Exhibit No.:	SDG&E – 12
Proceeding No.:	A.26-02-001
Witness:	Donna Singer
Date:	November 9, 2026

REBUTTAL TESTIMONY OF

DONNA SINGER

ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

CHAPTER 6 - MARKETING

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

November 9, 2026



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PREPARED REBUTTAL TESTIMONY OF DONNA SINGER

I. PURPOSE

The purpose of my rebuttal testimony is to address intervenors' prepared direct testimony served on September 11, 2026, in San Diego Gas & Electric Company's (SDG&E) Application (A.) 26-02-001. Specifically, my rebuttal testimony will address the following contentions made in intervenor testimony:

- San Diego Community Power (SDCP) and Clean Energy Alliance (CEA) (collectively, the SD CCAs) arguments regarding the need for real-time or near-real-time customer usage data to support customer understanding and participation in Proposed Demand Flexibility (DF) Rates;
- Public Advocates Office at the California Public Utilities Commission (Cal Advocates), the SD CCAs, and the Utility Consumers' Action Network's (UCAN) recommendations regarding additional Marketing, Education, and Outreach (ME&O) coordination and collaboration between SDG&E and the SD CCAs, including Cal Advocates' recommendation that SDG&E conduct an additional workshop regarding the Proposed DF Rates results and ME&O prior to Phase 2;
- Cal Advocates' recommendations regarding the development and refinement of SDG&E's phased ME&O strategy, including its recommendation that SDG&E submit a Tier 1 advice letter updating the ME&O strategy before Phase 2; and
- Cal Advocates' challenge to SDG&E's proposed ME&O budget, including its reliance on SDG&E's Dynamic Export Rate Pilot (DERP) as a basis for evaluating that budget.

Notably, there is meaningful common ground between certain intervenor recommendations and SDG&E's proposed ME&O approach. SDG&E agrees that customer education, clear and consistent communication, and the use of research and implementation

insights to refine ME&O are important, and its proposed strategy already incorporates these principles.[1]

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. REAL-TIME OR NEAR-REAL-TIME CUSTOMER USAGE DATA IS NOT NECESSARY FOR EFFECTIVE ME&O

The SD CCAs argue that timely usage information is necessary to assist customers with understanding dynamic rates and managing usage in response to changing prices.[2] For example, the SD CCAs' testimony states that, "[i]n the absence of timely customer usage information, the SD CCAs are unable to effectively assist customers in managing usage during periods of elevated prices."[3] SDG&E disagrees.

Real-time usage data is not necessary for effective ME&O or for customers to understand and respond to the day-ahead price signals of SDG&E's Proposed DF Rates. Consistent with SDG&E's discovery responses, ME&O may include customer education materials, digital communications, website content, and other resources to help customers understand the rate's price signals and identify opportunities to shift electricity usage in response to anticipated higher- or lower-priced hours.[4] These types of ME&O seek to influence customer behavior in response to the rate's pricing rather than ME&O seeking to influence customer behavior in

[1] Prepared Direct Testimony of Donna Singer on Behalf of San Diego Gas & Electric Company, Chapter 6 – Marketing (February 2, 2026) (SDG&E Opening ME&O Testimony) at 1-2.

[2] Prepared Direct Testimony on Behalf of San Diego Community Power and Clean Energy Alliance In SDG&E's Application for Approval of Demand Flexibility Rats (September 11, 2026) (SD CCA Opening Testimony) at 30 ("Achieving these [load shifting] outcomes requires timely meter data access for the customer's LSE [Load Serving Entity] to support participating customers in shifting their energy usage behavior and to evaluate the effectiveness of those changes within an actionable timeframe.").

[3] *Id.*

[4] *Id. at* Exhibit C (SDG&E Response to SDCP/CEA Data Request 02, Question 2.16(b) at 19-20).

response to past-usage. Nonetheless, customers still have access to past interval usage data through the secure online account portal, My Energy Center, that may help them understand their historical energy usage and may assist them in adjusting their consumption going forward. But SDG&E does use real-time interval meter data for ME&O nor does SDG&E consider use of real-time interval meter data necessary for effective ME&O. Combined with advanced access to day-ahead DF prices, these existing tools provide customers with actionable information to plan ahead and respond to price signals, but also to learn from prior usage, without requiring real-time interval meter data.

III. SDG&E HAS ALREADY PROVIDED FOR APPROPRIATE CCA COORDINATION ON ME&O

Cal Advocates recommends that SDG&E coordinate with CCAs concerning ME&O. Specifically, Cal Advocates recommends an additional workshop that would include discussion of CCA customer needs and barriers to CCA implementation of dynamic rates.[5] The SD CCAs similarly argue that additional coordination is important to implementing Proposed DF Rates. Their testimony identifies program coordination and CCA participation as issues that they believe must be addressed for meaningful CCA customer participation.[6] UCAN likewise raises concerns regarding SDG&E's collaboration with the SD CCAs in connection with Proposed DF Rate implementation.[7]

SDG&E agrees that clear and consistent customer communications are important and SDG&E's ME&O proposals provide for collaboration with the SD CCAs. Specifically,

[5] 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 5.

