

Application: A.18-11-015

Exhibit No.: SDG&E-

Witness: _____

SURREBUTTAL TESTIMONY OF
DOUGLAS S. WHITE
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



March 2, 2021

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1 **SURREBUTTAL TESTIMONY OF**
2 **DOUGLAS S. WHITE**

3 **I. INTRODUCTION**

4 The purpose of my Surrebuttal Testimony is to address the January 22, 2021 Prepared
5 Rebuttal Testimony of Mr. Michael Murray for Mission:data Coalition (“Mission:data”) regarding
6 San Diego Gas & Electric Company’s (“SDG&E”) proposed improvements to the click-through
7 authorization process (“CTP”). Specifically, my testimony addresses the following contentions
8 made in Mission:data’s rebuttal testimony:

- 9 • Mission:data’s further clarifications regarding its recommendation for
10 Service Level Agreement (“SLA”);¹
- 11 • Mission:data’s mischaracterization regarding SDG&E’s views on data
12 format standardization;² and
- 13 • Mission:data’s recommendation that the investor-owned utilities (“IOUs”)
14 be required to standardize data delivery formats.³

15 SDG&E’s failure to address any individual issue in this surrebuttal testimony does not
16 imply agreement by SDG&E with any argument, position or proposal asserted by Mission:data.

17 **II. MISSION:DATA'S RECOMMENDATIONS FOR A SERVICE LEVEL**
18 **AGREEMENT SHOULD BE REJECTED**

19 As set forth in further detail in my Rebuttal Testimony, an SLA is neither necessary or
20 appropriate for a wide variety of factual and policy issues.⁴ In its Rebuttal Testimony,
21 Mission:data seeks to clarify its prior recommendations by attempting to explain that all IT

¹ Prepared Rebuttal Testimony of Michel Murray for Mission:data Coalition (“Murray Rebuttal Testimony”) at pp. 3-6.

² *Id.* at p. 8.

³ *Id.* at pp.6-8.

⁴ Rebuttal Testimony of Douglas S. White (Chapter 1) at pp. DSW-3 to DSW-6.

1 projects are designed with some sort of service level expectations and that all applications assume
2 some performance parameters.⁵ However, the fact that the IOUs may have some internal service
3 level expectations or performance parameters does not justify the Commission’s imposition of a
4 standardized (or individualized) SLA across the utilities.

5 As an initial matter, it is important to understand that Mission:data’s use of the phrase
6 “click-through platform” is inaccurate.⁶ SDG&E’s click through authorization process (“CTP”),
7 which is how SDG&E has referred to the Click Through in this proceeding, is not a single
8 “platform,” but rather a process which relies on numerous different applications and programs to
9 complete. For example, some of the primary components include a: (1) Click Through web
10 application; (2) My Account web application; (3) Identity and Access Management application;
11 (4) Customer Relationship and Billing application; (5) Customer Authorization application; (6)
12 API / Batch File Data Provisioning; (7) API Gateway; and (8) Service Bus for complex
13 integrations. Most of these applications were purchased, are maintained by in-house personnel,
14 and are hosted in the SDG&E data center. With the exception of only one of the above-named
15 systems, related to customer billing functions, SDG&E does not enter into service level
16 agreements with respect to applications or programs that are maintained by in-house personnel and
17 hosted in the SDG&E data center.⁷

18 While SDG&E maintains certain performance parameters (such as with respect to
19 availability) for each of its in-house applications, it does not enter into SLAs regarding those in-
20 house applications; especially not the type of SLAs Mission:data proposes that would include
21 penalty provisions for underperformance. Indeed, the fact that SDG&E’s various in-house

⁵ Murray Rebuttal Testimony at pp. 4-5.

⁶ *Id.* at p. 4.

⁷ SDG&E notes that it does have an SLA with respect to its Customer Authorization application as that application utilizes a third-party vendor cloud platform as a Platform as a Service (“PAAS”).

1 applications and components that support CTP already have specific performance parameters,
2 there is no need for the type of SLAs that Mission:data proposes.

3 Most importantly, SDG&E does not utilize the systems and software listed above solely
4 for the CTP. In fact, with the exception of item 1 above (the CTP web application), the rest were
5 designed and implemented to serve other parts of SDG&E's business as their primary function
6 and, thus, were not primarily implemented to serve the CTP. As such, the levels of performance
7 that SDG&E might expect from such service must first meet the needs of SDG&E's own business.
8 SDG&E secondarily utilizes those systems to serve the CTP to deliver timely and accurate data.
9 Moreover, each of these components has its own maintenance schedule (which requires its own
10 downtime) and may be subject to issues irrespective of the CTP. Accordingly, while the CTP web
11 application may be operational and available for use, any downtime (scheduled or unplanned) of
12 any one of the individual CTP components listed above will affect the overall availability of the
13 CTP to customers and DRP's. Any disruption of one of the individual component applications or
14 programs can render the CTP unavailable.

