

Application: A.22-05-XXX

Exhibit No.: SDGE-3A

Witness: April Bernhardt

**PREPARED DIRECT TESTIMONY OF
APRIL BERNHARDT – CHAPTER 3A
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

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



MAY 2, 2022

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1 energy generation from Community Choice Aggregators (CCAs), SDG&E needs to adjust its
2 marketing strategies, target audiences, and budgets for these two rates. Unlike other DR
3 programs available to bundled, CCA, and Direct Access customers, moving forward SDG&E
4 will exclude promoting these rate options to unbundled customers in its service territory who
5 have service with a CCA. As part of the ME&O implementation strategy, SDG&E works
6 closely with its internal teams and media buyers to adhere to the CCA Code of Conduct.³

7 The overarching ME&O goals for Demand Response during 2023 are fourfold:

- 8 1. Increase awareness of available DR programs to both bundled and unbundled
9 customers.
- 10 2. Inform current DR participants on how to be successful and take action when
11 called upon.
- 12 3. Drive intent to participate through education of benefits for customers and
13 broader grid resiliency; and
- 14 4. Adhere to the CCA code and minimize customer confusion as much as possible.

15 SDG&E's proposed ME&O strategy intends to drive various marketing and engagement
16 tactics described throughout this testimony to achieve these goals. Creative concepts,
17 messaging, and tactics will be adjusted during the application period based on customer
18 feedback, performance, and/or economic conditions. Therefore, SDG&E's marketing plan needs
19 to be flexible and responsive to program changes. SDG&E's ME&O strategy will consider the
20 needs of specific customer segments based on demand (kWh), eligibility requirements, and
21 communication preferences. The availability of DR programs will be promoted to newly eligible
22 customers, with ongoing outreach to existing customers to help them take control of their energy
23 bill and conserve when called.

³ Decision (D.).12-12-036.

1 Messaging for each program will include details on eligibility, how to enroll, program
2 incentives, applicable opt-out instructions and/or penalties. An emphasis will also be placed on
3 the broader benefits of participating in DR, including helping to support California’s energy
4 goals and a more stable electric grid.

5 Messaging and tactics will also consider each program’s target audience and eligibility
6 requirements and will also aim to incorporate lessons learned from past campaigns, such as
7 leveraging specific channels. General market awareness tactics will include a mix of digital
8 advertising (*e.g.*, LinkedIn InMail, digital banners) and online content (*e.g.*, website and video).
9 Direct marketing tactics will include targeted email and direct mail communications to reach
10 smaller, defined niche audiences. SDG&E will also leverage stakeholder outreach to promote
11 programs through SDG&E’s Account Executives, Outreach Team, and business and residential
12 Customer Care Centers.

13 In summary, education efforts must clearly define the available options to empower
14 customers to make the right choice at the right time for their home or business.

15 **III. MARKETING EDUCATION & OUTREACH INITIATIVES**

16 The ME&O plan for program year 2023 includes support for the following programs and
17 rates: Technology Incentives Program, AC Saver, Technology Deployment Program, Base
18 Interruptible Program (BIP), Non-Residential Time-of-Use Plus (TOU+), Critical Peak Pricing
19 (CPP), Emergency Load Reduction Pilot (ELRP), and the Capacity Bidding Residential Pilot.
20 These programs and pilots are described in the prepared direct testimony of E Bradford Mantz
21 (Chapter 1A) also submitted with this application.

22 For each of the program areas for which SDG&E seeks ME&O budget approval, there
23 are labor and non-labor charges to cover the internal SDG&E ME&O administration, concept
24 development, campaign planning and all other activities described above.

1 **A. Technology Incentives Program**

2 For 2023, SDG&E proposes a continuation of ME&O activities for the Technology
3 Incentives (TI) program. The activities include leveraging SDG&E’s Account Executives to
4 reach eligible commercial, industrial or agricultural customers. SDG&E also plans to continue
5 its digital advertising, targeted communications and general awareness tactics such as the TI
6 webpage and collateral.

