

Application No. A.19-11-

Exhibit No: SDG&E-

Witness: Horace Tantum IV

**PREPARED DIRECT TESTIMONY OF
HORACE TANTUM IV
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY'S

LOW-INCOME CUSTOMER ASSISTANCE PROGRAMS
MARKETING, EDUCATION AND OUTREACH PLANS
FOR PROGRAM YEARS 2021 THROUGH 2026**



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

NOVEMBER 4, 2019

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1 anticipates spending an average of \$75 in ME&O cost per household as derived from the total
2 number of homes forecasted to be reached, divided by the total ME&O budget proposed in the
3 accompanying Application. The increase is primarily due to the addition of energy and water
4 conservation kits as a promotional/marketing expense, increased call center support for online
5 audits and increased digital media costs to promote online audits. In addition, as outlined in
6 Section F below SDG&E proposes to test providing a capitation fee to agencies to assist with
7 ESA Program audit completion.

8 As discussed in the CARE Prepared Direct Testimony of Sara Nordin, SDG&E's CARE
9 Program met its 90% penetration goal in 2018 and intends to not only maintain enrollment for
10 the 2021 through 2026 program cycle, but pursue new enrollments in hard-to-reach areas.²
11 Consistent with this new approach, ME&O targeting for the CARE Program will focus on
12 retention (*i.e.*, recertifications) of enrolled customers with continued new enrollment.

13 As discussed in the FERA Prepared Direct Testimony of Sara Nordin, SDG&E's FERA
14 Program will focus on achieving a 50% penetration target by the end of 2026.³ To reach this
15 target, ME&O efforts will focus on new enrollments and use tactics that have proven to be the
16 most successful in achieving the CARE penetration goal. Refer to Section F for details.

17 **B. Research & Key Findings**

18 SDG&E's multi-year approach to ME&O for ESA, CARE and FERA over the 2021
19 through 2026 program cycle will be built on efforts to effectively segment customers and target

² See Prepared Direct Testimony of Sara Nordin on Behalf of San Diego Gas & Electric Company's California Alternate Rates for Energy Program Plans and Budgets for Program Years 2021 Through 2026 (November 4, 2019) ("CARE Testimony") at 25-28.

³ See Prepared Direct Testimony of Sara Nordin on Behalf of San Diego Gas & Electric Company's Family Electric Rate Assistance Program Plans and Budgets for Program Years 2021 Through 2026 (November 4, 2019) ("FERA Testimony") at 6-9.

1 efforts that speak to specific values, behaviors and needs. SDG&E has developed this approach
2 based on key findings and research obtained from surveys and focus groups that dealt
3 specifically with its customer assistance programs. For instance, in August 2019, SDG&E
4 conducted ESA focus groups to identify issues and barriers to program delivery. Highlights
5 from the research showed the following:

- 6 • Residential customers who have previously participated in the ESA Program have
7 largely positive views. Among those who have not participated, lack of
8 awareness and misconceptions or mistrust are the biggest barriers.
- 9 • Engaging with the ESA Program online is not a barrier for most customers.
10 However, landlord engagement and approval for renters continues to be one of the
11 most challenging barriers to participation.
- 12 • Sample online energy audit questions were considered mostly relevant and easy to
13 answer.
- 14 • Most property owners/managers say they like the idea of a multifamily whole
15 building program and would consider engaging if approached by SDG&E.

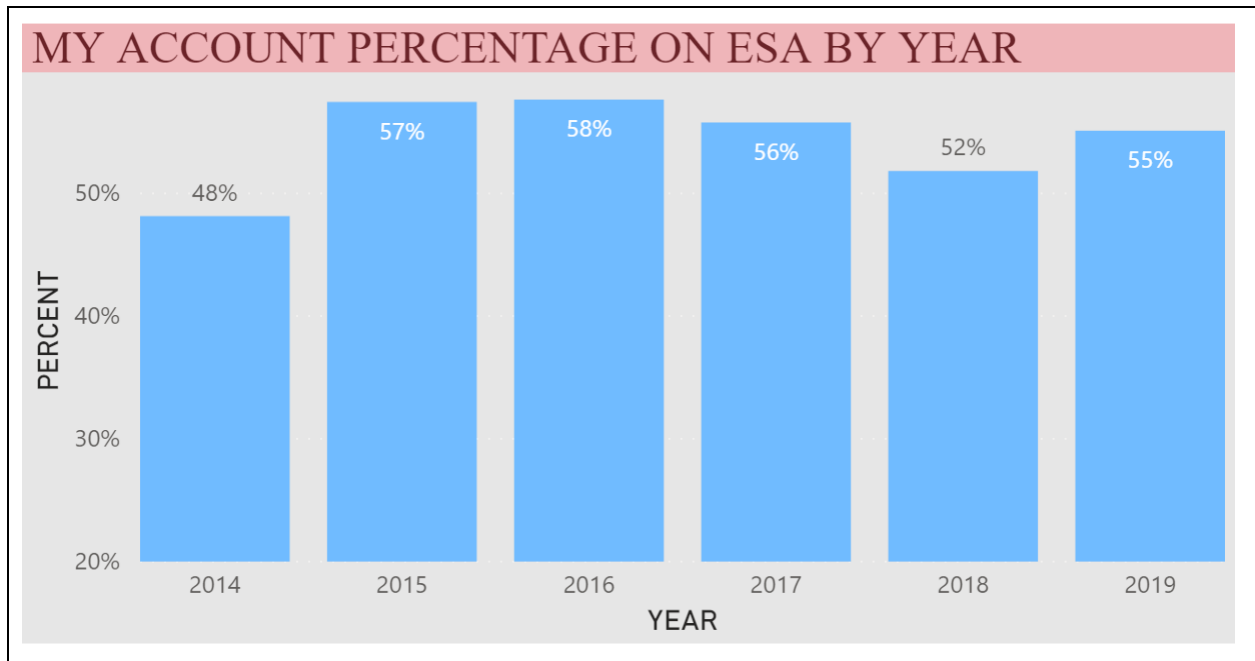
16 ESA customer telephone satisfaction surveys in the first half of 2019, further showed that
17 in-person contact at customer homes and word of mouth in the community continue to drive
18 program awareness. Direct marketing and SDG&E office visits were also key drivers.
19 Recommendations from these surveys included continuation of targeted outreach and the
20 creation of additional opportunities for in-person contact through community marketing efforts.

