

Application: \_\_\_\_\_

Exhibit No.: SDG&E-\_\_\_\_\_

**PREPARED DIRECT TESTIMONY OF**  
**RAGHAV MURALI**  
**ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**  
**CHAPTER 1**



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

**November 26, 2018**

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**PREPARED DIRECT TESTIMONY OF  
RAGHAV MURALI  
CHAPTER 1**

**I. INTRODUCTION**

The purpose of my prepared direct testimony is to give a brief overview of the Application, describe San Diego Gas and Electric Company's ("SDG&E") perspective on the data privacy implications at hand, and request specific action by the California Public Utilities Commission ("Commission"). The topics discussed in this chapter are expanded upon in the testimony of witnesses Tishmari Lewis (Chapter 2), Claudio Pellegrini (Chapter 3), Christopher Vera (Chapter 4), and John Roy (Chapter 6).

**II. APPLICATION OVERVIEW**

**A. Executive Summary**

By this Application ("A.") SDG&E complies with the Ordering Paragraphs ("OP" or "OPs") of the Commission's Resolution E-4868 ("Resolution").<sup>1</sup> The Resolution ordered the investor-owned utilities ("IOUs") to continue to refine their current click-through authorization processes ("CTP") by which customers can be authenticated as real customers of a specific IOU and then authorize the IOU to provide a specific data set to a third-party demand response provider ("DRP") via a seamless automated process that starts and ends on the website of the third-party.

SDG&E launched the first phase of its CTP in Spring 2018, with the third phase of implementation concluding around the time of this Application, November 2018.<sup>2</sup> In that short time, approximately 9,000 customers have authorized SDG&E to provide the expanded data set

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<sup>1</sup> Resolution E-4868 (August 24, 2017), pp. 105-106, OP 29.

<sup>2</sup> *Id.*, OP 26.

1 (as defined in the Resolution Attachment 1) to DRPs. The CTP solution, as discussed in both the  
2 testimony of witnesses Lewis (Chapter 2) and Pellegrini (Chapter 3), has been clearly successful  
3 in SDG&E's view. It has accomplished what it was designed to achieve: to provide a clear,  
4 secure, standards-based technology solution that begins and ends on a third-party website and  
5 through a process that achieves the following:

- 6 1) Securely provides utility authentication of the customer (the customer is  
7 confirmed to be who they say they are), and the customer is recognized by the  
8 utility as an SDG&E customer;
- 9 2) Allows the customer to indicate to the utility his or her desire to share a defined  
10 set of data with a defined third-party;
- 11 3) Requests the customer to verify his or her understanding and agreement to a set of  
12 SDG&E terms and conditions granting authority to SDG&E to share the data with  
13 the third-party;
- 14 4) Provides the third-party with confirmation of the customer authorization;
- 15 5) Seamlessly allows the customer to start and finish his or her authentication and  
16 authorization process on the third-party website and reduces the chance of  
17 attrition or abandonment of the authorization process mid-stream; and
- 18 6) Provides a process for the customer to revoke this authorization if, for any reason,  
19 the customer no longer wishes to share data with the third-party.

20 Not only has SDG&E's CTP achieved these goals, but it has done so within the budget  
21 authorized for the effort, and in the overall total timeframe that was contemplated under the  
22 Resolution.<sup>3</sup>

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<sup>3</sup> See *id.*, OP 26 for schedule (15 months).

1           **B.       Summary of the Chapters and their Contents**

2           As SDG&E looks forward to the future of the CTP, OP 29 of the Resolution lists ten  
3 required elements to be included in this Application. These elements can be grouped into three  
4 categories:

5           **Category 1** contains one element: The expansion of the CTP to serve distributed energy  
6 resource and energy management providers (collectively, “DERPs”) in response to OP 24 and  
7 the first bullet in OP 29. Today, as required, the CTP at SDG&E only serves DRPs who are  
8 participating directly in the California Independent System Operator (“CAISO”) markets, via  
9 SDG&E’s Electric Rule 32.<sup>4</sup>

10          **Category 2** also contains one element in response to the second bullet in OP 29: “a cost  
11 estimate and proposal for API [Application Program Interface] Solution 1,”<sup>5</sup> herein referred to as  
12 the “Alternate Solution,” to differentiate it from SDG&E’s current CTP, which is in operation  
13 and serving customers today.

