

Application: A.18-11-015

Exhibit No.: SDG&E-

Witness: _____

REBUTTAL TESTIMONY OF
TOM MOSES
CHAPTER 3
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



JANUARY 22, 2021

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1 **REBUTTAL TESTIMONY OF**
2 **TOM MOSES - CHAPTER 3**

3 **I. INTRODUCTION**

4 The purpose of my Rebuttal Testimony is to address the December 18, 2020 Prepared
5 Direct Testimony of Mr. Michael Murray for Mission:data Coalition (“Mission:data”) and the
6 December 18, 2020 Prepared Testimony of OhmConnect, Inc. (“OhmConnect”) sponsored by
7 Mr. Brian Kooiman. Messrs. Murray and Kooiman’s respective testimony responds to my
8 November 13, 2020 Updated Prepared Direct Testimony (Chapter 3) on behalf of San Diego Gas
9 & Electric Company (“SDG&E”).

10 As set forth in the respective testimonies of Messrs. Murray and Kooiman, both
11 Mission:data and OhmConnect make numerous recommendations regarding SDG&E’s proposed
12 improvements to the click-through authorization process (“CTP”) which, SDG&E disagrees with
13 and strongly objects to. My testimony addresses the following contentions made in Mission:data
14 and OhmConnect’s testimony:

- 15 • Mission:data’s and OhmConnect’s recommendation for Service Level
16 Agreement (“SLA”);
- 17 • Recommendations that customer enrollment conflicts be resolved at the
18 time of authorization;
- 19 • Mission:data’s recommendation that the investor owned utilities (“IOUs”)
20 should be prohibited from changing the customer-facing authorization
21 experience without notification to stakeholders and Energy Division
22 approval; and,
- 23 • Mission:data’s recommendation that two features of SDG&E’s proposal,
24 totaling \$205,523 be funded by shareholders.

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

4 **II. MISSION:DATA AND OHMCONNECT'S RECOMMENDATIONS FOR A**
5 **SERVICE LEVEL AGREEMENT SHOULD BE REJECTED**

6 As set forth in further detail in the Rebuttal Testimony of Douglas S. White (Chapter 1),
7 and the Rebuttal Testimony of Neil Umali (Chapter 2), an SLA is neither necessary or
8 appropriate for a wide variety of factual and policy issues. My testimony focuses on explaining
9 additional issues that would be associated with the various recommendations proposed by
10 Demand Response Providers ("DRPs").

11 **A. OhmConnect's Recommendations for Establishing Specific Performance**
12 **Metrics in an SLA Should be Rejected**

13 At page 8 of its testimony, OhmConnect proposes metrics that measure the following
14 four processes: (1) Delivery metrics corresponding to the delivery of the initial data set,
15 customer data, ongoing (raw) interval data, and RQMD; (2) Uptime metrics corresponding to the
16 IT data delivery systems; (3) Uptime metrics corresponding to the click-through authorization
17 system; and (4) Accuracy metrics corresponding to any of the delivered data.¹

18 As stated in the Rebuttal Testimony of Neil Umali (Chapter 2), implementing measures
19 to report on these proposed metrics would involve looking at the entire system architecture in
20 order to avoid downstream impacts across systems processes. Doing so would lead to
21 substantially high costs to SDG&E and ratepayers. There is no conducive SLA that can support
22 the complexity and dependencies of the Rule 32 system architecture. Below, I address each of
23 OhmConnect's proposed metrics and explain why they are unnecessary.

¹ Prepared Testimony of OhmConnect, Inc. ("OhmConnect Testimony") at p. 8.

