

Application No.: A.25-06-022

Exhibit No.: SDG&E-03

Witness: Roland Mollen

**PREPARED SUPPLEMENTAL TESTIMONY OF
ROLAND MOLLEN
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**



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

October 6, 2025

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1 **PREPARED SUPPLEMENTAL TESTIMONY OF ROLAND MOLLEN**
2 **ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**
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4 **I. INTRODUCTION**

5 On June 27, 2025, San Diego Gas & Electric Company (SDG&E) filed Application,
6 A.25-06-022, along with supporting testimony, requesting approval and funding for its Low-
7 Income Assistance Programs portfolio for Bridge Year 2027.¹ SDG&E's application presents its
8 2027 program descriptions, budgets and goals in support of its Low-Income Assistance
9 Programs. The Low-Income Assistance Programs covered in this application are the Energy
10 Savings Assistance (ESA) Program, California Alternate Rates for Energy (CARE) Program, and
11 Family Electric Rate Assistance (FERA) Program.²

12 On August 29, 2025, an *Administrative Law Judge's Ruling Directing Additional*
13 *Testimony to be Served by Applicants* (ALJ Ruling) was issued following the August 18, 2025
14 prehearing conference (PHC).

15 The purpose of this Supplemental Testimony is to provide the required information
16 identified in the ALJ Ruling to be added in support of A.25-06-022. The following sections
17 provide the required information in response to the ALJ Ruling.

18 **II. ESA PORTFOLIO AND PROGRAM COST EFFECTIVENESS**

19 *Provide Energy Savings Assistance (ESA) cost-effectiveness test results and forecasts for*
20 *program years 2021 through 2027 for the ESA portfolio, as well as by program component,*
21 *including for ESA Main, Multifamily Whole Building, the ESA Pilots, including but not limited to*
22 *ESACET and the Resource tests, Standard Practice Manual tests, and the Societal Cost Test.*

¹ Low-Income Assistance Programs are also referred to Income-Qualified Programs (IQP).

² On August 28, 2025, SDG&E filed Errata for the Testimonies of Roland Mollen and Hollie Bierman.

SDG&E's forecasted and reported ESA portfolio and individual program Cost Effectiveness Test (CET) results and forecasts for program years 2021 through 2027 can be found in Attachment A to this testimony. The forecasted test results provided are:

- ESACET
- Resource Test
- Total Resource Cost (TRC) Test
- Program Administrator Cost (PAC) Test
- Ratepayer Impact Measure (RIM) Test
- Societal Cost Test

D.24-07-015 Ordering Paragraph (OP) 1 adopted the use of the Societal Cost Test (SCT) as an additional information-only test for Distributed Energy Resource proceedings. D.24-07-015 OP 4 states, "By April 1, 2025, the investor-owned utilities or program administrators shall be required to submit Societal Cost Test results, with results for both the Base Social Cost of Carbon and High Social Cost of Carbon values, in all Commission activities requiring the cost-effectiveness analysis of Distributed Energy Resource proceedings that use the 2024 Avoided Cost Calculator or any subsequent Avoided Cost Calculators in the future, except where directed otherwise by statute or Commission decision." The Energy Division then incorporated the SCT into the California Energy Data and Reporting System (CEDARS) cost effectiveness calculator, which was publicly available as part of release CET 25.1 on August 20, 2025. The CET 25.1 allows for the calculation of reported 2024 SCT values and forecasted SCT values for 2024 - 2027. Therefore, SDG&E does not provide SCT values for years 2021-2023.

CEDARS provides the avoided costs version for the various program years in Table 1 below.³

Table 1: Program Year Assignment to CET Avoided Cost Version

Claim Program Year	Filing Program Year	CET Avoided Cost Version	Avoided Cost Calculator Vintage
2020	2020	2020	2019/E-5014
2021-2023	2021-2023	2021	2020/E-5077
	2024-2031 Application	2022	2021/E-5150
2024-2025	2024-2027 True-Up	2024	2022/E-5228
2026-2027	2026-2027 Update	2026	2024
2028-2029	2028-2035 Application & 2028-2031 True-Up	2028	2026
2030-2031	2030-2031 Update	2030	2028

SDG&E provides the following explanations of the data for the different program years. Specific explanations and notes are provided in Attachment A.