14          **Category 3** of required elements for this Application consists of the remaining eight  
15 bullet points contained in OP 29, which are generally less expansive and complex in nature.

16 These items are as follows:

- 17           -       A cost estimate and proposal for Synchronous data;
- 18           -       Improvements to the authorization process to increase participation;
- 19           -       Improvements to the data delivery processes;
- 20           -       Upgrades to information technology (“IT”) infrastructure needed for the CTP;

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<sup>4</sup> SDG&E Electric Rule 32 is the “direct participation” in the CAISO market rule; and governs the relationship between the customer, utility, and third-party or DRP. Pacific Gas and Electric Company and Southern California Edison Company’s direct participation rules are both numbered Rule 24. The rules are often referred to as Rule 24/32.

<sup>5</sup> Resolution, p. 105.

- 1 - Additional functionality suggested in the Customer Data Access Committee  
2 (“CDAC”);
- 3 - Resolution of any implementation issues in the current CTP or Alternate Solution  
4 as raised by the stakeholders in the CDAC;
- 5 - Costs for integrating the Customer Information Service Request (“CISR”)-DRP  
6 into the Green Button platforms; and
- 7 - A description of how SDG&E would update its website to include customer-  
8 friendly data on its Rule 32, how to authorize the sharing of data, and the how to  
9 revoke that authorization.

10 In responding to the bullets above from OP 29, SDG&E provides its prepared direct  
11 testimony divided into the following chapters:

- 12 1. Chapter 1 – My testimony, as described in the Introduction above;
- 13 2. Chapter 2 – The prepared direct testimony of Tishmari Lewis, who describes the  
14 proposed approach and rationale for each of the elements above, including  
15 business unit costs and the business perspective for the OP 29 elements;
- 16 3. Chapter 3 – The prepared direct testimony of Claudio Pellegrini, who describes  
17 the IT architecture, IT costs, and technical approach for each of the elements  
18 above;
- 19 4. Chapter 4 – The prepared direct testimony of Christopher Vera, who addresses  
20 privacy issues related to certain OP 29 elements;
- 21 5. Chapter 5 – The prepared direct testimony of Amanda White, who provides the  
22 revenue requirement needed for the proposed budgets requested in the  
23 Application;

1 6. Chapter 6 – The prepared direct testimony of John Roy, who provides SDG&E’s  
2 proposal on how costs associated with this Application should be recovered; and

3 7. Chapter 7 – The direct prepared testimony of Kellen Gill, who provides the  
4 estimated rate impacts that would result from the Commission’s approval of  
5 SDG&E’s requested budget.

6 **III. SDG&E’S PROPOSALS IN RESPONSE TO OP 29**

7 **A. Category 3 Requirements - SDG&E is already compliant with, or is**  
8 **proposing changes to comply with, these requirements.**

9 The final eight bullets of OP 29 contain several operational requirements. SDG&E has  
10 already achieved, or is proposing to achieve in this Application, each of these requirements.

11 Witnesses Lewis and Pellegrini provide greater detail on each of these, summarized below:

12 1. **Data Delivery Synchronization** – SDG&E understands the need to ensure a  
13 positive customer experience, providing a near real-time response to reduce the  
14 number of customers abandoning the process. SDG&E is currently meeting these  
15 needs, as required by the Resolution.<sup>6</sup>

16 2. **CTP Improvements** – SDG&E’s recommendation to improve the CTP includes  
17 the development and implementation of a communication plan when a planned or  
18 unplanned outage occurs that impacts the CTP. This plan is described in greater  
19 detail in Chapter 2. SDG&E requests no incremental funding for this effort.

20 3. **Data Delivery Process Improvements** – SDG&E does not recommend any  
21 immediate improvements in this area. Data is being delivered in the timeframes

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<sup>6</sup> See Resolution, OPs 18 and 29.

1 required, and without any significant issues. SDG&E recommends waiting until  
2 more time has passed to determine if further improvements are warranted.

3 4. **Improvements to the CTP Infrastructure** – SDG&E is proposing new  
4 integration test environments to streamline testing for DRP integration to help  
5 DRPs launch sooner.

6 5. **Additional CTP Functionalities Proposed in CDAC for the Current CTP**  
7 **Solution** – As described in greater detail in Chapter 2 and Chapter 3, SDG&E has  
8 either achieved, or proposes to achieve, new functionalities to the CTP.

