Supplemental Filing of SAN DIEGO GAS & ELECTRIC COMPANY (U 902E) In Support of Responses to Questions and Related Testimony Pursuant to Phase 1 Assigned Commissioner's Ruling.

Rulemaking 12-06-013 Phase 1

## PREPARED DIRECT TESTIMONY OF

## **ALEX KIM**

## **CHAPTER 1**

## ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**MARCH 21, 2014** 



## **TABLE OF CONTENTS**

I.	INTRODUCTION	1
II.	SDG&E RESIDENTIAL CUSTOMERS	2
III.	ELDERLY, VULNERABLE, MEDICAL BASELINE AND THIRD PARTY NOTIFICATION CUSTOMERS	4
IV.	CARE, OTHER LOW INCOME CUSTOMERS, HARD TO REACH AND DIVERSE POPULATIONS	5
V.	NET ENERGY METERING CUSTOMERS	6
VI.	EXPANDING EXISTING ENERGY MANAGEMENT PLATFORMS	6
VII.	OUTREACH	7
VIII.	MARKETING	8
IX.	TECHNOLOGY	10
Χ.	BUDGET	11
XI.	SUMMARY AND CONCLUSION	11
XII.	OUALIFICATIONS	13

## PREPARED DIRECT TESTIMONY OF

### **ALEX KIM**

## **CHAPTER 1**

### I. INTRODUCTION

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

The purpose of this testimony is to provide a high level overview of San Diego Gas & Electric Company's ("SDG&E") Customer Communication, Outreach and Education, and Technology plans as it pertains to the Phase 1 rate change proposals set forth in the testimony of Chris Yunker and Cynthia Fang, submitted on February 28, 2014 in this proceeding. Specifically, SDG&E will demonstrate that our plans are in sync with Commission direction and the Energy Division's Staff Proposal for Residential Rate Reform, as well as with SDG&E's Smart Pricing Program Outreach and Education Plan ("SPP Plan"). SDG&E's SPP Plan<sup>1</sup> will serve as the foundational outreach and education plan for SDG&E's residential, small business and small agricultural customers regarding time-of-use based pricing plans, whereas this plan will complement the SPP Plan and provide the additional focus needed for customers in the California Alternate Rates for Energy ("CARE"), Medical Baseline, Fixed-Income and other hard to reach customer groups. SDG&E will utilize the communications and outreach channels that have successfully reached these customer groups in a familiar and effective manner. SDG&E will provide them with important rate information to help them make informed choices about their pricing plan options. Key elements of SDG&E's Customer Communication, Outreach and Education, and Technology plans are provided in accordance with the Assigned Commissioner's Ruling Requiring Utilities to Submit Phase 1 Rate Change Proposals, issued on

<sup>1</sup> AL 2466-E/EB.

February 13, 2014 ("ACR"). SDG&E also provides responses to the Commission's questions

regarding Customer Communication, Outreach and Education, and Technology outlined in the

ACR, which are presented as Attachment A to SDG&E's Supplemental Filing.

### II. SDG&E RESIDENTIAL CUSTOMERS

SDG&E's service area consists of about 1.2 million residential electric meters, of which approximately 2,500 are currently on a time of use based pricing plan.<sup>2</sup> The table below provides additional information regarding the residential market.

Residential	Total	
Total Electric Meters	1,237,084	
Total CARE (DRLI) Accounts	292,254	
Smart Meters Installed	1,232,237	
12 months of Smart Meter data	1,230,387	

The service area is divided into four climate zones: coastal, inland, desert and mountain.

These four climate zones typically have very different temperatures, which often result in different energy usage patterns for the customers in each zone.

Residential	Total	%
Coastal Region	700,622	57%
Inland Region	518,176	42%
Desert Region	2,833	<1%
Mountain Region	13,913	1%

11

2

3

4

5

6

7

8

9

10

<sup>&</sup>lt;sup>2</sup> Data as of January 2013 and includes customers on the following time of use pricing plans: time of use (DR-TOU), solar (DR-SES) and electric vehicle (EV-TOU, EV-TOU2) rates.