21 SDG&E will use eligibility estimates, paired with PRIZM data, to identify potential ESA
22 premises not previously treated and potential CARE or FERA customers. SDG&E will also use
23 eligibility estimates to identify ME&O opportunities among low-income communities and hard-

1 to-reach populations that have lower penetration rates relative to potential eligibility. The data
2 identifies communities that may require extra attention and/or additional marketing to raise
3 overall participation.

4 SDG&E has also noticed that as of 2019, 64% of CARE customers, 83% of FERA
5 customers, and 55% of ESA customers are enrolled in SDG&E's online platform, My Account.
6 While traditional ME&O methods will continue to be an important component of SDG&E's
7 strategy, the trend in increased enrollment on My Account amongst low-income customers (as
8 shown in Figures 1, 2 and 3 below) supports including more digital methods of engagement.

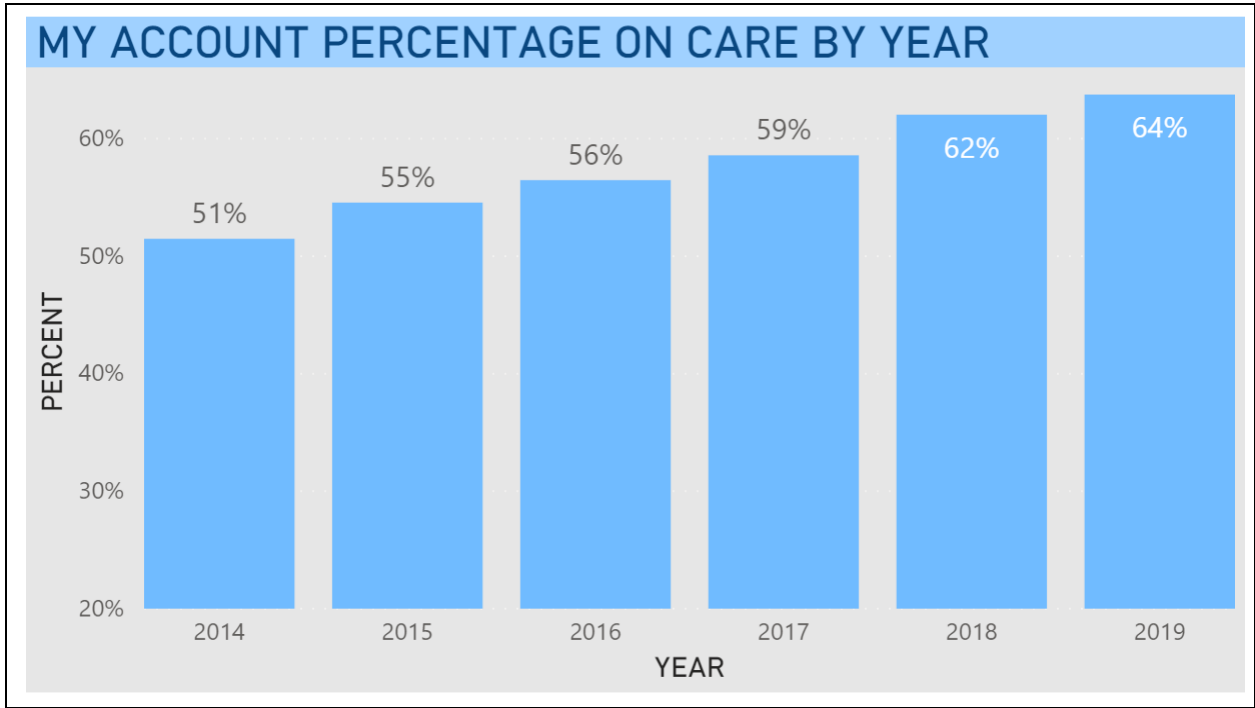
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10 **FIGURE 1:**
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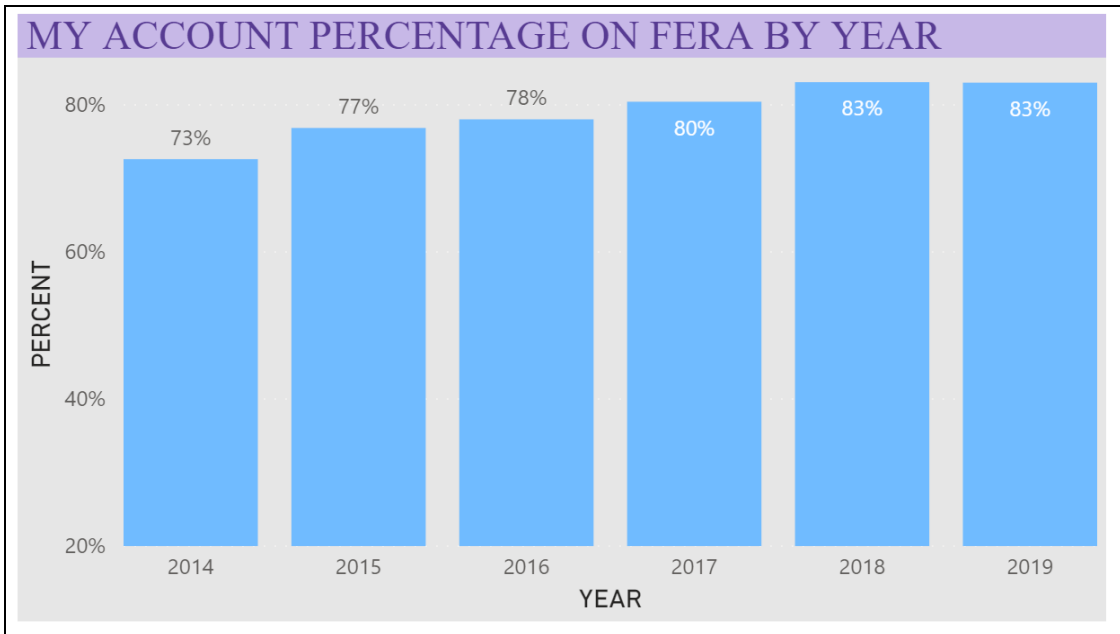
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FIGURE 2:



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FIGURE 3:



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1 **C. Target Audiences**

2 Over the last few years, SDG&E has segmented its residential customer population into
3 detailed profiles that consider energy-related attitudes and behaviors, such as energy
4 conservation, media consumption habits, lifestyle preferences, mobile usage, propensity to
5 engage and more. Customer segmentation enables SDG&E to better target hard-to-reach
6 customers and provide useful information to overcome barriers with relevant solutions. As
7 discussed, SDG&E also uses other tools, like PRIZM data and current eligibility estimates, to
8 identify low-income customers that are more likely to qualify for the ESA, CARE and FERA
9 Programs. In all, this information allows SDG&E to more effectively focus ME&O efforts
10 around the following blended characteristics:

- 11 • Perceived ability and willingness to change energy consumption patterns and
12 behaviors;
- 13 • Motivations for adopting new behaviors, including underlying values that drive
14 decisions;
- 15 • Attitudes toward energy efficiency and environmental issues;
- 16 • The use of technology and communication tools (*e.g.*, internet and smart phones);
- 17 • Affinity for new technologies and energy management tools; and
- 18 • Limited or specialized communication needs and preferences.

19 SDG&E will use available data analytics tools, such as PRIZM, to properly segment and
20 target potential customers based on their home type, ownership status, previous enrollment and
21 other factors. The Prepared Direct Testimony of Sara Nordin for the ESA, CARE and FERA
22 Programs describes, in detail, the prioritized populations for each program. ME&O will use
23 program prioritization to effectively reach the audience with relevant offers and messaging.

1 For the upcoming program cycle, SDG&E will focus on the following customer
2 segments:

3 **1. Greatest Need and Greatest Potential for Energy Savings**

4 While SDG&E will promote assistance programs to all low-income customers, the utility
5 will target marketing efforts to those customers who exhibit the greatest need combined with the
6 greatest potential for energy savings. Criteria for evaluation may also include CARE enrollment
7 status, socio-demographic data and previous ESA treatment, including an evaluation of measures
8 received as an indicator of which customers can benefit from deeper energy savings.

9 **2. Low Penetration Zip Codes**

10 Using data provided by the California Public Utilities Commission (Commission) and our
11 own enrollment information, SDG&E will target zip codes in our region with low penetration
12 numbers. Please refer to the Prepared Direct Testimony of Sara Nordin for ESA, CARE and
13 FERA for details on these zip codes by program.

14 **3. Customers Eligible for ESA Program Special Initiatives**

15 SDG&E will also focus ME&O efforts on customers who have been recognized as low-
16 income targets impacted by special circumstances including:

- 17 • High Usage customers,
- 18 • Medical Baseline customers,
- 19 • Community Air Protection Blueprint Neighborhood customers,
- 20 • Customers impacted by disconnections, and
- 21 • Customers who reside in High Fire Threat Districts (HFTD).

