

Company: San Diego Gas & Electric Company (U 902 M)
Proceeding: 2028 General Rate Case
Application: A.26-06-_____
Exhibit: SDG&E-13

PREPARED DIRECT TESTIMONY OF BRITTANY APPLESTEIN SYZ

(CUSTOMER AND EXTERNAL RELATIONS)

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



June 2026

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SUMMARY

CUSTOMER & EXTERNAL RELATIONS (In 2025 \$)			
Categories of Management	2025 Adjusted-Recorded (000s)	TY2028 Est. (000s)	Change (000s)
Total Non-Shared Services	8,858	10,331 ¹	1,473
Total Shared Services (Incurred)	0	503	503
Total O&M	8,858	10,834	1,976

Summary of Requests

- Approval of \$10.834 million in total Test Year (TY) 2028 O&M costs for Customer and External Relations, reflecting an increase of \$1.976 million over 2025 adjusted-recorded levels, to support non-shared and shared services that allow SDG&E to provide clear and transparent information on safety, rate design, critical programs, bill management, and major infrastructure projects. These costs are allocated as follows:
 - Approval of \$10.331 million in non-shared O&M costs, primarily consisting of labor costs for the following:
 - Marketing Communications Research & Analytics (MarCom) funding to deliver mandated safety communications, wildfire and Public Safety Power Shutoffs (PSPS) outreach, rate and bill education, emergency communications, and customer program awareness through multilingual, multi-channel strategies.
 - Regional Public Affairs (RPA) funding to support public safety partner coordination, liaise with municipalities, conduct required outreach on infrastructure projects, wildfire mitigation, and emergency preparedness, meet franchise compliance obligations across 27 cities and two counties, and respond to increasing regulatory and community engagement requirements.
 - Community Relations funding to support Commission-required public outreach, facilitate two-way communication with vulnerable

¹ Note: Totals may include rounding differences.

and hard-to-reach customers through trusted community-based organizations, and assist customers in accessing various types of safety, affordability, and assistance programs.

- \$1.132 million in Customer and External Relations RAMP-related costs, including funding for Electric Public Safety Communications, which support ongoing risk mitigation through public education campaigns addressing electric safety, wildfire preparedness, and emergency awareness.
- Approval of \$503 thousand in shared services costs associated with enterprise-level Communications and Stakeholder Engagement leadership that provides coordinated strategy, oversight, and alignment across SDG&E and SoCalGas, improving efficiency and supporting consistent, transparent engagement.

1 **PREPARED DIRECT TESTIMONY OF BRITTANY APPLESTEIN SYZ**
2 **CUSTOMER AND EXTERNAL RELATIONS**

3 **I. INTRODUCTION**

4 **A. Summary of Customer and External Relations Costs and Activities**

5 My testimony supports the Test Year (TY) 2028 forecasts for operations and maintenance
6 (O&M) costs for both non-shared and shared services associated with the Customer and External
7 Relations area for San Diego Gas & Electric Company (SDG&E). Table BS-1 summarizes my
8 sponsored costs.

9 Certain forecasted activities and estimated costs were presented previously in SDG&E's
10 2025 RAMP Application (A.) 25-05-013.² Those activities and any changes that have occurred
11 since the RAMP filing are detailed in Section V below.³

12 The Company has removed costs for political, civic, and related activities, and other
13 nonallowable expenses, as well as customer assistance program funding such as CARE, FERA,
14 and ESA, which are addressed and recovered through separate proceedings. The remaining costs
15 included in the request support the staffing and tools needed to effectively communicate essential
16 information to customers and key stakeholders, including information addressing public safety,
17 rates, and infrastructure projects, customer assistance, and to respond to community needs.

18 **TABLE BS-1**
19 **Test Year 2028 Summary of Total Costs**

CUSTOMER & EXTERNAL RELATIONS (In 2025 \$)			
Categories of Management	2025 Adjusted-Recorded (000s)	TY2028 Est. (000s)	Change (000s)
Total Non-Shared Services	8,858	10,331 ⁴	1,473
Total Shared Services (Incurred)	0	503	503
Total O&M	8,858	10,834	1,976

20 My testimony addresses the role of Customer and External Relations (CER), specifically
21 the three core functions of MarCom, RPA, and Community Relations, in supporting SDG&E's

² A.25-05-013, Application of San Diego Gas & Electric Company to Submit its 2025 Risk Assessment and Mitigation Phase Report (May 15, 2025).

³ *Id.*

⁴ Note: Totals may include rounding differences.

1 delivery of clear, timely information and meaningful engagement. These functions develop and
2 deploy communications related to public safety, rates, infrastructure projects, customer
3 assistance, and other community needs. Collectively, they are responsible for managing
4 essential communications with customers, employees, public safety partners, local and state
5 government stakeholders, community leaders, and hard-to-reach and vulnerable populations
6 across SDG&E's service territory.

7 SDG&E uses these integrated functions to deliver safety and emergency communications
8 (including wildfire and PSPS), rate and bill education, information on assistance programs
9 (including low-income and medical baseline), and Commission-mandated notices and outreach.
10 These communications are designed to be accessible and delivered through appropriate channels,
11 to allow customers to understand and appropriately respond to the information provided.

12 Without these functions, SDG&E would be less able to (1) communicate urgent safety
13 risks and emergency actions, (2) enable customers to understand and respond to rate changes and
14 bill management tools and available assistance, or (3) meet Commission-required outreach and
15 engagement obligations for public outreach and stakeholder engagement. Funding these
16 departments supports public safety, regulatory compliance, and facilitates responsive
17 engagement with customers and the communities SDG&E serves.

18 The forecasts presented reflect targeted investments, operational efficiencies, and the
19 strategic use of technology to maintain essential capabilities while controlling costs. SDG&E
20 has taken deliberate steps to control costs within these functions, including reducing staffing
21 levels, increasing reliance on technology-enabled tools, and streamlining cross-functional
22 coordination. These efforts have allowed SDG&E to support expanded regulatory, safety, and
23 customer engagement requirements with relatively modest cost growth. Importantly, these
24 functions also support customer affordability by helping customers better understand rate
25 options, access bill assistance programs, and take actions to manage their energy usage.

- 26 • **Marketing Communications Research & Analytics (MarCom)** plans and
27 delivers critical customer and employee communications, including safety and
28 emergency messaging, rate and bill education, and program awareness, using
29 customer research and data-driven insights to reach diverse audiences through
30 integrated, multi-channel, multilingual strategies.

- 1 • **Regional Public Affairs (RPA)** serves as the primary liaison to local
2 governments and public safety partners, supports outreach for infrastructure
3 projects and emergency operations, and administers franchise compliance across
4 SDG&E’s territory.
- 5 • **Community Relations** partners with nonprofit and community-based
6 organizations to reach vulnerable and hard-to-reach customers, support access to
7 assistance programs, and facilitate two-way community engagement and
8 employee involvement.