Program Years 2021 – 2023: For these historical years, SDG&E provides CET results based on data availability. Forecast CET results came from either A.19-11-005 or approved advice letters.⁴ For actual/reported CET results, SDG&E used its Annual Reports as its source of information. As stated previously, the SCT was not calculated for these years.

Program Year 2024: ESACET, Resource Test, TRC Test, PAC Test, RIM Test, SCT Base and SCT High were recalculated using the 2026 CET avoided cost version and the most recent Non-Energy Benefits (NEB) tool version 4.0 for both the forecast and actual values.

³ Although these program years correspond to Energy Efficiency program cycles, SDG&E selected the appropriate CET avoided cost version for running its various cost effectiveness tests for ESA programs.

⁴ See A.19-11-005 Attachment B Table A-7 available at [Attachment B Excel 2021-2026 - SDGE.xlsx](#).

1 **Program Years 2025 – 2027:** ESACET, Resource Test, TRC Test, PAC Test, RIM Test,
2 SCT Base and SCT High were recalculated using the 2026 CET avoided cost version and the
3 most recent NEB tool version 4.0. Only forecasted values for these CETs for these years are
4 provided. Actual/reported CETs will be provided in future Annual Reports.

5 **III. PROGRAM YEAR 2027 CALIFORNIA EMERGING TECHNOLOGY FUND**

6 *The Utilities’ Joint Stipulation with the California Emerging Technology Fund (CETF)*
7 *regarding affordable broadband Education and outreach expires on December 31, 2026, under*
8 *Decision (D.) 21-06-015. Do the Utilities plan to extend the Joint Stipulation and continue*
9 *coordination with CETF and Community Based Organizations on affordable broadband using*
10 *ESA, California Alternate Rates for Energy (CARE), and Family Electric Rate Assistance*
11 *(FERA) Marketing, Education, and Outreach materials and budgets? Please explain why the*
12 *Utilities plan to extend, or not extend, the Joint Stipulation.*

13 SDG&E intends to work with California Emerging Technology Fund (CETF) to update
14 and extend the Joint Stipulation and collaborate with CETF through 2027 to inform low-income
15 customers in its service territory about affordable broadband offerings.⁵ On September 8, 2025,
16 CETF sent a letter to SDG&E, Pacific Gas & Electric Company (PG&E), Southern California
17 Edison Company (SCE) and Southern California Gas Company (SoCalGas) (together, the
18 “IOUs”) requesting an extension of the Joint Stipulation through the Bridge Funding period.
19 CETF included a copy of the current joint stipulation and provided their recommended updates,
20 which were subsequently reflected in a draft Addendum to the Joint Stipulation (Addendum).
21 SDG&E intends to work with the other IOUs and CETF to review the draft Addendum and
22 finalize the Addendum for the 2027 bridge year. SDG&E understands that CETF will attach a

⁵ D.21-06-015 at 268 and Attachment 6.

1 copy of any agreed-upon Addendum to its Intervenor Testimony to be served by November 21,
2 2025.

3 **IV. CARE AND FERA PROGRAM BUDGETS**

4 *Provide updates to reflect a reduction in SDG&E's CARE and FERA administrative*
5 *budgets, accounting for the fact that PG&E is covering the cost of the 2027 CARE-FERA*
6 *Eligibility Study.*

7 SDG&E's CARE and FERA Administrative budgets would be reduced by \$2,963 and
8 \$5,000, respectively, with the removal of forecasted costs of SDG&E's share of the 2027
9 CARE/FERA Eligibility Study. SDG&E's updated CARE 2027 administrative budget is
10 \$7,398,686. SDG&E's updated FERA 2027 administrative budget is \$979,185.

V. SUPPLEMENTAL CARE PROGRAM INFORMATION

A. 2025-2027 CARE Enrollment

Explain why SDG&E's projected 2025–2027 CARE net enrollment figures are identical.

SDG&E projects identical net enrollment figures for the CARE program across 2025, 2026, and 2027, based on the average annual net enrollment trend observed from 2021 to 2024. Net enrollments are calculated as total new enrollments minus total attrition.⁶

B. CARE Enrollment by Zip Codes with Enrollment Rates Below 70%

SDG&E stated that it will focus its marketing and outreach efforts on ZIP codes with CARE enrollment rates below 70%. Please provide the list of ZIP codes that SDG&E plans to target where CARE enrollment remains below 70%, as well as the current enrollment numbers for each of those ZIP codes.