[6] SD CCA Opening Testimony at 15.

[7] Testimony of Luke Tougas on Behalf of the Utility Consumers' Action Network Concerning SDG&E Approval of Demand Flexibility Rates in Compliance with D.25-08-049 (September 11, 2026) at 11.

SDG&E's proposed strategy calls "[c]ollaborating with CCAs to share messaging framework and align [communications] approach across our service territory."[8] It also identifies the SD CCAs among the local stakeholders SDG&E will engage to provide customers with information and resources related to the Proposed DF Rates.[9]

SDG&E and the SD CCAs also engaged before intervenor testimony was filed. As discussed in SDG&E's opening and rebuttal policy testimony, SDG&E and the SD CCAs met on October 13, 2025, and January 7, 2026. SDG&E subsequently met separately with CEA on June 5, 2026, and SDCP on August 19, 2026. The SD CCAs did not raise a need for more collaboration or a collaborative framework during those meetings.

The Commission's guidance decision (D.25-08-049) did not prescribe an ME&O governance structure or ME&O co-development requirement. Instead, the guidance decision required collaboration on "creating and launching [CCA] DF programs *with* IOU DF programs. . . ."[10] This language requires collaboration on implanting SDG&E's rates with the SD CCA rates. Without SD CCA rates, SDG&E is not required to collaborate on the ME&O for SDG&E's Proposed DF Rates. Consistent with SDG&E's direct testimony, the appropriate focus for SD CCA collaboration on ME&O is implementation-level coordination regarding rollout, outreach, and customer communications regarding SDG&E's proposed DF Rates. If the SD CCAs also offer DF generation rates, additional coordination would help support clear and consistent customer messaging.

[8] SDG&E Opening ME&O Testimony at 5.

[9] *Id.*

[10] D.25-08-049, Conclusions of Law 34, at 145-146 (emphasis added).

Importantly, SDG&E regularly engages the SD CCAs on rate education topics as necessary using agenda space at the existing quarterly SDG&E and San Diego Regional CCA meetings. In addition, SDG&E typically provides courtesy copies of rate education communications to the SD CCAs ahead of deployment to shared customers. If the SD CCAs offer DF generation rates and existing channels prove insufficient, additional coordination touchpoints may be appropriate.

Accordingly, SDG&E does not believe the Commission needs to prescribe any additional collaboration, including any ME&O governance structure, workshop, or reporting requirement. SDG&E will engage in additional collaboration with the SD CCAs, in compliance with D.25-08-049, when SDG&E becomes aware of an SD CCA rate that either of the SD CCAs plan to implement.

IV. SDG&E'S PHASED ME&O STRATEGY ALREADY PROVIDES FOR CONTINUED REFINEMENT, MAKING A TIER 1 ADVICE LETTER UNNECESSARY

Cal Advocates recommends additional ME&O requirements such as "strategies to identify barriers faced by equity and access customers," assessment of "CCA customers' understanding of and interest in the proposed dynamic rate," a survey of "a statistically significant number of lower income customers and DAC customers," and submission of an update to SDG&E's ME&O plan through a Tier 1 advice letter prior to Phase 2 of SDG&E's ME&O plan, including "any pilot results, with specific metrics and values, that inform SDG&E's decisions to expand or restrict ME&O to additional customer segments."[11] SDG&E recommends that the Commission reject Cal Advocates' proposed Tier 1 advice letter requirement because it will add a regulatory requirement without additional value. SDG&E's

[11] Cal Advocates Opening Testimony, Chapter 2 at 6-7.

approach already incorporates customer research and relevant information learned through implementation, which is already built into SDG&E's proposal.

Cal Advocates seeks for SDG&E to focus on a few targeted customer segments—equity and access customers and CCA customers—rather than allowing SDG&E to use the information it obtains from Phase 1 of its implementation to appropriately direct its ME&O for this rate. As explained in direct testimony, SDG&E proposes a targeted, flexible and phased approach to ME&O divided into three periods: Pre-Launch, Phase 1, and Phase 2.[12] Phase 1 will use the Educate, Act, Support framework to create general awareness, introduce eligible customers to Proposed DF Rates, encourage enrollment, and support customers on Proposed DF Rates.[13] Phase 2 will provide for continued refinement of the ME&O strategy based on results from the 2025 Low-Income Needs Assessment (LINA), DF Pilots from the other California IOUs, marketing engagement metrics, and customer feedback related to the Proposed DF Rates, and SDG&E's Measurement and Evaluation results.[14]

Customer research is also an existing component of SDG&E's ME&O strategy. In addition to initial qualitative research, SDG&E anticipates conducting additional research toward the end of Phase 1 to gauge customer reactions, assess customer understanding and barriers to participation, and identify opportunities to refine messaging for Phase 2. The proposed budget provides funding for Customer Research and Insights.[15]

[12] SDG&E Opening ME&O Testimony at 2-3.

[13] *Id.*

[14] *Id.* at 3.

[15] *Id.* at 3-4.