9 Together, these functions support SDG&E’s ability to meet its regulatory obligations and
10 the company’s commitments to safety, reliability, and affordability.

11 SDG&E has also created an enterprise-wide Communications & Stakeholder
12 Engagement function to coordinate strategy across SDG&E and SoCalGas. The Senior Vice
13 President of Communications & Stakeholder Engagement provides leadership and oversight for
14 communications and government, community, and stakeholder engagement activities,
15 strengthening alignment and driving efficiency while maintaining customer trust.

16 The TY 2028 CER forecasts support ongoing core activities and targeted incremental
17 investments to strengthen stakeholder engagement, public safety and emergency preparedness,
18 data-informed outreach, and connectivity with hard-to-reach and vulnerable customers.

19 These requested costs reflect prudent management and the strategic use of technology to
20 improve efficiency while maintaining the capabilities required to meet growing regulatory
21 expectations and community needs.

22 **B. Organization of Testimony**

23 My testimony is organized as follows:

- 24 • **Affordability & Efficiency:** Discuss how CER applies proactive planning
25 and coordination of internal and external communications.
- 26 • **Non-Shared O&M Costs:** Details forecasted costs and activities for
27 CER’s three subdivisions (i.e., Marcom, RPA, and Community Relations).
- 28 • **Shared O&M Costs:** Forecasts for newly created shared group
29 (Communications & Stakeholder Engagement).
- 30 • **Risk Assessment Mitigation Phase (RAMP) Integration**

1 **C. Support To and From Other Witnesses**

2 My testimony references the testimony and workpapers of several other witnesses, either
3 in support of their testimony or as support for mine.

- 4 • Wildfire Mitigation and Vegetation Management (Exhibit (Ex.) SDGE-
5 07): Supports the Wildfire Mitigation Plan including coordinating with
6 community-based organizations (CBOs), delivering clear, accessible
7 safety messaging that educates customers, and supporting during
8 emergencies.
- 9 • Customer Services (Ex. SDGE-12): Manages webpages and collaborates
10 on digital campaigns to engage customers effectively; Customers
11 Programs to connect nonprofit organizations with information and
12 resources to help customers access low-income assistance programs,
13 including Access and Functional Needs (AFN) and Medical Baseline
14 (MBL) designations.
- 15 • Compensation and Benefits (Ex. SCG-16/SDGE-20): Supports the
16 compensation modernization initiative.
- 17 • Shared Services testimony (Ex. SCG-22/SDGE-27): Provides further
18 details on shared services and the associated calculations.

19 The MarCom team works with other witness areas including:

- 20 • Wildfire Mitigation and Vegetation Management (Exhibit (Ex.) SDGE-07)
 - 21 ○ MarCom supports the Company’s Wildfire Mitigation Plan by
22 delivering clear, accessible safety messaging that educates
23 customers and communities on wildfire risk, preparedness actions,
24 available resources, vegetation management and clearance
25 activities, hardening efforts, and year-round safety practices. This
26 messaging educates customers on the resources available to help
27 prepare for and respond to wildfire-related events, including Public
28 Safety Power Shutoffs.
 - 29 ○ MarCom acts as the Public Information Officer during
30 emergencies, supporting Emergency Management and confirming
31 accurate, timely, and clear messaging reaches customers,

1 stakeholders, and media. The team coordinates communication
2 channels, including social media, press releases, website updates,
3 and direct outreach to help keep communities informed and safe.

- 4 • Customer Services (Ex. SDGE-12)
 - 5 ○ MarCom collaborates closely with Customer Services' Digital
6 Services group to deliver a seamless, brand-aligned digital
7 experience for sdge.com. MarCom develops messaging, creative
8 assets, and brand guidelines, while Digital Services manages
9 technical execution. Together, they confirm that webpages and
10 digital campaign reflect SDG&E's brand standards and engage
11 customers effectively.

12 The RPA team works with other witness areas including:

- 13 • Wildfire Mitigation and Vegetation Management (Ex. SDGE-07)
 - 14 ○ The RPA team supports as-needed customer and stakeholder
15 outreach in support of SDG&E's Wildfire Mitigation Plan
16 implementation including the awareness of the Public Safety
17 Power Shutoff (PSPS) program, fire-hardening, vegetation
18 management, and aerial inspections.
 - 19 ○ The RPA team supports Emergency Management operations
20 including acting as the liaison to Public Safety Partners during
21 events such as PSPS and other hazards. Responsibilities include
22 emergency planning and response, regulatory compliance,
23 notifications, and coordination of community engagement
24 activities, including briefings, town hall meetings, and wildfire
25 safety fairs.

26 The Community Relations team works with other witness areas including:

- 27 • Wildfire Mitigation and Vegetation Management (Ex. SDGE-07)
 - 28 ○ The Community Relations team supports the Wildfire Mitigation
29 Plan by coordinating with and supporting community-based
30 organizations (CBOs) that provide vegetation management work

1 such as San Diego Canyonlands and Urban Corps, and local fire
2 agencies.

3 ○ The Community Relations team supports Emergency Management
4 operations through outreach and education efforts to regional
5 CBOs.

6 ● Customer Services (Ex. SDGE-12)

7 ○ The Community Relations team works with Customers Programs
8 to connect nonprofit organizations with information and resources
9 to help customers access low-income assistance programs,
10 including Access and Functional Needs (AFN) and Medical
11 Baseline (MBL) designations. The team also supports nonprofits
12 as small business customers by connecting them to energy
13 efficiency programs and multifamily affordable housing initiatives.
14 By equipping community partners with accurate, timely program
15 information, Community Relations improves awareness,
16 enrollment, and effective utilization of assistance programs among
17 vulnerable and hard-to-reach customers.

18 **II. AFFORDABILITY & EFFICIENCY**

19 SDG&E has prioritized cost discipline within CER by reducing staffing, leveraging
20 technology, and improving coordination across functions, enabling the Company to meet
21 expanding regulatory and safety requirements while limiting cost growth.

22 The MarCom forecast remains relatively flat by utilizing tools, including self-service
23 reporting supported by advanced analytics, workflow-based drafting support, and automated
24 translation, to reduce turnaround time and reliance on external resources.

25 RPA has realigned into overall reduced staffing and leveraged support from other teams
26 to streamline municipal coordination and construction-related inquiries.⁵

27 Community Relations has realigned into overall reduced staffing and coordinated more
28 closely with MarCom and RPA to align outreach strategies and materials, reducing outreach
29 expenses while maintaining engagement with CBOs.

⁵ The majority of the incremental increase is related to two roles that remained vacant for over a year.

1 These efforts allow SDG&E to maintain essential communication and engagement
 2 capabilities while minimizing incremental cost impacts to customers.

3 **III. NON-SHARED O&M COSTS**

4 “Non-Shared Services” are activities that are performed by a utility solely for its own
 5 benefit. Corporate Center provides certain services to the utilities and to other subsidiaries. For
 6 purposes of this general rate case, SDG&E treats costs for services received from Corporate
 7 Center as Non-Shared Services costs. Table BS-2 summarizes the total non-shared O&M
 8 forecasts for the listed cost categories.

