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PREPARED TESTIMONY OF

LIZZETTE GARCIA-RODRIGUEZ

ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

CHAPTER 7 - MEASUREMENT & EVALUATION

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FEBRUARY 2, 2026

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LIZZETTE GARCIA-RODRIGUEZ
CHAPTER 7 - MEASUREMENT & EVALUATION

I. INTRODUCTION

The purpose of this testimony is to describe SDG&E's proposed Evaluation, Measurement and Verification (EM&V) activities for San Diego Gas & Electric Company's (SDG&E) proposed demand flexibility rates (Proposed DF Rates).

II. EVALUATION, MEASUREMENT, AND VERIFICATION OBJECTIVES

The primary goal of the EM&V process for the Proposed DF Rates is to evaluate how customers respond to price signals. SDG&E proposes conducting a two-year DF rate study to analyze changes in energy usage (load impacts), potential bill reductions, and any cost savings for the utility. By gathering data and insights over this two-year period, SDG&E intends to assess participant enrollment, customer awareness, load response, and customer behavior on the Proposed DF Rates. To support this analysis, interval data from participants will be collected for DF Rates Evaluation Year 1 and DF Rates Evaluation Year 2 of the Proposed DF Rates evaluation.

SDG&E plans to conduct customer surveys to gather feedback on their experience with the Proposed DF Rates. These surveys will help assess customer understanding, perception of price responsiveness, satisfaction, and overall commitment. Additionally, demographic and behavioral data will be collected from both participants and non-participants to better understand which customer segments are most likely to adopt and benefit from a dynamic pricing model.

A. Proposed DF Rates Initiation Phase and Evaluation Plan for Year 1 and Year 2.

During the initial phase, SDG&E plans to establish a comprehensive Request for Proposals (RFP), conduct bill impact analyses, and define evaluation plans to support effective

implementation in subsequent years. During this phase, SDG&E will design the RFP to articulate evaluation program objectives, eligibility criteria, performance requirements, survey objectives, and contractual terms, ensuring alignment with regulatory guidance and market best practices. Furthermore, SDG&E will assess potential bill impacts across customer segments to understand how proposed rate changes. Additionally, SDG&E will develop an evaluation plan that outlines evaluation metrics and data collection strategies to allow for effective monitoring of any adopted DF Rates. As part of this process, SDG&E will hire an external consultant to conduct the evaluation activities, including administering customer surveys to support the overall assessment framework. The initial phase activities will position SDG&E to launch a well-designed, data-informed evaluation program with clear expectations and measurable results. SDG&E proposes to address the following objectives in DF Rates Evaluation Year 1 and Year 2.

Objective 1: Participant enrolled and customer awareness under DF Rates

Metric 1: Participant enrollment in DF Rates

Approach: Identify non-residential customers enrolled in DF Rates by business types and operating hours using NAICS codes. Identify awareness and responsiveness to day-ahead pricing. Identify residential customers enrolled in DF rates and segment them by key attributes, including housing type (single family or multi family), income qualification status (CARE/FERA), and electrification indicators (e.g., electric water heating).

Evaluation: SDG&E will extract non-residential customer enrollment data from its customer information systems, using NAICS codes to categorize businesses and cross-referencing operating hours to identify patterns (e.g., 24/7 operations vs. daytime-only). Additional variables will include customer class (commercial vs. industrial), rate, and geographic distribution by climate zone.

SDG&E will extract residential customer enrollment data from its customer information systems and segment customers based on household and service characteristics rather than business attributes. Key segmentation variables will include housing type (single family versus multi family), income qualification status (CARE/FERA), rate enrollment (e.g., TOU DR 1), electrification indicators (such as electric water heating, where available), and geographic distribution by climate zone. Interval usage data will be analyzed to identify time of use consumption patterns. A summary table will be created to show a monthly trend analysis of current and new enrollments using these variables for residential and non-residential customers.

Metric 2: Customer awareness of DF Rates

Approach: Evaluate residential and non-residential customer awareness and responsiveness of DF rates and day ahead pricing by administering customer surveys.