9 6. **Resolution of Implementation Issues** – SDG&E knows of no current  
10 implementation issues to resolve.

11 7. **Integrating CISR-DRP Form Terms and Conditions with SDG&E’s Green**  
12 **Button Platform** – SDG&E has implemented the link to the full terms and  
13 conditions in the CTP.

14 8. **Publication of an Information Utility Website** – The customer education web  
15 page for CTP has been developed and published.

16 **B. Three New Data Elements:**

17 In this Application, SDG&E proposes (in the testimony of Ms. Lewis, Chapter 2) to add  
18 three data elements to the current data set provided to DRPs.<sup>7</sup> These data elements are: 1) gas  
19 usage; 2) the customer’s participation in Energy Efficiency (“EE”) programs; and 3) historical  
20 customer rate information and notification of a customer rate change. These new data elements  
21 would also be available to DERPs, should the CTP expand to DERPs. These three elements are

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<sup>7</sup> The Prepared Direct Testimony of Tishmari Lewis (Chapter 2), Section IV. Whitepaper Responses: Requests for Additional Data – Recommended.



1 minimal in their cost to provide, and support a level playing field for data. More importantly,  
2 these data fields meet a specific business need and cannot be obtained from other parties.  
3 SDG&E elects to add them now because they support integrated demand side management  
4 (“IDSM”) activity. For example, it may be useful for a DRP, which already receives data on DR  
5 program participation through the CTP, to also receive a customer’s EE program participation.  
6 Specifically, some of SDG&E’s EE programs include thermostat rebates, which would be useful  
7 for the DRP to know to support further DR activity. Similarly, it could be useful for the DRP to  
8 receive gas usage data, if available, for customers as part of the expanded data set.<sup>8</sup>

9 **C. Category 2 Requirement - The Current CTP has been a success so far; no**  
10 **alternative solution is required at this time.**

11 As stated above, SDG&E launched its CTP on time in Spring 2018 and, since that time,  
12 thousands of customers have authorized SDG&E to provide the expanded data set (as defined in  
13 the Resolution) to DRPs. In SDG&E’s view, the CTP has been a success so far; customers are  
14 enrolled in third-party demand response (“DR”) programs at greater numbers than ever before,  
15 and protected, encrypted data is securely flowing between more third parties and the utility than  
16 ever before, with customers’ informed consent. These are tangible successes that support the  
17 State’s goal to increase direct third-party DR.

18 Given this success, the Commission should allow SDG&E to continue its current CTP  
19 rather than turning its attention to building out a separate process, an Alternate Solution.  
20 Investing in the current successful CTP, rather than requiring SDG&E to invest incremental  
21 resources into building an Alternate Solution, is a logical and prudent use of ratepayer funds.

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<sup>8</sup> In fact, Southern California Gas Company recently filed an application to begin offering gas demand response programs. See A.18-11-005, Application of Southern California Gas Company (U 904 G) to Establish a Demand Response Program (filed November 6, 2018).

1 Underlying the Commission’s requirement for the IOUs to propose and provide a cost estimate  
2 for an Alternate Solution, instead of waiting to evaluate the current CTP, was its desire to avoid  
3 customers “using a failed system to authorize the Utility to share their data with the third-party  
4 with the likely result that program enrollments would be lower than desired.”<sup>9</sup> However, there  
5 has been no evidence presented that the currently functioning CTP has “failed” in any way. In  
6 fact, to date, SDG&E has received positive feedback on the solution from a growing number of  
7 users. Likewise, there has been no indication that there are a substantial number of third-party  
8 DRPs who are anxious to use an Alternate Solution. SDG&E cannot champion the use of  
9 ratepayer funds for an Alternate Solution that may have little or no value to the grid without  
10 knowing that it would have substantial traction with both DRPs and customers. Therefore, the  
11 success of SDG&E’s current CTP should assuage the Commission’s concern. Further, given the  
12 lack of record as to the potential use of the Alternate Solution, proceeding with that Solution is  
13 unwarranted.<sup>10</sup> Instead of requiring a new, and alternate process, the Commission should nurture  
14 the continued early growth of SDG&E’s current – and thriving – CTP.