SDG&E further explained this learning-based approach in response to Cal Advocates Data Request 11.[16] SDG&E's approach does not identify discrete Proposed DF Rate results or thresholds that would independently trigger an expansion of ME&O to additional customer segments, including equity and access customers. Rather, Proposed DF Rate results are one source of information, together with implementation experience and evaluation insights developed over time, including customer awareness, participation patterns, and responsiveness to price signals. Collectively, this information will help SDG&E evaluate whether and how targeted outreach should expand to equity and access customers.[17] SDG&E also already plans to measure outreach performance for internal use to monitor progress in reaching customers and refine and enhance strategy and messaging as necessary. Those metrics include paid-media reach and impressions, targeted communications and bill messages, email performance, webpage visits, and other digital performance, as applicable.[18]

Thus, the underlying objective of Cal Advocates' recommendation is already incorporated into SDG&E's phased ME&O strategy, which is designed to evolve as relevant information becomes available. SDG&E does not believe it is the best use of ratepayer funds to pre-determine that its ME&O budget be directed to a specific group or groups, regardless of what the totality of the information collected is showing. Further, requiring a Tier 1 advice letter (AL) before Phase 2 would add a regulatory filing requirement without adding value to that process. Cal Advocates argues that additional metrics should be included in such an AL, but fails to even identify what those metrics would be or how they would assist in directing Phase 2 of SDG&E's

[16] *See* Attachment A hereto, SDG&E Response to Cal Advocates Data Request 11 at Questions 2(b), 2(c), and 2(c)(i) at 3-4.

[17] *Id.*

[18] SDG&E Opening ME&O Testimony at 9.

ME&O. Accordingly, SDG&E recommends that the Commission reject Cal Advocates' recommendations regarding additional ME&O metrics for specific customer groups and for a proposed Tier 1 advice letter requirement.

V. SDG&E'S PROPOSED ME&O BUDGET IS APPROPRIATE FOR THE ROLL OUT OF A NEW AND DIFFERENT RATE DESIGN WITH BROAD ELIGIBILITY

Cal Advocates challenges SDG&E's approximately $2.455 million Proposed DF Rates ME&O budget, arguing that SDG&E's 2025 Dynamic Export Rate Pilot (DERP) evaluation contradicts the need for its proposal and that SDG&E's ME&O-associated labor costs are unsupported.[19] Cal Advocates miscites to SDG&E data request responses and seeks to compare the current rate to a DF rate, but one with significantly different characteristics and eligibility. SDG&E addresses these contentions further herein.

A. DERP is not an Appropriate Rate Comparison for Evaluating the Proposed DF Rates ME&O Budget

Cal Advocates cites DERP's low customer awareness and participation, customer communication preferences, and participation barriers, including lack of on-site generation, program relevance, trust, and perceived complexity.[20] Cal Advocates concludes that, because export compensation rate pilot was not successful in attracting customer to participate, that SDG&E has therefore not demonstrated that its proposed ME&O budget is necessary.[21] These conclusions are not sound. As Cal Advocates notes, even SDG&E has noted that its DERP pilot

[19] 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 4-5.

[20] *Id.*

[21] *Id.*

rate has been unsuccessful.[22] On this the parties agree. SDG&E has concluded, however, that this is evidence that its customers are not ready for a DF rate. Cal Advocates, on the other hand, concludes that SDG&E's ME&O was ineffective and therefore that SDG&E's ME&O budget for this rate should be reduced. Cal Advocates' support for this conclusion are not only internally inconsistent, but the comparison itself is inappropriate.

As an initial matter, the DERP pilot rate had very small total eligibility, noted as 9 *total* customers eligible for the rate at the time of the DERP survey report.[23] The Proposed DF Rates have a significantly larger eligibility at approximately 1.5M electric meters. These numbers alone justify a significantly larger budget. Further, additional ME&O efforts (and budget) will need to be employed to reach the additional types of customers eligible for the Proposed DF Rates as compared to the DERP pilot rate. The DERP pilot was available to only bundled commercial customers with specific exporting capabilities.[24] Again, the Proposed DF Rates will be available to all customers and all customer classes, excluding streetlighting, and both bundled and unbundled customers. Moreover, the estimated ME&O budget for DERP was $10,000 (almost all of which was used).[25] These are significant differences that highlight how unreasonable it is to compare the limited DERP pilot rate and its ME&O rollout to the proposed rollout of the much broader and more complicated Proposed DF Rates.

The differences in the DERP rate vs the Proposed DF Rate are significant and are more likely the reason that the DERP pilot failed to attracted customers than that SDG&E's ME&O

[22] *Id.*

[23] Cal Advocates Opening Testimony, Chapter 3 at Appendix B, 2025 DERP Report at 7.

[24] 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.