9 **TABLE BS-2**
 10 **Non-Shared O&M Summary of Costs**

CUSTOMER AND EXTERNAL RELATIONS (In 2025 \$)			
Categories of Management	2025 Adjusted-Recorded (000s)	TY2028 Est. (000s)	Change (000s)
A. Brand Marketing & Communications	5,198	5,874	676
B. Regional Public Affairs	1,769	2,288	519
C. RAMP - Safety Campaign	876	1,132	256
D. Community Relations	1,015	1,038	23
Total⁶	8,858	10,332	1,474

11 **A. Marketing Communications Research & Analytics**

12 **TABLE BS-3**
 13 **Marketing Communications Research & Analytics Cost Summary**

A. Marketing Communications Research & Analytics	2025 Adjusted-Recorded (000s)	TY2028 Est. (000s)	Change (000s)
1. Marketing Communications Research & Analytics	5,198	5,874	676
Total	5,198	5,874	676

14 **1. Description of Costs and Underlying Activities**

15 MarCom is responsible for planning, developing, and executing integrated
 16 communications that provide customers, employees, media, public safety partners, and

⁶ Note: Totals may include rounding differences.

1 stakeholders with timely and accurate information essential to public safety and utility service
2 and projects. MarCom translates complex and operationally critical information into clear
3 communications that customers and employees can understand and act upon. MarCom also
4 supports real-time response efforts during unplanned events, including wildfires, gas
5 emergencies, major electrical outages, severe weather and natural disasters, and other
6 emergencies, by preparing and distributing timely and accurate information. This communication
7 is intended to keep our communities safe and informed. The following sections describe
8 MarCom's role in performing these functions.

9 **a. Marketing Communications**

10 MarCom is responsible for crafting and executing integrated marketing and
11 communication plans to support customers and to help the company meet applicable regulatory
12 communication requirements and customer-notice expectations. Given SDG&E's
13 demographically and geographically diverse service territories, marketing and communication
14 strategies need to be multi-pronged, multichannel, multilingual, and culturally sensitive.

15 SDG&E proactively engages customers and stakeholders through mass and targeted
16 channels to drive participation in its services and programs and safety tips and resources. Efforts
17 include:

- 18 • Safety communications, on such topics as wildfire and PSPS events, natural gas
19 and electric safety messages, and crisis communications.
- 20 • Rate education for new rate classes, rate changes, natural gas and electric seasonal
21 rate education, and bill management tools.
- 22 • Customer programs that support customers by addressing a range of service,
23 affordability, and assistance needs, including AFN customers.
- 24 • Managing user experience design, compliance, and site performance, to maintain
25 accurate, compliant, and accessible information for customers on sdge.com.

26 MarCom also coordinates directly with the Commission to implement communication
27 requirements, including development, management, and distribution of required customer
28 communications for programs, such as the Annual Rate Comparison, Electric and Natural Gas
29 Rate Alerts, California Industry Assistance Credit, and the Economic Development Rate.
30 Additionally, the team is responsible for developing public education and communications for

1 several annual reports, including the AFN Annual Report and the Public Safety Power Shutoff
2 Pre-Season and Post Season reports.

3 To deliver these required communications and information effectively and efficiently,
4 MarCom leverages customer data, research, and external expertise to tailor messaging, improve
5 engagement, and create communications that are adapted for cultural relevance and delivered in
6 multi-pronged, multichannel, multilingual, and culturally sensitive.

7 The team manages critical information dissemination through an integrated mix of earned
8 and paid media channels, including digital content, streaming audio and video, email,
9 newsletters, and traditional outlets like print, broadcast, radio, out-of-home, direct mail,
10 brochures, fact sheets, and bill inserts.

11 As part of its ongoing responsibilities, the team performs pre-incident planning and
12 readiness work for critical incidents and potential Emergency Operations Center (EOC)
13 activations, including developing communication plans and tactics as well as internal workflows
14 and processes so it is prepared to support the Public Information Officer role when the EOC is
15 activated. Without approval of these costs, SDG&E's ability to deliver timely emergency
16 communications, comply with Commission-mandated outreach requirements, and provide
17 customers with actionable information regarding safety and bill management could be impacted.

18 **b. Media and Stakeholder Engagement**

19 Media and Stakeholder Engagement is central to SDG&E's external communications,
20 enabling timely, accurate, and transparent information to reach customers, stakeholders, and the
21 public. While traditional media and proactive engagement with local media and stakeholders on
22 company issues remains a key focus, the team also recognizes the growing influence of social
23 media and online forums. Media and Stakeholder Engagement responds to inquiries and
24 emergencies, issues news releases and media advisories, and develops content specifically
25 designed for both established media outlets and emerging digital platforms, including social
26 media and blogs. This content supports communication on a wide range of topics, including
27 safety, infrastructure projects, rate education, wildfire and PSPS preparedness, electrification,
28 bill management, customer assistance programs, and consumer protection.

29 The Media and Stakeholder Engagement team centralizes all external communications
30 through designated spokespersons, who confirm information is timely and accurate. They also
31 provide ongoing 24 hours a day, seven days a week (24/7) communications support for critical

1 incidents, delivering situational awareness and timely information as events occur. In addition,
2 as part of its regular responsibilities, the team conducts pre-incident emergency planning and
3 preparedness activities in advance of any Emergency Operations Center activation, including
4 developing pre-approved materials and communication tools, facilitating training and exercises
5 with the broader MarCom team, and establishing processes so that, when the EOC is activated,
6 the team can assume an expanded role as the Public Information Officer and support rapid,
7 coordinated response operations.

8 MarCom also develops educational toolkits, such as FAQs, infographics, and shareable
9 digital content, to support clear understanding of key issues across traditional media, digital
10 creators, and community partners. Ongoing updates to sdge.com, sdgetoday.com, and social
11 media channels help promote transparency, reinforce public safety messaging, and inform
12 customers about available programs and resources.

13 **c. Branding and Creative Services**

14 Branding and Creative Services is responsible for maintaining SDG&E's brand standards
15 and managing the development of customer-facing materials across all communication channels.
16 The team produces and oversees standardized templates, fact sheets, project notices, signage,
17 advertising, digital graphics, and presentations to confirm communications are consistent,
18 accessible, and compliant.

19 The team partners closely with internal departments, including Digital Services, and
20 external vendors to efficiently design and deploy customer education materials, email
21 communications, and visual assets, including photography and video. By leveraging in-house
22 expertise and technology-enabled tools, Branding and Creative Services delivers high-quality
23 materials quickly and cost-effectively, supporting timely communication during routine
24 operations and urgent events. Creative Services conducts advance planning and preparedness
25 activities to support emergency response, including the development of templates, visual
26 standards, and communication assets. During EOC activations, Creative Services reports into
27 the EOC and operates under the direction of the Public Information Officer to support
28 coordinated emergency communications efforts.