22 As detailed in the ESA Prepared Direct Testimony of Sara Nordin, these customers are
23 eligible for additional measures as part of their ESA treatment.

1 **D. ME&O Objectives**

2 The overarching objective of SDG&E’s low-income ME&O efforts is to make sure
3 customers know about and understand the range of programs and services that SDG&E offers to
4 help save money, manage energy use and other benefits the programs may provide.

5 **E. ME&O Strategies**

6 SDG&E understands the importance of developing an overall strategic ME&O approach
7 that directly addresses program barriers and will consider the following guiding principles in
8 both the planning and implementation processes:

- 9 • **Value** – Put forth programs and solutions that are perceived as worthwhile
10 solutions.
- 11 • **Simplify** - Make programs easy to understand.
- 12 • **Collaborate** - Communicate openly with customers and partners to better
13 understand needs and concerns.
- 14 • **Awareness & Trust** - Continue to collaborate with the Energy Solutions Partner
15 (ESP) Network and other Community-Based Organizations (CBOs) to deliver
16 news and information about SDG&E’s customer assistance programs.
- 17 • **Accessibility** - Include multiple in-language and accessibility options as needed.

18 Overarching ME&O strategies include:

- 19 • Use a combination of SDG&E segmentation, PRIZM data and eligibility
20 estimates to target customers in areas of high propensity.
- 21 • Build ongoing customer engagement that starts a journey upon initial enrollment
22 and continues through ongoing communication and education efforts that will
23 engrain energy-efficient actions into everyday life.

- Use a coordinated and integrated mix of general awareness channels, targeted communications and collaborative partnerships to build a multi-touch campaign approach. Additional discussion of these topics is provided in Section F below.
- Monitor research survey results, customer responses and marketing metrics (see Section G below) for continued refinement of ME&O tactics.

Specific strategies for each program follow in the section below:

For ESA, ME&O is designed to generate leads for program contractors and support ongoing energy education for participants. To that end, ME&O efforts will promote online home energy audits on the front end and continuing engagement in the form of energy education after treatment. SDG&E believes ongoing education to maximize engagement will help keep customers mindful of ways to effectively manage their energy use long after treatment is completed.

The proposed ESA Program design, as described in the ESA Prepared Direct Testimony of Sara Nordin in Section D, lays out SDG&E's intent to provide customers with deeper savings by optimizing each residence with available measures and by increasing engagement with the occupant. ME&O efforts for ESA will support this strategy by:

- Providing ongoing energy education to improve customer engagement with energy efficiency.
- Leveraging ESA as the lead offer to engage customers and drive participation in other programs, as appropriate.
- Promoting ESA as part of a comprehensive package of offerings that customers value and find easy to understand.

- Helping landlords understand program benefits for their properties and their tenants.

For CARE, SDG&E's ME&O efforts have proven successful in increasing enrollment and maintaining participation. For the 2021 through 2026 program cycle, CARE ME&O objectives will continue to include attracting new customer enrollments, maintaining eligible customer enrollments and leveraging partnerships to connect with hard-to-reach audiences. The ME&O strategy will support the CARE Program target of maintaining 90% or more penetration by:

- Continuing to build customer awareness of the program.
- Driving customer enrollment in CARE through targeted ME&O.
- Optimizing recertification communications to retain eligible customers enrolled in the program.

For FERA, SDG&E's ME&O focus is to reach a 50% penetration rate by 2026. Objectives for this effort include increasing new customer enrollments, increasing awareness of the program, keeping eligible customers on the program through recertifications and leveraging community partners to spread awareness and connect customers with the FERA Program.

If approved for the 2021 through 2026 program cycle, the ME&O strategy for the FERA Program 50% penetration target will:

- Actively promote FERA as a targeted offer to non-qualifying CARE customers.
- Make the FERA Program more prevalent in ME&O communications, including as a standalone program, to increase awareness of the program.
- Implement an enrollment campaign that targets potentially eligible customers.

Creative Messaging Strategy

In its messaging, SDG&E will highlight the convenience and ease of program enrollment, but also communicate solutions that mitigate challenges and barriers experienced by customers related to their energy bill or energy burden. To effectively communicate with customers, SDG&E will follow messaging strategies that provide simple, clear and direct communications. Messaging strategies will focus on:

- **Promoting program benefits** - Concentrating on the solutions and positive impacts of ESA, CARE and FERA that appeal to target audiences. Examples of benefit-focused messaging include: “Help is available if you’re having difficulty paying your energy bill” or “SDG&E can help increase the value, comfort and safety of your home.”
- **Leveraging financial points** - Explaining to customers that SDG&E can help decrease energy costs and make energy bills more manageable. Examples of financial-focused messaging include: “You can save 30% or more each month on your energy bill” or “Find out how SDG&E can help provide no-cost energy-saving improvements for your home.”
- **Building an emotional connection** - Understanding that customers respond better when the message is more meaningful and relatable to them. Examples of ways SDG&E can make a deeper connection to overcome trust, cultural and language barriers include: sharing testimonials from participating customers, creating different materials to reflect multicultural differences (transcreation) or working to spread the word with trusted community partners.