15 **D. Category 1 Requirement - An Expansion of Click-Through to all DERPs is**  
16 **premature and imprudent.**

17 The Commission, as well as third parties, have also expressed a desire to expand the CTP  
18 to parties other than DRPs. Commission Staff issued a whitepaper through the CDAC and  
19 invited feedback on whether there was a need for customer usage data to support the growth of  
20 other energy programs statewide. A handful of parties responded to this invitation and provided  
21 their feedback.<sup>11</sup>

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<sup>9</sup> Resolution, p. 63.

<sup>10</sup> SDG&E identifies serious technical concerns associated with the Alternate Solution in Chapter 3.

<sup>11</sup> SDG&E received responses from the following third parties, via the Energy Division: California Efficiency + Demand Management Council, ecobee, Home Energy Analytics, Lockheed-Martin,

1           SDG&E believes that the CTP should not yet be expanded for use by DERPs. The  
2 Commission has developed multiple platforms to supply data in various proceedings, rather than  
3 a single multi-faceted proceeding. A single proceeding may allow multiple platforms to be  
4 consolidated to serve ratepayers in an efficient manner. The best value is derived when fewer  
5 data delivery platforms can provide necessary data to the right parties for the right reasons.

6           Further, there has been no record developed to demonstrate that expanding the CTP to  
7 DERPs would be in the best interest of ratepayers or even the DERPs themselves. Many more  
8 questions need to be asked and answered before the CTP, and the provision of the current  
9 customer information data set, is expanded to DERPs. If the CTP were to be expanded as  
10 proposed, the companies likely to use it will be those who can afford to build a system that  
11 integrates with each of the IOUs' click-through platforms. This approach may limit the data that  
12 can be delivered to smaller companies, those with less technology, or with less ability or  
13 incentive to invest in IOU integrations. Such issues become magnified when considering the  
14 burgeoning DERP market. Given the Commission's preference for DR growth to occur using  
15 third-party providers, along with its mandate for IOUs to outsource 60% of their energy  
16 efficiency portfolio in the near term, the role of DERPs will invariably expand, creating a larger  
17 need for data. For this reason, the Commission should not rush to expand the CTP for the sake  
18 of expansion alone, without a record of whether this would be an effective approach for such a  
19 potentially vast number of third parties, many of whom may not even be aware of this CTP  
20 proceeding.

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OhmConnect, Mission:Data, SunRun, and Tesla. The Public Advocates Office also provided a response.

1           Indeed, the need for a more deliberative and thoughtful approach to expanding the CTP,  
2 or building out an alternative platform, for all DERPs should be taken seriously considering the  
3 very public data privacy concerns in other industries, particularly social media. These concerns  
4 were identified and addressed by the State during this past legislative session in the California  
5 Consumer Privacy Act (“CCPA”).<sup>12</sup> This law authorizes fines and a private right to legal action  
6 to protect every Californian’s right to privacy. It also illustrates the State’s serious emphasis on  
7 transparent data management, customer privacy, and data protection. Ordering an immediate  
8 expansion of the CTP for all DERPs without a record of the need for DERP access to customer  
9 usage data, the scope and content of such data, and controls for access to that data at a time when  
10 DERPs are rapidly expanding, is not prudent given the high priority the State has placed on data  
11 control. Customer privacy and data access issues must be treated in a thoughtful, deliberative  
12 manner. For this reason, in response to the Commission’s first bullet in OP 29, SDG&E  
13 proposes that the Commission should initiate a separate proceeding where all relevant  
14 stakeholders will have the opportunity to participate and shape the outcome.<sup>13</sup> The data use,  
15 sharing and privacy concerns described above are expanded upon in witness Vera’s testimony  
16 (Chapter 4).

17           If, however, SDG&E is ordered to implement an expansion of the CTP to DERPs now  
18 regardless of the risks, the testimony of Tishmari Lewis (Chapter 2) provides recommended  
19 parameters for implementation and cost estimates. The testimony of John Roy (Chapter 6)

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<sup>12</sup> Assembly Bill (“AB”) 375, California Consumer Privacy Act, Stats. 2017-2018, Ch. 55 (Cal. 2018), Section 1798.150(a)(1)(A).

<sup>13</sup> This approach is consistent with the Customer Choice Gap Analysis. See California Public Utilities Commission, *California Customer Choice Project: Draft Gap Analysis/Choice Action Plan* (October 2018), p. 1. The proposed proceeding would also address any jurisdictional issues or controls to be established for an expansion of the CTP to DERPs.