29 **d. Research and Analytics**

30 The Marketing Analytics and Research team serves as SDG&E's center for customer
31 insights and data-driven decision-making. The team designs and manages quantitative and

1 qualitative research, including surveys, focus groups, customer satisfaction studies, and
2 third-party research, to inform outreach strategies, improve customer experience, and align
3 communications with customer needs.

4 Using advanced analytics, including segmentation and predictive modeling, the team
5 supports targeted communications that help deliver information to the appropriate audience. The
6 team also evaluates campaign performance across key communication channels, including
7 outbound communications, digital platforms, paid media, and social media, and develops
8 performance dashboards to increase transparency and support data-driven decision-making.

9 Beyond marketing support, the team conducts Commission-required and operationally
10 critical research, including PSPS studies, energization timeline research, and pipeline awareness
11 surveys, and manages residential and business customer insight panels.

12 **e. Employee Communications**

13 Employee Communications is integral to SDG&E's ability to operate safely and reliably
14 by keeping employees informed and prepared to serve customers. The team facilitates clear
15 communication between leadership and employees by sharing key developments, policy
16 changes, strategic priorities, and emergency conditions.

17 These communications also support employee awareness of evolving safety, security, and
18 operational risks, including cyber and physical security considerations, helping to reinforce safe
19 work practices and support timely, coordinated responses to operational events.

20 Employee Communications delivers targeted messaging across multiple channels,
21 including the intranet, email, digital displays, and virtual and in-person meetings, and provides
22 communication tools and guidance to leaders and employees. These efforts support Company
23 priorities related to safety, affordability, operational efficiency, and regulatory compliance,
24 allowing the workforce to be able to respond to customer and operational needs.

25 Employee Communications conducts advance planning and preparedness activities to
26 support emergency response communications and, during an EOC activation, reports into the
27 EOC and operates under the direction of the Public Information Officer. Without these
28 capabilities, employees would have reduced visibility into safety conditions, operational
29 priorities, and emerging risks, which could impact safe and reliable operations and compliance.

f. Description of RAMP Mitigation

Within this cost category there are non-shared O&M costs for a risk control that was presented in the 2025 RAMP Report and is listed in the table below. As outlined in RAMP Chapter SDG&E-Risk-5 Electric Infrastructure Integrity, SDG&E delivers broad public awareness and education to customers about safety, including the importance of maintaining safe behavior around SDG&E’s electrical equipment. Through a comprehensive, year-round marketing and outreach campaign, SDG&E promotes a wide range of natural gas and electric safety topics, with primary focus areas including the risks of metallic balloons, downed powerline safety, maintaining a minimum 10-foot clearance from overhead powerlines, safe interaction with electrical equipment like pad mounted transformers, the dangers of generator back feed and natural gas safety with 811 Dig Alert, appliance checks and carbon monoxide awareness. This education effort is executed through a coordinated mix of multi-channel tactics designed to reach diverse audiences through bill inserts and bill package messaging, organic and paid social media, television, video, out of home media like transit shelters, print ads and digital advertising. Traffic drives customers to dedicated electric safety content on sdge.com. SDG&E also displays prominent safety signage near electrical facilities and on natural gas and electric delivery infrastructure.

**TABLE BS-4
RAMP and GRC Risk Control/Mitigation Activities - O&M
In 2025 \$ (000s)**

Customer and External Relations				
ID	Control/Mitigation Name	2025 RAMP 2028 Estimate In 2024 \$ (000s)	2028 GRC 2028 Forecast In 2025 \$ (000s)	Change (\$000s)
C215	Electric Public Safety Communications	1,363	1,132	(231)

g. Description of Selection and Prioritization of RAMP Risk Mitigations

The RAMP risk mitigation efforts are associated with specific actions, such as programs, projects, processes, and utilization of technology and are designed to address a specific safety and/or reliability risk. The Company’s selection and prioritization of these RAMP mitigation activities considered many factors when determining if these risk mitigation activities are an effective and worthwhile investment. The Enterprise Risk Management (ERM) process for

1 identifying and assessing system risk is described in the RDF Integration testimony (Ex. SCG-
2 02B/SDGE-02B).

3 At the start of the year, SDG&E's Marketing team evaluated Gas & Electric Safety
4 (GES) subject areas, taking into consideration multiple factors including:

- 5 • Safety risk severity and exposure, informed by incident history, consequence
6 potential, and system vulnerability
- 7 • Customer impact, including the potential to prevent serious injury, property
8 damage, service interruptions, or outages
- 9 • Effectiveness of behavioral mitigation, based on demonstrated ability of outreach
10 and education to reduce unsafe behaviors
- 11 • Cost effectiveness, using ratepayer funds efficiently to achieve measurable risk
12 reduction outcomes, distinct from and not reliant on a formal benefit cost ratio
13 (BCR)
- 14 • Operational and system constraints, including feasibility, timing, and alignment
15 with seasonal or environmental conditions

16 Topic prioritization balances both seasonal relevance and overall safety risk. Seasonal
17 safety topics, such as metallic balloon awareness, generator backfeed prevention, and gas
18 appliance safety checks, are activated during periods when likelihood or exposure increases.
19 However, primary emphasis remains on annual (evergreen) safety topics that present consistently
20 higher safety risk year-round. This approach promotes sustained mitigation of the most serious
21 hazards while maintaining flexibility to elevate seasonal messaging when risk indicators warrant.

22 Based on this assessment, the 811 Dig campaign continues to receive a large allocation of
23 marketing resources and market presence due to its direct relationship to excavation damage
24 prevention, high consequence risk, and strong evidence that awareness and compliance reduce
25 long term system risk. From a customer perspective, this investment is worthwhile because it
26 helps prevent serious safety incidents, service disruptions, and costly repairs, while supporting
27 reliable service and public safety. SDG&E implemented targeted modifications to its marketing
28 strategy to support the 811 campaign and its revised damage rate target of 1.19%, consistent with
29 SDG&E's RAMP framework.

30 Metallic Balloon Safety has been identified as another priority safety topic, supported by
31 historical data showing a sustained reduction in impact. Concentrating messaging during peak

1 celebration months improves top-of-mind awareness and supports overall cost effectiveness.
2 Over the past six years, balloon-related sustained customer outages exceeding five minutes
3 declined by approximately 50%, from roughly 66,000 to 33,000 customers. This outcome
4 demonstrates the effectiveness of targeted outreach as a preventative mitigation rather than a
5 reactive response.

6 Additional focus areas, including 10-foot Powerline Clearance and Electric Equipment
7 Safety, have also been designated as priority mitigations due to the elevated risk they pose to
8 both customers and the electric system. Together, this prioritization and selection process
9 confirms that safety communications are relevant, targeted and aligned with RAMP objectives
10 by preventing the increase of future safety and reliability risk while providing clear value to
11 customers and the company.