- 1 1. *Delivery metrics corresponding to the delivery of the initial data set, customer*
2 *data, ongoing (raw) interval data, and RQMD. The metrics should measure how*
3 *frequently expected data in this category is actually delivered. For example, one*
4 *appropriate delivery metric would be whether interval data for a particular*
5 *consumption date was provided to the authorized DRP.*

6 SDG&E already monitors the Click Through system based on the CPUC authorized
7 performance statistics. The Click Through system can track when it delivers data to DRPs but it
8 cannot track when it does not deliver data. It is an automated system. If it has something to
9 send, it sends it. If it does not have data to send, it does not deliver data. If the DRP knows they
10 are expecting data, then they should track when they do not receive the data and use the current
11 methods in place to follow up with SDG&E for investigation. However, it is not necessary to
12 include a delivery metric reflecting when data was not delivered because the metric would be of
13 little value. A metric indicating successful delivery tells the DRP what they already know, *i.e.*,
14 that they received the data.

- 15 2. *Uptime metrics corresponding to the IT data delivery systems. The metrics*
16 *should measure whether the data delivery system is available to transmit data to*
17 *the authorized DRP.*

18 SDG&E already monitors the Click Through system and when the system is unavailable
19 works diligently to recover the system. There is no need to include these types of metrics into an
20 SLA.

- 21 3. *Uptime metrics corresponding to the click-through authorization system. The*
22 *metrics should measure whether the click-through authorization system is*
23 *working properly and successfully allows customers to authorize data access to a*
24 *DRP.*

25 SDG&E already monitors the Click Through system and when the system is unavailable
26 works diligently to recover the system. SDG&E does not track if the system is allowing
27 customers to authorize data access to a DRP. There are many reasons a customer may not
28 successfully authorize data access to a DRP. One of the possible scenarios is that the system is

1 having a problem. If this is the case, SDG&E works diligently to make the system available
2 again. Another scenario is that the customer decides on their own that they do not want to
3 continue. It is extremely difficult to differentiate between the two scenarios when gathering this
4 data for reporting purposes.

5 4. *Accuracy metrics corresponding to any of the delivered data. The metrics should*
6 *measure whether the data provided by the IOU as the MDMA is accurate. For*
7 *example, one appropriate accuracy metric would be whether the initial customer*
8 *data included accurate data for all elements.*

9 The Click Through system at SDG&E is an automated system and delivers available data
10 on a near real-time basis. SDG&E verifies the accuracy of the data for the billing process and
11 sends the same data to the DRP. The multiple processes involved to collect, scrub, verify, and
12 finalize billing quality data is complex and scrutinized. However, on rare occasions we have
13 found some of the data to have inaccuracies. If this is the case for the billing process, it is
14 corrected to ensure the accuracy of the bills being sent to customers. The corrected data is then
15 sent to the DRP for their records. The DRP is receiving the best quality data we have at any
16 given time. SDG&E believes instituting additional checks on this data to ensure accuracy is not
17 needed and duplicative of the efforts already in place for the billing process. Providing metrics
18 involving inaccuracy of the data sent to DRPs would require new data checks, monitoring, and
19 reporting that would unnecessarily increase the cost to provide this data to the DRPs.

20 **B. OhmConnect and Mission:data’s Recommended 99.8% Uptime Rate is**
21 **Neither Practical Nor Realistic**

22 Both OhmConnect and Mission:data propose a target of 99.8% uptime for the click-
23 through and related systems.² As explained in the Rebuttal Testimony of Neil Umali (Chapter 2),

² OhmConnect Testimony at p. 9; Prepared Direct Testimony of Michel Murray for Mission:data Coalition (“Murray Testimony”) at p. 10.

1 it is unrealistic to require IOUs to achieve this high level of performance for this type of data
2 delivery. This type of high level performed is typical for mission critical systems such as
3 managing the electric and gas delivery systems. The delivery of data to assist a third parties
4 business model does not justify the cost and expenses necessary to achieve the heightened level of
5 performance.

