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Witness:	Kyle W. Kettler
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REBUTTAL TESTIMONY OF

KYLE W. KETTLER

ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

CHAPTER 7 – MEASUREMENT & EVALUATION

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

November 9, 2026

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PREPARED REBUTTAL TESTIMONY OF KYLE W. KETTLER

I. INTRODUCTION

San Diego Gas & Electric (SDG&E) appreciates the opportunity to address arguments made by intervenors. This rebuttal testimony adopts the opening Prepared Testimony of Lizzette Garcia-Rodriguez on Behalf of SDG&E (Chapter 7 - Measurement & Evaluation). The purpose of this testimony is to respond to concerns raised by the Public Advocates Office of the California Public Utilities Commission (Cal Advocates). Cal Advocates recommends that the California Public Utilities Commission (Commission) should reject SDG&E's Evaluation, Measurement, and Verification (EM&V) budget proposal for the Proposed Demand Flexibility (DF) Rates, and that the scope of the proposal's research objectives should be expanded. SDG&E responds to these contentions below.

SDG&E's failure to address any individual issue in this rebuttal testimony does not imply agreement by SDG&E with any argument, position, or proposal asserted by parties.

II. DISCUSSION

A. Cal Advocates' Claim That the EM&V Budget Is Too High Should be Rejected

Cal Advocates argues that SDG&E's EM&V budget is inappropriately high, arguing that SDG&E's requested $1.6M for EM&V operations across two years is higher than what has been approved for pilot programs testing similar rates.[1] SDG&E addresses this issue in detail herein and further withdraws its request for the $438,480 EM&V line item for miscellaneous research, analytical support, and labor support. SDG&E no longer has access to the subject matter expert

[1] Cal Advocates Opening Testimony in Response to SDG&E's Dynamic Rate Application (A.) 26-02-001, Chapter 2, Implementation, Marketing, and Evaluations (September 11, 2026) (Cal Advocates Opening Testimony, Chapter 2) at 18-19.

knowledge on which this line-item estimate was based and is therefore withdrawing its request for these costs.

With respect to SDG&E's overall EM&V budget of $1.6M (and the updated budget of approximately $1.2M), Cal Advocates references the $551K budget for SDG&E's Dynamic Export Rate Pilot (DERP) as a comparison.[2] Notably, SDG&E's $551K budget was part of a multi-stage *pilot* evaluation plan—not a plan for a full DF rate like the one here. And although the $551K budget used the same substantive methodology as used to compute the EM&V budget for this Application,[3] a more apt comparison for the Proposed DF Rate is the EM&V budget for the full Real Time Pricing (RTP) pilot rate proposed by SDG&E in its 2021 application (A.21-12-006), which was then consolidated with the (DERP) application. For the RTP pilot rate, SDG&E estimated costs at $1.3M for Phase 1 of the proposed EM&V, which was a two-year study.[4] The EM&V budget for the RTP pilot rate is a better comparison to SDG&E's Proposed DF Rate budget because the RTP pilot was for an RTP import rate like the Proposed DF Rates and it had significantly broader customer eligibility than the DERP pilot (but still not as broad as the Proposed DF Rates).

The DERP pilot rate is too different from the Proposed DF Rate to serve as a useful comparison for EM&V purposes. The DERP pilot was limited to bundled commercial customers, excluding the agricultural customer class, with an on-site device capable of exporting

[2] Cal Advocates Opening Testimony in Response to SDG&E's Dynamic Rate Application (A.) 26-02-001, Chapter 3, Revenue Requirement and Cost Recovery (September 11, 2026) (Cal Advocates Opening Testimony, Chapter 3) at 3-8.

[3] *See* D.23-11-006 at Ordering Paragraph 2 (adopting the DERP Settlement Agreement); *see also* A.21-12-006/008 (cons.), Joint Motion for Adoption of Settlement Agreement on Application 21-12-008 Regarding Export Compensation Pilot (filed June 9, 2023), Attachment A at Section 3.7.

[4] A.21-12-006/008 (cons.), Ex.SDG&E-06, Prepared Supplemental Direct Testimony of Leslie Willoughby on Behalf of SDG&E (August 15, 2022) at 18.

energy and subject to a Rule 21 interconnection agreement.[5] SDG&E's Proposed DF Rates, however, will be offered to significantly more customer groups, including all customer classes except streetlighting, and to both bundled and unbundled customers. Moreover, the rate design for the Proposed DF Rates is more complex than the DERP rate design. There are more distinct components of the rate, including distribution, commodity, and transmission, all of which vary independently on an hourly or a time of use basis. The addition of an hourly distribution rate component and a TOU transmission rate component, which were absent from the commodity-only DERP rate, will require more effort to analyze from a research design perspective.

