Application No.: A.21-04Exhibit No.:
Witness: April Bernhardt

PREPARED DIRECT TESTIMONY OF APRIL BERNHARDT ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



April 15, 2021

TABLE OF CONTENTS

I.	PURPOSE	1
II.	EDUCATION AND OUTREACH COSTS OVERVIEW	1
III.	2022 COST PROJECTIONS	3
IV.	QUALIFICATIONS	5

1 2 3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23 24

25

PREPARED DIRECT TESTIMONY OF APRIL BERNHARDT ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

I. **PURPOSE**

This testimony outlines San Diego Gas & Electric Company's ("SDG&E's") projected ongoing education and outreach costs related to the crediting of greenhouse gas ("GHG") allowance revenues on customers' bills in the year 2022, as part of the Energy Resource Recovery Account ("ERRA") forecast proceeding.

This testimony is based on recorded costs and projections set forth in SDG&E's prior GHG testimony, submitted on August 1, 2013 and September 1, 2013, April 15, 2014, and in prior ERRA testimony, submitted on April 15, 2015, April 15, 2016, April 14, 2017, April 13, 2018, April 15, 2019, and April 15, 2020.

II. EDUCATION AND OUTREACH COSTS OVERVIEW

Beginning in 2013, education and outreach activity has included working with the Energy Division and outside consultants to define those activities. The education and outreach activity was administered by the Center for Sustainable Energy ("CSE") under the statewide marketing, education and outreach effort known as Energy Upgrade California. The utilities were tasked with implementing support communications, such as email, direct mail and bill inserts, and these costs were designated as administrative.

After a major statewide media effort in the first half of 2014, local communications have continued those efforts since, with a focus on the use of bill inserts, direct mail and email, which have been accounted for as administrative costs per direction from the California Public Utilities Commission ("CPUC" or "Commission"). These communications have been implemented by the utilities and feature the logo of the CPUC. No additional paid statewide education and outreach activity has taken place since that initial effort.

In 2016, the Commission issued Decision ("D.") 16-06-041, providing continued direction for the utilities to focus on the following activities:

- 1. twice annually notify Climate Credit recipients¹ via on-bill communications when a credit has been provided, and distribute the CPUC letter via email or bill insert;²
- 2. ensure that call center and customer service staff members are provided with sufficient information to answer questions, and direct customers to a statewide webpage for more information about the credit;³ and
- 3. notify the Director of Energy Division or his designee if there are any barriers in executing these activities.⁴

The Decision further states that a separate statewide awareness campaign is very expensive ("\$20 million per year expense would achieve a 40% to 60% awareness level" and that the Energy Upgrade California program should include climate credit messaging instead. Thus, SDG&E is no longer reserving any funds for statewide media efforts to promote the Climate Credit but will solely focus on the local communication activities.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

D.16-06-041 at 17, Ordering Paragraph ("OP") 1. SDG&E electric only customers receive the electric bill Climate Credit while SDG&E gas only customer receive the gas Climate Credit. If an SDG&E customer has both gas and electric service, they receive both Climate Credits.

On March 29, 2019, SDG&E filed a Petition for Modification ("PFM") of D.13-12-003 requesting to change the months in which the semi-annual Climate Credit is distributed – from April and October to August and September. The PFM was granted per D.19-12-002, effective December 5, 2019.

³ D.16-06-041 at 17, OP 2.

⁴ *Id.* at 17, OP 3.

⁵ Id. at 8 (citing R.11-03-12 August 21, 2013 Targetbase report findings included in D.16-06-041).

Id. at 9 ("[m]essaging related to the climate credit has already been incorporated into the request for proposals for a statewide marketing campaign that was considered in A. [Application] 12-08-007 et al.").

III. 2022 COST PROJECTIONS

For 2022, I have included in the Application the Detail of Outreach and Administrative Expense costs (Attachment G) – costs –at the same level as the 2021 ERRA Forecast Application. The forecast for 2022 incorporates SDG&E's proposal to retain the August and September Climate Credit disbursement timing for 2022 and beyond, which is being considered by the Commission in R.20-05-002. SDG&E is awaiting Commission approval on this proposal.

If SDG&E's proposal in R.20-05-002 is approved, and in accordance with D.13-12-003, SDG&E anticipates that it will maintain the three touchpoints with customers in April along with the distribution months, August and September:

- 1. SDG&E must coordinate with Energy Division staff to develop new language to modify twice-annual written communications required under D.16-06-041 to include points 1-4, above, when appropriate. New communication materials must also present a timetable clearly showing the distribution months for both the electric and natural gas credits for that year. The April timing of the natural gas credit is not affected by this Decision. Anticipated communication materials include:
 - a. An April customer bill insert/letter/email explaining that the April electric
 Climate Credit will be distributed in August for 2020 and 2021; and
 - b. August and September customer bill inserts/letters/emails providing information about the Climate Credit as required in D.16-06-041. SDG&E must include information about the change in timing of Climate Credit distribution.⁷

⁷ D.19-12-002 at 10-11.

If SDG&E's proposal in R.20-05-002 is not approved and SDG&E is required to revert to the Climate Credit distribution months of April and October, SDG&E anticipates it will resume the twice a year Climate Credit recipient communication as originally directed in D.16-06-04. The administrative costs are projected to be slightly less given one less touch point.

Therefore, I have included \$59,000 for the required administrative costs as stated above. My total cost projection of the expenses to be incurred in 2022 is \$59,000. This concludes my prepared direct testimony.

IV. QUALIFICATIONS

My name is April Bernhardt. I am employed by SDG&E as a marketing manager. My business address is 8306 Century Park Court, CP-62C, San Diego, California, 92111.

I graduated from San Diego State University with a degree in Liberal Arts and Science. I have more than 17 years of experience working for two Fortune 250 companies in San Diego in the areas of communications and media, and most recently marketing.

I have been employed by SDG&E as a communications manager since 2010 with increasing areas of responsibility. As the marketing manager of pricing plans, my responsibilities include collaborating with internal and external stakeholders on Marketing, Education & Outreach ("ME&O") and as the conduit of information to ensure stakeholders are informed on critical ME&O developments. Additionally, I am responsible for developing marketing strategies to increase customer satisfaction and awareness of rate changes and pricing plan options.

Prior to my current role, I served as a senior project manager in communications at SDG&E. Prior to that, I served as a senior communications manager in Media and Employee Communications at SDG&E. I previously held communication roles at Sempra Energy and Qualcomm Inc.

I have previously testified before the California Public Utilities Commission.