

Company: San Diego Gas & Electric Company
Application: 17-09-_____
Exhibit No.: SDG&E-_____

PREPARED TESTIMONY OF

JULIA MENDOZA

ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

CHAPTER 3

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

September 13, 2017



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**PREPARED TESTIMONY OF
JULIA MENDOZA
(CHAPTER 3)**

I. OVERVIEW AND PURPOSE

The purpose of my testimony is to present San Diego Gas & Electric Company's (SDG&E) proposal for the Enhanced Partnership Program ("EPP") and request approval of funding for the EPP. The EPP is a component of the Energy Management Plan ("EMP") collaboratively developed by the San Diego Unified Port District ("District") and SDG&E in accordance with the guidance and authority provided in Assembly Bill No. 628 ("AB 628").¹ The EPP is designed to provide necessary resources and oversight to successfully manage the EMP.²

My testimony is organized as follows:

- **Section II – Proposal Background:** provides an overview of the EPP Proposal's development.
- **Section III – Description of the EPP:** describes the structure and support provided by the EPP to manage the EMP.
- **Section IV – Cost of EPP:** provides a summary of the costs and associated with the proposed EPP.³
- **Section VI – Conclusion:** summarizes the proposal.

¹ AB 628 ("Energy Management Plans for Ports and Harbor Districts") (Stats. of 2013), codified in California Public Resources Code § 25990.

² Port of San Diego Climate Action Plan 2013, *available at*: <https://www.portofsandiego.org/document/environment/climate-mitigation-and-adaptation-plan/documents-1/5515-port-of-san-diego-climate-action-plan/file.html>

³ The cost recovery proposal associated with EPP is described by Cynthia Fang in Chapter 4.

1 • **Section VII – Qualifications:** briefly summarizes my qualifications
2 as a witness.

3 SDG&E is requesting \$5.506 million⁴ in to implement the EPP Proposal from 2019
4 through 2023. The electric and gas cost recovery for the EPP Proposal is addressed in the
5 Prepared Direct testimonies of Cynthia Fang (Chapter 4) and Michael Foster (Chapter 5),
6 respectively.

7 **II. PROPOSAL BACKGROUND**

8 AB 628, signed into law by Governor Brown on October 11, 2013, encourages the
9 District, in conjunction with SDG&E, to prepare one or more EMPs to address the goals set forth
10 in AB 628, namely, reduction of GHG emissions and economic development in within the Port
11 tidelands.⁵ In accordance with AB 628, any resulting EMP must include proposals that seek to
12 “reduce air emissions and promote economic development through the addition of new
13 businesses and the retention of existing businesses in the [D]istrict,”⁶ as referenced in Todd
14 Cahill’s testimony in Chapter 1.

15 SDG&E and the District have a long history of promoting energy efficiency in the Port
16 tidelands. The District has participated in an Energy Efficiency (EE) Local Government
17 Partnership (LGP) agreement with SDG&E in place since 2010.⁷ The current LGP agreement
18 provides \$692,840 in EE funding for each year of the 2016 – 2020 term. The EE LGP agreement

⁴ Fully loaded costs.

⁵ Cal. Pub. Res. Code § 25990(a)(authorizing the District to develop an energy management plan jointly with an electrical corporation in order to “reduce air emissions” and “promote economic development”).

⁶ *Id.*

⁷ *See* D.09-09-047.

1 aims to support the District’s Green Port Program⁸ and accomplish goals laid out in the
2 California Public Utilities Commission’s (“Commission”) California Long-Term Energy
3 Efficiency Strategic Plan.

4 The District leverages existing EE LGP funding to support specific EE activities
5 supporting the District and its many tenants; however, the scope and authorized funding of the
6 existing LGP, which is EE focused, limits SDG&E’s ability to provide solutions or support for
7 certain activities, such as Advanced Technologies, Clean Generation, Clean Transportation, and
8 specialized EE measures specifically authorized in AB 628 and included in the District’s EMP.
9 As the current LGP is insufficient to allow for comprehensive AB 628 solutions, SDG&E and
10 the District are proposing the EPP to manage the expansion of District activities beyond those
11 permitted under the District’s existing EE LGP.

12 SDG&E and the District held a working session meeting on January 25th, 2017 to discuss
13 deficiencies in the current EE LGP as it relates to AB 628. The purpose of this meeting was to
14 determine solutions and discuss the work that would need to be completed and coordinated to
15 support the District’s EMP proposals.