- 1 • **Integrating relevant solutions** - Aligning messaging when appropriate with
2 other campaigns. For example, adding rate education, Energy Efficiency (EE)
3 and Energy Management Technology solutions in energy education materials.
- 4 • **Post-enrollment messaging** - Continued communication beyond the enrollment
5 process based on an understanding of customer needs with solutions to modify
6 behavior for greater energy savings. SDG&E's proposal for digital engagement
7 with customers will help deliver persistent energy savings through relevant
8 follow-up communications.

9 **F. ME&O Tactics**

10 As previously discussed, SDG&E continues to find that the most effective method to
11 drive enrollments is through a comprehensive and integrated ME&O strategy that includes a
12 coordinated mix of general awareness, direct marketing and community engagement tactics. To
13 be effectively integrated, SDG&E's tactical approach is based on providing consistent and
14 reinforced communications to specific targeted audiences using a layer of broader advertising
15 that creates general program awareness, then funnels down to more targeted media with specific,
16 individual, targeted messaging. These communication tactics include calls to action that drive
17 customers to program webpages (*e.g.*, sdge.com/ESA) for more information about the programs
18 and enrollment.

19 **1. General Awareness**

20 To promote general awareness, SDG&E will utilize:

- 21 • Both general market and streaming television. General market television
22 provides a layer of overall awareness which, when coupled with other
23 tactics, helps to reinforce messaging. Streaming television (through a
24 cable provider or online) allows SDG&E to target markets a little deeper

1 and provides measurable metrics on customer engagement such as the
2 percentage of customers that watch an advertisement all the way through.

- 3 • Messaging included in monthly customer bill packages, such as on-bill
4 messages and bill inserts to non-ESA/CARE customers. To reinforce
5 overall awareness of these programs, SDG&E will continue to include
6 program messaging in all customer bills, which will also include non-
7 ESA, non-CARE, and non-FERA customers.
- 8 • Print will be used to target hard-to-reach customers in the back country
9 and within multilingual communities. Print advertising will be produced
10 in languages most prevalent in SDG&E's service territory such as
11 Spanish, Chinese, Vietnamese and Tagalog.
- 12 • Online advertising includes banner ads, pre-roll video, paid search and
13 paid social media. While online media will drive general awareness, it
14 also provides an opportunity to use more selective targeting and
15 messaging by enabling SDG&E to track performance, test new methods
16 and optimize tactics going forward. This will be further discussed in
17 Section G below.
- 18 • Organic social media will also be used to promote these programs through
19 SDG&E's accounts on Instagram, Facebook, Twitter and Pinterest.
- 20 • Community engagement with partners who play an integral role in
21 spreading general program awareness. See Section F.3 below for more
22 information.

1 **2. Direct Marketing**

2 In the 2021 through 2026 program cycle SDG&E is proposing to give customers a choice
3 in the way that SDG&E communicates with them by providing an e-mail option and exploring
4 text messaging options. SDG&E’s email campaigns will continue to utilize a “nurture”
5 approach, which takes prior customer action into consideration to target customers with specific
6 follow-up messaging. For example, if a customer clicks on an initial email offer but does not
7 enroll, a subsequent email will be automatically generated with messaging that provides
8 enrollment assistance. If the same customer still does not act, an additional email with different
9 messaging can be sent to prompt enrollment. In this sense, SDG&E will be “nurturing”
10 customers through the process.

11 SDG&E will also be placing tracking pixels on outbound emails allowing us to track
12 customers from the time they click on the email all the way through the online application
13 process to when they submit. This is discussed in more detail in Section G below.

14 While SDG&E has found through focus groups and quarterly residential research that
15 most segments of customers like to receive information via email, SDG&E also understands that
16 some customers prefer receiving paper mail. As such, SDG&E will continue to use direct mail
17 to target these customers with technology-free options to apply. However, quarterly customer
18 research is starting to show more acceptance by seniors of more technical messaging platforms.
19 SDG&E will continue to monitor this through our research to see if this trend continues.

20 In 2016, SDG&E launched a new component in direct mail efforts aimed at increasing
21 enrollment in CARE by delivering personalized rate comparisons. SDG&E will continue to
22 identify households that would likely qualify for CARE but are not currently enrolled. In
23 addition, SDG&E will undertake a specific targeted effort that is similar for the FERA Program.
24 These customers then receive a bill comparison through a targeted direct mail letter and email

1 campaign that shows the household’s utility bill from the last 12 months compared to the
2 household’s utility bill if the customer qualified for the CARE or FERA discount. The letter will
3 direct customers to SDG&E’s website where they will get a description of the CARE or FERA
4 Program, eligibility requirements necessary to enroll, and directions for enrolling or renewing
5 either online or through interactive voice response (IVR).