12 **2. Forecast Method**

13 The forecast method developed for this cost category is Base Year. This method is most
14 appropriate because the last recorded year accurately reflects the expense level associated with
15 current departmental activity. The Base Year reflects ongoing and recurring activities. The level
16 of effort and resources required to deliver this work remains largely consistent over time. Other
17 forecasting methods, such as multi-year averaging or trending, would incorporate historical
18 spending, including surveys and research activities, that are no longer representative of expected
19 future costs. For that reason, historical spending reflects the ongoing cost of performing these
20 functions and provides a reasonable baseline for future forecasts, with adjustments made for any
21 known changes.

22 **3. Cost Drivers**

23 SDG&E's total adjusted-recorded expenditures of \$5.197 million in 2025 consisted of
24 \$3.289 million in labor costs and \$1.909 million in non-labor costs. Collectively, these
25 investments provided a foundational level of customer communications as outlined above,
26 confirming customers receive timely, accurate, and actionable information to make informed
27 decisions about their energy use, and safety as well as having timely and relevant information on
28 SDG&E's programs, projects, and services. The requested incremental increases are driven by
29 evolving customer expectations, expanded emergency response requirements, and ongoing safety
30 and compliance communication obligations.

31 Within each MarCom function there are various cost drivers:

- 1 • Marketing Communications cost drivers include labor and non-labor resources.
2 The function relies heavily on specialized expertise of communication
3 professionals in strategy, content development, design, and execution. Ongoing
4 investment in customer communications advances critical initiatives aligned with
5 customer needs. These communications include rate education across all
6 customer classes that clarify pricing structures, changes, and available offerings,
7 gas and electric safety communications that deliver timely, accurate information
8 to protect communities, and support for major company projects that demand
9 specific, consistent, and impactful messaging. These expenditures are vital for
10 deepening customer understanding and reinforcing the company’s dedication to
11 safety, affordability, and reliability. Costs in this area include developing
12 communication materials, conducting customer research, creative design and
13 media buying, all of which are essential to delivering effective, targeted
14 messaging to support customers, all of which are data driven.
- 15 • Media and Stakeholder Engagement cost drivers encompass labor and non-labor
16 including media monitoring and distribution services, creative development for
17 multimedia content, technology upgrades, translation services, and crisis
18 communications support during emergencies. Costs also include internal staffing
19 of a dedicated hotline to provide situational awareness and rapid emergency
20 response. Additional costs are associated with proactive outreach through press
21 releases, media events, social media campaigns, and blogs.
- 22 • Employee Communications cost drivers include labor and non-labor to lead and
23 execute on internal messages, labor for video production management, and digital
24 board system maintenance software. Additional costs are also needed for digital
25 and creative services for executing employee communications, including safety
26 messaging, operational initiatives, or organizational changes.
- 27 • Branding and Creative Services costs are primarily driven by staffing costs for
28 designers and production specialists, along with technology investments in
29 creative software, asset management systems, and stock images licenses.
- 30 • Research and Analytics cost drivers include labor and non-labor to manage
31 vendor contracts that support specialized studies, to invest in custom research that

1 addresses unique business needs, and to license fee software platforms such as
2 Qualtrics. Transactional research tools and customer satisfaction programs add
3 ongoing costs to measure experience and loyalty, while expertise from certain
4 partners promotes alignment with industry best practices. Key cost drivers for the
5 analytics functions are largely software licenses, including custom data
6 integrations using systems such as Google Big Query.

7 For TY 2028, SDG&E is requesting a total of \$5.874 million for MarCom and \$1.132
8 million for RAMP – Safety Campaign. This forecast is based on base year costs with an
9 incremental funding request of \$0.676 million (MarCom) and \$0.256 (RAMP – Safety
10 Campaign) above the base-year. The main drivers include the following:

- 11 • \$112,000 – 1 FTE (Media and Stakeholder management level position): Support
12 expanding real-time and daily communications duties and rapid response
13 requirements, particularly during emergencies. Filling this position allows
14 SDG&E to meet expanding expectations and continue providing timely, accurate,
15 and transparent information to customers and stakeholders.
- 16 • \$134,000 – 1 FTE (senior creative services role): This position is critical to
17 delivering high-quality visual design across print and digital platforms,
18 confirming customer communications are clear, consistent, accessible, and
19 effective, particularly for safety messaging, rate changes, bill education, and
20 Emergency Operations Center activations. The role also supports the growing
21 need for centralized oversight of public messaging requirements and compliance
22 with accessibility, regulatory, and other legal standards across all communications
23 developed within or reviewed by Marcom.
- 24 • \$40,000 – Non-Labor: The Brand and Creative group forecasts the need to
25 implement new project management software department-wide that strengthens
26 compliance processes of communications materials. This solution streamlines
27 documentation review processes, and adheres to department guidelines while
28 keeping overall expenses low.
- 29 • \$250,000 – Non-Labor: To support expanded safety communications and enhance
30 public safety, SDG&E is requesting additional funding from \$750,000 to \$1
31 million. Initial efforts focused on four critical topics: mylar balloons, carbon

monoxide, downed wires, and 811 Call Before You Dig. The scope has since expanded to include pad-mounted equipment, overhead electrical clearance, and generator safety, significantly increasing the complexity and volume of required outreach. Additional resources are necessary to support timely, accessible, and impactful public safety communications across multiple platforms.

- \$55,000 – Non-Labor: An adjustment is requested to increase the Rate Education budget from a Base Year of \$860,000 to \$915,000 to restore typical seasonal rate education activities that were paused or scaled back due to the sole focus on prolonged PSPS events in January 2025, and the prioritization of Base Services Charge messaging. The 2025 Base Year also reflected reduced creative costs, as new creative materials had not been developed since 2023 but need to be updated based on the changing environment. This adjustment supports renewed customer education while maintaining an affordability-focused approach through continued use of cost-efficient tactics and existing assets.
- \$100,000 – Non-Labor: An adjustment is requested for Customer Research as the Base Year does not reflect the approximately \$100,000 in annual research costs typically incurred to support ongoing customer insights and campaign effectiveness. This is not new or incremental work; rather, the 2025 Base Year understated recurring research costs because the associated annual research expense was not captured in the recorded baseline. This adjustment is necessary to accurately reflect ongoing customer research costs.
- An adjustment of \$168,000 reflects changes in connection with the compensation modernization initiative. Please refer to the Compensation and Benefits testimony, Ex. SCG-16/SDGE-20.