16 SDG&E and the District agreed that the formation of an EPP would be the best way to
17 address the gap between what the scope of the existing EE LGP can support, and the work that
18 will be needed to support the District’s EMP proposals. This includes dedicated resources to
19 support the cruise ship shore power rate discount and the specialized EE proposal requested in
20 this Application. Additionally, the funding request in the EPP is intended to support
21 management, oversight and other incremental activities for EMP-related proposals that have
22 already been proposed in other proceedings. This includes SDG&E’s SB350 Transportation

⁸ See Green Port Program, Port of San Diego, *available at*:
<https://www.portofsandiego.org/environment/green-port.html>

1 Electrification Proposals application.⁹ That application includes a proposal for medium and
2 heavy duty electric vehicles and forklift electrification to support conversions within the District.
3 SDG&E’s Electric Program Investment Charge Triennial (EPIC 3) Plan application includes a
4 Demonstration of Multipurpose Mobile Battery for the District.¹⁰ Additionally, the EMP
5 anticipates leveraging SDG&E’s existing, Commission- approved EcoChoice and EcoShare
6 programs.

7 SDG&E and the District support the EPP, and believe the EPP is essential to manage
8 collaboration between the District and SDG&E to maintain forward progress in planning,
9 implementation, tracking and reporting EMP activities.

10 **III. ENHANCED PARTNERSHIP PROGRAM**

11 The EMP includes many different measures, activities and programs, therefore dedicated
12 resources are needed to manage the EMP effectively. The EPP will provide flexibility to support
13 a broader range of work under the EMP umbrella. As noted above, the District’s LGP agreement
14 with SDG&E, which supports existing EE measures in the District, has a yearly budget of
15 \$692,840 (totaling \$3,464,200 over the five-year term of the LGP) to support administration,
16 marketing, education, outreach and implementation efforts to support EE activities. The EPP
17 would provide similar support for the EMP proposals beyond those already covered by the LGP
18 agreement. SDG&E and the District staff will work jointly through the EPP to implement the
19 proposals included in this Application, as well as proposals in the District’s EMP.

⁹ Application of San Diego Gas & Electric Company (U 902-E) for Approval of SB 350 Transportation Electrification Proposals, A.17-01-020 (filed Jan. 20, 2017).

¹⁰ Application of San Diego Gas & Electric Company (U 902-E) for Approval of Electric Program Investment Charge Triennial Plan for Years 2018-2020 at 6, A.17-05-009 (filed May 1, 2017).

1 SDG&E is requesting \$5.5 million (including overhead loaders and escalation) in
2 incremental ratepayer funding to fund the EPP for the five-year term of the EMP. As described
3 in detail below, SDG&E and the District have developed four key goals for the EPP: (1) Program
4 Governance & Management, (2) Strategy & Planning, (3) Implementation Support, and (4)
5 Stakeholder Outreach & Engagement.

6 **A. Program Governance & Management**

7 The first goal of the EPP is to provide a framework to manage for EMP activities,
8 including the Electric Shore Power Rate Discount, the RFO component of the EE Proposal and
9 contracts resulting therefrom, and specialized EE measures and audits included in the EMP. EPP
10 funding will enable SDG&E to assign staff to develop and track proposal budgets to ensure
11 proper spend of ratepayer funding on Commission-authorized work, and to ensure that expenses
12 are hitting the proper accounting distributions for accurate tracking. There will also be a need
13 for inter-departmental coordination at SDG&E and the District to ensure accurate tracking for
14 GHG reductions, in support of the District's CAP and the goals of the State, as described in AB
15 628 and the Governor's Executive Orders referred to in Todd Cahill's testimony (Chapter 1).¹¹
16 Upon approval of this Application, SDG&E and the District will work jointly under the EPP
17 framework to formulate the key milestones for the EMP, and will set up project management
18 processes and tools to provide tracking, reporting, and status updates on progress towards these
19 goals.

¹¹ AB 628 (Stats. of 2013); *see also, e.g.*, EO B-30-15 (April 29, 2015), *available at*:
<https://www.gov.ca.gov/news.php?id=18938>.

