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**PREPARED DIRECT TESTIMONY OF**  
**DONNA SINGER**  
**ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**  
**CHAPTER 6 - MARKETING**

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



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**PREPARED TESTIMONY OF  
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**I. INTRODUCTION**

Marketing, Education, and Outreach (ME&O) will be essential to building customer awareness around the availability and potential benefits of a Demand Flexibility (DF) rate and ultimately guiding participants through a transition to dynamic pricing. SDG&E aims to empower interested, eligible customers to understand, adopt and successfully adapt to using energy based on DF rate price signals. This chapter outlines our proposal to leverage a research-based approach to gaining commercial, agricultural, and residential customer participation in DF rates and supporting those customers after enrollment. ME&O will be designed to avoid directly targeting ineligible customers: those enrolled in Net Energy Metering (NEM), Net Billing Tariff (NBT), conjunctive billing arrangements, or grandfathered rates.

SDG&E's ME&O approach is designed to support customer understanding, encourage adoption, and help customers succeed on DF rates using research, segmentation, and targeted engagement. The plan also incorporates forthcoming insights from PG&E's and SCE's Dynamic Flexibility Pilots ("DF Pilots") and will prioritize affordability and accessibility throughout implementation. The remainder of this chapter describes SDG&E's ME&O objectives, strategies, research plan, segmentation, messaging framework, communication tactics, community engagement, paid media, metrics, and budget.

**II. OBJECTIVES AND STRATEGIES**

The objectives for SDG&E's ME&O are to:

- Create general awareness across the service territory of DF rates and the difference between DF and TOU.
- Directly introduce eligible customers to DF.

- Educate targeted customers on how DF rates work and how DF can help save customers money while supporting the grid by shifting energy use to lower cost/lower demand periods.
- Encourage interested customers to take action and enroll in DF rates.
- Support customers who enroll in DF rates by promoting resources and behavior changes to respond to price signals.

SDG&E's ME&O strategies include:

- Using a phased, multi-channel, and integrated approach for targeted residential, agricultural, and commercial customers to build awareness, understanding and adoption of DF.
- Leveraging customer research results to reach the right customers with the right message.
- Providing simple, clear and transparent communications.
- Using customer insights and segmentation to customize communications for various customer segments.
- Developing in-language and culturally relevant materials for non-English speaking communities.
- Offering and promoting online information and tools that make it easy for customers to learn about DF and find the information they need to be successful on the rate.
- Leveraging Community Based Organizations ("CBOs") to educate hard-to-reach customers.
- Collaborating with CCAs on ME&O rollout and outreach to help ensure consistent messaging across service territories.

The phased approach for ME&O aims to align customer education, outreach, and support with the availability of research findings and customer insights. A phased structure allows SDG&E to (1) introduce DF concepts in a clear and manageable way, (2) support customers as they adopt new behaviors, and (3) refine outreach based on results from the DF Pilots, the 2025 LINA Study, and SDG&E's Year 1 and Year 2 Measurement and Evaluation.

- Pre-Launch activities will focus on foundational work, including research and message development to validate customer understanding of DF concepts and customer-friendly language explanations, standing up digital infrastructure like a dedicated landing page and updates to existing digital content, development of education materials, and program readiness including agency onboarding, internal engagement of customer-facing teams, and implementation planning.
- Phase 1 (Year 1 after launch) will focus on introducing DF to eligible customers using an Educate–Act–Support messaging framework. Activities will emphasize customer education, enrollment support, and early behavioral guidance. Phase 1 will also integrate insights from initial customer research and early campaign performance, while avoiding targeted outreach to customers whose eligibility or potential benefits remain uncertain pending DF Pilot evaluations.
- Phase 2 (Year 2 after launch) will refine and expand ME&O based on findings from the DF Pilots, the LINA Study, and SDG&E’s Measurement and Evaluation. Enhancements may include updated messaging, improved guidance for enrolled customers, and expanded targeted outreach—potentially including multilingual approaches and engagement with equity and access customer groups if research indicates these customers are likely to benefit. Phase 2 is intentionally flexible to responsibly incorporate new data and respond to external factors or emerging customer needs.

