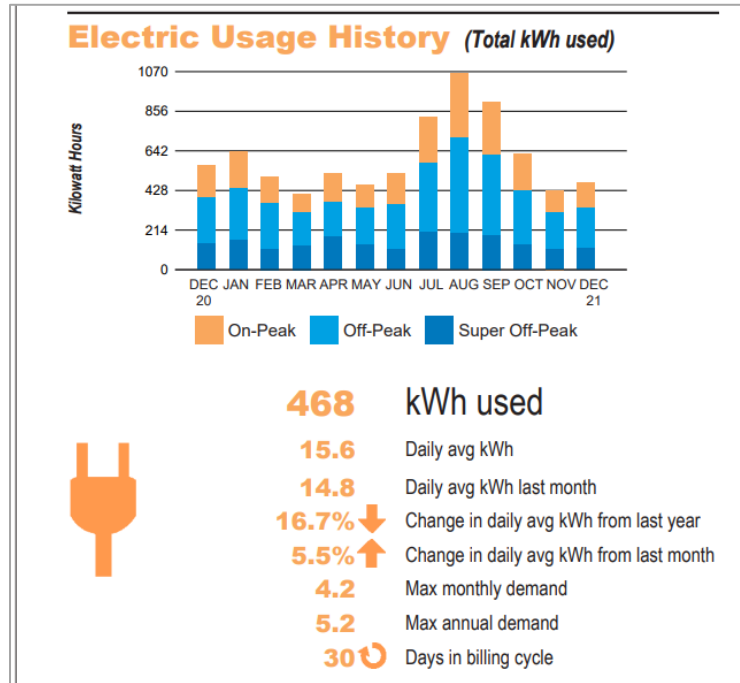
1           SDG&E recognizes that Time-of-Use (“TOU”)-ELEC is an innovative rate design not  
2 previously offered to residential customers. Therefore, there could be some initial customer  
3 confusion without clear and concise information on the demand-based fixed charge plus  
4 volumetric pricing, which SDG&E plans to provide as part of its ME&O activities. Educational  
5 information via online resources coupled with SDG&E’s Customer Care Center and targeted  
6 communication to eligible customers can help reduce customer confusion.

7           In my prepared direct testimony filed on September 1, 2021, I outlined SDG&E’s  
8 approach to ME&O, including primary goals and tactics. SDG&E cannot speculate on specific  
9 messaging associated with this proposed rate design as the Commission has not approved it.  
10 However, the following information should provide additional details around the proposed  
11 ME&O effort. It’s important to note that marketing plans need to be adaptable and flexible to  
12 address final Commission decisions and to evolve as SDG&E receives feedback from customers,  
13 stakeholders, and customer-facing employees.

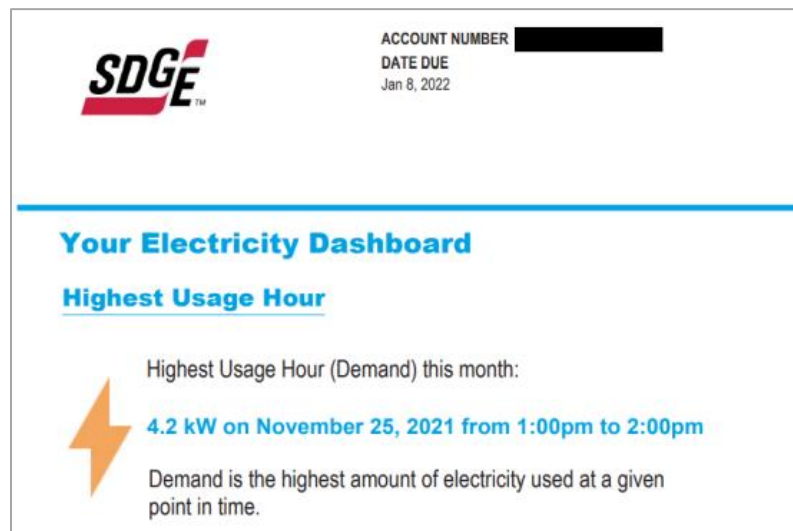
14           One tactic and channel to help SDG&E customers understand rate options and the  
15 differences in structure and pricing is to provide online content on the sdge.com web page  
16 specific to TOU-ELEC. SDG&E plans to provide detailed information explaining the rate  
17 structure, including key definitions, eligibility requirements, potential benefits and risks,  
18 instructions on calculating the monthly demand-based fixed charge, and pricing for the demand-  
19 based fixed charge tiers and volumetric rates. Specific to the demand-based fixed charge,  
20 detailed information would be provided to direct customers about where they can find their  
21 maximum monthly demand and highest usage hour on their customer bill and online within  
22 MyAccount and SDG&E’s app. For illustrative purposes, a sample bill would also be posted  
23 online. Maximum monthly and maximum annual demand are shown in one place, with

1 additional detail on maximum hourly demand shown elsewhere. Examples of this are shown  
2 below in Figures 1 and 2.

3 **Figure 1 – Illustrative Highest Monthly and Annual Demand Bill Presentation**



4  
5 **Figure 2 – Illustrative Highest Hourly Demand Bill Presentation**



1 From this point, a customer could go to their Usage information in MyAccount and view  
2 hourly usage information for the date they had the highest demand, i.e., November 25, 2021.

3 This is shown below in Figure 3.

4 **Figure 3 – Highest Monthly Demand Day MyAccount Hourly Usage**



5  
6 Like existing pricing plan pages on sdge.com, the online content for TOU-ELEC would  
7 include tips and resources for saving energy and lowering their maximum demand. The page  
8 would also have a frequently asked questions (“FAQ”) section to address key customer  
9 questions. These FAQs and other text on the webpage would evolve based on customer  
10 feedback. These bill and online details, coupled with instructions on calculating the demand-  
11 based fixed monthly charge, would provide customers a self-service option to see if this rate is  
12 an option the customer would want to consider further.

1 In addition to the SDG&E webpage, customers would be directed to contact SDG&E's  
2 Customer Care Center for further assistance or to learn more about the rate and how it compares  
3 to their current plan. During this conversation, the Customer Care Center would have the ability  
4 to walk a customer through how the fixed charge is calculated, what a customer's potential  
5 demand-based fixed charge is, and discuss steps to manage their maximum demand. The  
6 Customer Care Center will also be equipped with data on qualifying technologies so they can  
7 help the customers understand how adding such technology may change their monthly demand  
8 profile and, thus, their fixed charge tier.

9 SDG&E is currently exploring the ability to provide personalized rate analysis in targeted  
10 emails to eligible customers. Based on historical data, this customized approach could inform  
11 customers of their anticipated monthly demand-based fixed charge and their forecasted bill  
12 amount.

13 ME&O for TOU-ELEC will exclude promoting the rate option to unbundled customers  
14 who have service with a Community Choice Aggregator. As part of developing the ME&O  
15 implementation strategy, SDG&E works closely with its internal teams and media buyers to  
16 adhere to the Code of Conduct while informing its existing bundled customers about their rate  
17 options.

### 18 **III. CONCLUSION**

19 As stated in my direct testimony, one of the goals of the ME&O plan is to remind  
20 SDG&E customers there are pricing plan options that may fit their household. Therefore, if  
21 adopted, TOU-ELEC would be an optional untiered TOU rate with a fixed charge available to  
22 qualifying customers for consideration.

23 This concludes my prepared rebuttal testimony.  
24