7 SDG&E’s proposed budget for the TI Program is set forth in Table AB-1 below:

Table AB-1: ME&O Budget for Technology Incentives					
2023	2024	2025	2026	2027	TOTAL
\$50,000	N/A	N/A	N/A	N/A	\$50,000

8
9 **B. AC Saver**

10 SDG&E’s ME&O efforts for the AC Saver Program will target residential and business
11 customers and continue to foster a relationship with currently enrolled customers through pre-
12 season reminders and program updates as needed. Activities will also focus on acquiring newly
13 eligible program participants, including new SDG&E customers and new qualifying technologies
14 such as Net Energy Metering (NEM) customers who became eligible per D. 21-03-056. Tactics
15 may include updates to the website and collateral, social media, digital advertising, and direct
16 marketing efforts such as email and/or direct mail campaigns. Marketing activities for
17 residential customers will be in English and in Spanish, where appropriate.

18 SDG&E’s proposed budget for the AC Saver Program is set forth in Table AB-2 below.

Table AB-2: ME&O Budget for AC Saver Program					
2023	2024	2025	2026	2027	TOTAL
\$141,388	N/A	N/A	N/A	N/A	\$141,388

1 **C. Technology Deployment**

2 Marketing efforts for Technology Deployment will continue to foster the relationship
3 with currently enrolled customers through pre-season reminders and program updates as needed.
4 Tactics may include updates to the website and collateral, social media, digital advertising, and
5 direct marketing efforts such as email and/or direct mail campaigns. Marketing activities for
6 residential customers will be in English and in Spanish, where appropriate. SDG&E’s proposed
7 budget for the Technology Deployment Program is set forth in Table AB-3 below.

Table AB-3: ME&O Budget for Technology Deployment					
2023	2024	2025	2026	2027	TOTAL
\$147,441	N/A	N/A	N/A	N/A	\$147,441

8
9 **D. Base Interruptible Program**

10 For 2023, SDG&E proposes a continuation of ME&O activities for its Base Interruptible
11 Program. Marketing will target non-residential customers and focus on support through
12 SDG&E’s Account Executives. Marketing tactics may include a continuation of targeted email
13 communications along with updating the program website, and collateral as needed. SDG&E’s
14 proposed budget for the Base Interruptible Program is set forth in Table AB-4 below:

Table AB-4: ME&O Budget for Base Interruptible Program					
2023	2024	2025	2026	2027	TOTAL
\$7,095	N/A	N/A	N/A	N/A	\$7,095

15 **E. Non-Residential TOU+**

16 Marketing efforts in 2023 will continue to educate SDG&E’s bundled, non-CCA, non-
17 residential Time-of-Use+ existing and eligible customers. Messaging will include information
18 about the rate, number of potential event days, and the higher event day pricing. Proposed
19 marketing tactics include targeted communications via email and education through SDG&E’s
20 related websites. General awareness tactics for customers in communities that have not

1 transitioned to CCAs may include digital advertising, and social media. SDG&E’s proposed
2 budget for Non-Residential TOU+ is set forth in Table AB-5 below:

Table AB-5: ME&O Budget for Non-Residential TOU+					
2023	2024	2025	2026	2027	TOTAL
\$105,000	N/A	N/A	N/A	N/A	\$105,000

3
4 **F. Critical Peak Pricing Rate (CPP)**

5 Marketing efforts for Critical Peak Pricing (CPP) in 2023 will continue to educate
6 SDG&E’s bundled, non-CCA, non-residential customers and newly, eligible customers.
7 Marketing will include awareness around event days and timing, capacity reservation and any
8 program changes. Marketing efforts will incorporate a mix of direct marketing and general
9 awareness such as email and/or direct mail campaigns and may include digital advertising and
10 social media. SDG&E’s proposed budget for Critical Peak Pricing is set forth in Table AB-6
11 below:

Table AB-6: ME&O Budget for Critical Peak Pricing (CPP)					
2023	2024	2025	2026	2027	TOTAL
\$95,000	N/A	N/A	N/A	N/A	\$95,000

12
13 **G. Emergency Load Reduction Pilot (ELRP)**

14 The Emergency Load Reduction Pilot ME&O efforts for 2023 will focus on recruiting
15 SDG&E’s large commercial and industrial (C&I), bundled and unbundled customers who can
16 meet the minimum load shed requirement. Education will include the benefits of DR
17 participation and will be conducted through SDG&E’s Account Executives. Tactics will consist
18 of updating targeted and general awareness communications such as the web page, email,