1 further discusses SDG&E’s proposal for cost recovery of such an undertaking, should SDG&E  
2 be ordered to implement an expansion of the CTP to DERPs. These costs are not reflected,  
3 however, in SDG&E’s budget request, revenue requirement, or estimated rate impacts.

4 **E. If SDG&E is ordered to expand the CTP to DERPs, controls should be**  
5 **mandated.**

6 Notwithstanding SDG&E’s position that the Commission should build a further record  
7 before expanding the CTP to DERPs, SDG&E recommends that any future expansion of the  
8 CTP to DERPs should occur only with the following controls in place:

9 **1. All DERPs, including DRPs, should receive the same data.**

10 If the CTP is expanded to other energy service providers, DERPs should receive the same  
11 data set that is currently being provided to DRPs through the CTP,<sup>14</sup> under the conditions  
12 described below.

13 To ensure a level playing field, SDG&E proposes that the CTP expansion to DERPs  
14 should restrict the data set authorized by customers and provided to the DERP to the information  
15 contained in the expanded data set approved by the Commission in the Resolution. This also  
16 minimizes ratepayer exposure to a more complicated and costly process. Further, such an  
17 approach simplifies the authorization process so that different data options do not confuse  
18 customers, which could result in the authorization of the incorrect data set. In sum, all DRPs and  
19 DERPs should get the same data.

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<sup>14</sup> Resolution, Attachment 1, describes the “expanded data set” for SDG&E in detail. SDG&E has implemented this data set and is referred to herein as the “current data set.”

1                   **2. If required to implement expansion to DERPs, DERPs who choose to**  
2                   **access the CTP should be subject to the same data controls as DRPs.**

3                   **a. Utility Registration:**

4                   DERPs should be required to sign a registration contract with SDG&E as DRPs do today.

5 Consistent with how the IOUs treat DRPs, the purpose of a DERP contract should be to:

- 6                   i. Identify the DERPs who will be integrating into SDG&E’s system;
- 7                   ii. Set forth the parameters for how data will be sent and received; and
- 8                   iii. Set forth any consequences if the CTP participation contract is
- 9                   breached.

10                   **b. Commission Registration:**

11                   Further, the Commission has ruled that it has jurisdiction over DRPs.<sup>15</sup> As such, DERPs

12 must be required to register with the Commission, just as DRPs are required to do today. This is

13 an important step to ensure that data recipients have some “skin in the game,” which includes

14 providing a performance bond based on the number of customers served, as DRPs do today.<sup>16</sup>

15 Beyond mere equity with DRPs, these requirements should be in place to ensure that appropriate

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<sup>15</sup> See Decision (“D.”) 10-06-002 (modified in D.10-12-060) in which the Commission established that the Commission has jurisdiction over third-party demand response.

<sup>16</sup> On December 4, 2012, the Commission adopted D.12-11-025 (later amended by D.13-05-012), which set policies for the implementation of direct participation demand response. In April 2014, the Commission approved a set of rules that defined the roles and responsibilities of third-party DRPs, aggregators, utilities, and customers in direct participation demand response. More information on direct participation demand response and the utilities’ Rule 24/32 is available online. See California Public Utilities Commission, *DRP Registration Information*, available at <http://www.cpuc.ca.gov/General.aspx?id=8314>. Any DERP/aggregator that enrolls a utilities’ bundled customers in Direct Participation Demand Response is required to register with the Commission (and with CAISO). As a part of the Commission registration, DERP/aggregators serving residential and small commercial customers (defined as having a maximum peak demand of less than 20 kW) are also required to provide a performance bond and sample customer notification form letter to the Commission.

1 controls for customer privacy and data usage exist, resulting in Commission jurisdiction and  
2 enforcement capability should violations or abuses occur.

3 **c. Consumer Protections:**

4 Additionally, it is worth noting that the Commission has ruled that there should be certain  
5 consumer protections for ratepayers and customers of the utilities when sharing their data with  
6 DRPs.<sup>17</sup> Specifically, the Commission has allowed customers who encounter less than  
7 scrupulous companies to file formal complaints at the Commission and for those complaints to  
8 be resolved through a regulated, transparent process. The same standard must be applied to  
9 DERPs.