SDG&E is committed to provide customers with clear and timely information. In 2013, SDG&E executed a major outreach and marketing campaign to educate customers on the impacts of rate increases and upcoming rate reform as well as offer energy solutions to help them better manage their energy usage. These solutions included in-home energy surveys, a new customer engagement and rewards program, along with existing demand response and energy efficiency incentives and rebates. As a part of this effort, SDG&E communicated to all Tier 3 and 4 customers (approximately 300,000) on multiple occasions through various channels including Twitter, Facebook, SDGE.com, direct mail, email, and our Customer Contact Center. Additionally, SDG&E identified customers that would see an increase of over 20%, proactively notified them and offered payment plans to help minimize the impact. These efforts resulted in more engaged and informed customers in rate related issues and energy solutions. SDG&E has committed to expand these efforts in 2014 and beyond to all customers impacted by electric rate reform. Additionally, as part of the approved SPP Plan, residential, small business and agricultural customers will receive targeted information about pricing plans that would most benefit them.

SDG&E is especially committed to communicating to our unique, hard to reach customers that could benefit from additional support to make these complex energy choices appear easy and understandable. The largest population of customers with unique needs is our CARE population. With nearly 300,000 customers currently receiving a CARE discount, SDG&E will leverage its ongoing relationships with strategic outreach partners to ensure pricing plan information can be delivered in the methods that are most effective for these customers. SDG&E has conducted significant research to better understand our customers, including their needs, behaviors and propensity to adopt specific offers. As a result of these research efforts,

6. Communication channel preferences
Based upon our understanding of customer preferences, SDG&E will provide personalized tailored solutions and communications as described below.

# III. ELDERLY, VULNERABLE, MEDICAL BASELINE AND THIRD PARTY NOTIFICATION CUSTOMERS

The behavioral segments that contain the largest percentage of elderly, vulnerable, medical baseline and third party notification customers (customers who authorize another party to receive notification of their bill) prefer to be communicated with directly through traditional channels such as direct mail, the customer contact center or through an organization/agency that they currently interact with. Simple, straight forward communications and messages are most effective.

20

9

10

11

12

13

14

15

16

17

18

19

<sup>3</sup> SDG&E Residential Customer Segmentation Study 3-1-12.

## ,

## 

# 

# IV. CARE, OTHER LOW INCOME CUSTOMERS, HARD TO REACH AND DIVERSE POPULATIONS

The behavioral segments that contain the highest percentage of CARE, low-income, hard to reach<sup>4</sup> and diverse populations customers have the highest interest in engaging with SDG&E as well as a higher than average motivation to save money and energy. This segment of customers also has a lower than average interest in time-of-use ("TOU") pricing plans.

Additional research has also shown that these customers rely heavily on their cell phones as their main communication link. Behavioral studies also suggest that their higher than average interest in playing the lottery and participating in contests to win prizes, would make them more likely to engage in behavioral programs or gamification platforms.<sup>5</sup>

These insights would suggest that leading the conversations with pricing plans may not garner the interest. Alternatively, leading with energy efficiency and other offers that help them save money and energy and bundling them with information about pricing plans is likely to be a more successful approach. Behavioral and gamification offers may also be well suited for this segment.

As the administrator of CARE and Energy Savings Assistance Program, SDG&E will leverage its position and trusted relationship with these customers. SDG&E will continue to work with LIHEAP agencies and through other well-established relationships with community based organizations as further described section 7 of my testimony.

SDG&E plans to continue our on-going, proven effective communications with all customer segments and will continue to use insights and feedback from customers to refine our offers and communications tactics.

<sup>&</sup>lt;sup>4</sup> Hard to reach customers includes customers with limited English proficiency.

<sup>&</sup>lt;sup>5</sup> "Ways to Motivate, Enable and Continuously Engage Consumers", K.A. Donnelly, 1/25/11.

## V. NET ENERGY METERING CUSTOMERS

SDG&E plans to address the expected impacts to one of the fastest growing customer segments in the SDG&E service territory, Net Energy Metering ("NEM") customers, as rate structure changes go into place during 2014. As of January 2014, over 33,000 customers have installed solar energy systems in the area. Further, with 1,200 to 1,500 new rooftop solar customers being added each month, this has become one of the most dynamic and high profile segments in SDG&E's customer base.

Customers who have installed solar on their homes have benefitted from NEM mechanism because these customers were typically in the upper tiers and with the addition of solar, many of these customers are now offsetting the upper two tiers with solar generation.

Although the CPUC is just beginning to consider changes to NEM, Assembly Bill ("AB") 327 requires the CPUC to establish a transition period for existing NEM customers by March 31, 2014. This transition period is intended to ensure that customers have a reasonable payback opportunity on their investment. Even with those protections, the issues surrounding rate reform as it relates to NEM customers can be confusing and SDG&E will be communicating directly with this customer segment to make certain they understand how the changes will and will not affect them.