1 **B. Strategy & Planning**

2 Appropriately, the District’s CAP will guide the development of EPP strategy. In its own
3 words, the CAP “establishes an iterative process of implementation, evaluation and strategic
4 updating.”¹² The EPP will align with this strategic approach and the goals of AB 628, to “ensure
5 the CAP remains current and effective at reducing GHG emissions.”¹³

6 SDG&E and the District intend to update the EMP or file new EMPs periodically over
7 the next 15 years to ensure that the EMP aligns with developing state/local goals, laws,
8 regulations and directives, and leverage newly available technology solutions in phases. The EPP
9 will support strategy and planning efforts between SDG&E and the District regarding the
10 existing EMP efforts and will guide the production of new proposals for inclusion in subsequent
11 or updated EMPs.

12 **C. Implementation Support**

13 The Port’s CAP is a policy-level document that guides the implementation of the CAP’s
14 GHG reduction measures. To evaluate the CAP’s GHG measures, the Port will conduct
15 performance assessments of each implemented reduction measure and track and monitor overall
16 progress toward the CAP’s 2020 and 2035 GHG reduction goals.¹⁴ In addition to the
17 development and tracking of an integrated master schedule of projects, the EPP will also provide
18 oversight for EMP proposal implementation. The EMP proposals require engineering support,
19 inspections, review, coordination and management of measure implementation on various

¹² Port of San Diego Climate Action Plan 2013 at 37, *available at*:
<https://www.portofsandiego.org/document/environment/climate-mitigation-and-adaptation-plan/documents-1/5515-port-of-san-diego-climate-action-plan/file.html>.

¹³ *Id.* at 37.

¹⁴ *Id.* at 35

1 District properties covered by differing lease terms, and coordination of necessary approvals and
2 permits. For example, the District cannot provide blanket approvals for the installation of
3 electric vehicle charging infrastructure for all interested District tenants, as the leases for each
4 property and the characteristics of each site are different. Implementation support is critical to
5 the timely implementation of projects, while ensuring compliance with existing leases,
6 ordinances, applicable regulations, as well as seeking Board of Port Commissioner approval if
7 required.

8 **D. Stakeholder Outreach and Engagement**

9 Soon after the District and SDG&E agreed to work collaboratively to develop the EMP,
10 SDG&E contracted with the Rocky Mountain Institute (RMI)¹⁵ to assist SDG&E and the District
11 with two key tasks: (1) identifying the most promising opportunities for collaboration between
12 SDG&E and the District, and (2) to design a customized facilitation plan to co-create an EMP.

13 The resulting RMI Report¹⁶ recommended specific steps for the District and SDG&E to
14 take in order to develop a comprehensive EMP. One such outcome identified in the RMI Report
15 was the need to “align on how to define stakeholder participation and develop a stakeholder
16 engagement plan, including how to include certain stakeholders in the development and

¹⁵ RMI – an independent nonprofit founded in 1982 – transforms global energy use to create a clean, prosperous, and secure low-carbon future. It engages businesses, communities, institutions, and entrepreneurs to accelerate the adoption of market-based solutions that cost-effectively shift from fossil fuels to efficiency and renewables. RMI has collaborated with and advised dozens of leading utilities and electricity system stakeholders, including the NY PSC, the US Navy, FERC, SMUD, Walmart, General Motors, SunPower, and EDF. See Rocky Mountain Institute, *available at: <https://www.rmi.org>*.

¹⁶ RMI Workshop Report is attached as Appendix E.

1 ownership of the EMP.”¹⁷ Developing a stakeholder engagement & outreach platform is a task
2 that will be undertaken through the EPP.

3 The EPP will be designed to provide a platform for stakeholder outreach and
4 engagement. One of the key goals of the EPP is to establish a broad stakeholder group, and
5 create a formal structure to engage, educate and receive feedback from this stakeholder group
6 and other parties interested in the District’s EMP. The most significant stakeholders in this
7 process will be the District’s tenants, who are vital to the success of the EMP and to whom many
8 of the standard and specialized EE proposals discussed in Paul Pruschki’s testimony (Chapter 2)
9 will be directed towards, as it is the District’s tenants who will benefit from and directly affect
10 the energy management and GHG emissions reductions sought in the EMP and the District’s
11 CAP. Additionally, there will be broader benefits to local communities through reduced criteria
12 air pollutants associated with equipment and vehicles, and the facilitation of the State GHG
13 reduction goals. SDG&E has established relationships with the District’s tenants through its
14 Account Executives, who are the primary point of contact with assigned tenant accounts, and
15 already assist District tenants with energy management needs and participate in the District’s
16 Green Business Network. Both SDG&E and the District have established communication
17 channels with other key stakeholders, including elected officials from the District’s five member
18 cities: Chula Vista, Coronado, Imperial Beach, National City and San Diego. The EPP will
19 leverage these existing SDG&E and District relationships to seek greater engagement. Some
20 additional potential stakeholder organizations include the San Diego Port Tenants Association,
21 the San Diego Regional Chamber of Commerce, the Port of San Diego Ship Repair Association,
22 and the San Diego & South County Economic Development Councils. It is crucial that