Even distinct from evaluation of a more complicated rate design, the EM&V activities that are proposed in this application are more complex than the DERP program's research objectives. SDG&E has proposed to conduct analysis of customer characteristics, including technology and household service details like the presence of electric water heaters, surveying both participants and non-participants, disaggregating results by sub-population characteristics such as CARE/FERA status, and connecting customer survey responses to observed load reductions.[6] The Proposed DF Rates EM&V proposal also commits to a bill impact analysis for all eligible customers across all customer classes,[7] which was outside the scope of the DERP's evaluation plan.[8]

[5] *See* SDG&E Schedule Dynamic Export Rate Pilot, Dynamic Export Rate Pilot Program, available at https://tariffsprd.sdge.com/view/tariff/?utilId=SDGE&bookId=ELEC&tarfKey=1133.

[6] Prepared Testimony of Lizzette Garcia-Rodriguez on Behalf of San Diego Gas & Electric Company, Chapter 7, Measurement & Evaluation (February 2, 2026) (SDG&E Opening Testimony, EM&V) at 2-3.

[7] *Id.* at 4-5.

[8] A.21-12-006/008 (cons.), Joint Motion for Adoption of Settlement Agreement on Application 21-12-008 Regarding Export Compensation Pilot (filed June 9, 2023), Attachment A at Section 3.6.

In addition to the broad variety of data types incorporated into the research plan, the Application proposes conducting an analysis of the Proposed DF Rates' impact on customer consumption patterns using the quasi-experimental difference in differences research design as part of Research Objective 2, Metric 1.[9] Such an evaluation produces estimates about program impacts that are more precise than a descriptive comparison of participant load patterns as was included in the DERP pilot's EM&V proposal.[10] Specifying a research design that uses this type of regression modelling can help to rule out confounding variables that are unrelated to the Proposed DF Rates.

Accordingly, the Proposed DF Rates and the DERP pilot are so different as to make comparison somewhat unreasonable. Given the larger eligible population for the Proposed DF Rates and the additional analytic extensions as compared to the DERP's EM&V program, SDG&E's EM&V budget proposal for the Proposed DF Rates is reasonable and should be found as such by the Commission.

Finally, Cal advocates raises a specific objection to a line item in the EM&V budget proposed in SDG&E's Chapter 7 Direct Testimony.[11] The proposed EM&V budget includes a $438,480 line item for miscellaneous research, analytical support, and labor support.[12] Subsequent data request responses assert that this category does not include labor costs.[13] Due to employee turnover, SDG&E cannot replicate the calculations used to produce this budget estimate. Accordingly, SDG&E withdraws its request for this line item.

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[9] SDG&E Opening Testimony, EM&V at 3-4.

[10] A.21-12-006 cons., Joint Motion for Adoption of Settlement Agreement on Application 21-12-008 Regarding Export Compensation Pilot (filed June 9, 2023), Attachment A at Section 3.6.

[11] Cal Advocates Opening Testimony, Chapter 3 at 5-6.

[12] *Id.*

[13] *Id.* at Appendix B at 22.

B. Request by Cal Advocates to Include Additional EM&V Analysis

Notwithstanding their argument that the EM&V budget should be rejected, Cal Advocates also proposes extending the research objectives for the EM&V schedule. While two of Cal Advocates' proposals are outside the scope of EM&V activities and therefore not appropriate for inclusion in the EM&V studies, SDG&E is willing to include four of Cal Advocates' other proposals within the existing two-year EM&V framework of surveys and analysis.

1. Cal Advocates' Requests for Analysis of Revenue Neutrality and Additional Years of EM&V Reporting are not Justifiable

Two of Cal Advocates' proposals to amend the EM&V plan for the Proposed DF Rates fall outside of normal EM&V operations. The first calls for evaluating whether the Proposed DF Rates are revenue neutral as a component of the rate design process.[14] As addressed in the November 9, 2026 rebuttal policy testimony of SDG&E witness Jeff DeTuri, the Proposed DF Rates are designed for revenue neutrality in the same manner as other SDG&E rates. Additional analysis on this issue is unnecessary.