6 All companies invest more in their critical applications and systems to keep them running
7 smoothly. SDG&E applies a tier level to all applications that range from tier level 0 to tier level 4.
8 The business requirements of an application are used to determine the tier level and the application
9 is built to provide the appropriate availability. For example, an application would be considered a
10 tier level 1 if it would create a safety issue if it became unavailable. SDG&E builds tier 1
11 applications to attain an availability goal of 99.9%, not much different from the proposed
12 availability of 99.8% by OhmConnect and Mission:data. Clearly, the CTP application would not
13 cause a safety issue if it was not available. The amount of effort to refactor the CTP to ensure its
14 availability at 99.8% was not estimated. The CTP system was built based on the requirements
15 provided by the CPUC. Including an SLA requirement of 99.8% availability is a change in scope
16 that SDG&E has not had a chance to fully review, analyze, and estimate. The CTP system does
17 not warrant the cost and effort necessary to improve the availability to 99.8%. OhmConnect and
18 Mission:data have not given sufficient facts to justify this level of availability.

19 **III. MISSION:DATA'S AND OHMCONNECT'S SPECIFIC RECOMMENDATIONS**
20 **REGARDING SDG&E'S CTP ARE FLAWED, MISGUIDED AND SHOULD BE**
21 **REJECTED**

22 **A. OhmConnect Misunderstands SDG&E's Proposal for the Enhancement to**
23 **the Authorization Screen**

24 At pages 12-14 of its testimony, OhmConnect opposes SDG&E's proposed
25 "disenrollment functionality," suggesting that it would give SDG&E the first pass at convincing

1 a customer that they should remain on SDG&E's program.³ However, it appears that
2 OhmConnect misunderstands SDG&E's proposal.

3 The proposed improvement is to simply notify the customer of ineligibility for the DRPs
4 program when the customer is already enrolled in a conflicting program. The current system
5 allows the customer to complete the authorization process and redirects to the DRP website. The
6 following dataset to the DRP includes the ineligibility conflict and the customer is confused
7 when the DRP notifies them of the conflict. The proposal by SDG&E is to simply notify the
8 customer of ineligibility before being redirected to the DRP website. The proposal intends to
9 reduce the confusion that may be caused by the current system.

10 OhmConnect's recommendations for improvements to the disenrollment process is
11 outside the scope of what SDG&E has proposed. SDG&E has not had the opportunity to review
12 this additional scope in detail nor budgeted the costs of developing this type of disenrollment
13 functionality. However, based on a cursory review of OhmConnect's recommendations,
14 OhmConnect proposes a disenrollment functionality that does not account for the complexity of
15 the current disenrollment process. Each conflicting program has a different set of conditions that
16 need to be met before the customer can disenroll. Combining each of these conditions into a
17 single process that is easily consumed by a DRP customer will be expensive and time
18 consuming. SDG&E would need more time to develop a proposal for this functionality (which
19 again is out of scope) in order to do a proper estimate.

³ OhmConnect Testimony at pp. 12-14.

1 **B. Mission:Data’s Recommendation Prohibiting Changes to Customer-Facing**
2 **Authorization Experience Without Energy Division Approval Is Unnecessary**
3 **and Should Be Rejected**

4 At pages 13-16 of its testimony, Mission:data suggests that as a condition of approving
5 the applications, the IOUs should be prohibited from changing the customer-facing authorization
6 experience without notification to stakeholders and Energy Division approval.⁴ This
7 recommendation is unnecessary and should be rejected.

8 SDG&E proposes to enhance the customer experience by informing the customer during
9 the authorization process that there is a conflict with an existing DR program. Currently, the
10 process notifies the DRP later in the data delivery process that the customer is ineligible because
11 of the conflicting program. This causes confusion with the customer due to the fact that the
12 customer is not being notified at time of authorization in the CTP that there was a conflict.

13 SDG&E’s proposal has only been estimated at a high level. Project requirements need to be
14 gathered and a design needs to be agreed upon.