[25] *See* Attachment B hereto, SDG&E Responses to Cal Advocates DR 13, Q6-Q7.

strategy was inappropriate. Even Cal Advocates makes this argument. Despite arguing first that SDG&E's strategy was to blame, Cal Advocates then immediately cites to the DERP evaluation which found "the principal barriers to participation were structural (eligibility, trust, complexity, and customers' underlying resources), rather than marketing volume."[26]

SDG&E's DF ME&O proposal is intended to communicate the new rates to eligible residential, business, and agricultural customers through a phased strategy that includes Customer Research and Insights, Digital and Paid Media, Direct Customer Outreach and Education, and Program Management and Support.[27] As explained in discovery, the proposed ME&O budget reflects planning-level estimates based on anticipated program scale and segmentation, phased implementation, vendor-informed estimates, historical ME&O experience, and anticipated customer outreach and engagement activities.[28]

Given these differences in eligibility, scope, and ME&O effort, DERP is not an appropriate benchmark for determining the reasonable level of ME&O necessary for the Proposed DF Rates.

B. SDG&E's ME&O Labor Budget Is For Incremental Labor & Substantiated by Evidence

Cal Advocates argues that SDG&E is not entitled to its estimated incremental labor costs because SDG&E said in discovery that it "intends to use existing resources" (which SDG&E did not say) and because SDG&E made clarifications in a data request response and mistakenly failed to respond to part of the request.[29]

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[26] Cal Advocates Opening Testimony, Chapter 3 at 4 (citing to Appendix B, 2025 DERP Report, at 11).

[27] SDG&E Opening ME&O Testimony at 9 and at 10, Table 1.

[28] *See* Attachment B hereto, SDG&E Response to Cal Advocates Data Request 13, Question 2(d) at 9.

[29] Cal Advocates Opening Testimony, Chapter 3 at 4-5.

First, Cal Advocates states that SDG&E stated that it "intends to use existing resources" to support ME&O activities, citing SDG&E's response to Q1(a) of Cal Advocates' Data Request 08.[30] However, in the cited response, SDG&E actually states as follows:

> Labor costs are included in the ME&O cost estimate only and are listed in the workpapers; the Billing System and M&E estimates do not include incremental labor cots as SDG&E intends to use existing resources.[31]

Accordingly, it is clear that when SDG&E states that it intends to use existing resources, it is referencing the cost estimates for the Billing System and M&E estimates. Noteably, SDG&E has removed the labor costs associated with M&E from its request due to this very issue. However, for ME&O, SDG&E's request is incremental and SDG&E has not stated otherwise.

With respect to Q3 of Cal Advocates DR 17 in which Cal Advocates seeks clarification on the incrementality of labor costs for M&E, Billing System and ME&O, SDG&E clarifies its response with the information it previously provided to Cal Advocates in DR 8—that the labor costs for all categories but ME&O does not include labor.[32] SDG&E mistakenly failed to provide a response to the question of incrementality, and Cal Advocates did not subsequently notify SDG&E of this omission or otherwise seek clarification.[33] However, in numerous other data request responses provided to Cal Advocates, SDG&E does state that the amounts requested are incremental.[34] Further, SDG&E specifically states that it did not seek these costs in other

[30] *Id.* at 4 (citing to Appendix B, SDG&E Response to Cal Advocates DR 17, Q3).

[31] *Id.* at Appendix B, SDG&E Response to Cal Advocates DR 08, Q1a.

[32] *See id.* at Appendix B, SDG&E Response to Cal Advocates DR 17, Q3.

[33] *See id.*

[34] *Id.* at Appendix B, SDG&E Response to Cal Advocates DR 08, Q4(a), Q4(d), and Q4(f) (stating that SDG&E did not seek these costs in its GRC, they are not in existing rates, and it did not include costs associated with this rate in its TY 2028 GRC Phase 1 proceeding).

proceedings, including in its TY 2024 GRC Phase 1 or its Test Year 2028 GRC Phase 1.[35] SDG&E also provided additional details on what the proposed ME&O labor costs would entail.[36] Thus, although SDG&E already employs marketing personnel, it has not included a forecast for these hours in any other proceeding for the activities and hours required to perform the work associated with this request.[37] Thus, these are incremental hours and incremental labor revenue requests.

VI. CONCLUSION

SDG&E's proposed ME&O strategy already incorporates the core objectives reflected in intervenor testimony, including customer education, clear and consistent communications, appropriate CCA coordination, and continued refinement based on research and implementation learnings and additional ME&O metrics and reporting requirements are unnecessary. Additionally, SDG&E's proposed ME&O budget is supported by the record, by the broad eligibility for the Proposed DF Rate, and by its new and relatively complex rate design, which will require substantial customer education.

This concludes my rebuttal testimony.

[35] *Id.*

[36] *See* Attachment B hereto, SDG&E Responses to Cal Advocates DR 13, Q1, Q2a, Q2b, and Q2d.

[37] *See also* Attachment C hereto, SDG&E's Supplemental Response to Cal Advocates DR 08, Q1(b) (providing cost drivers for all three areas of its Proposed DF Rates budget, including ME&O).

ATTACHMENT A

SDG&E Response to Cal Advocates Data Request 11

CAL ADVOCATES DATA REQUEST 11
DEMAND FLEXIBLE RATE APPLICATION – A.26-02-001
SDG&E RESPONSE
DATE RECEIVED: APRIL 8, 2026
DATE RESPONDED: APRIL 22, 2026

OBJECTIONS TO INSTRUCTIONS

1. SDG&E objects to the instructions to the extent they seek a verified response. SDG&E is providing responses in good faith and that it believes to be true and correct. SDG&E is not aware of any obligation to provide a verification to a data request.