The second proposal calls for annual reports beyond the planned two-year evaluation period, arguing that this information would benefit long-term planning by the Commission.[15] SDG&E disagrees that extended reporting for this rate is necessary or advisable. SDG&E has proposed two-years of reporting, in which SDG&E expects to provide significant information about the rate and customers' performance on the rate. However, extending the relatively extensive EM&V activities beyond two years will add additional and on-going costs that are unnecessary. Cal Advocates can seek information on the rate via data requests or via SDG&E's

[14] Cal Advocates Opening Testimony, Chapter 2 at 8-12.

[15] *Id.* at 12.

cyclical GRC Phase 2 proceedings where rate design is addressed. However, SDG&E opposes any requirement for SDG&E to create and submit yet another annual report for hypothetical long-term planning needs.

2. SDG&E Will Add Reasonable Requested Analyses to its Research Plan

SDG&E proposes accepting the following additions to the EM&V research plan:

Use of Assistive Technology

Cal Advocates seeks analysis on Proposed DF Rate participants' access to automated load response technologies.[16] SDG&E does not keep detailed information about end users' adoption of automation technology, but planned surveys of Proposed DF Rate participants can be expanded to ask about such assistive technologies. The anticipated cost associated with this proposal is low and is in line with Objective 1 metric 2: customer awareness of Proposed DF Rates. Accordingly, SDG&E is amenable to seeking information from survey participants on their use of assistive technology and performing an analysis to determine how such technology may influence load shifting.

Customer Protection Analysis

Cal Advocates argues that SDG&E should be required to "intentionally monitor participant performance under the MEC and distribution capacity price limits."[17] Under the already proposed bill impact analysis, counterfactual bills for the otherwise applicable tariff will be calculated for all eligible customers.[18] Cal Advocates' proposal requires calculating a second counterfactual: the prevailing Proposed DF Rates without customer protections for bills in which

[16] *Id.* at 16.

[17] *Id.* at 17.

[18] SDG&E Opening Testimony, EM&V at 4-5.

the CAISO price exceeds the price ceiling. This is within the scope of Objective 2 metric 2: Bill Impact Analysis and SDG&E agrees to perform that analysis.

Distribution Pricing Analysis

Cal Advocates seeks a research objective evaluating whether "the location-based distribution pricing method provides appropriate prices signals to customers."[19] SDG&E will compile CAISO and cluster prices for inclusion in the EM&V report.

ESJ and DAC Customer Bill Analysis

Finally, Cal Advocates argues for the inclusion of a variable identifying ESJ and DAC customers in the bill impact analysis comparison of otherwise applicable tariffs, and to collect "ESJ and DAC customers' experiences on the proposed dynamic rate to inform future rate design."[20] SDG&E is amenable to providing analysis of the Proposed DF Rates' effect on ESJ and DAC populations in aggregate for the bill impact analysis included in the existing EM&V research plan. However, SDG&E already proposes a participant and non-participant survey about customer understanding and awareness about the Proposed DF Rates. SDG&E thinks the proposed survey, in conjunction with the data on bill impacts, is a reasonable approach. Extending the survey to pursue responses from specific populations will require oversampling which is likely to be costly. Accordingly, although SDG&E agrees to provide bill impact analysis for these groups, SDG&E does not support additional survey expenses and therefore does not support the request for additional qualitative data collection from these customer groups.

This concludes my prepared rebuttal testimony.

[19] Cal Advocates Opening Testimony, Chapter 2 at 17.

[20] *Id.* at 18.

III. STATEMENT OF QUALIFICATIONS

My name is Kyle Kettler and my business address is 8330 Century Park Ct., San Diego, CA 92123. I am employed by SDG&E as a Data Science & Business Intelligence Senior I in the Customer Pricing Department. In my current position, I am responsible for managing and conducting load and energy research analysis.

I attended the University of Nebraska, Lincoln and graduated in 2015 with a Bachelor of Arts in Economics, Mathematics, and Philosophy. I attended the University of California, Irvine and earned a Masters of Arts in Economics in 2016, where I worked as a research assistant and PhD candidate studying Electricity Markets and Policy until 2021. Since 2022, I have worked in the Electric Forecasting, Research & Analysis team at SDG&E with positions of increasing responsibility.

I have not previously testified before the Commission.