1 collateral, and customer talking points as needed to support program changes. SDG&E's
2 proposed budget for the ELRP is set forth in Table AB-7 below:

Table AB-7: ME&O Budget for Emergency Load Reduction Pilot (ELRP)					
2023	2024	2025	2026	2027	TOTAL
\$50,000	N/A	N/A	N/A	N/A	\$50,000

3
4 **H. Capacity Bidding Residential Pilot**

5 For 2023, SDG&E's ME&O efforts for the Capacity Bidding Resident Pilot, as included
6 in the testimony of E. Bradford Mantz (Chapter 1A) will be similar to the commercial program.
7 However, it will focus on SDG&E's residential, bundled and unbundled customers and will be
8 primarily marketed by third-party aggregators. SDG&E will support third-party marketing
9 efforts via the program website, collateral. SDG&E's proposed budget for CBP Residential Pilot
10 is set forth in Table AB-8 below:

Table AB-8: ME&O Budget for Capacity Bidding Residential Pilot					
2023	2024	2025	2026	2027	TOTAL
\$15,000	N/A	N/A	N/A	N/A	\$15,000

11
12 **I. DR Programs Not Requiring Additional ME&O Budget in 2023**

13 SDG&E is not requesting any additional ME&O funding through this Application for the
14 for following programs in 2023:

- 15 • Capacity Bidding Program (CBP)⁴
- 16 • Emergency Load Reduction Pilot Residential (A.6)⁵

⁴ Electric Reliability Phase II OIR Decision 21-12-015 already approved a marketing budget for the year 2023.

⁵ ELRP A.6 targets residential customers. ME&O funding to support ELRP A.6 was granted in D.21-12-015 through 2023.

- Demand Response Auction Mechanism (DRAM)⁶
- Electric Rule 32⁷

IV. CONCLUSION AND SUMMARY

In program year 2023, ME&O efforts must continue to engage new and existing customers on the importance of demand response, peak energy use, participation in events, and energy management technologies. Existing customers will need ongoing education around program changes and their options. This includes, but is not limited to, understanding events, their ability to adjust peak use, and how their participation can positively impact grid resiliency. These efforts will require the development and implementation of robust and dynamic marketing campaigns with a variety of tactics deployed to reach the various audiences at the right time and at the right place. When appropriate and feasible, DR ME&O efforts will complement other ME&O activities around SDG&E's ongoing rate education and energy efficiency.

This concludes my prepared direct testimony.

⁶ Per D.17-12-003, p. 197, OP 46, ME&O funding is not needed to support Demand Response Auction Mechanism (DRAM).

⁷ Per D. 17-12-003, p. 197, OP 46, ME&O funding is not needed to support Electric Rule 32.

1 **V. WITNESS QUALIFICATIONS**

2 My name is April Bernhardt. SDG&E employs me as a marketing manager in the
3 company's Corporate Communications and Marketing department. My business address is 8306
4 Century Park Court, CP-62C, San Diego, California, 92111.

5 I graduated from San Diego State University with a Bachelor of Liberal Arts and Science
6 in Psychology. I have more than 17 years of experience working in corporate communications
7 and media relations, and most recently, marketing—my career spans working both in wireless
8 communications and the energy sector.

9 I have been employed by SDG&E as a communications manager since 2010 with
10 increasing areas of responsibility. As the marketing manager of Pricing Plan Education, I oversee
11 the marketing and communication efforts for Clean Transportation, Demand Response programs,
12 Community Choice Aggregation, Rate Reform, and Net Energy Metering. My responsibilities
13 include developing marketing strategies to increase customer awareness and understanding of the
14 issues mentioned above. Additionally, I am responsible for collaborating with internal and
15 external stakeholders to ensure stakeholders are informed on critical Marketing, Education, and
16 Outreach activities.

17 Prior to my current role, I served as a senior project manager in communications
18 overseeing executive communications and internal change management for SDG&E. I also
19 served as a senior communications manager in Media and Employee Communications at
20 SDG&E and previously held management roles in communications at Sempra Energy and
21 Qualcomm Inc.

22 I have previously testified before the California Public Utilities Commission.