¹⁷ *Id.* at 11.

1 interested stakeholders have a platform for engagement in the implementation of the EMP, so
2 that their ideas, projects and questions can be heard and addressed.

3 **IV. EPP COSTS**

4 SDG&E estimates a total budget of \$4.024 million¹⁸ in 2017 dollars (excluding overhead
5 loaders and escalation) to fund the EPP Proposal. This budget provides funding for the EPP for
6 five years and is broken out into two separate budgets, one for SDG&E and one for the District.
7 Below, Table JM-1 provides a cost breakout by year for both SDG&E and the District.

Table JM-1 - Summary 5 Year Budget by Category
(Direct Costs, 2017 Dollars, Cost in 1,000's)

Budget Categories	2019	2020	2021	2022	2023	Totals
Total SDG&E EPP Budget	\$349	\$374	\$399	\$274	\$274	\$1,671
Total Port EPP Budget	\$517	\$517	\$517	\$401	\$401	\$2,353
Total EPP Budget	\$866	\$891	\$916	\$675	\$675	\$4,024

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9 Below, SDG&E's detailed EPP budget table illustrates the funding for each budget
10 category. SDG&E's budget includes labor for an SDG&E Program Manager to lead the EPP and
11 a SDG&E Program Assistant, resulting in 2 full-time equivalent (FTE) SDG&E staff. The "EPP
12 Project Management Support" funding will support initial implementation of the EPP, as well as
13 reporting and regulatory obligations. The "EMP Workshops & ELab Membership" funding is
14 the budget needed for additional RMI engagement to cover a review of existing work,
15 interviews, workshop design and facilitation, and a workshop summary report. Additionally,
16 SDG&E is seeking funds for travel and conference registration fees in support of the District's
17 EMP, as well as a small budget for office supplies and minor expenses. SDG&E's EPP budget is
18 \$1.671M in 2017 dollars as shown below in budget table JM-2.

¹⁸ These are direct costs in 2017 dollars. Fully loaded costs are presented below in the revenue requirement section of my testimony.

Table JM-2 - SDG&E EPP Budget by Category & Year
(Direct Costs, 2017 Dollars, Cost in 1,000's)

Budget Categories - SDG&E	2019	2020	2021	2022	2023	Totals
Program Manager - Labor	\$133	\$133	\$133	\$133	\$133	\$664
Program Assistant - Labor	\$81	\$81	\$81	\$81	\$81	\$404
EPP Framework & Operations	\$100	\$75	\$50	\$25	\$25	\$275
EMP Workshops & ELab Membership	\$30	\$80	\$130	\$30	\$30	\$300
Travel/Conferences	\$5	\$5	\$5	\$5	\$5	\$25
Office Supplies & Expenses	\$1	\$1	\$1	\$1	\$1	\$3
Total SDG&E EPP Budget	\$349	\$374	\$399	\$274	\$274	\$1,671

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The District’s EPP budget is broken out by budget category and includes both Labor and Non-Labor to support the various EMP activities listed below in Table JM-3. The labor line items provide funding to support District staff in the following positions: Program Manager, Senior Environmental Specialist/Planner, and Engineering Manager, resulting in 1.38 FTE District staff. The Non-Labor line items include costs for consulting services and education and outreach, and can be split into three subcomponents: Specialized EE, Clean Transportation, and Advanced Technologies. As noted previously, SDG&E has requested approval of the Clean Transportation and Advanced Technology programs through other applications before the Commission, however, the inclusion of these programs as part of this EMP requires certain non-labor support as well.