### **III. CUSTOMER RESEARCH**

An external vendor will be engaged to facilitate initial qualitative customer research to help inform our ME&O strategy and implementation.

Research goals include:

- Gathering customer perceptions of DF rates and perceptions on impact to bills;
- Exploring customer understanding of rate descriptions and what customers want to learn about DF rates;
- Identifying effective ways to communicate DF rates and through which channels;
- Testing potential customer-facing names for DF rates.

Messaging research will be designed to address eligible customer segments, including CCA and Non-CCA commercial and agricultural customers of various sizes as well as residential CCA, Non-CCA, CARE, and non-CARE customers across multiple climate zones, and including business and residential customers located in DACs.

SDG&E anticipates conducting additional customer research toward the end of Phase 1 to help gauge customer reactions, assess customer understanding and barriers to participation, and identify opportunities to enhance or refine messaging to increase customer adoption of DF rates in Phase 2. From an affordability perspective, it may make sense to hold on designing this additional research until findings from the DF Pilots can be reviewed and insights incorporated into SDG&E's longer-term ME&O plan.

#### **IV. TARGET AUDIENCE AND SEGMENTATION**

ME&O will consider bill analysis, internal customer analytics, vendor research, the 2025 LINA study, and – when published – the DF Pilots' mid-term and final evaluations. As information becomes available, SDG&E will incorporate insights into its ME&O approach, adjusting messaging and targeting strategy to efficiently and effectively reach the right audiences. The DF Pilot results may also inform expansion of ME&O to specifically target equity and access customers.

Depending on analysis and research findings, SDG&E's segmentation strategy could potentially categorize customers into the following groups:

- General large business customers
- General medium-sized business customers
- General small business customers
- Agricultural customers
- General residential customers
- Residential and small business customers in low income and disadvantaged communities
- Non-English-speaking communities
- Customers with access and functional needs

## V. MESSAGING AND CUSTOMER JOURNEY

The framework for messaging and the customer journey will include a three-tiered campaign including *Educate*, *Act*, and *Support* messaging to target eligible customers and then support customers who have enrolled in DF. As with the broader ME&O approach, messaging in Phase 1 will not specifically target equity and access customers. Separate from the more formal research described above, SDG&E will evaluate early campaign performance metrics to better understand interest and engagement by customers and will adjust as necessary; including applying test-and-learn strategies to optimize messaging effectiveness, reach, and participation. Phase 2 ME&O messaging may be updated based on results from the DF Pilots as well as SDG&E's Measurement and Evaluation, incorporating insights to help inform and optimize ME&O efforts as well as learnings about customer understanding, satisfaction and overall commitment. Demographic and behavioral data collected from participants may help clarify which customers segments are more likely to adopt and benefit from DF rates.

The Educate, Act, Support messaging framework includes:

- Launching initial tactics to target customers most likely to succeed on the rate.
- If indicated by the DF Pilots, tailoring messaging and tactics to reach equity and access customers.
- Partnering with CBOs to develop outreach strategies and provide support with materials tailored to engage their specific communities with a plan to update and/or expand CBOs engagement and strategy based on results of the DF Pilots.
- Collaborating with CCAs to share messaging framework and align approach across our service territory.

**Educate.** Educational messaging will provide high-level information about DF rates to all customers, tailored when appropriate to each audience segment. Initial marketing materials will introduce customers to DF rates and may contain information such as explanation of the evolution from TOU, how customers can control energy costs on DF

1 rates, and how DF rates support the grid by shifting energy use to lower cost/lower  
2 demand times. Communications will provide resources to learn more about DF rates and  
3 the necessary enrollment process. SDG&E will also engage local stakeholders including  
4 local media, elected officials, CCAs and CBOs to provide information and resources for  
5 DF.

6 **Act.** Initial Act messaging will be tailored to customers identified as 1) most likely to  
7 succeed on a DF rate and 2) most likely to enroll in a DF rate and will encourage  
8 enrollment. Subsequent Act messaging will incorporate lessons learned from early  
9 campaign tactics as well as the DF Pilots, which could result in updated and/or expanded  
10 Act messaging to target additional customer segments.