2. SDG&E objects to the instructions to the extent they purport to require the individual(s) responsible for providing the response and/or designate the proper witness to cross-examine concerning the response. The responses reflect SDG&E's response as a Company to the requests and not the work of any one individual.

3. SDG&E objects to the instructions to the extent they state that the requests are ongoing in nature and require subsequent, supplemental information.

4. SDG&E objects to the instructions to the extent they request responses in multiple formats.

5. SDG&E objects to the instructions to the extent they provide shortened timelines for objections and requests for clarification.

EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.

2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.

3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.

4. These responses are made solely for the purpose of this proceeding and for no other purpose.

Subject to the foregoing general objections and express reservations, SDG&E responds as follows:

Data Requests

SUBJECT: MARKETING, EDUCATION, AND OUTREACH

CAL ADVOCATES DATA REQUEST 11
DEMAND FLEXIBLE RATE APPLICATION – A.26-02-001
SDG&E RESPONSE
DATE RECEIVED: APRIL 8, 2026
DATE RESPONDED: APRIL 22, 2026

QUESTION 1:

1. Please provide a narrative description of SDG&E's process for selecting Community Based Organizations (CBOs) to use for customer education.[1]

SDG&E RESPONSE 1:

SDG&E objects to this request as overbroad. SDG&E further objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SDG&E responds with respect to what it did for this proceeding, as follows:

As discussed in SDG&E's ME&O testimony (Ex. SDGE-06) SDG&E has an established database of CBOs and plans to identify potential CBOs based on their established presence in targeted communities and demonstrated relevance to program objectives. Each organization will be evaluated for alignment between its mission and initiatives and the intended outreach goals, as well as for the demographics and geographic areas served to ensure meaningful reach to relevant customer segments. SDG&E expects to meet with prospective CBOs to provide an overview of the program, discuss outreach requirements, and potential outreach tactics. During these discussions, organizational capacity and bandwidth are assessed to confirm the CBOs ability to effectively support outreach efforts. Where applicable, a Memorandum of Understanding (MOU) will be completed which documents the roles, expectations, and deliverables.

QUESTION 1a:

a. Does SDG&E plan to leverage all CBOs in its Energy Solutions Partner Network to educate customers about Demand Flexibility (DF) rates? If not, please describe SDG&E's intended strategy to select CBOs to target DF rate education.

SDG&E RESPONSE 1a:

SDG&E works strategically with a network of approximately 200 CBOs that reflect the diverse demographics of its customer base across the service territory. As noted in the response to Question 1, SDG&E will strategically identify CBOs that are well positioned to support outreach for the Demand Flexibility rate option. At this time, but subject to refinement, SDG&E has identified approximately 59 CBOs for potential engagement.

QUESTION 2a:

2. SDG&E states that it plans to incorporate insights from "PG&E's and SCE's Dynamic Flexibility Pilots ("DF Pilots")" in its marketing, education, and outreach (ME&O) approach to equity and access customers.[2]

    a. Please confirm that the DF Pilots referenced are Pacific Gas and Electric

Company's (PG&E's) Expanded Dynamic Flexibility Pilot 2 and Southern California Edison's (SCE's) Expanded Dynamic Flexibility Pilot[3] ordered by D.24-01-032. If SDG&E is referring to other pilots, please specify them.

SDG&E RESPONSE 2a:

Confirmed. SDG&E is not referring to any additional Dynamic Flexibility pilots.

QUESTION 2b:

b. What results from the DF Pilots would cause SDG&E to expand ME&O to equity and access customers?

SDG&E RESPONSE 2b:

SDG&E objects to this request on grounds that it calls for speculation. Subject to and without waiving the foregoing, SDG&E responds as follows:

As described in SDG&E's testimony, SDG&E intends to monitor and incorporate relevant insights from PG&E's and SCE's Dynamic Flexibility Pilots related to customer understanding, engagement, and responsiveness to dynamic pricing. The testimony does not specify discrete results or thresholds that would independently trigger an expansion of ME&O to additional customer segments but instead reflects a learning-based approach that considers pilot insights as they become available.

QUESTION 2c:

c. Will SDG&E decide whether to target equity and access customers based on the DF Pilots results alone?

SDG&E RESPONSE 2c:

No. As reflected in the testimony, insights from the DF Pilots are intended to inform SDG&E's understanding of dynamic pricing implementation, but are not the sole input to decisions regarding future refinements to ME&O.

QUESTION 2ci:

i. If not, list other factors that SDG&E will use to inform expansion of ME&O targeted to equity and access customers.

SDG&E RESPONSE 2ci:

In addition to insights from the DF Pilots, SDG&E's ME&O testimony (Ex. SDGE-06) indicates that refinements to its ME&O approach would be informed by implementation experience and evaluation insights developed over time, such as customer awareness, participation patterns, and responsiveness to price signals. As described in the Measurement and Evaluation testimony, these insights are expected to emerge through

surveys, enrollment data, and observed customer behavior and may inform future adjustments to ME&O strategies.