15 Deriving an SLA for SDG&E's CTP would therefore be complicated and impractical
16 because each of these systems and applications supporting the CTP are independent, with
17 individual maintenance schedules and recovery targets when issues are encountered. To
18 implement a CTP 99.8% SLA, SDG&E would have to synchronize the maintenance schedules and
19 recovery times across all of these systems and applications and be forced to impose the same
20 99.8% SLA on those individual systems to achieve this target. This is not a realistic expectation
21 given the magnitude of distinct program and applications SDG&E's CTP relies on. Such an
22 endeavor would also require significant investment of cost and infrastructure to achieve.

23 Hypothetically, if the CPUC were to order a decoupling of systems from the CTP and the
24 rest of SDG&E's business operations, and if SDG&E were to build separate or isolated systems
25 that are designed only to serve the CTP and to meet some guaranteed level of service performance

1 as Mission:data suggests, SDG&E would be starting over, and incurring incredible costs that
2 would be both an unwarranted and unwise use of ratepayer funds. Applying some SLA standard,
3 as stated in my Rebuttal Testimony, to SDG&E is unreasonable, inappropriate and unworkable.
4 Mission:data's requests for an SLA for the CTP should be rejected on their lack of any merit or
5 relevance.

6 **III. MISSION:DATA'S ASSERTIONS REGARDING STANDARDIZATION ARE**
7 **INACCURATE**

8 **A. Contrary to Mission:Data's Statement, SDG&E Has Considered**
9 **Standardization**

10 In its Rebuttal Testimony, Mission:data asserts that "SDG&E does not even believe it
11 would be prudent to examine the concept of standardization with the other IOUS, let alone attempt
12 standardization of the data formats."⁸ This statement is blatantly false.

13 In response to Mission:data's self-serving data requests, SDG&E accurately stated there is
14 no requirement to standardize CTP file formats – which remains true. Mission:data misconstrues
15 this response to argue that SDG&E is somehow unwilling to coordinate with others regarding data
16 format standardization. That is simply untrue.

17 In fact, SDG&E has considered standardization at various steps in its Rule 32 automation
18 to serve DRPs as well as the CTP. However, SDG&E submits that the issue is complicated and
19 there are numerous considerations. Ultimately, SDG&E decided against standardization given the
20 circumstances and for a variety of reasons. The three main reasons are:

- 21 1) the complexities in deciding on what standard should be used across utilities with
22 regard to parties' preferences;
- 23 2) the differences between IOUs' systems; and

⁸ Murray Rebuttal Testimony at p. 8.

1 3) increased costs to ratepayers that would result from trying to standardize these
2 differences.

3 When deciding what standard should be used, it is crucial to recognize that third parties
4 who receive IOU data do not always agree on what the format standard should be. For example,
5 one of SDG&E's largest third-party recipients of customer energy usage data (meter data only) has
6 received data for years from SDG&E in the Green Button format. However, this same third party
7 has recently expressed their preference to receive data going forward in a comma separated values
8 (CSV) format, stating the Green Button standard for that particular third party is more difficult to
9 process related to the volume of data they receive. This CSV format is the very technology that
10 Mission:data criticizes SDG&E for using in its CTP.⁹

11 SDG&E is aware that there are various needs and opinions on this matter that need to be
12 adequately vetted. Notably, Mission:data itself acknowledges that:

13 I understand that CSV files are useful for opening individual files in
14 spreadsheet programs such as Microsoft Excel, CSV files in automated
15 platforms have largely been abandoned throughout the industry in favor of
16 structured data formats, such as XML or JSON.¹⁰

17 But Mission:data provides no evidence, citations, or affidavits that support the notion that CSV
18 files have been "abandoned" at all, let alone widely. Nor does Mission:data explain which
19 "industry" it is referring to when it says that CSV files have been abandoned throughout the
20 industry.¹¹

⁹ Murray Rebuttal Testimony, at p. 7.

¹⁰ *Id.*

¹¹ *Id.*

1 Historically, a discussion of standardizing CTP data has not been undertaken, nor ordered
2 by the CPUC when it has approved each of the IOUs' Rule 24/32 filings.¹² The Commission
3 could have undertaken such an effort at any step of the long regulatory process, going back to
4 2012 and the first Rule 24/32 decision.¹³ In fact, the Commission has agreed implicitly all along,
5 by granting approval of each IOU's individual and sometimes very different data proposals, that
6 differences exist between the IOUs' systems, which would include formats.