B. Regional Public Affairs

**TABLE BS-5
RPA Non-Shared O&M Summary of Costs**

B. Regional Public Affairs	2025 Adjusted-Recorded (000s)	TY2028 Est. (000s)	Change (000s)
1. Regional Public Affairs	1,769	2,288	519
Total	1,769	2,288	519

1 **1. Description of Costs and Underlying Activities**

2 The RPA team serves as the primary liaison between SDG&E and local governments,
3 public safety partners, community organizations, and other stakeholders across two counties and
4 27 municipalities. Acting as a trusted single point of contact, RPA engages with elected
5 officials, municipal staff, public safety partners, community organizations, and customers to
6 better facilitate utility operations, resolution of complex issues, including customer escalations,
7 permitting and right of way challenges, project coordination, construction impacts, and property
8 access challenges. The team plays a critical role in enabling timely delivery of infrastructure
9 projects, both SDG&E and municipal projects, by supporting municipal coordination,
10 stakeholder briefings, public meetings, and project specific outreach and education. By
11 facilitating coordination with local governments and stakeholders, RPA helps avoid project
12 delays, permitting challenges, and community conflicts, which can otherwise increase project
13 costs and impact customers. The team supports issue resolution related to permits, access,
14 construction coordination, and customer escalations, helping to minimize disruption and
15 facilitate efficient project delivery.

16 The RPA team also supports emergency operations by providing coordinated engagement
17 with government and community partners well before, during, and after emergency events,
18 including PSPS events. RPA facilitates emergency planning and response, coordination of
19 public safety partners and local governments, regulatory compliance, public notifications, and
20 coordination of community engagement activities to assist our customers, including briefings,
21 town hall meetings, and wildfire safety fairs. Through this work, RPA helps keep communities
22 informed and supported during emergency events and recovery efforts, reinforcing public safety,
23 transparency, and trust.

24 RPA plays a key role in carrying out Commission-directed stakeholder engagement by
25 supporting the planning and execution of public participation activities, including hearings,
26 workshops, and community meetings. This work includes developing outreach strategies,
27 identifying and coordinating with affected stakeholders, managing meeting logistics, and
28 facilitating engagement to support meaningful participation.

29 In addition, RPA is responsible for administering and maintaining compliance with
30 franchise agreements across 27 cities and two counties in SDG&E’s service territory, with a

1 focus on efficient, predictable processes that benefit customers through reliability, safety, and
2 efficient service delivery.

3 **2. Forecast Method**

4 The forecast method developed for this cost category is Base Year. This method is most
5 appropriate because the last recorded year accurately reflects the expense level associated with
6 ongoing regional public affairs responsibilities. The Base Year incorporates the labor and
7 non-labor resources necessary to manage franchise commitments. These activities are continual,
8 recurring, and the underlying scope of work remains consistent. Other forecasting methods, such
9 as multi-year averaging or trending, would incorporate higher historical spending that are no
10 longer representative of expected future costs. Therefore, the base year provides a reasonable
11 starting point for forecasting future expenditures.

12 **3. Cost Drivers**

13 SDG&E's total adjusted-recorded expenditures of \$1.769 million in 2025 consisted of
14 \$1.704 million in labor costs and \$65,000 in non-labor costs. These investments support core
15 Regional Public Affairs functions by enabling effective engagement with local governments,
16 community leaders, and other stakeholders, as described above. This work provides stakeholders
17 with clear, timely access to information related to safety, reliability, and energy-related
18 decisions, as well as meaningful awareness of SDG&E's programs, projects, and services. The
19 incremental funding request reflects rising expectations for local engagement, increased
20 coordination demands during emergencies, and the expanding scope of safety, regulatory, and
21 compliance-driven or Commission mandated public outreach responsibilities.

22 The incremental cost requests are for labor associated with backfilling a director and an
23 RPA manager position. Although these roles were partly captured in the 2025 base year, they
24 remained vacant for over a year. Both positions are crucial to carrying out the activities
25 described above as well as the following new or expanded roles and responsibilities:

- 26 • Commission driven stakeholder engagement activities in connection with
27 regulatory proceedings. For example, the RPA department is responsible for
28 public safety partner notifications throughout PSPS events. RPA also leads public
29 safety partner outreach related to Order Instituting Rulemaking (OIR)
30 proceedings, including the Order Instituting Rulemaking Regarding Microgrids

1 Pursuant to Senate Bill 1339,⁷ and the implementation of SB 1221 Gas
2 corporations: ceasing service: priority neighborhood decarbonization zones.⁸

- 3 • RPA has seen an increase in the number of inquiries surrounding municipal and
4 utility infrastructure projects. RPA acts as the liaison between SDG&E and the
5 community on right-of-way issues. The department manages franchise
6 agreements that allow SDG&E to work and maintain equipment within the right-
7 of-way. RPA also coordinates with municipalities on a range of infrastructure
8 projects, such as San Diego Energy Efficiency, Capital Project Coordination, and
9 a variety of other projects (tie lines, battery energy storage systems, utility
10 undergrounding, the Corrective Maintenance Program, gas distribution safety and
11 integrity, etc.). RPA is responsible for hosting public meetings such as town halls
12 and workshops; coordinating with governing bodies; managing customer
13 communications, including construction notices, hotline support, one-on-one
14 meetings, and complaint resolution.

15 For TY 2028, SDG&E is requesting a total of \$2.288 million for RPA. This forecast is
16 based on base year costs with an incremental funding request of \$0.519 million above the base-
17 year including the following main drivers:

- 18 • \$194,000 – 1 FTE (Regional Public Affairs director level position): The Regional
19 Public Affairs Director, which is currently vacant, provides strategic leadership
20 for the regional public affairs team, oversees partnerships with city and county
21 officials, aligns utility initiatives with municipal priorities, and directs stakeholder
22 engagement efforts. A director position is needed to provide strategic leadership
23 and oversight to effectively manage initiatives and fulfill all commitments.
- 24 • \$233,000 – 1.2 FTE (Regional Public Affairs manager level position): The
25 Regional Public Affairs Manager, which is currently vacant, helps to build and
26 maintain relationships with local governments and agencies, stakeholders, and
27 customers focused on issue resolution, advancing infrastructure projects, and

⁷ R.19-09-009, OIR Regarding Microgrids Pursuant to Senate Bill (SB) 1339 (September 19, 2019),
available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M314/K274/314274617.PDF>.

⁸ SB 1221 (Min, 2024), available at:
https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202320240SB1221.

community priorities and programs. Given the increasing complexity of the regulatory and energy environment and the expanding requirements for stakeholder communication, additional resources are needed to enable the Regional Public Affairs team to fulfill its responsibilities.

- An adjustment of \$97,000 reflects changes in connection with the compensation modernization initiative. Please refer to the Compensation and Benefits testimony, Ex. SCG-16/SDGE-20.

C. Community Relations

**TABLE BS-6
Community Relations Non-Shared O&M Summary of Costs**

D. Community Relations	2025 Adjusted-Recorded (000s)	TY2028 Est. (000s)	Change (000s)
1. Community Relations	1,015	1,038	23
Total	1,015	1,038	23

1. Description of Costs and Underlying Activities

The Community Relations team serves as SDG&E’s primary, trusted connection to nonprofit Community-Based Organizations (CBOs), local partners and the diverse communities within its service territory. Through these relationships, the team reaches vulnerable and hard-to-reach customers with timely, accurate information that supports public safety, access to essential services, and awareness of critical topics, including bill reduction programs, customer assistance programs, emergency preparedness, infrastructure projects, energy efficiency, and small business support. By leveraging CBOs as trusted messengers, SDG&E can effectively communicate with customers who may face language, access, technology, or trust barriers and who might not otherwise be reached through traditional communication channels.