QUESTION 3

3. SDG&E states that its "Educate, Act, and Support" messaging framework will include tactics to target customers "most likely to succeed on the [Demand Flexibility] rate."[4] Please describe SDG&E's process to identify customers most likely to succeed on a DF rate.

SDG&E RESPONSE 3:

As described in SDG&E's ME&O testimony (Ex. SDGE-06) the "Educate, Act, and Support" framework is intended to support customer understanding of and engagement with the Demand Flexibility rate. SDG&E does not use a deterministic screening process to identify or exclude customers from outreach. Rather, SDG&E's testimony reflects a learning-based ME&O approach, under which outreach strategies may be refined over time based on implementation experience and evaluation insights, including customer awareness, participation patterns, and responsiveness to price signals as those insights become available, consistent with the Measurement and Evaluation framework described in the application.

QUESTION 3a:

a. How does SDG&E define customer success on a DF rate?

SDG&E RESPONSE 3a:

As reflected in SDG&E's Measurement & Evaluation testimony (Ex. SDGE-07) customer success on a Demand Flexibility rate is evaluated based on customers' awareness and understanding of the rate, their responsiveness to day-ahead price signals, observed participation and enrollment behavior, realized load response, and bill impacts over time. The testimony does not establish a single success threshold. Customer success on a DF rate means that customers understand and respond to hourly price signals by shifting or reducing usage, have the opportunity to achieve bill savings or avoid bill increases, remain satisfied with the rate, and/or continue participating over time. Thus, success is evaluated through load response, billing outcomes, customer understanding, satisfaction, and sustained enrollment.

END OF REQUEST

ATTACHMENT B

SDG&E Responses to Cal Advocates Data Request 13

CAL ADVOCATES DATA REQUEST 13
DEMAND FLEXIBLE RATE APPLICATION – A.26-02-001
SDG&E RESPONSE
DATE RECEIVED: MAY 8, 2026
DATE RESPONDED: JUNE 3, 2026

OBJECTIONS TO INSTRUCTIONS

1. SDG&E objects to the instructions to the extent they seek a verified response. SDG&E is providing responses in good faith and that it believes to be true and correct. SDG&E is not aware of any obligation to provide a verification to a data request.

2. SDG&E objects to the instructions to the extent they purport to require the individual(s) responsible for providing the response and/or designate the proper witness to cross-examine concerning the response. The responses reflect SDG&E's response as a Company to the requests and not the work of any one individual.

3. SDG&E objects to the instructions to the extent they state that the requests are ongoing in nature and require subsequent, supplemental information.

4. SDG&E objects to the instructions to the extent they request responses in multiple formats.

5. SDG&E objects to the instructions to the extent they provide shortened timelines for objections and requests for clarification.

EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.

2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.

3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.

4. These responses are made solely for the purpose of this proceeding and for no other purpose.

Subject to the foregoing general objections and express reservations, SDG&E responds as follows:

DATA REQUESTS
SUBJECT: MARKETING, EDUCTION AND OUTREACH (ME&O)

CAL ADVOCATES DATA REQUEST 13
DEMAND FLEXIBLE RATE APPLICATION – A.26-02-001
SDG&E RESPONSE
DATE RECEIVED: MAY 8, 2026
DATE RESPONDED: JUNE 3, 2026

QUESTION 1
For each budget line item in SDG&E's "2025 Flex Demand ME&O Budget Workbook"[1] (Chapter 6 Workpaper), please provide a description for the step(s) or task(s) associated with each monthly budget value.

SDG&E RESPONSE TO QUESTION 1

The monthly budget values shown in the "2025 Flex Demand ME&O Budget Workbook" represent planning-level forecasted allocations of Marketing, Education, and Outreach ("ME&O") activities across the pre-launch, Phase 1 and Phase 2 implementation periods, consistent with SDG&E's approach described in testimony of ME&O efforts. Budget values reflect subject matter expertise in executing ME&O efforts, the anticipated timing of these activities based on program rollout schedules, and customer engagement strategies. Forecasts were developed on a quarterly basis and generally applied evenly for the three months within each quarter.

Steps or tasks associated with each monthly budget value may typically include, but are not limited to:

- Customer Research activities, which may include defining research objectives and methodology; soliciting and evaluating vendor proposals; contracting with research firms; developing research materials; conducting surveys and focus groups; analyzing results; and incorporating findings into subsequent ME&O strategy, messaging, and customer segmentation approaches.
- Web development activities, which may include engaging web development resources; defining scope and requirements; developing, reviewing, and publishing new or updated web content; and refining web content over time to support customer education and engagement throughout the phased ME&O implementation.
- Paid Media activities, which may include engaging creative and media agencies; developing campaign strategy, audience targeting, and media plans; producing and approving advertising assets; executing media placement; and optimizing campaign performance over time.
- Bill Package activities, which may include development of customer-facing messaging and materials; coordination with print vendors; production and insertion of materials into bill elements; and updates to messaging based on program phase, customer feedback, and internal review processes.
- Targeted Customer Communication activities, which may include customer segmentation and analytics; development and review of messaging and creative assets; deployment of communications to targeted audiences; and ongoing refinement of messaging, targeting strategies, and delivery timing.