#### VI. EXPANDING EXISTING ENERGY MANAGEMENT PLATFORMS

SDG&E has been a leader in rate reform efforts and ensuring our customers have the tools needed to help them adapt. Our vision is to ensure that energy prices are both equitable and affordable for all customers. To achieve our vision we will communicate, educate and engage with our customers about how they use their energy. In addition to offering our traditional energy rebates and incentives, SDG&E has developed many new tools to help customers engage

in and manage their energy use such as an online Energy Management Tool, a gaming platform "Manage Act Save", Spending Alerts, "Green Button Connect" data, solar and energy survey calculators, and Energy Usage Reports. Because of these solutions, SDG&E has a strong foundation for continuing this dialogue and incorporating new topics. With the addition of new energy use alerts, customers can sign up for weekly energy usage emails, as well as set spending alerts so they are notified when their energy bill has reached certain thresholds. Soon, rate comparison tools will be available for customers to see pricing plan options side by side enabling them to make informed choices.

SDG&E will use these tools to work with customers that could benefit from additional support to ensure that they are aware of and comfortable making energy choices.

## VII. OUTREACH

As demonstrated in the responses to the questions posed in the ACR, SDG&E will leverage its knowledge and experience with these customer segments while utilizing the specialized connections of our community partners that work closely with these various subsegments. SDG&E has earned their trust as energy advisors through continuous engagement by way of direct communication and outreach, which plays a pivotal role. This course of action will continue in order to ensure customers that SDG&E is by their side throughout this process and are providing customers with sound, educated guidance. SDG&E strongly believes that outreach is critical to reaching these populations. SDG&E has worked diligently to develop partnerships with over 200 community based organizations and partners throughout our service territory that continuously assist SDG&E in communicating with hard to reach customers. In 2013, we conducted over 1,000 engagements with our partners and over 1,700 engagements/events in total. These partners are particularly effective at assisting us with the translation of messaging

- into multiple languages, cultural nuances and communicating and explaining those messages to their constituencies. SDG&E is taking a strategic approach to first reach out to our most impacted communities through our partners. Outreach tactics for this effort will include:
  - Business & Community Collaboratives;
  - Educational Events & Workshops; and
  - Door-to-Door Engagement.

## VIII. MARKETING

As demonstrated in the responses to the questions posed in the ACR, SDG&E plans to communicate with our customers about their future pricing plan options, as well as the tools and services that complement those options. Customers are not always occupied in energy related issues and require more frequent reminders. SDG&E believes it is important that customers see complementary and repetitive messaging across multiple campaigns. For this reason, SDG&E plans to incorporate appropriate pricing plan information into campaigns and efforts led by the energy efficiency programs, demand response programs, Energy Savings Assistance programs as well as coordinate with the Statewide Energy Upgrade California campaign. As referenced earlier, leading the conversation with pricing plans is not likely to be successful with certain customer segments. However, leveraging the interest and awareness that the various energy savings programs create provides opportunities to incorporate pricing plans and solutions into the communications. SDG&E believes that Integrated Demand Side Management ("IDSM") communications will be the most effective way to ensure that customers are thinking about their energy use in a holistic manner. Helping the customer identify offerings that are personalized will help to ensure the customers' energy decisions will be successful. This plan will rely on the

approach that has been approved in the SPP Outreach and Education Plan, which bundles pricing plans, tools, programs and services to assist the customer in making educated, holistic energy choices.

SDG&E's bill package continues to be a relevant communication channel to our customers. SDG&E believes that these new pricing plan options will need to be displayed in a different manner. SDG&E will continue to pursue options to simplify customer bills in order to make them easier to read. SDG&E will explore opportunities to highlight helpful information and help improve the customers' understanding of energy costs. SDG&E will also use other traditional communications channels to inform customers including SDG&E's website, Customer Contact Center, and direct mail.

In addition to traditional channels, SDG&E will use social media (Twitter, Facebook, YouTube, Instagram, Pinterest, etc.) and progressive campaigns, such as gamification, to reach customers. SDG&E actively engages our over 21,000 Twitter and 1,800 Facebook followers and has also developed several informational videos that are posted on SDGE.com and YouTube. SDG&E will continue to use these communications platforms to inform customers about rate changes and energy solutions to support rate reform efforts.