Evaluation: Conduct pre- and post-event surveys to assess awareness of DF Rate pricing signals, ability to respond (e.g., load reduction actions taken), understanding of rate structure, and customer interest using the customer enrolled list. Also, utilize interval meter data to track changes in energy usage to assess customer responsiveness to price changes and load reductions with self-reported actions from surveys. Analyze the correlation between awareness and responsiveness.

Objective 2: Load Response and Customer Behavior

Metric 1: Load Response to DF Rates, Load Impact Analysis,* Average Load Profiles and RA Window, *and Incremental Response Beyond TOU

Approach: Measure changes in energy usage (reduction, shift, or increase) after customers enroll in DF Rates using a difference-in-difference regression comparing pre- and post-DF Rates usage. Analyze load impacts by customer class, rate, month, weather,

weekday/weekend patterns, and identify average load shapes during Resource Adequacy (RA) hours by month and customer type using a regression analysis. Assess whether DF Rates lead to additional load reductions beyond existing TOU rates using a regression analysis.

Evaluation: SDG&E plans to submit a Request for Proposal (RFP) for the load impact evaluation study. Following that, SDG&E will provide a formal evaluation plan, which will include the appropriate impact methodology. Finally, SDG&E will perform an DF Rates Load Impact Evaluation based on the DR protocols using different statistical methods such as regression analysis and difference-in-differences to identify how usage varies based on customer class, rate, weather conditions, month, and day of the week. This model estimates the change in energy usage before and after customers enroll in DF Rates. Incremental load reductions attributable to DF Rates will be estimated by comparing actual customer usage under dynamic pricing to a modeled TOU counterfactual using regression and difference-in-differences methods. The analysis will determine whether customers on DF Rates achieve greater load reductions than those on existing TOU rates listed in Section B. Customer-specific and temporal factors will be controlled to isolate the impact of day-ahead pricing beyond reductions driven by standard TOU rates.

Metric 2: Bill Impact Analysis and **Enrollment Behavior Based on Bill Savings**

Approach: Compare customer bills under the applicable DF Rate vs. their otherwise applicable tariff (OAT) and identify customers with potential savings based on historical interval data. Determine how many customers with projected savings enroll in DF Rates using historical day ahead market prices to approximate DF Rates and assess whether those savings are realized.

Evaluation: SDG&E proposes using preliminary bill impact data to model both short-term and long-term effects of the DF Rate on customer bills. This modeling will account for

scenarios with and without changes in consumption, allowing for a comprehensive assessment of energy savings compared to the customer's standard tariff. Additionally, SDG&E plans to conduct bill impact analyses for all eligible customers and monitor these differences over time. While similar methodologies will likely be used to assess the DF Rate study in Year 2, SDG&E plans to collaborate with stakeholders to define the scope of the study and identify any additional areas for evaluation.

B. Accounts used as comparison for DF Rates

Dynamic pricing will be offered to all customer classes, with the exception of streetlighting customers, as described in the prepared direct testimony of Jeff DeTuri (Chapter 1). Enrollment in dynamic pricing will be subject to eligibility requirements. Customers currently participating in Net Energy Metering (NEM), the Net Billing Tariff (NBT), Critical Peak Pricing (CPP), or similar demand response programs, as well as those under conjunctive billing arrangements or grandfathered time-of-use (TOU) rates, will not be eligible to participate, as described in prepared direct testimony of Chelsea Haro (Chapter 5).

The rates listed below will be used as comparison benchmarks for customers eligible to participate in DF Rates: ALTOU, TOUA, TOUDR1, TOUPA, and TOUPA3. The table below summarizes the number of accounts by customer class and month for comparison. Detailed account counts by rate and month are provided in Attachment B.