6 SDG&E intends to leverage successful CARE direct marketing efforts in the 2021
7 through 2026 program cycle by incorporating an additional step to help prompt customer
8 completion of the audit that kickstarts the ESA Program journey. Customers will have the
9 opportunity to receive an energy and water conservation kit upon completion of the new ESA
10 Program online audit and direct marketing will support this through continued messaging and
11 promotion.

12 **3. Community Outreach and Engagement**

13 Community outreach and engagement allows SDG&E to connect and directly engage
14 customers with energy savings solutions in the communities where they work and live. These
15 outreach activities provide information about SDG&E’s customer assistance programs to
16 potentially eligible customers. SDG&E has established various successful partnerships with
17 trusted social service and non-profit entities in targeted communities and will continue to do so
18 for the 2021 through 2026 program cycle. These partners can help to connect customers to
19 customer assistance programs who may be unaware, concerned, afraid or have a language
20 barrier. To assist community partners in outreach efforts, SDG&E intends to deliver
21 presentations, workshops, trainings and participate at community events. A few key areas of
22 community engagement that SDG&E proposes to include:
23

1 **Community Events**

2 Every year, SDG&E participates in hundreds of community events and presentations
3 throughout its service territory. By participating in local events and spending one-on-one time
4 with customers in its communities, at events and locations familiar to them, SDG&E is not only
5 able to build trust, but also able to assist customers who may need extra assistance or in-language
6 help enrolling in SDG&E’s programs. In the future, SDG&E will attend small, community-level
7 events such as multicultural celebrations, health and wellness fairs, safety and emergency
8 preparedness expos and environmental events – places where people are already going for more
9 information and assistance. Bilingual staff at these events will help customers complete the
10 various customer assistance program enrollment forms. Although not always the best place to
11 get large numbers of new enrollments, community events are great places to build trust and
12 program awareness. Community events also offer effective forums for SDG&E to reach special
13 audiences who may not always engage through traditional marketing tactics. Such audiences
14 include customers in rural areas, customers who are elderly and customers with disabilities or
15 other special needs.

16 **SDG&E Employees**

17 Educating and engaging SDG&E employees in the promotion of bill saving solutions like
18 the CARE Program to customers is an important component of SDG&E’s outreach efforts.
19 Utilizing employees as ambassadors for these solutions, all of whom have their own network of
20 family and friends, will be another way that customers can learn and engage in these programs.
21 As part of SDG&E’s outreach efforts, ESA, CARE and FERA Program education will be
22 provided a minimum of two times a year to the general employee population through a variety of
23 channels including digital presentation boards and employee fairs.

1 **SDG&E Customer Contact Center Phone Enrollment**

2 SDG&E will continue to utilize its Customer Contact Center representatives to assist
3 customers calling to establish new service, make payment arrangements or inquire about the
4 CARE Program. Customers calling the Customer Contact Center will be offered CARE through
5 the IVR system. Customers speaking with an Energy Service Specialist (ESS) will also be
6 informed about the CARE and FERA Programs and referred to the automated enrollment IVR,
7 the CARE online enrollment process or mailed an application.

8 **Branch Offices**

9 Customers potentially eligible for the CARE and ESA Programs often visit SDG&E
10 Branch Offices each month to pay their bills in person. Branch office staff are trained to assist
11 with enrollment efforts for the CARE Program and provide leads for ESA Program contractors.
12 SDG&E’s outreach team will support the branch offices during the summer with lobby assistants
13 who speak represented languages in diverse areas. The outreach team will use representatives
14 who speak languages specific to communities in the SDG&E service territory, such as Arabic,
15 Mandarin and Russian. SDG&E will continue to be successful in assisting customers where
16 English is not the primary language by strategically addressing local language preferences and
17 placing teams in bill payment offices that often serve these specific communities.

18 **Live Call Campaign**

19 Utilizing the data from a prospect list, SDG&E plans to continue successful
20 implementation of a telephone outbound call campaign targeting potential low-income
21 households. Customers will be called and educated on ESA, CARE and FERA. The telephone
22 representative will fill out and submit the appropriate application on the customer behalf with the
23 provided information and customer approval.

1 In locations where there are hard-to-reach or Disadvantaged Communities customers not
2 currently enrolled, SDG&E will implement targeted door-to-door outreach that is coordinated
3 with the Live Call Campaign to drive increased enrollment percentages. In locations where there
4 is no concentrated population large enough to make this type of outreach cost effective, SDG&E
5 will continue the targeted Live Call Campaign without the additional door-to-door component.
6 SDG&E intends to repurpose existing budget for Live Call campaigns to add this component in a
7 way that will not increase overall outreach expenditures.

8 **Energy Solutions Partner Network**

9 The ESP Network consists of more than 190 grassroots CBOs, who take an active role in
10 helping SDG&E educate and engage customers in connecting to energy solutions. These CBOs
11 tend to be small, grassroots in nature and represent the diversity of SDG&E's service territory
12 both by zip code and where there is a high opportunity of enrollment in the various programs.
13 ESPs support several customer segments including: immigrants, low income, military,
14 multicultural, tribal, non-English speaking, rural, seniors, social services, special needs and
15 youth.

