

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

Application of San Diego Gas & Electric
Company (U 902 E) for Approval of Real Time
Pricing Pilot Rate

Application No. 21-12-____
(Filed December 13, 2021)

**PREPARED DIRECT TESTIMONY OF
APRIL BERNHARDT (CHAPTER 4)
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

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December 13, 2021



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1 SDG&E believes this approach can provide Third Parties low-cost support to promote the Pilot
2 alongside their potentially complementary products while still providing consistency in
3 SDG&E’s customer experience, as bundled SDG&E customers are currently used to SDG&E
4 providing information on available rate options.

5 SDG&E shared a high-level overview of the approach it would take regarding ME&O
6 during the second RTP Pilot Stakeholder Workshop held on October 13, 2021.² There were no
7 participant comments or questions about the proposed ME&O approach during the workshop.

8 **II. THIRD PARTY ME&O PROPOSAL**

9 To support Third Parties (including storage, demand response, and electric vehicle
10 charging vendors)³ marketing to gain customer enrollment, SDG&E plans to create a dedicated
11 web landing page with downloadable resources for interested Third Parties to leverage in cross
12 promoting the rate availability with their complementary programs and/or products to eligible
13 customers. Utilizing factsheet(s), FAQs, and the web page, SDG&E would make information
14 readily available about the rate details and benefits, enrollment information including customer
15 Letter of Authorization, and links to any relevant collateral. The website and subsequent
16 resources would be available before Stage 1 of the RTP Pilot.

17 Along with providing materials to drive enrollment, SDG&E also proposes to provide
18 rate education tips that Third Parties can share with customers to help them be successful. These
19 customer assistance tips, along with the resources stated above, would be SDG&E branded and
20 include the SDG&E Business Care Center (BCC) and Customer Care Center (CCC) contact

² See Prepared Direct Testimony of Jeff DeTuri (Chapter 1) on Behalf of SDG&E (December 13, 2021), Attachment B, Real Time Pricing Pilot Stakeholder Workshop #2 PowerPoint (October 13, 2021).

³ Application 19-03-002, Joint Opening Brief of California Solar & Storage Association, OhmConnect, Inc., and California Energy Storage Alliance (“Joint Advanced Rate Parties”) and Enel X North America, Inc. (November 16, 2020) at 29-30.

1 information as an additional resource to address potential customer questions. Providing a single
2 source for resources increases the opportunity for consistent messaging across all parties
3 promoting the rate. Additionally, SDGE believes that making its website the single source for
4 resources will better enable SDG&E to refine the information provided as needed as more
5 insights are gathered, such as information on customer awareness, knowledge, and satisfaction.

6 SDG&E also proposes hosting training webinars before the start of Stage 1 and Stage 2
7 of the Pilot to help educate interested Third Parties on the rate design. These workshops are also
8 an opportunity to engage Third Parties in answering questions about the rate, as well as an
9 opportunity for Third Parties to provide feedback on the ME&O resources. SDG&E anticipates
10 utilizing a staff member on the RTP Pilot team to serve as an on-going resource for Third Parties
11 to answer questions about the Pilot and potential customer bill impacts.

12 **III. SDG&E'S ME&O PROPOSAL**

13 **1. Strategy**

14 Concurrent with supporting Third Party ME&O activities as outlined above, SDG&E
15 proposes a segmented marketing strategy for both Stage 1 and Stage 2 that will educate
16 customers about the availability of the RTP Pilot and helps drive enrollment through low-cost,
17 targeted communication channels. SDG&E's ME&O strategy will consider the needs of the
18 customer segments for Stage 1 and Stage 2 of the Pilot, including in-language communication
19 needs for residential customers and outreach to low-income customers.

20 ME&O activities will move customers from awareness to enrollment to engagement.
21 SDG&E believes this approach will be more cost-effective in targeting eligible customers and

1 will ensure that any marketing activities comply with the Community Choice Aggregation
2 (CCA) Code of Conduct⁴ established by the CPUC.

3 During the Pilot period, messaging and tactics may be adjusted based on customer
4 feedback, primary and secondary research, performance and/or economic conditions. Therefore,
5 SDG&E's marketing plan needs to be flexible and responsive. Additionally, ME&O activities
6 may be adjusted to accommodate the final design of the RTP Pilot and budget approval.

7 **2. Messaging**

8 Consistent with the resources provided to Third Parties as outlined above, messaging for
9 Stage 1 and Stage 2 would include rate details and benefits, enrollment requirements, and links
10 to any relevant collateral and tools. SDG&E also plans to leverage customer and third-party
11 feedback to adjust messaging for Stage 1 and Stage 2 as needed.