The following table provides a list of zip codes in areas of high poverty where a 25% or higher proportion of customers have a household income less than 100% of the Federal Poverty Guideline, and current enrollment numbers by zip code.

**Table 2: Zip Codes with Less than 70% Enrollment and
Year-to-Date Enrollment Numbers**

Low CARE Enrollment by Zip Code	City	Year-to-Date Enrollment (as of August 31, 2025)
92122	University City	57.1%
92101	San Diego (Downtown)	65.2%
92061	Pauma Valley/Pala	66.6%

⁶ 2021 – 2024 SDG&E Low Income Annual Reports, CARE Table 2.

1 **C. 2027 LINA Budget**

2 *Describe whether SDG&E's CARE budget accurately reflects the cost for the 2028 Low-*
3 *Income Needs Assessment (LINA) study, given that the LINA study cost is equally shared*
4 *between CARE and ESA budgets.*

5 SDG&E did not request a study budget for the 2028 LINA study in its 2027 CARE and
6 ESA bridge funding budgets. The budget for this study was already authorized in program cycle
7 2021-2026 by D.21-06-015 OPs 166 and 169, and funded equally between ESA and CARE
8 budgets. The budget will be carried forward and expended in 2027 and 2028 when the study is
9 implemented. Refer to Prepared Testimony of Roland Mollen, Table 8: ESA and CARE Studies
10 Budget.⁷

11 This concludes my prepared supplemental testimony.

⁷ D.21-06-015, OP 167; Prepared Testimony of Roland Mollen on behalf of SDG&E, RM-16 to RM-17 and Table 8: ESA and CARE Studies Budget at 37.

1 **VI. STATEMENT OF QUALIFICATIONS**

2 My name is Roland Mollen. My business address is 8335 Century Park Court, Suite
3 1200, San Diego, California 92123-1257. I am employed by SDG&E as its Residential
4 Customer Programs Manager. In my current position, I am responsible for managing SDG&E's
5 customer assistance programs which include ESA, CARE, and FERA. In addition, I am
6 responsible for all related processing activities such as for new applications, recertifications, and
7 post enrollment verifications.

8 The purpose of my supplemental testimony is to sponsor and testify to the substance of
9 the additional data required by the ALJ Ruling as it pertains to the CARE, FERA and ESA
10 program portfolios.

11 My qualifications and experience are as follows: I attended Webster University. I
12 graduated with a Master of Business Administration degree. I was hired by SDG&E in 2016 in
13 the Marketing & Communications Department. Since then, I have held positions of increasing
14 responsibility in the Company. I have been in my present position for approximately two and a
15 half years.

16 I have not testified before this Commission previously.
17

ATTACHMENT A

San Diego Gas & Electric Company
Attachment A - Cost Effectiveness Test Results (2021-2027)