This outreach improves awareness and participation in programs that help customers reduce or manage their energy bills, while supporting equitable access to critical safety and assistance information. Community Relations also facilitates two-way engagement through community events and nonprofit partnerships, providing customers with opportunities to ask questions, raise concerns, and provide feedback that helps SDG&E identify gaps and improve programs and services. As CPUC requirements for public outreach continue to expand, the Community Relations team plays a key role in supporting customer participation in Commission

1 mandated workshops, hearings, and outreach activities by helping communities understand
2 proceedings and provide input.

3 SDG&E also incorporates structured community input through advisory engagement
4 mechanisms composed of nonprofit and community leaders that provide feedback on community
5 priorities, including support for vulnerable populations, STEM education, and emergency
6 preparedness, helping to inform and strengthen outreach strategies.

7 Through programs focused on emergency readiness, workforce development, climate
8 action, and K-16 STEM education, the team supports community preparedness, career pathways,
9 and self-sufficiency, while also providing an effective platform to educate participants about
10 SDG&E’s programs, services, and safety initiatives. During emergency events, Community
11 Relations coordinates outreach with organizations such as 211 San Diego, local fire agencies,
12 Fire Safe Councils, and Community Emergency Response Teams to support community
13 preparedness and response efforts, including education on defensible space, Call Before You
14 Dig, and PSPS readiness, ensuring customers remain informed before, during, and after
15 emergency conditions.

16 **2. Forecast Method**

17 The forecast method developed for this cost category is Base Year. This method is most
18 appropriate because the last recorded year accurately reflects the expense level associated with
19 ongoing Community Relations activities. The Base Year incorporates the labor and non-labor
20 resources necessary to maintain a consistent presence in the community. These activities are
21 continual, recurring, and the underlying scope of work remains consistent. Other forecasting
22 methods, such as multi-year averaging or trending, would incorporate higher historical spending
23 in areas such as promotional items and consulting services that are no longer representative of
24 expected future costs. Therefore, the base year provides a reasonable starting point for
25 forecasting future expenditures.

26 **3. Cost Drivers**

27 SDG&E’s total adjusted-recorded expenditures of \$1.016 million in 2025 consisted of
28 \$0.917M in labor costs and \$99k in non-labor costs. Investments in Community Relations
29 support consistent, meaningful engagement with local communities and vulnerable populations
30 by providing accessible information and direct support, which is essential to building trust,
31 improving program participation, and meeting safety and regulatory obligations.

1 The primary cost driver for Community Relations is labor, reflecting the
 2 relationship-based and staff-intensive nature of effective engagement with CBOs and the
 3 customers they serve. Community Relations staff maintain ongoing, trusted relationships with a
 4 diverse network of CBOs and local partners in order to reach vulnerable and hard-to-reach
 5 customers with timely, accurate information.

6 These labor resources support direct outreach and coordination with CBOs to
 7 communicate critical safety information, including wildfire and PSPS preparedness; provide
 8 advance notice and education regarding infrastructure projects and related community impacts;
 9 deliver information on customer assistance and affordability programs; and conduct
 10 Commission-mandated public outreach and engagement activities. Because this work relies on
 11 sustained, two-way interaction, cultural competency, and presence in the community, it cannot
 12 be effectively automated or scaled without dedicated staff.

13 Accordingly, Community Relations labor costs are essential to supporting compliance
 14 with regulatory outreach requirements and public safety, enhancing program awareness and
 15 participation among vulnerable populations, and responding effectively to community needs.

16 **IV. SHARED O&M COSTS**

17 As described in the Shared Services testimony (Ex. SCG-22/SDGE-27), Shared Services
 18 are activities performed by a utility shared services department (i.e., functional area) for the
 19 benefit of: (i) SDG&E or SoCalGas, (ii) Sempra Corporate Center, and/or (iii) any affiliate
 20 subsidiaries. The utility providing Shared Services allocates and bills incurred costs to the entity
 21 or entities receiving those services.

22 Table BS-7 summarizes the total shared O&M forecasts for the listed cost categories.

23 **TABLE BS-7**
 24 **Shared O&M Summary of Costs**

CUSTOMER & EXTERNAL RELATIONS (In 2025 \$) (In 2025 \$) Incurred Costs (100% Level)			
Categories of Management	2025 Adjusted-Recorded (000s)	TY2028 Est. (000s)	Change (000s)
A. Community Stakeholders Engagement	0	503	503
Total Shared Services (Incurred)	0	503	503

1 I am sponsoring the forecasts on a total incurred basis, as well as the shared services
2 allocation percentages related to those costs. Those percentages are presented in my shared
3 services workpapers, along with a description explaining the activities being allocated. *See*
4 Ex. SCG/SDGE-13-WP. The dollar amounts allocated to affiliates are presented in our Shared
5 Services testimony. *See* Ex. SCG-22/SDGE-27.

6 **A. Communications & Stakeholder Engagement**

7 **1. Description of Costs and Underlying Activities**

8 The Senior Vice President of Communications & Stakeholder Engagement provides
9 enterprise-wide leadership and strategic direction for the Companies' communications,
10 government, community, and stakeholder engagement activities, supporting SDG&E's and
11 SoCalGas's ability to operate safely, reliably, and transparently. In this role, the Senior Vice
12 President oversees the development and execution of integrated communications and
13 engagement strategies that align with the Companies' business objectives, regulatory priorities,
14 and external policy drivers, while providing consistent coordination and oversight across both
15 utilities. This shared function supports effective implementation of Company strategy through
16 proactive stakeholder outreach, issues management, policy engagement, and clear, timely
17 communications related to operations, infrastructure investment, safety initiatives, and
18 affordability. This shared role is intended to align practices and coordination across the two
19 utilities, creating operational efficiencies that are expected to reduce costs over time. This
20 structure is intended to help reduce duplication of effort across SDG&E and SoCalGas by
21 consolidating strategy, coordination, and oversight functions that would otherwise be performed
22 independently by each utility. Shared Services costs reflect the labor and non-labor expenses
23 associated with leadership, planning, and administrative activities that occur at both SDG&E and
24 SoCalGas, and enable efficient use of resources, reduced duplication of effort, and alignment of
25 messaging and engagement strategies across the Companies, contributing to customer trust and
26 long-term affordability.

27 **2. Forecast Method**

28 The forecast method developed for this cost category is Zero-Based. This methodology
29 is appropriate because the department and associated roles are newly established and therefore
30 do not have historical cost data that would support a base-year forecast.

1 **3. Cost Drivers**

2 The forecast is largely labor-driven and includes the addition of a new Senior Vice
 3 President. This position enhances coordination and alignment across the Companies, promotes
 4 efficient use of resources, reduces duplicative activities, and supports consistent engagement
 5 strategies that contribute to better customer service and communications and long-term
 6 affordability.