12 **3. Target Audience**

13 For SDG&E's outreach activities, proper segmentation will be essential to target eligible
14 customers only as defined in the testimony of Ray Utama (Chapter 3) to minimize outreach
15 costs. For both Stage 1 and Stage 2, SDG&E's marketing activities will exclude CCA
16 customers.⁵ Should a CCA energy service provider (ESP) offer a RTP rate or Pilot of their own,
17 their customers would receive any relevant ME&O communications from that ESP rather than
18 from SDG&E. SDG&E would be willing to share, however, any lessons learned or relevant
19 ME&O materials.

⁴ D.12-12-036, *Decision Adopting a Code of Conduct and Enforcement Mechanisms Related to Utility Interactions with Community Choice Aggregators, Pursuant to Senate Bill 790.*

⁵ See Prepared Direct Testimony of Ray Utama (Chapter 3) on Behalf of SDG&E (December 13, 2021) at RU-3 – RU-4.

1 Stage 1: Outreach activities would focus on medium and large commercial and industrial
2 (C&I) bundled (non-CCA) customers who are believed to have automated technology to shift
3 their energy load. C&I customers with energy storage systems and electric vehicles, would also
4 be included as a customer segment.

5 To further refine targeting customers that are more likely to enroll in the Pilot, Marketing
6 will leverage bill impact data as outlined in Leslie Willoughby’s testimony (Chapter 5) to target
7 perceived structural beneficiaries and neutral beneficiaries on the RTP Pilot.

8 Stage 2: Outreach activities would be expanded to all other bundled customers in the
9 following customer classes: agricultural, small business, and residential, with a focus on
10 residential and small business, as described in the testimony of Ray Utama (Chapter 3).⁶ Again,
11 because only commodity pricing is affected in the Pilot rate, the rate is inapplicable to CCA
12 customers and SDG&E will exclude them from Stage 2 ME&O.⁷ Customer segmentation would
13 focus on customers with energy storage systems and electric vehicles.

14 **4. Tactics and Timing**

15 For both Stage 1 and Stage 2 of the RTP Pilot, SDG&E would cross-promote the
16 availability of the rate as appropriate through SDG&E channels to reach eligible customers while
17 ensuring compliance with the CCA Code of Conduct.⁸ This includes having information about
18 the rate details readily available on sdge.com. Where and when it makes sense, SDG&E will
19 integrate RTP Pilot availability and messaging with energy efficiency and on-going rate

⁶ See *id.* at RU-4.

⁷ *Id.*

⁸ D.12-12-036, *Decision Adopting a Code of Conduct and Enforcement Mechanisms Related to Utility Interactions with Community Choice Aggregators, Pursuant to Senate Bill 790.*

1 education. The messaging integration will be based on how well the target audience overlaps,
2 which tactic is used, and its ability to hold an integrated message.

3 In addition to developing materials to support Third Party acquisition, SDG&E will also
4 support ME&O efforts through its own media channels utilizing low-cost tactics including
5 website, targeted emails, and direct calling by SDG&E's Account Executives (AEs).

6 The proposed tactics for Stage 1 and Stage 2 of the customer journey that SDG&E would
7 likely utilize include but are not limited to:

- 8 • Awareness/Enrollment: RTP Pilot webpage, fact sheet(s), direct outreach to
9 eligible customers via email.
 - 10 ▪ Specific to Stage 1, SDG&E would also utilize direct-to-customer
11 outreach by SDG&E's AEs to reach, eligible C&I customers. During the
12 direct-to-customer outreach by AEs, SDG&E anticipates using these
13 conversations to gain customer feedback on the rate and communication
14 materials. SDG&E's BCC would also serve as a resource to enroll
15 customers and answer questions about the Pilot.
 - 16 ▪ Similar, to Stage 1, SDG&E's BCC and CCC would be a resource for
17 businesses and residential customers interested in Stage 2 of the Pilot.
- 18 • Enrollment: Once a customer is enrolled in the rate, participants would receive a
19 welcome email with confirmation they are registered in the RTP Pilot and would
20 include tips to be successful on the Pilot and the process for opting out.
- 21 • Engagement: To encourage participant retention and attention throughout the
22 Pilot, SDG&E would support participants with seasonal tips that may be shared
23 by Third Parties, by SDG&E's AEs, and/or by targeted email as part of SDG&E's
24 ongoing rate education.
- 25 • Conclusion: As the RTP Pilot nears conclusion, SDG&E intends on sending a
26 communication to customers thanking them for their participating and informing
27 them of any next steps.