11 **Support.** Support messaging helps enrolled customers leverage tools and resources  
12 necessary to be successful on a DF rate.

## 13 **VI. MULTI-CHANNEL AND INTEGRATED CAMPAIGN TACTICS**

14 SDG&E plans to use various channels and tactics in its integrated education and  
15 campaign to promote DF rates, such as direct-to-customer messaging, paid media, broad  
16 customer outreach, and SDG&E-owned channels. Integrated campaign tactics may include:

- 17 • Dedicated website landing page
- 18 • Updates to existing website pages to add DF rate education as appropriate
- 19 • Earned media
- 20 • Existing owned channels
  - 21 ○ Bill Package: SDG&E may leverage customer bill inserts, bill envelopes
  - 22 and/or on-bill messaging to help educate customers where they may be
  - 23 most engaged. Brief messaging can guide customers to a website for more
  - 24 detailed information.
  - 25 ○ Collateral: Printed materials such as brochures and fact sheets may be
  - 26 produced for use with various customer segments and through various

channels, including outreach teams and CBOs. “Quick Response” QR codes may be used on print materials as another opportunity to connect customers directly to a dedicated webpage for additional information.

- Organic Social: Social media channels (i.e., Facebook, X, Instagram, Nextdoor, LinkedIn and/or YouTube) may be used as an interactive and targeted way to broadly inform customers about DF rates. Posts would be brief, clear, and easy to understand, and will guide customers via direct links to webpages that contain detailed information.
- Message Integration: Integrated campaign tactics prioritize affordability by reducing costs while maintaining reach. SDG&E will identify opportunities to integrate DF rate messaging into other relevant ME&O efforts to eligible customers. Message integration will be based on how well the audience and calls to action overlap and which channel is used. In addition, different channels will be evaluated individually for their potential to carry multiple messages. As information becomes available from the DF Pilots, messaging may also be integrated into planned outreach to specific target audiences, such as CARE and FERA, DAC communities, and other distinct groups of equity and access customers.
- Direct marketing tactics will use a digital approach as part of specific, targeted campaigns leveraging customer segmentation data. In particular, email will be used to inform eligible customers of DR rates and direct them online to learn more.

## **VII. COMMUNITY ENGAGEMENT AND OUTREACH**

Community engagement and outreach typically includes Community Based Organizations (CBOs), SDG&E employees, external stakeholders, and CCAs in our territory.

- SDG&E plans to strategically leverage its valued network of approximately 200 CBOs, collectively called the Energy Solutions Partner Network, to help educate customers about DF rates. These organizations reflect the diverse demographics of SDG&E’s customer base within its service territory. Many of these CBOs are small grassroots agencies serving individuals with Access and Functional Needs (“AFN”), multicultural, multilingual, low-income, seniors, and Limited English Proficient (“LEP”) audiences in communities of concern. These partners employ a variety of tactics, including messaging through email and social media channels such as Facebook, X, and Instagram, posting information on their websites, and providing booth space at in-person events. SDG&E will again take a phased approach using its Energy Solutions Partner Network with a plan to increase engagement and reach in Phase 2 if and when the DF Pilots indicate DF rates are potentially beneficial for low-income customers and if a more targeted approach is warranted.

- Employee outreach: ME&O activities will also include outreach and education to SDG&E employees prior to the implementation of DF rates. Internal employee groups will be leveraged to help drive early education about DF rates for utility-employees, especially those whose work in customer-facing roles. Customer-facing groups may include the Customer Care Center, account executive, outreach and field service teams. Employees will be engaged through internal channels, including events, emails, and online or digital resources.
- External stakeholders: Information will be provided to external stakeholders, including elected officials, tribal leaders, third party organizations, to help them understand the origin, purpose and benefits of the DF rates, enabling them to address potential questions from their constituents.
- CCAs: Continued engagement with CCAs will aim to align messaging throughout service territories around DF rates.