7 **V. RISK ASSESSMENT MITIGATION PHASE (RAMP) INTEGRATION**

8 **A. GRC Risk Controls/Mitigations and Benefit Cost Ratios**

9 As previously discussed, certain costs supported in this testimony are for Control
 10 activities described in SDG&E’s May 15, 2025, RAMP Report⁹ for activities designed to reduce
 11 risk. Specifically, the control in this testimony was included in the Electric Infrastructure
 12 Integrity Risk Chapter. A roadmap matching controls and mitigations to both the 2025 RAMP
 13 and the TY 2028 GRC testimony is appended to Ex. SCG-02B/SDGE-02B. Table BS-8 below
 14 summarizes the Control BCRs based on the costs¹⁰ in this testimony and estimated in the 2025
 15 RAMP with the associated BCRs. Appendix B provides a GRC workpaper breakdown for the
 16 RAMP controls and mitigations sponsored in this testimony

17 **TABLE BS-8**
 18 **Comparison of RAMP and GRC Risk Control/Mitigation Benefit Cost Ratios**

Customer and External Relations							
ID	Control/ Mitigation Name	2025 RAMP Direct, in 2024\$ 2028-2031			2028 GRC Direct, in 2025 \$ 2028-2031		
		BCR Societal	BCR Hybrid	BCR WACC	BCR Societal	BCR Hybrid	BCR WACC
C215	Electric Public Safety Communications	0.40	0.41	0.38	0.22	0.22	0.21

19 **B. Justification For Proposed Mitigations With BCRs <1**

20 The RDF prescribes a methodology for calculation of Benefit Cost Ratios under three
 21 discount rates as detailed in the table above. Certain of these calculations result in a BCR that is
 22 less than one. SDG&E justifies the selection of these mitigations based on a thorough analysis

⁹ A.25-05-013.

¹⁰ Post-test year forecasts can be found in the detailed workpapers Ex. SDGE-13-WP.

1 of operational considerations. Details regarding the justification for each mitigation are provided
 2 in the table below and are compiled with all mitigations in SCG-02B/SDGE-02B, RDF
 3 Integration testimony.

4 **Table BS-9**
 5 **Control/Mitigation Justification**

ID	Control/Mitigation Name	Justification
C215	Electric Public Safety Communications	This control provides a comprehensive electric and gas safety outreach campaign that proactively reduces the likelihood of injuries, fatalities, infrastructure damage, and reliability risk by increasing public awareness of hazards that can cause system damage and unplanned service interruptions. While the quantified Benefit-Cost Ratio reflects only directly monetized benefits, this mitigation addresses low-frequency, high-consequence risks that are not fully captured in the BCR framework, including impacts to life, public safety, and system reliability. For these reasons, the mitigation remains reasonable and necessary.

6 **C. Changes From 2025 RAMP Report**

7 Since the timing of the filing of the 2025 RAMP Report in May 2025 some
 8 circumstances may have changed that impact the control/mitigation scope – including units,
 9 costs, and other factors that influence the forecast. In addition, updates may have occurred
 10 affecting the underlying assumptions used to calculate the BCRs and are described in the RDF
 11 Integration testimony (Ex. SCG-02B/SDGE-02B). Key changes impacting the forecasts include:

- 12 • Reduced the scope of control by removing gas safety campaigns

13 **D. Feedback from Safety Policy Division and Parties**

14 The Commission’s Safety Policy Division (SPD) issued their assessment report on
 15 October 10, 2025 regarding the Companies’ 2025 RAMP Reports. Parties subsequently served
 16 opening and reply comments on November 17, 2025, and December 1, 2025, respectively.
 17 Appendix B in the RDF Integration testimony (Ex. SCG-02B/SDGE-02B), appends a summary
 18 of the feedback and recommendations received and the Companies’ responses.

19 **VI. CONCLUSION**

20 The TY 2028 CER forecast presented in this testimony are reasonable, necessary, and
 21 appropriately aligned with SDG&E’s obligation to operate safely, reliably, affordably, and
 22 transparently in an increasingly complex regulatory and operational environment. The proposed

1 forecast supports essential, ongoing activities that enable effective communication with
2 customers, communities, public safety partners, local governments, and other key stakeholders,
3 many of which are required to meet Commission mandates and statutory requirements.

4 The CER forecast balances affordability with the need to deliver essential services that
5 protect public safety, enhance system reliability, support regulatory compliance, address the
6 evolving expectations of customers and stakeholders, and help customers better manage their
7 energy use and bills. For these reasons, SDG&E respectfully requests that the Commission
8 approve the TY 2028 Customer and External Relations forecasts as presented.

9 This concludes my prepared direct testimony.

1 **VII. WITNESS QUALIFICATIONS**

2 My name is Brittany Applestein Syz. My business address is 8335 Century Park Ct., San
3 Diego, California, 92123. My current position is Vice President of External Affairs &
4 Communications under the External Affairs & Communications organization. The External
5 Affairs & Communications organizations provide services to SDG&E. I joined SDG&E in
6 2015. I have been in my current position at SDG&E since 2025. I am a licensed attorney in the
7 State of California.

8 I have not testified in front of the Commission before.

APPENDIX A
GLOSSARY OF TERMS

APPENDIX A

Glossary of Terms

ACRONYM	DEFINITION
AFN	Access and Functional Needs
BCR	Benefit Cost Ratio
CBO	Community Based Organization
CER	Customer and External Relations
EOC	Emergency Operations Center
FAQ	Frequently Asked Question
MarCom	Marketing Communications Research & Analytics
MBL	Medical Baseline
O&M	Operations and Maintenance
PSPS	Public Safety Power Shutoff
RPA	Regional Public Affairs
STEM	Science, Technology, Engineering, Math

APPENDIX B

GRC-RAMP INTEGRATION TABLE

Area: CUSTOMER & EXTERNAL RELATIONS

Witness: Brittany A. Syz

GRC - RAMP Integration

GRC Workpaper	GRC Wkp Description	RAMP WKP	RAMP Wkp Description	RAMP Unit Measure	TOTAL (in 000s)							UNITS						
					2025	2026	2027	2028	2029	2030	2031	2025	2026	2027	2028	2029	2030	2031
1FC005.000	RAMP-Safety Campaign	1OR05 C215	SDG&E-Risk-5 Electric Infrastructure Integrity Electric Public Safety Communications	Impressions	876	882	882	1,132	1,132	1,132	1,132	*65,386	*65,386	*65,386	*87,182	*87,182	*87,182	*87,182

SDG&E/CUSTOMER & EXTERNAL RELATIONS/Exh No:SDGE-13-WP/Witness: B. Syz

San Diego Gas & Electric Company
2028 GRC - APPLICATION
O&M Workpapers

Note: Totals may include rounding differences. Total amounts preceded by a double asterisk (**) are in millions (\$MM). Unit values preceded by a single asterisk (*) are displayed in thousands (000s).