28 Throughout both Stages of the Pilot it will be important that marketing activities remain
29 flexible in order to incorporate customer feedback and any changes in the eligible target
30 population. For Stage 2, SDG&E anticipates translating marketing materials in-language.

1 To support enrollment and implementation of Stage 1 by the end of 2022,⁹ it is
2 anticipated that marketing activities for Stage 1 would begin in Q3 2022. SDG&E anticipates
3 starting ME&O efforts for Stage 2 in or around Q3 2024.

4 **5. Customer Support**

5 Before any public-facing marketing activities, SDG&E anticipates providing customer-
6 facing employees, including CCC, BCC, AEs and SDG&E's Outreach Team with education and
7 resources to enable them to support customer questions about the RTP Pilot Stage 1 and Stage 2.
8 This will be particularly important for customers who do not have an SDG&E assigned AE.

9 **6. Customer Research**

10 Throughout the RTP Pilot, SDG&E will use multiple channels to solicit feedback that can
11 then be used to adjust ME&O materials where needed and applicable. This section primarily
12 focuses on evaluating ME&O messaging, tactics, customer awareness and understanding of the
13 materials. ME&O activities will also leverage the evaluation materials as outlined in the
14 testimony of Leslie Willoughby (Chapter 5) to further refine its marketing strategy and tactics for
15 Stage 2 of the Pilot.

16 During Stage 1, to keep costs at a minimum, SDG&E recommends conducting research
17 in-house, using an online survey tool (Qualtrics) to solicit feedback from SDG&E customers
18 following their communications with an SDG&E AE. The survey would seek feedback
19 regarding their understanding of the RTP Pilot, usefulness of communication materials, barriers
20 to participating, and satisfaction if they did enroll in the Pilot. To supplement this tool, SDG&E
21 further recommends soliciting feedback from its AEs and CCC/BCC regarding communications

⁹ See D.21-07-010 at 52 (Pilot Stage 1 should begin by end of 2022).

1 with customers and any feedback they received that could further enhance the communications
2 materials and/or Pilot.

3 For Stage 2 of the Pilot, SDG&E proposes to use its Business Customer Panel and
4 Residential Customer Panel to test and solicit customer understanding of Pilot messaging and
5 communication resources. Every year, SDG&E partners with research firm Alida to recruit two
6 panels of customers, one business and one residential, and manage participation in online
7 monthly surveys on various topics. These online panels provide SDG&E an opportunity to
8 present draft marketing materials including creative concepts, messaging, and tactics to business
9 and residential customers to get their feedback. Currently, the panels have approximately 600
10 small-medium business owners as well as 1,400 residential customers, with an average response
11 rate of 60-70% for each survey.

12 **IV. ESTIMATED BUDGET**

13 For Stage 1 ME&O activities as outlined above, SDG&E estimates a budget of
14 \$119,156.00. At this time, there are too many unknown variables to develop an accurate
15 estimate for the implementation of ME&O activities needed for Stage 2.

1 **V. STATEMENT OF QUALIFICATIONS**

2 My name is April Bernhardt. I am employed by SDG&E as a marketing manager in the
3 company’s Corporate Communications and Marketing department. My business address is 8306
4 Century Park Court, CP-62C, San Diego, California, 92111.

5 I graduated from San Diego State University with a Bachelor of Liberal Arts and Science
6 in Psychology. I have more than 17 years of experience working in corporate communications
7 and media relations, and most recently, marketing—my career spans working both in wireless
8 communications and the energy sector.

9 I have been employed by SDG&E as a communications manager since 2010 with
10 increasing areas of responsibility. As the marketing manager of Pricing Plan Education, I oversee
11 the marketing and communication efforts for Clean Transportation, Demand Response programs,
12 Community Choice Aggregation, Rate Reform, and Net Energy Metering. My responsibilities
13 include developing marketing strategies to increase customer awareness and understanding of the
14 issues mentioned above. Additionally, I am responsible for collaborating with internal and
15 external stakeholders to ensure stakeholders are informed on critical Marketing, Education, and
16 Outreach activities.

17 Prior to my current role, I served as a senior project manager in communications
18 overseeing executive communications and internal change management for SDG&E. I also
19 served as a senior communications manager in Media and Employee Communications at
20 SDG&E, and previously held management roles in communications at Sempra Energy and
21 Qualcomm Inc.

22 I have previously served as a witness before the California Public Utilities Commission.
23