## **VIII. PAID MEDIA**

Paid media can play a strategic role in the customer journey by reaching large audiences quickly while targeting particular customer segments and delivering consistent and sequential messaging. Given the current focus on affordability and pending results from the DF Pilots, SDG&E will carefully curate paid media spend in the Phase 1 of its ME&O program, monitoring for opportunities to optimize tactics and reach for Phase 2, including targeting equity and access customers. Broad reach tactics including digital display, paid search, and paid social will be instrumental in introducing DF to the general customer base, while print and out-of-home tactics will be used to target hard-to-reach communities. Effectively communicating DF rates through paid media channels and refining the message as supported by research can help build deeper customer engagement.

- Paid search - Paid search text ads appear in search engines when someone is researching the topic. For example, if someone Googles "Demand Flex" (and/or the determined customer-facing name), then a text ad appears that features information from SDG&E about DF rates and guides customers to a designated webpage for more information.
- Paid social - Targeted paid social ads run on platforms such as Meta (Facebook), Reddit, Nextdoor, LinkedIn and Instagram. These ads include an image and copy and run in multiple languages where possible.

- Print - Print ads run in multiple community publications throughout San Diego County and Southern Orange County, including publications focused on multi-cultural communities in our region (in-language, when available).
- Programmatic display - Digital banner ads appear online or on mobile devices, targeted based on criteria like zip code, income, etc. This targeting allows for precise audience reach and effective advertising.
- High impact digital: High-impact ads are visually engaging formats that capture attention and drive higher engagement rates. They often include rich media and interactive elements to maximize user interaction.

## **IX. METRICS**

Once ME&O activity begins, SDG&E plans to measure and track key pieces of outreach data for internal use to monitor progress reaching customers and refine and enhance strategy and messaging as necessary. ME&O tracking will include:

- Impressions and reach of paid media
- Number and type of outbound targeted communications and bill messages
- Email open and clickthrough rates, number of visits to our dedicated webpage and,
- Digital performance, as applicable.

## **X. ME&O BUDGET**

In this section, SDG&E has identified ME&O-associated costs required to successfully communicate new DF rates to eligible residential, business and agriculture customers, aligning with the its two-phase ME&O plan. Where feasible and appropriate and with affordability top-of-mind, SDG&E plans to take a digital-first approach to help mitigate costs. However, not all customers – and especially those in hard-to-reach populations – have a valid email address on file or have limited access to digital channels and may require other communication methods that may be more costly. The ME&O plan and accompanying budget is divided into three time periods: the pre-launch period before the new DF rates go live. Phase 1, which represents the

first year after launch, and Phase 2, the second year after launch. To successfully support SDG&E's goals and objectives, ME&O will cost an estimated \$2,455,000 over approximately three years as outlined in the table below.

**Table 1: Estimated ME&O Costs for Demand Flexibility Rates**

Category	Pre-Launch	Phase 1	Phase 2	Total <sup>1</sup>
Customer Research and Insights	\$120,000	-	\$10,000	\$130,000
Digital and Paid Media	\$28,500	\$264,000	\$264,000	\$556,500
Direct Customer Outreach and Education	\$117,000	\$204,667	\$273,741	\$595,408
Program Management and Support	\$477,500	\$310,800	\$384,720	\$1,173,020

## **XI. CONCLUSION AND SUMMARY**

This concludes my prepared direct testimony

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<sup>1</sup> Totals may reflect rounding.

1 **XII. WITNESS QUALIFICATIONS**

2 My name is Donna Singer and my business address is 8306 Century Park Court, San  
3 Diego, California, 92111. I am a Manager of Advertising & Marketing Communications for San  
4 Diego Gas & Electric Company (SDG&E).

5 I have been employed by by SDG&E since 2023 and currently serve within the  
6 Marketing, Brand & Customer Communications department. In this role, I am responsible for  
7 developing and executing marketing strategies that enhance customer awareness, engagement,  
8 and understanding of company programs and priorities. My work includes partnering with  
9 internal stakeholders on key customer communication and marketing initiatives, as well as  
10 leading a team of marketing and communications professionals.

11 I hold a Bachelor of Arts degree in English from Gonzaga University. I bring more than  
12 20 years of experience in communications, including change management and marketing  
13 communications consulting for SDG&E on various projects beginning in 2015 as well as  
14 communications and marketing roles in the biotechnology and medical device industries.

15  
16 I have not previously testified before the Commission.