[1] Prepared Direct Testimony of Donna Singer on Behalf of San Diego Gas & Electric Company Chapter 6 – Marketing (SDG&E Chapter 6) Workpaper, February 2, 2026, titled "Ch 6_Marketing."

- Educational and Supporting Materials (e.g., Webinars, Collateral, Video/Film, Translation) activities, which may include audience identification; content and creative development; vendor coordination; production of materials; translation into multiple languages; and iterative updates to content to support customer understanding and program participation.
- Outreach and Community-Based Organization ("CBOs") activities, which may include identifying and prioritizing outreach opportunities; coordinating and participating in community events; developing and distributing outreach materials; evaluating and contracting with CBO partners; and collaborating with CBOs to extend program awareness and engagement.
- Program Management and Support (Internal Labor and Agency/External Support activities, which may include overall program planning and oversight; coordination across internal teams and external vendors, including collaboration with regulatory, legal, and customer-facing teams; integration of messaging across channels to ensure consistency; tracking and reporting on campaign performance; analyzing customer engagement metrics; refining messaging, targeting, and channel strategies over time; and ongoing management of ME&O activities throughout program implementation.

QUESTION 2

Please provide, in Excel format, calculations for each monthly cost for all line items in SDG&E's Chapter 6 Workpaper. Please include in calculations a granular breakdown of costs including but not limited to costs for personnel, events, and units, such as the following:

SDG&E RESPONSE TO QUESTION 2:

The ME&O budget presented in Chapter 6 Workpapers reflects planning-level estimates developed to support the phased implementation of the ME&O strategy described in testimony.

In general, cost estimates were developed on a quarterly basis and applied evenly to the three months in each quarter. To the extent detailed calculations are not available, budget amounts are based on forecasted program activities by phase and quarter, typical vendor cost estimates, and historical program experience and internal labor planning assumptions and blended rates.

QUESTION 2a

For line items that involve labor, please provide calculations for monthly costs that include number of and type of personnel.

SDG&E RESPONSE TO QUESTION 2a

For line items involving labor, the values reflected in the Chapter 6 Workpapers previously provided to Cal Advocates were developed using planning-level estimates of staffing needs and level of effort by functional role category.

Labor costs were estimated at a quarterly level based on anticipated program activities and evenly allocated across the three months within each quarter for budgeting purposes.

Labor cost estimates reflect aggregated role categories (e.g., marketing, research, analytics, outreach and program management), estimated level of effort required to support ME&O activities within each program phase and blended labor rates consistent with internal planning practices.

Illustrative calculations reflecting these methodologies are provided in the accompanying Excel file based on available data.

SDG&E does not maintain labor cost calculations at a fully disaggregated employee- or task-level by month; rather, the values reflect aggregated, planning-level estimates based on program timelines and campaign phasing used to develop the budget values provided in the Chapter 6 Workpapers.

CAL ADVOCATES DATA REQUEST 13
DEMAND FLEXIBLE RATE APPLICATION – A.26-02-001
SDG&E RESPONSE
DATE RECEIVED: MAY 8, 2026
DATE RESPONDED: JUNE 3, 2026

QUESTION 2b

For line items that involve objects, please provide calculations for monthly costs that include the type and number of objects. For example, for the line "Res and Biz Insert," please include the number of units and the cost per unit in the calculations for each month.

SDG&E RESPONSE TO QUESTION 2b

For line items involving materials or other unit-based costs, the values reflected in the Chapter 6 Workpapers were developed using planning-level estimates of campaign volume and unit cost assumptions, where applicable.

These estimates were developed at a quarterly level based on anticipated outreach and customer engagement activities and were allocated evenly across the three months within each quarter.

Where applicable, cost estimates are based on estimated customer populations or campaign reach (e.g., bill insert volumes, email communications), vendor-informed unit cost assumptions based on comparable prior programs, and aggregated campaign-level estimates for media and collateral. For example, for the "Res and Biz Insert" line item, estimated units are based on the approximate residential and business customer population receiving printed bills at the time of the application (on the order of hundreds of thousands of customers, consistent with SDG&E's paper billing population). Estimated cost reflects vendor-informed pricing for comparable bill insert production, printing, and fulfillment services. Total costs are developed at a campaign level using these assumptions and allocated across months consistent with the quarterly budgeting approach described above.

These estimates are planning-level and may vary based on final quantities, design specifications, vendor pricing and paper-billing population at the time of production.

Illustrative calculations reflecting these methodologies are provided in the accompanying Excel file based on available data. In some instances, costs are developed at an aggregated level and are not tracked or maintained as discrete unit-level calculations for each monthly value.

QUESTION 2c

For line items that include iterative events, please provide calculations for monthly costs that include the number of events and the cost per event.

SDG&E RESPONSE TO QUESTION 2c

For line items associated with recurring or iterative events, the values reflected in the Chapter 6 Workpapers were developed based on anticipated outreach and engagement activities, including webinars and community outreach.