16 The ESP Network will help SDG&E promote and enroll customers in a wide variety of
17 solutions including customer assistance programs like ESA, CARE or FERA, but also including
18 energy efficiency, demand response, services, tools and pricing plans offered by SDG&E.
19 Partners will promote programs through a variety of outreach tactics which may include hosting
20 SDG&E presentations, sending e-mails, posting on social media channels (Facebook, Twitter
21 and Instagram), website updates and providing SDG&E booth space at their events. By working
22 through trusted neighborhood-level organizations, SDG&E will have a team of trusted
23 ambassadors throughout the service territory that serve most unique communities.

1 SDG&E’s High Fire Threat District (HFTD) is primarily located in the eastern part of
2 SDG&E’s service territory and includes several hard to reach areas. Many customers who fall
3 within the definition of the Access and Functional Needs⁴ (AFN) population may be eligible to
4 participate in the CARE Program. As such, SDG&E will conduct targeted marketing and
5 outreach of low-income programs to the AFN community to increase its participation rate via the
6 CBO and ESP network who work with the AFN community. SDG&E will look to expand its
7 ESP network to include more CBOs and service agencies that work with the AFN community in
8 the HFTD.

9 Capitation Agencies

10 Partnering with social service agencies, such as WIC offices and other non-profit
11 “intake” organizations continues to be an effective and efficient way to enroll SDG&E’s hardest-
12 to-reach customers in the CARE and FERA Programs. These are trusted organizations in the
13 community that help connect high-risk and low-income individuals and families to state and
14 federally-funded assistance programs. The majority of these organizations are also located in
15 low-income, diverse communities serving multicultural/multilingual, seniors, veterans,
16 customers with disabilities or special needs and LEP audiences. A \$20 “capitation fee” will be
17 provided to these partners for each successful enrollment.

18 For the 2021 through 2026 program cycle, SDG&E proposes to continue to partner with
19 these organizations to engage and enroll customers in these programs. These organizations have
20 been essential in SDG&E’s achievement of the CARE Program 90% enrollment target.

21 However, with the CARE Program penetration rate above 90%, the program is reaching

⁴ The De-Energization proceeding, Rulemaking (R.) 18-12-005, defined several groups as it relates to Public Safety Power Shutoff (PSPS) events, including the AFN population. *See* Decision (D.) 19-05-042 at 77-83 and Appendix A.

1 saturation and remaining unenrolled customers are harder to find. The Capitation Agencies
2 should continue to be an effective and efficient way to engage customers, especially the hard-to-
3 reach and limited English proficient (LEP) segments. SDG&E will evaluate existing Capitation
4 Agencies annually and continue to explore new partnership opportunities. In addition, SDG&E
5 has requested additional funding for FERA capitation enrollments. SDG&E also proposes to test
6 providing a capitation fee to agencies to assist with ESA Program audit completion.

7 **2-1-1 San Diego**

8 2-1-1 San Diego (2-1-1) connects people in San Diego with community, health and
9 disaster services through a toll-free phone service and searchable online database via their
10 website. The 2-1-1 services include: disaster relief, emergency financial assistance, housing,
11 food resources like Cal-Fresh, literacy, LIHEAP referrals and much more. As a partner, 2-1-1
12 screens callers for eligibility in SDG&E's customer assistance programs and offers over-the-
13 phone enrollment services. Additionally, by leveraging the calls they receive from low-income
14 customers and people at high risk in other public assistance programs, 2-1-1 can successfully
15 offer customers the ESA, CARE and FERA Programs. SDG&E plans to continue to work with
16 2-1-1 to enroll customers on CARE and FERA and other customer assistance offerings including
17 ESA, Medical Baseline and Level Pay Plan.

18 **Multifamily Organizations**

19 There is a large focus on serving the multifamily sector with ESA offerings and SDG&E
20 recognizes the importance of reaching the people authorized to make energy efficiency decisions
21 for multifamily properties. Many of these property owners and management companies are
22 members of various apartment and housing associations. To reach these decision makers,
23 SDG&E, and in particular the SDG&E Single Point of Contact for multifamily housing, will

1 continue to partner with organizations such as San Diego Housing Federation, San Diego County
2 Apartment Association, Southern California Rental Housing Association and San Diego
3 Interfaith Housing to ultimately reach low-income customers that reside in multifamily housing.
4 By partnering with these organizations and with the property decision makers, SDG&E can make
5 sure there is a more uniform outreach to all eligible properties for higher participation.

6 **California LifeLine**

7 In D.19-04-021, the Commission approved a LifeLine pilot with Boost Mobile, Inc.
8 (Boost Mobile) to provide CARE customers with low-cost cell phones. To help bridge the
9 digital divide, Boost Mobile will be partnering with SDG&E at CARE outreach events to enroll
10 eligible customers for a period of two years from the date of pilot implementation, which started
11 on July 22, 2019. Provision of low-cost cell phones to CARE eligible customers is expected to
12 allow CARE customers to enroll and recertify eligibility using their mobile device and provide
13 another avenue for SDG&E to communicate CARE Program information to participating
14 customers.