7 Within the Rule 24/32 regulatory proceedings, without exception, the cost estimates for
8 each IOUs' proposals have also differed greatly.¹⁴ This is due to the fact that whatever
9 enhancements are being required will cost each IOU a different sum because each will either: (1)
10 choose to leverage what currently exists specific to the individual IOU, which notably differs; or
11 (2) design some IT functions potentially with less than ideal "workarounds" if no other suitable
12 path exists; or even (3) which is to build something new if the existing cannot serve the new
13 purpose related to the CTP and there are no possible workarounds, depending on what is most cost
14 effective. It is notable that the Commission has also agreed that the IOUs could differ on what
15 data they provide to DRPs given their system differences, as demonstrated by the fact that
16 Resolution E-4868 ordered each IOU to provide their separate and distinct list of data elements.¹⁵

¹² SDG&E's Electric Rule 32 governs the direct participation of customers in the energy markets, while the same tariff is Electric Rule 24 at both PG&E and Southern California Edison. Herein the rule is referred to as Rule 24/32 when discussing all utilities, and Rule 32 on items specific to SDG&E.

¹³ Decision 12-11-025 (later amended by Decision 13-12-029) set policies for the implementation of direct participation in the CAISO markets for demand response. See also subsequent rulings: D 15-03-042, D.16-03-008, D. 16-06-008, SDG&E's advice letter 3030-E (<http://regarchive.sdge.com/tm2/pdf/3030-E.pdf>); also D. 17-06-005.

¹⁴ Resolution E-4868 addresses PG&E Advice Letter (AL) 4992-E, SCE AL 3451-E, and SDG&E AL 3030-E, filed on January 3, 2017, which each contained very different budgets for their implementations.

¹⁵ In Resolution E-4868, see the Attachments, which are unique to each IOU, listing the required data elements each IOU is to provide as their specific "expanded data set."

1 Simply put, the Commission so far has chosen not to undertake the process to require
2 standardization of data in the CTP.

3 Each IOU began this process to serve DRPs from their own unique starting point with their
4 IT architecture and systems at that time. SDG&E, in making each proposal to serve its Rule 32
5 customers and the CTP, has made proposals that leverage, to the greatest extent possible, existing
6 systems in order to contain costs. For example, in its Advice Letter (AL) 3153-E, SDG&E
7 proposed to meet the added performance metrics for the CTP by using an existing SDG&E
8 internal system which was being used first to track web metrics not related at all to Rule 32, DRPs
9 or the CTP. SDG&E proposed this approach, to use an “off the shelf” purchased software already
10 being used elsewhere in its business to also now track those newly required CTP metrics, because
11 it could do so without any additional or incremental cost to ratepayers.¹⁶ Importantly, AL 3153-E-
12 B, filed as a supplemental to clarify the nomenclature of performance metrics to be monitored by
13 SDG&E, stated:

14 Wherever possible, SDG&E is aligned with the other IOUs on the
15 definitions. However, it has been discovered that there are system
16 differences between the IOUs, and the metrics being provided will
17 necessarily differ. This is particularly true if the IOU does not have the
18 control to change that metric without abandoning its plan to use an existing
19 system.¹⁷

20 The Commission has consistently recognized and supported this path by approving such requests
21 for different formats, different data, or in this case approving the use of different metrics, as it did
22 in approving these advice letters (AL 3153 -E and 3153-E-A) and approaches.¹⁸

¹⁶ AL 3153-E, November 22, 2017, at page 2.

¹⁷ SDG&E AL 3153-E-B, August 29, 2018, at page 2.

¹⁸ SDG&E Advice Letter 3153-E and supplemental 3153-E-B were approved via disposition letter, effective as of September 28, 2018. <http://regarchive.sdge.com/tm2/pdf/3153-E-B.pdf>

1 SDG&E believes the Commission has acted prudently to date when it recognized the IOU
2 system differences and different formats. It appears that the opportunity to standardize data was
3 perhaps missed at the beginning of Rule 24/32 automation and the CTP. In this instance, there
4 may be an opportunity for future format alignment, and SDG&E is always open to such
5 discussion. However, we must recognize the complexities, the time it would take for such a
6 process to be done adequately to develop an evidentiary record on such an important topic, and
7 that system differences may make the necessary cost/benefit analysis of adding standardization
8 difficult or cost prohibitive for so few parties using the CTP. Standardization must not be
9 undertaken merely for the sake of standardization alone when ratepayer funding is used.