Year	Program	ESA Cost Effectiveness Test		Resource Test		Total Resource Cost Test		Program Administrator Cost Test		Ratepayer Impact Measure Test		Societal Cost Test (1) Base		Societal Cost Test (1) High	
		Forecast	Actual	Forecast	Actual	Forecast	Actual	Forecast	Actual	Forecast	Actual	Forecast	Actual	Forecast	Actual
2021	Portfolio	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	ESA Main (2)	0.74	0.19	0.41	0.30	0.19	0.08	0.19	0.08	0.14	0.07	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	ESA CAM (3)	Not Applicable	Not Available	Not Applicable	Not Available	0.00	0.60	0.00	0.60	0.00	0.34	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	SDG&E MFWB (5)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Pilot Plus/Pilot Deep (7)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Electrification Pilot (SCE only)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
2022	Portfolio	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	ESA Main (4)	0.28	0.14	0.47	0.28	0.16	0.05	0.16	0.05	0.13	0.04	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	ESA CAM (3)	Not Applicable	Not Available	Not Applicable	Not Available	0.25	0.15	0.26	0.15	0.18	0.11	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	SDG&E MFWB (5)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Pilot Plus/Pilot Deep (7)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Electrification Pilot (SCE only)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
2023	Portfolio	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	ESA Main (4)	0.36	0.11	0.37	0.2	0.19	0.03	0.19	0.03	0.15	0.03	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	ESA CAM (3)	Not Applicable	Not Available	Not Applicable	Not Available	0.66	0.29	0.77	0.29	0.18	0.22	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	SDG&E MFWB (6)	0.19	Not Available	Not Available	Not Available	0.14	Not Available	0.14	Not Available	Not Available	Not Available	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Pilot Plus/Pilot Deep (7)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Electrification Pilot (SCE only)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
2024	Portfolio	0.28	0.21	0.34	0.19	0.19	0.12	0.19	0.12	0.13	0.09	0.27	0.16	0.28	0.17
	ESA Main	0.27	0.21	0.30	0.14	0.17	0.11	0.17	0.11	0.12	0.08	0.23	0.15	0.24	0.15
	SDG&E MFWB	0.28	0.29	0.40	0.81	0.23	0.18	0.24	0.18	0.15	0.12	0.33	0.25	0.35	0.26
	Pilot Plus/Pilot Deep (7)	Not Applicable	0.00	Not Applicable	0.01	Not Applicable	0.00	Not Applicable	0.00	Not Applicable	0.00	Not Applicable	0.00	Not Applicable	0.00
	Electrification Pilot (SCE only)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
2025	Portfolio	0.27	Not Applicable	0.33	Not Applicable	0.19	Not Applicable	0.19	Not Applicable	0.13	Not Applicable	0.26	Not Applicable	0.27	Not Applicable
	ESA Main	0.26	Not Applicable	0.29	Not Applicable	0.17	Not Applicable	0.17	Not Applicable	0.12	Not Applicable	0.22	Not Applicable	0.23	Not Applicable
	SDG&E MFWB	0.29	Not Applicable	0.42	Not Applicable	0.24	Not Applicable	0.25	Not Applicable	0.15	Not Applicable	0.34	Not Applicable	0.35	Not Applicable
	Pilot Plus/Pilot Deep (7)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Electrification Pilot (SCE only)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
2026	Portfolio	0.28	Not Applicable	0.33	Not Applicable	0.20	Not Applicable	0.20	Not Applicable	0.14	Not Applicable	0.27	Not Applicable	0.28	Not Applicable
	ESA Main	0.26	Not Applicable	0.28	Not Applicable	0.17	Not Applicable	0.17	Not Applicable	0.12	Not Applicable	0.23	Not Applicable	0.23	Not Applicable
	SDG&E MFWB	0.32	Not Applicable	0.44	Not Applicable	0.27	Not Applicable	0.28	Not Applicable	0.16	Not Applicable	0.38	Not Applicable	0.39	Not Applicable
	Pilot Plus/Pilot Deep (7)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Electrification Pilot (SCE only)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
2027	Portfolio	0.30	Not Applicable	0.31	Not Applicable	0.16	Not Applicable	0.16	Not Applicable	0.11	Not Applicable	0.21	Not Applicable	0.22	Not Applicable
	ESA Main	0.25	Not Applicable	0.26	Not Applicable	0.13	Not Applicable	0.13	Not Applicable	0.10	Not Applicable	0.17	Not Applicable	0.18	Not Applicable
	SDG&E MFWB	0.31	Not Applicable	0.38	Not Applicable	0.21	Not Applicable	0.22	Not Applicable	0.15	Not Applicable	0.28	Not Applicable	0.29	Not Applicable
	Pilot Plus/Pilot Deep (7)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Electrification Pilot (SCE only)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Notes

(1) SCT was not required until 2024 per D.24-07-015 OPs 1 and 4.

(2) Forecast values for PY 2021 from Application A.19-11-005 Attachment B Table A-7.

(3) CAM values for PY 2021-2023 from Application A.19-11-005 Attachment B Table A-7

(4) Forecast values for ESA Main PY 2022 and 2023 from AL 3842.

(5) Southern MFWB program forecast was approved on 12-30-2022 per AL 4115E/3144G. Therefore, the program was only available starting in PY 2023.

(6) MFWB forecast (only TRC and ESACET) for PY 2023 from AL 4115E/3144G, see Table 8 and Table 9. The PAC test was not reported, but was included in the CET run receipt.

(7) Per D. 21-06-015 Attachment 2, no specific cost effectiveness threshold is being set for this pilot; however, the IOUs shall track the cost effectiveness of the treatments, and the impact to the overall ESA program portfolio cost effectiveness with the addition of the pilot treatments.

Not Applicable: The data is not appliable for one of the following reasons:
Electrification pilot only applies to SCE.
Future year actuals have not occurred yet.
ESACET and Resource Test values for ESA CAM were not forecasted in the application.
Per the reasons detailed in notes 1-7 above.

Not Available: Unable to complete these cell calculations due to unavailability of historical data.