15 **G. Metrics**

16 SDG&E understands that aligning how, what, and when data is measured is essential to
17 understanding the effectiveness of an ME&O campaign. This data allows for leveraging
18 successes or making course corrections to achieve goals.

19 SDG&E will continue the use of monthly metrics to determine whether ME&O efforts
20 are moving the needle in the right direction. The first step is to establish a starting point or
21 baseline, to which monthly results can be compared. SDG&E will do this by reviewing results
22 from the prior month, as well as comparing results to marketing industry standards. The second
23 step will be to track monthly results, as detailed in the monthly reports to the Commission and

1 analyze them for consistent trends. The last step is to revisit tactical strategies and adapt them (if
2 needed) to maximize results and achieve program goals.

3 SDG&E proposes the following ME&O metrics for the 2021 through 2026 program
4 cycle:

5 **General Marketing**

6 SDG&E will follow industry best practices in media buying as it seeks to achieve
7 television targets and make sure advertisements are run at the contracted times to reach the
8 correct audience. For print, SDG&E will continue to manage the marketing agencies to make
9 sure all advertisements run within SDG&E's campaign timing.

10 **Streaming Television**

11 SDG&E will monitor and track the View Through Rate (VTR) to confirm whether
12 customers are watching advertisements to completion.

13 **Online Media**

14 SDG&E will continue to track the metrics from the current program cycle, such as clicks,
15 click-through rate (CTR) and impressions. In 2019, SDG&E's marketing team also implemented
16 a new tracking mechanism that places pixels in online banner advertisements to follow the
17 customer's actions and journey from banner click to submission of the application. This
18 functionality provides SDG&E insight on the number of customers that make it from banner
19 click to submission, but most importantly shows where customers drop off during the application
20 process. This critical information allows SDG&E to focus on problematic areas and adjust its
21 online application to help maximize the submission success rate.

22 SDG&E has established the following performance benchmarks for SDG&E's CARE
23 and ESA online advertising:

Table 1: Online Performance Benchmarks

Media Type	Metric	SDG&E Benchmark
Display Banners	CTR	.15%
Online Video	VTR	25%
Paid Social Media	CTR	.65%
Paid Search	CTR	18%

The above benchmarks have been established over multiple years of campaign management and will continue to be optimized.

Email

SDG&E will track many of the same metrics established for online media above using the same techniques. SDG&E plans to implement the use of pixel tracking in outbound emails for the 2021 through 2026 program cycle. This will allow us to track a customer from the click through the application until the drop-off or successful submission. Again, this will help show where customers might find difficulty in the application and inform potential improvements to the process. This may also allow follow-up with customers who do not successfully complete an application.

SDG&E has established the following performance benchmarks for CARE and ESA email campaigns and proposes to maintain the levels provided in Table 2 below for the 2021 through 2026 program cycle. With funding approval for FERA, SDG&E will establish similar benchmarks.

1 **Table 2: Email Performance Benchmarks**

Metric	CARE Promo	CARE Recertification	ESA Promo
Open Rate	34%	54%	35%
Click Rate	5%	36%	4%
Effective Rate	17%	68%	10%

2
3 **Source Codes**

4 SDG&E will continue to utilize source codes for several channels, including community
5 engagement and partner education and outreach. These source codes will allow SDG&E to track
6 the total number of ESA Program audits completed and total number of CARE and FERA
7 applications submitted through these various channels.

8 **II. CONCLUSION**

9 SDG&E respectfully requests the Commission to approve the ESA, CARE and FERA
10 ME&O plans for the 2021 through 2026 program years as described herein, and the associated
11 ME&O budgets as prepared in this Application.

12 This concludes my prepared direct testimony.
13

1 **III. STATEMENT OF QUALIFICATIONS**

2 My name is Horace Tantum IV. My business address is 8326 Century Park Court,
3 CP62C, San Diego, California, 92123-1569. I am employed by San Diego Gas & Electric
4 Company (SDG&E) as the Marketing Manager for Customer Programs, Services and Safety. I
5 have been employed by SDG&E as the Marketing Manager since May 2014. I am responsible
6 for leading the marketing team to develop and implement marketing plans for residential and
7 commercial/industrial customer programs. Prior to my current position, I held the position of
8 Senior Communications Advisor.

9 Before joining SDG&E in December 2012, I spent nearly two years as the Marketing
10 Director for MJE Marketing, where I was responsible for the development, implementation and
11 supervision of integrated marketing, advertising, public relations and social media campaigns for
12 clients including the Port of San Diego, California Bank & Trust, First 5 San Diego, and the City
13 and County of San Diego. From 2002-2011, I was a Senior Account Supervisor for Brandon
14 Taylor, SDG&E's general market advertising agency of record.

15 I graduated from the University of Colorado with a Bachelor of Arts degree in Economics
16 and a Master of Business Administration degree with marketing emphasis. I have more than 25
17 years of experience in marketing, communications, advertising, business management and
18 creative direction in various industries.

19 I have previously testified before the California Public Utilities Commission.