Specialized Energy Efficiency

Non-labor expenses will be required for consultant, design, and reporting tasks associated with tracking the implementation of specialized EE measures. Consultant services will include the development of reporting systems for the District to track energy-related efficiency improvements made by District tenants and monitor those efficiencies in context to the District’s Climate Action Plan and associated greenhouse gas reduction targets. Although the proposal includes a management role to support the Request for Offer (RFO) process, the District will require incremental resources to ensure that project tracking and administrative support are

1 provided to support the success and reach of the proposed program offer for specialized EE
2 measures. The consultant would also provide reporting support to the District and SDG&E,
3 where necessary.

4 **Clean Transportation**

5 Non-labor expenses are requested to be utilized, in part, by the District to hire third party
6 consultants. In addition, the District will implement Zero Emission Vehicle Technical
7 Assistance that will allow them to assist port tenants with education and tools to adopt zero
8 emission vehicles. The purpose of the consultant services will be to assess emission reductions
9 and investment needs for conversion of traditional vehicles and freight handling equipment to
10 zero-emission counterparts. Such analyses may include the creation of an inventory of vehicles
11 and mobile equipment per tenant, associated emissions (criteria pollutant and greenhouse gases),
12 costs of traditional fuel, operations, and maintenance. Research will be done to ascertain
13 comparable zero-emission vehicle and equipment. Included in the research of zero-emission
14 vehicles and equipment will be costs associated with initial purchases, maintenance, and
15 infrastructure. Emissions reductions associated with zero-emissions vehicles will be assessed for
16 comparison to traditional fuel use and vehicle types.

17 **Advanced Technologies #1 – Cruise Ship Terminal (Mobile Battery Storage)**

18 Non-labor expenses will be required for consultant, design, inspection, and reporting
19 tasks associated with the Advanced Technologies Proposal #1—Mobile Battery project.
20 Consultant services will include the creation of engineering specifications, plans, and designs for
21 the mobile battery. This project is dependent upon grant funding and once implemented will
22 require inspection and reporting as to its use, function, and ability to perform. Reports will be
23 summarized in writing and submitted to the District and SDG&E.

Advanced Technologies #2 – Infrastructure Upgrades

Non-labor expenses are requested to support Advanced Technologies Proposal #2— Infrastructure Upgrades to develop long-term growth and energy load forecasts, in close collaboration with the District and SDG&E. This task includes the development of a long-term model for load growth based on anticipated redevelopment into future years to better understand infrastructure capacity, upgrade needs, potential configurations, and cost-benefit analysis. Such tasks may include the development of infrastructure options to be considered by relevant partners (*i.e.*, the District, SDG&E, tenants); engineering specifications, plans, and designs; and facilitated consultation between the District, SDG&E, District tenants, and other regional partners, as applicable. Future projects are dependent upon grant funding and future filings. Consultant services would support the required report preparation, technical analysis, and cross-organizational coordination necessary to understand infrastructure upgrade needs to serve future loads. Reports will be summarized in writing and submitted to the District and SDG&E.

**Table JM-3 - District EPP Budget by Category & Year
(Direct Costs, 2017 Dollars, Cost in 1,000's)**

Budget Categories - District	2019	2020	2021	2022	2023	Totals
Program Manager - Labor	\$52	\$52	\$52	\$44	\$44	\$242
Senior Environmental Specialist/Planner - Labor	\$79	\$79	\$79	\$67	\$67	\$369
Engineering Manager	\$87	\$87	\$87	\$71	\$71	\$402
Consultant Design/Inspection Requirements/Reporting	\$80	\$80	\$80	\$0	\$0	\$240
Long Term Growth Model, Forecast Development & Studies on Infrastructure Needs	\$100	\$100	\$100	\$100	\$100	\$500
ZEV Technical Assistance for Port Tenants, Inventory of Vehicles & Equipment	\$50	\$50	\$50	\$50	\$50	\$250
Technical Assistance for Port Tenants, Tracking & Verification of Specialty EE Measures	\$30	\$30	\$30	\$30	\$30	\$150
Education & Outreach	\$10	\$10	\$10	\$10	\$10	\$50
Grant Writing Support	\$30	\$30	\$30	\$30	\$30	\$150
Total District EPP Funding	\$517	\$517	\$517	\$401	\$401	\$2,353

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1 SDG&E and the District will utilize the same approach used in the existing LGP
2 agreement between the parties, whereby the District submits task authorizations for review and
3 approval by SDG&E to use allocated funding for EMP activities, to ensure oversight and
4 appropriate use of SDG&E ratepayer funding. Upon approval of this Application, SDG&E and
5 the District will negotiate and execute a separate EPP agreement to govern this process, while
6 keeping the existing LGP EE agreement in place through December 2020.