10 **d. Grid and Greenhouse Gas Value:**

11 SDG&E believes that ratepayers should only fund expansion of the currently launched  
12 CTP to DRPs if some grid value or reduction in greenhouse gas (“GHG”) is directly  
13 attributable to the resource. In other words, SDG&E wants to prevent any non-energy related  
14 company from accessing this data, at the expense of ratepayers, to serve industries that do not  
15 directly provide some value to ratepayers. Requiring DRPs to register with the Commission, as  
16 described above, is one way to ensure that the third-party receiving the data at ratepayer expense  
17 is, in fact, an energy management company or offers some grid or GHG benefit.

18 **e. Use Neutral:**

19 In addition, any expansion of the CTP to DRPs should be “use neutral.” This means  
20 that the CTP should be developed for all kinds of DRPs (as described above), without

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<sup>17</sup> See, e.g., SDG&E Electric Rule 32, Sheet 17. Per Rule 32, customers are also afforded a complaint process with the Commission if disagreements arise between customers and DRPs. *Id.*, Sheet 23-25.

1 preference as to the type of distributed energy resource. This supports competition, fairness and  
2 a level playing field.

3 **IV. SUMMARY OF SDG&E'S BUDGET REQUEST AND OTHER COST**  
4 **ESTIMATES**

5 SDG&E seeks cost recovery for its proposed budgets as discussed in witness John Roy's  
6 prepared direct testimony (Chapter 6). SDG&E has developed cost estimates based upon its  
7 good faith assumptions, described in each chapter. The budgets SDG&E seek recovery for have  
8 not been sought elsewhere and are directly attributable to the items in this Application as  
9 described. Chapter 3, the prepared direct testimony of witness Pellegrini, contains the total  
10 individual cost estimates for SDG&E's proposed budgets. The total budget request from Mr.  
11 Pellegrini is summarized below in Table RM-1:



1

Table RM-1 - SDG&amp;E TOTAL BUDGET REQUEST (in dollars)

		Year 1	Year 2	Year 3	Year 4	Year 5	TOTAL
<b>Category 3 - Misc. Projects</b>	<b>Testimony Reference</b>						
<b>Status of Authorization</b>	Capital, Pellegrini, Section V.	146,997					146,997
<b>DR Program Eligibility Check</b>	Capital, Pellegrini, Section V.	342,993					342,993
<b>Status of Authorization</b>	O&M, Pellegrini, Section V.	1,845	5,534	4,612	3,689	2,767	18,447
<b>DR Program Eligibility Check</b>	O&M, Pellegrini, Section V.	4,304	12,913	10,761	8,608	6,456	43,042
<b>System Test Environment</b>	Capital, Pellegrini, Section IV.	52,083					52,083
<b>System Test Environment</b>	O&M, Pellegrini, Section IV.	8,906	10,219	9,890	9,563	9,234	47,812
<b>Expanded Dataset</b>	Capital, Pellegrini, Section VI.	427,554					427,554
<b>Expanded Dataset</b>	O&M, Pellegrini, Section VI.	14,320	42,960	35,800	28,640	21,480	143,199
<b>TOTAL BUDGET REQUEST</b>		999,002	71,626	61,063	50,500	39,937	1,222,128

2

1 Questions on the above table should be directed to Mr. Pellegrini (Chapter 3).

2 Chapter 2 (Lewis) and Chapter 3 (Pellegrini) also contain other cost estimates for items  
3 required by OP 29 in the Resolution. Although SDG&E provides cost estimates for these items,  
4 it is not requesting recovery of such amounts at this time for the reasons explained in Chapter 2  
5 and Chapter 3. For convenience, SDG&E provides a total of all the cost estimates for which it  
6 currently does not seek funding in Table RM-2 below. Questions on Table RM-2 should be  
7 directed to witnesses Lewis (Chapter 2) and Pellegrini (Chapter 3).