Table LGR-1 Number of accounts will be used as comparison for DF Rates

Class	Service Provider	202501	202502	202503	202504	202505	202506	202507	202508	202509	202510	202511	202512
Commercial	BUNDLED	139,163	139,077	139,054	139,099	139,031	138,971	138,915	138,790	138,855	138,791	138,723	137,272
	DA	1,602	1,595	1,594	1,587	1,586	1,578	1,578	1,646	1,644	1,647	1,644	1,623
	Commercial Total	147,313	140,765	140,672	140,648	140,686	140,617	140,549	140,493	140,436	140,499	140,438	140,367
Industrial	BUNDLED	623	621	618	622	629	628	622	621	585	575	569	540
	DA	59	61	62	62	62	63	64	74	75	76	76	75
	Industrial Total	680	682	682	680	684	691	691	686	695	660	651	645
Residential	BUNDLED	1,071,297	1,069,403	1,071,728	1,071,280	1,071,957	1,074,316	1,076,231	1,075,849	1,077,040	1,074,433	1,073,175	1,069,088
	Residential Total	1,068,785	1,071,297	1,069,403	1,071,728	1,071,280	1,071,957	1,074,316	1,076,231	1,075,849	1,077,040	1,074,433	1,073,175
Grand Total		**1,216,778**	1,212,744	1,210,757	1,213,056	1,212,650	1,213,265	1,215,556	1,217,410	1,216,980	1,218,199	1,215,522	1,214,187

III. BUDGET

This section outlines the proposed evaluation budget for the Proposed DF Rates, broken down by Initiation Phase, Evaluation for Year 1 and Year 2, and summarized over the full duration of the program.

Table LGR-2 Evaluation, Measurement, and Verification (EM&V) Budget

SDG&E EM&V Activities	DF Rates Initiation Phase	DF Rates Evaluation for Year 1	DF Rates Evaluation for Year 2	Total DF Rates Budget
Develop RFP, bill impacts, and evaluation plans	$174,000			$174,000
Load Impact Evaluation (includes load and bill impacts, bill savings, and utility savings)		$300,000	$309,000	$609,000
Customer Research (includes surveys on customer acceptance, customer understanding of the DF Rates, barriers to entry, difficulties in implementation, etc.)		$210,000	$216,300	$426,300
Miscellaneous research, analytical support, and labor support		$216,000	$222,480	$438,480
Total EM&V related costs	$174,000	$726,000	$747,780	$1,647,780

IV. SUMMARY AND CONCLUSIONS

In the DF Rates initiation phase, SDG&E will focus on building the program foundation by developing a detailed Request for Proposals, performing bill impact analyses, and establishing evaluation plans to enable effective implementation in Years 1 and 2.

In DF Rates Evaluation Year 1 and Year 2, SDG&E's evaluations of adopted DF Rates will leverage data from its Advanced Metering Infrastructure, including hourly interval usage, and customer characteristics, to assess load impacts among enrolled participants. SDG&E will hire an external consultant to conduct the evaluation activities, including administering participant and non-participant surveys to assess customers' understanding of the hourly pricing structure, ease of enrollment, barriers to participation, and accessibility of pricing information. Additional post-event surveys are planned. Insights gained from Year 1 will inform us of improvements for Year 2 implementation.

SDG&E anticipates that the combination of load impact studies and survey data will help SDG&E understand the factors influencing participation and nonparticipation and whether participating customers are achieving bill reductions and perceived success on their DF Rate. Evaluating customer awareness and responsiveness to DF pricing may provide valuable insights into load reduction and grid reliability. Further, understanding how customers may shift or reduce loads in response to day-ahead pricing may be useful in guiding the development of future rate strategies aimed at enhancing grid reliability.

This concludes my prepared direct testimony.

V. SUMMARY OF QUALIFICATIONS

My name is Lizzette Garcia-Rodriguez and my business address is 8330 Century Park Ct., San Diego, CA 92123. I've been employed by SDG&E since 2009, and started as a Business Economic Analyst II in the Load Research Section of the Marketing Department. My current position is Load Analysis Project Manager III in the Customer Pricing Department. In my current position I am responsible for managing and conducting load and energy research analysis. Over the past 16 years I have held positions of increasing responsibility within the company that have included Load and Energy Research.

I attended National Autonomous University of Mexico, where I graduated with a Bachelor of Actuarial Science in 1996. I continued to attend University of Phoenix where I graduated with an MBA in 2015.

I have previously testified before the Commission.

ATTACHMENT A

Proposed DF Rates Timeline for Evaluation, Measurement, and Verification Activities

	Q1	Q2	Q3	Q4
DF Rates Initiation phase	**Develop RFP**	**Select Winning Bidder**	**Bill Impacts**	**Finalize Evaluation Plans**

	Q1	Q2-Q3	Q4
DF Rates Evaluation for Year 1	**Pre-event surveys**	**DR LI Evaluation for Year 1**	**Post-event surveys**

	Q1	Q2-Q3	Q4
DF Rates Evaluation for Year 2	**Pre-event surveys**	**DR LI Evaluation for Year 2**	**Post-event surveys and Final Load Impact Evaluation**

ATTACHMENT B

The table below displays the number of accounts that will be used as comparison for DF Rates by rate and month.