15 SDG&E is asking for permission to move forward with this proposal. The CTP was
16 designed and developed based on the requirements agreed upon and directed by the CPUC. All
17 improvements to the User Interface (UI) or the Customer Experience (CX) will still be governed
18 by the initial CPUC requirements for the CTP. There is no reason or precedent identified that
19 would necessitate *prior* design approval from DRPs or the CPUC.

20 **C. SDG&E Opposes Mission:data’s Recommendation the Certain Features of**
21 **its CTP Proposal Totaling \$205,523 be Implemented at Shareholders**
22 **Expense**

23 At pages 16-20 of its testimony, Mission:data suggests that two features of SDG&E’s
24 proposal (*i.e.*, its “dedicated test environment” and “automated method for DRPS to determine

⁴ Murray Testimony at pp. 13-16.

1 the status of authorization”) totaling \$205,523, should be funded by shareholders because
2 SDG&E should have implemented them previously.⁵ SDG&E strongly disagrees with this
3 recommendation and Mission:data’s unfounded accusations of “sub-par behavior.

4 As an initial matter, in regards to the “dedicated test environment,” Mission:data
5 misunderstands SDG&E’s proposal. SDG&E already has a fully functional test environment
6 that is being used for multiple purposes including testing authorized enhancements, bug fixes,
7 and testing with new DRPs. However, the Click Through system was built with a single test
8 environment to keep costs to a minimum. In anticipation of onboarding *new* DRPs, SDG&E is
9 proposing a separate test environment to be used so that the new DRP is not impacted by
10 unanticipated outages and ongoing work that would be occurring in the existing test
11 environment. Since Mission:data’s recommendation is based on a misunderstanding of
12 SDG&E’s proposal, and because a dedicated test environment already exists, the recommendation
13 should be rejected.

14 With respect to the status of authorizations, SDG&E is proposing this enhancement to
15 provide quicker and more efficient status information to the DRP. Again, it is important to note
16 that the Click Through system was designed based on the requirements at the time. The Click
17 Through data specification did not require the status details of authorizations. As the program
18 has progressed, SDG&E is recognizing the benefit to DRPs and is asking for permission to add
19 this functionality to the existing process. There is simply no basis for Mission:data
20 recommendation that this additional functionality – that was never required – be funded by
21 shareholders.

⁵ Murray Testimony at pp. 16-20.

1 Finally, I note that Mission:data references the Green Button standard on page 19 of its
2 testimony and seems to suggest that it alone is basis for SDG&E to have included an automated
3 inquiry method on authorization statuses.⁶ However, to be clear, SDG&E did not design its CTP
4 program pursuant to the Green Button standard. Therefore, any attempts by Mission:data to rely
5 on the Green Button standard as a basis for criticizing SDG&E's CTP program are improper,
6 irrelevant and should be ignored.

7 **IV. CONCLUSION**

8 This concludes my rebuttal testimony.

⁶ Murray Testimony at p. 19.

1 **V. STATEMENT OF QUALIFICATIONS**

2 My name is Tom Moses and I am an Enterprise Architect at San Diego Gas & Electric
3 Company. My business address is 8690 Balboa Avenue, San Diego, CA 92123. My current
4 responsibilities include defining and governing the technical and business architectures of
5 systems that support San Diego Gas & Electric, including Customer Assistance, Customer
6 Experience, Energy Efficiency programs, Demand Response programs, and SDG&E's Electric
7 Rule 32. I have been employed within the Sempra Energy family of companies for 34 years,
8 including SDG&E for the last 22 years.

9 I obtained my Bachelor of Science Degree in Business Administration with an emphasis
10 in Information Systems from San Diego State University in May 1982. I obtained my Masters of
11 Business Administration from Pepperdine University in June of 1986.

12 I have not previously testified before the Commission.

LIST OF ACRONYMS

CTP	Click-Through Authorization Process
ED	Energy Division
IOU	Investor Owned Utility
RQMD	Revenue Quality Meter Data
SLA	Service Level Agreement
DRPs	Demand Response Providers
SDG&E	San Diego Gas & Electric Company