8 **Table RM-2 - SDG&E TOTAL COST ESTIMATES FOR ITEMS NOT REQUESTED (in dollars)**

		Year 1	Year 2	Year 3	Year 4	Year 5	TOTAL
<b>DERP Expansion Business Support</b>	O&M, Lewis, Section VI	93,077	282,300	282,300	282,300	282,300	1,222,277
<b>DERP Expansion</b>	Capital, Pellegrini, Section IX	593,760	0	0	0	0	593,760
<b>DERP Expansion</b>	O&M, Pellegrini, Section IX	21,955	131,732	131,732	87,821	65,866	439,106
<b>Alternate Solution</b>	Capital, Pellegrini, Section VIII	2,539,967	846,656	0	0	0	3,386,623
<b>Alternate Solution</b>	O&M, Pellegrini, Section VIII	0	352,065	821,485	704,130	469,420	2,347,100
<b>Alternate Solution</b>	O&M, Lewis, Section VII	0	86,084	129,125	129,125	129,125	473,459
<b>Total for projects</b>		<b>3,248,759</b>	<b>1,698,837</b>	<b>1,364,642</b>	<b>1,203,376</b>	<b>946,711</b>	<b>8,462,325</b>

9  
10 **V. CONCLUSION**

11 In view of SDG&E's demonstration in this Application, SDG&E respectfully requests  
12 that the Commission act as follows:

- 13 1) **The Commission should approve SDG&E's budget request of \$1,222,128, as**  
14 **described in Table RM-1 above, for enhancements to its existing CTP.**

1           2)     **The Commission should not direct SDG&E to build an Alternate Solution.**

2           SDG&E requests that it not be ordered to provide an alternative CTP, separate  
3           from its current CTP,<sup>18</sup> as referenced in Resolution, OP 29. Rather, the  
4           Commission should invest in the proven and continued success of SDG&E’s  
5           existing CTP. If, however, SDG&E is ordered to implement an Alternate  
6           Solution, SDG&E should be granted a two-way balancing account.

7           3)     **The Commission should defer expansion of the CTP to DERPs and other**

8           **Energy Management Services (“EMS”).** SDG&E believes that the Commission  
9           should not order a CTP expansion until it convenes a more deliberative process to  
10          ensure that there is adequate need by DERPs for the current data set provided to  
11          DRPs, and that there are adequate data controls in place. This is particularly  
12          important because of the State’s emphasis on data privacy and the rapid expansion  
13          occurring in the DERP market. Specifically, the Commission should convene a  
14          new proceeding to develop a record on this issue and arrive at a more holistic  
15          platform.

16          4)     **If SDG&E is ordered to expand the CTP to DERPs, SDG&E requests the**

17          **Commission require DERPS be treated the same as DRPs.** Should expansion  
18          of the CTP to DERPs occur, the Commission should establish certain necessary  
19          controls, such as requiring DERPs to register with the IOUs and the Commission,  
20          as DRPs are required to do today.

21          This concludes my prepared direct testimony.

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<sup>18</sup> This includes any modifications the Commission would order to the current SDG&E CTP to serve as a foundation or start for the Alternate Solution in any form.

1 **VI. STATEMENT OF QUALIFICATIONS**

2 My name is Raghav S. Murali. I am employed by SDG&E. My business address is 8326  
3 Century Park Court, San Diego, CA 92123. I am the Customer Programs Policy and Strategy  
4 Manager for SDG&E. My primary responsibilities include regulatory strategy, compliance  
5 filings, data analytics, and reporting for all customer program offerings. At SDG&E, I have  
6 previously held the positions of Senior Policy Advisor and Public-Sector Supervisor. Prior to  
7 SDG&E, I was an Environmental and Energy Attorney at Schiff Hardin LLP in Chicago, served  
8 as Assistant Chief of Staff of Legislative Affairs to Illinois Governor Pat Quinn, overseeing the  
9 state's energy and environmental agencies, and served as Chief Policy Advisor and Chief of  
10 Legislative Affairs for the Illinois Environmental Protection Agency.

11 In 2004, I graduated from the University of Michigan with a Bachelor of Arts in Political  
12 Science. I also received a JD from Chicago-Kent College of Law in 2007, with a Certificate in  
13 Public Interest Law.

14 I have not previously testified before the Commission.

## LIST OF ACRONYMS

A.	Application
AB	Assembly Bill
CAISO	California Independent System Operator
CCPA	California Consumer Privacy Act
CDAC	Customer Data Access Committee
CISR	Customer Information Service Request
CTP	Click-Through Authorization Process
DERPs	Distributed Energy Resource and Energy Management Providers
DR	Demand Response
DRP	Demand Response Provider
EMS	Energy Management Services
IDSM	Integrated Demand Side Management
IOUs	Investor-Owned Utilities
IT	Information Technology
OP/OPs	Ordering Paragraphs
SDG&E	San Diego Gas & Electric Company