Table LGR-3 Number of accounts used as comparison for DF Rates[1]

Rate Description	Service Provider	202501	202502	202503	202504	202505	202506	202507	202508	202509	202510	202511	202512
Commercial-ALTOU	BUNDLED	13,938	13,885	13,875	13,858	13,772	13,705	13,684	13,644	13,655	13,631	13,620	13,414
	DA	483	482	480	473	472	469	469	507	504	503	500	490
Commercial-ALTOU Total		14,421	14,367	14,355	14,331	14,244	14,174	14,153	14,151	14,159	14,134	14,120	13,904
Commercial-PAT1	BUNDLED	297	292	287	287	286	281	282	282	285	285	285	268
	DA	4	4	4	4	4	4	4	4	4	4	4	4
Commercial-PAT1 Total		301	296	291	291	290	285	286	286	289	289	289	272
Commercial-TOUA	BUNDLED	121,070	121,033	121,034	121,084	121,118	121,110	121,102	121,015	121,063	121,025	120,977	119,807
	DA	1,067	1,061	1,062	1,062	1,062	1,057	1,057	1,087	1,088	1,092	1,092	1,084
Commercial-TOUA Total		122,137	122,094	122,096	122,146	122,180	122,167	122,159	122,102	122,151	122,117	122,069	120,891
Commercial-TOUPA	BUNDLED	3,858	3,867	3,858	3,870	3,855	3,875	3,847	3,849	3,852	3,850	3,841	3,783
	DA	48	48	48	48	48	48	48	48	48	48	48	45
Commercial-TOUPA Total		3,906	3,915	3,906	3,918	3,903	3,923	3,895	3,897	3,900	3,898	3,889	3,828
Industrial-A6TOU	BUNDLED	35	35	35	35	35	35	35	30	33	32	31	27
	DA	6	6	6	6	6	6	6	10	10	10	10	9
Industrial-A6TOU Total		41	41	41	41	41	41	41	40	43	42	41	36
Industrial-ALTOU	BUNDLED	562	558	555	557	561	563	556	559	523	514	509	483
	DA	51	53	54	54	54	55	56	62	63	64	64	64
Industrial-ALTOU Total		613	611	609	611	615	618	612	621	586	578	573	547
Industrial-TOUA	BUNDLED	4	4	4	4	5	2	3	3	2	3	3	3
Industrial-TOUA Total		4	4	4	4	5	2	3	3	2	3	3	3
Industrial-TOUPA	BUNDLED	22	24	24	26	28	28	28	29	27	26	26	27
	DA	2	2	2	2	2	2	2	2	2	2	2	2
Industrial-TOUPA Total		24	26	26	28	30	30	30	31	29	28	28	29
Residential-TOUDR1	BUNDLED	1,071,297	1,069,403	1,071,728	1,071,280	1,071,957	1,074,316	1,076,231	1,075,849	1,077,040	1,074,433	1,073,175	1,069,088
Residential-TOUDR1 Total		1,071,297	1,069,403	1,071,728	1,071,280	1,071,957	1,074,316	1,076,231	1,075,849	1,077,040	1,074,433	1,073,175	1,069,088
GRAN TOTAL		**1,212,744**	**1,210,757**	**1,213,056**	**1,212,650**	**1,213,265**	**1,215,556**	**1,217,410**	**1,216,980**	**1,218,199**	**1,215,522**	**1,214,187**	**1,208,598**

[1] Bundled service means a customer receive both electric generation and electric delivery from SDG&E under a single pricing plan. In other words, SDG&E provides the electricity you use and delivers it to your home or business, and the costs for these services are combined into one bill.
Direct Access is a program that allows eligible non-residential customers to purchase their electricity from a competitive provider called an Energy Service Provider (ESP) instead of SDG&E. SDG&E still delivers the electricity through its transmission and distribution system, but the generation portion of the bill comes from the ESP you choose.