10 **B. Standardization of Data Delivery for CTP is Out of Scope and Unwarranted**

11 In its Rebuttal Testimony, Mission:data recommends that the IOUs now be required to
12 standardize data delivery formats as a condition of the Commission’s approval of their CTP
13 applications.¹⁹ SDG&E disagrees that Commission-ordered standardization is either appropriate
14 or warranted as it is clearly out of scope of this proceeding.²⁰ While the Commission is being
15 asked to determine whether the IOU’s proposed click-through enhancements are “just and
16 reasonable,” the issue of standardization of data delivery formats is not in scope.²¹

17 But even if standardization was in scope, it would be unwarranted and inappropriate at this
18 time for all of the reasons discussed above; namely that the parties have not done any of the work
19 that would be necessary in order to agree on a standard. More fundamentally, the parties have not
20 provided or elicited any evidence in this proceeding on which standards exist widely and which
21 should even be considered, nor how to achieve standardization given the IOU system differences,

¹⁹ Murray Rebuttal Testimony at pp. 6-9.

²⁰ See *Assigned Commissioner’s First Amended Scoping Memo and Ruling* at pp. 5-6 (listing the twelve issues in scope in this proceeding).

²¹ *Id.*

1 Nor has any party established in this proceeding what the benefits are of standardization in this
2 present instance of the IOUs' CTPs relative to the costs.

3 If the Commission and SDG&E were to entertain the thought of standardization now as
4 Mission:data proposes, SDG&E can relay these facts:

- 5 1) Not all DRPs have requested nor have they indicated a preference for any single
6 format;
- 7 2) No DRP using SDG&E's CTP has requested SDG&E to use a single or different
8 data standard;
- 9 3) Changing over SDG&E's systems to provide CTP data in a different format,
10 hypothetically and only if so ordered, would take additional funding not already
11 requested by SDG&E in this application as well as completely new cost estimates
12 (and time to do those estimates); and
- 13 4) No analysis has been done, nor entered into the record, as to the benefits of using
14 any specific one standard when compared to the relative costs for a pilot (Demand
15 Response Auction Mechanism, or DRAM) and SDG&E's CTP, which is currently
16 serving merely 2 demand response providers to date.²²

17 Also, it is important to note that the timing matters. It is worth noting that SDG&E's CTP
18 is utilized by its DRAM sellers of DR. All this work to date for SDG&E's Rule 32 automation
19 and its CTP has been done primarily to support an effort (DRAM) that is still a pilot, is still to be
20 evaluated for cost effectiveness, and on which the Commission has not decided yet to be a long-
21 term program.²³ Aligning or standardizing data formats in the CTP may not be prudent before we

²² SDG&E would want to apply the same criteria to the issue of data standardization that it applied to other CTP enhancements – namely, is there a good business reason for doing so, what are the costs and benefits to ratepayers, and is this particular enhancement worthy of that ratepayer cost? *See Updated Direct Prepared Testimony of Neil Umali at p. NU-11.*

²³ D.19-07-009 at p. 9.

1 know that the IOUs will even continue to support Rule 32 and the DRAM long-term. Most likely
2 it is only then SDG&E will be able to determine if the costs of standardizing data formats have the
3 chance to be recouped through the benefits of the program and not be a burden on ratepayers.
4 Mission: data has not made a compelling case for data standardization at this time. SDG&E is
5 open to that process when it is warranted.

6 **IV. CONCLUSION**

7 This concludes my surrebuttal testimony.

1 **V. STATEMENT OF QUALIFICATIONS**

2 My name is Douglas S. White. I am employed by San Diego Gas & Electric Company
3 (“SDG&E”). My business address is 8326 Century Park Court, San Diego, CA 92123. I am the
4 Customer Programs Policy and Strategy Manager for SDG&E. My primary responsibilities
5 include management of regulatory strategy, proceeding participation, compliance filings, and
6 policy development for all customer program offerings.

7 Prior to SDG&E, I spent over a decade in-house with semi-regulated entities, including
8 wireless and telecommunications providers, developing policy. Additionally, I served as policy
9 advisor to the Speaker of the New Jersey General Assembly, Joseph Roberts, and managed the
10 chamber’s utilities committee. I started my career in the Washington, DC, office of California
11 Governor Gray Davis.

12 In 2003, I graduated from the University of Massachusetts Amherst with a Bachelor of
13 Business Administration in Management. I also received a Master of Public Administration from
14 New York University in 2007, with an emphasis in public policy analysis.

15 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