7 **V. REVENUE REQUIREMENT CALCULATION**

8 Table JM-4 shows the fully loaded costs for the EPP.

Enhanced Partnership Program Loaded Cost Summary (Cost in 1,000s; Includes Loaders, Escalation)					
2019	2020	2021	2022	2023	Total
\$ 1,118	\$ 1,174	\$ 1,231	\$ 980	\$ 1,003	\$ 5,506

9
10 To develop a fully loaded cost estimate for the EPP proposal, incremental O&M costs
11 and benefits are adjusted to include overhead allocations, consistent with their classification as
12 company labor, contract labor, or purchased services and materials. Overhead allocations are
13 those activities and services associated with direct costs and benefits, such as payroll taxes and
14 pension and benefits, or costs that cannot be economically direct-charged, such as administrative
15 and general overheads. The overhead allocations adhere to the methodology proposed by the
16 Federal Energy Regulatory Commission (FERC)¹⁹ and were derived using the same
17 methodology used in SDG&E's most recent GRC filing. SDG&E used the average of January
18 2017 – May 2017 internal overhead planning rates for illustrative purposes in this application;

¹⁹ FERC guidelines reference the Statement of Federal Financial Accounting Standards 4: Managerial Cost Accounting Standards and Concepts.

1 however, actual overhead rates would be applied in the determination of actual revenue
2 requirement, and only overheads incremental to the program would be included.

3 SDG&E is proposing to split the revenue requirement at 90% electric and 10% gas
4 accordance to the authorization provided in D.14-10-046 for the 2015 EE programs.²⁰

5 The cost recovery proposal from electric and gas associated with the costs of the
6 proposed EPP activities is described in the prepared direct testimonies of Cynthia Fang (Chapter
7 4) and Michael Foster (Chapter 5), respectively.

8 **VI. CONCLUSION**

9 SDG&E believes that effective collaboration with the District, accomplishment of the
10 goals set forth in the District’s EMP and CAP, and the provision of energy efficiency and energy
11 management solutions to the District’s tenants can only be achieved with the appropriate staff,
12 marketing, and technical resources requested in this Application. Oversight, support and
13 measurement are the keys to efficacious implementation of the District’s EMP. A successful
14 EMP, as supported by the EPP will not only benefit the District and its tenants, but also the
15 adjacent communities, including nearby disadvantaged communities such as Chula Vista and
16 National City, through the reduction of GHG emissions and the growth of green jobs and
17 economic development in the San Diego region.

18
²⁰ D.14-10-046 at 167, OP 21 (“Program Administrators’ existing energy efficiency program funding shall be extended annually through 2015, at the 2015 annually spending levels by program administrators as approved in this Decision until the earlier of 2025 or when the Commission issues a superseding decision on funding levels. IOUs are to collect in rates the annual authorized budget levels for the program administrators in their service territory at the 2015 level, less carry-forward of unspent funds from prior portfolio cycles, until the earlier of 2025 or when the Commission issues a superseding decision on funding.”).

1 **VII. QUALIFICATIONS**

2 My name is Julia Mendoza and I am employed by San Diego Gas & Electric Company
3 (“SDG&E”). My business address is 8335 Century Park Court, San Diego, California 92123.

4 My present position is Product Manager in the Customer Programs department of
5 SDG&E. My primary responsibilities are leading the AB628 application effort, the creation of
6 the District’s EMP, and supporting the District’s CAP. I began work at SDG&E in 1993 as a
7 Team Leader in Energy Efficiency, and held various positions with increasing responsibility
8 including: Customer Project Planner, Senior Program Manager, Energy Programs Supervisor
9 (Demand Response and Energy Efficiency). Additionally, I worked at Sempra Energy between
10 1998 – 2002 as an Energy Information Consultant and Regional Account Executive.

11 In 1985, I graduated from San Diego State University, San Diego with a Bachelor Degree
12 in Psychology.

13 I have not previously submitted testimony before the California Public Utilities
14 Commission.