In SDG&E's ACR responses, which are attached to the Supplement Filing as Attachment A that include a year-by-year roadmap attached to the ACR responses as Appendix B, SDG&E has demonstrated that we have had a long, successful history communicating information to customers. SDG&E's plans are not simply created specifically for the residential rate reform changes being proposed in this proceeding; rather it is already part of our long-term plan and vision. By leveraging the existing campaigns in the channels we know are successful, continuing to partner with our community organizations, deploying tools to help customers make smart

energy choices and leading customers to take action by enrolling in programs, pricing plans or services, SDG&E is confident that we are prepared to help our customers make this transition towards TOU pricing plans.

#### IX. TECHNOLOGY

As demonstrated in the responses to the questions posed in the ACR, SDG&E is offering free programmable communicating thermostats ("PCTs") and plans to offer free PCTs when it rolls out its TOU and TOU plus rates to residential customers who have air conditioning and meet the eligibility requirements. The utilization of these technologies can lead to significant load reductions for customers and help them better control their energy usage during peak periods. The Statewide Pricing Study found that enabling technology essentially doubled demand reduction during the Critical Peak Pricing ("CPP") events. Customers without enabling technology reduced 13%, and customers with PCTs on a similar CPP rate reduced 27%. 6

Additionally, as also demonstrated in the responses to the questions posed in the ACR, SDG&E publishes a list of tested and verified PCTs' and In-Home-Display ("IHDs") on its Home Area Network ("HAN") website. Customers can select from several IHD's and two types of PCTs that will communicate with their smart meter. Some of the devices on the website have manufacturer rebates. SDG&E provides customers with the information needed to obtain the rebates if one is offered for that product. HAN devices and IHDs can help customers better manage their energy usage leading toward easier adoption of TOU pricing plans. SDG&E will continue to inform customers about the benefits and availability of this technology.

<sup>6</sup> Impact Evaluation of the Statewide Pricing Pilot, Final Report, Prepared by Charles River Associates, March 16, 2005. (Primary authors where Steve George and Ahmad Faruqui.)

Another important enabling technology SDG&E is rolling out as part of its SPP Plan is rate comparison tools. These tools will help our customers make informed decisions on which rate plans will work best for them based upon their historical usage patterns and personal preferences. SDG&E intends to leverage these tools to help educate customers and move further toward TOU pricing,

## X. BUDGET

Customer communication, education and outreach, and technology are extremely important to SDG&E and how we manage our business. SDG&E will require funding to develop and effectively execute a robust customer communication, education and outreach plan. However, because SDG&E does not know at this time if its February 28, 2014 rate change proposals will be adopted, it is unclear how to proceed with a targeted and detailed communications, education and outreach plan. This uncertainty results in SDG&E not being able to specifically estimate the funding levels needed for this undertaking. Accordingly, SDG&E is requesting to create a memorandum account to track all costs associated with customer communication, education and outreach, and technology for these residential rate reform efforts. To formally request implementation of this memorandum account, SDG&E proposes to file a Tier 2 advice letter with a preliminary statement indicating disposition of account to be addressed in SDG&E's Annual Regulatory Account Balance Update filing, or other applicable proceeding as directed by the Commission.

## XI. SUMMARY AND CONCLUSION

SDG&E is committed to developing robust Customer Communications, Education and Outreach, and Technology plans to efficiently transition our customers to new rate designs and pricing plans offered by electric rate reform. SDG&E will build upon its experience and

- foundational plans developed to provide customers with important tools and rate information to help them make informed choices about their pricing plan options.
  - This concludes my testimony.

3

4

3

4

5

6

7

8

9

10

11

12

My name is Alex Kim. My business address is 8335 Century Park Court, San Diego,

California, 92123. I am employed by San Diego Gas & Electric as Director of the Residential

Services Department. Currently, my responsibilities include the Customer Contact Center,

Residential Customer Experience and Engagement, and Customer Assistance Programs for San

Diego Gas & Electric. I have been employed by San Diego Gas & Electric since 2003. Prior to

joining SDG&E, I was employed by Sempra Energy and Southern California Gas Company.

Over the past 25 years, I have held positions of increasing responsibility within the company that

have included various customer service programs, marketing and outreach.

I graduated from California State Polytechnic University - Pomona with a Bachelors of

Science degree in Mechanical Engineering.

I have previously testified before the Commission.