Event-related costs were estimated at a quarterly level based on expected activity levels and were allocated evenly across the three months within each quarter.

Event cost estimates reflect anticipated frequency of outreach and engagement activities, estimated cost per event based on planning assumptions and prior program experience and aggregated costs for event support, materials, and coordination activities

Illustrative calculations reflecting these methodologies are provided in the accompanying Excel file based on the data available in the ordinary course of business.

SDG&E does not maintain event-level cost calculations at a fully disaggregated monthly format and instead reflects planning-level estimates consistent with program budgeting practices.

QUESTION 2d

Please identify any assumptions/estimates made in the development of these calculations and explain how SDG&E developed the assumption/estimate. For example, the number of and type of personnel to do specified work.

SDG&E RESPONSE TO QUESTION 2d

The values reflected in the Chapter 6 Workpapers previously provided to Cal Advocates were developed using planning-level assumptions and estimates consistent with standard ME&O program budgeting practices.

Key assumptions include:

- Costs estimated at a quarterly level and evenly allocated across the three months within each quarter
- Staffing levels and level of effort based on anticipated program activities and phased implementation
- Labor costs reflect aggregated role categories and blended labor rates for up to eight roles including marketing, research, analytics and outreach personnel.
- Material and media costs based on vendor-informed estimates and historical program experience
- Customer outreach and engagement activities developed based on anticipated program scale and segmentation strategy
- Event frequency and scope reflect planned outreach activities within each program phase

These assumptions were developed through internal planning processes informed by prior ME&O program implementation, subject matter expertise, and the program approach described in testimony.

QUESTION 2e

Please provide all supporting documentation for how assumptions were derived. For example, documentation of the salary range for each type of personnel included in labor costs.

SDG&E RESPONSE TO QUESTION 2e

The Chapter 6 Workpapers reflect planning-level estimates developed to support the phased implementation of the ME&O strategy described in testimony. Additional internal planning inputs were used to develop the estimates, including aggregated cost inputs across labor, media, and outreach activities, vendor-informed estimates and historical program experience, internal labor planning assumptions and allocation methodologies.

Labor costs reflected Chapter 6 Workpapers were developed using planning-level assumptions based on functional role categories (e.g., marketing, research, analytics, outreach and program management) and estimated levels of effort required to support program activities. Salary inputs used in developing these estimates reflect blended compensation assumptions across these role categories. For budgeting purposes, SDG&E applies fully-loaded labor cost assumptions, which incorporate base salary along with overhead components such as benefits, payroll taxes, and other employee-related costs. These labor cost assumptions are developed at an aggregated level and are not maintained as discrete salary ranges by individual role or personnel type. Costs reflected for Agency Support/External labor were based on quarterly estimates for external agency and vendor support consistent with prior ME&O experience and did not rely on compensation assumptions by personnel role.

CAL ADVOCATES DATA REQUEST 13
DEMAND FLEXIBLE RATE APPLICATION – A.26-02-001
SDG&E RESPONSE
DATE RECEIVED: MAY 8, 2026
DATE RESPONDED: JUNE 3, 2026

QUESTION 3

Please provide, in Excel format, the ME&O budget that SDG&E planned for its un-tiered time-of-use rate, TOU-ELEC[2] at the time that SDG&E began implementation of the ME&O plan approved in SDG&E Advice Letter 4145-E, effective February 16, 2023.[3] Please include cost categories, calculations, and monthly costs if available.

SDG&E RESPONSE TO QUESTION 3:

SDG&E objects to this request on grounds that it assumes facts that do not exist. SDG&E Advice Letter (AL) 4145-E was not effective February 16, 2023. SDG&E AL 4145-E has not been approved. Additionally and accordingly, SDG&E has no approved ME&O plan for rate TOU-ELEC and SDG&E has not begun implementation of an approved ME&O plan. Subject to and without waiving the foregoing objections, SGD&E responds as follows:

While waiting for a resolution of AL-4145-E, SDG&E completed a dedicated TOU-ELEC webpage which includes plan overview information, educational videos, FAQs and an enrollment form. Additional information regarding cost of these ME&O activities are provided in response to Question 4 below.

[2] The Commission approved TOU-ELEC in D.22-11-022, Decision Adopting an Opt-In Tariff to Encourage Residential Electrification, November 17, 2022, at 58.
[3] SDG&E Advice Letter 4145-E, Implementation of San Diego Gas & Electric Company's Marketing, Education and Outreach Plan in Compliance with D.22-11-022, January 17, 2023, at Attachment A.

CAL ADVOCATES DATA REQUEST 13
DEMAND FLEXIBLE RATE APPLICATION – A.26-02-001
SDG&E RESPONSE
DATE RECEIVED: MAY 8, 2026
DATE RESPONDED: JUNE 3, 2026

QUESTION 4

Please provide, in Excel format, a detailed breakdown of SDG&E's actual spending on ME&O for Schedule TOU-ELEC, approved in Decision (D.) 22-11-022.

SDG&E RESPONSE TO QUESTION 4:

SDGG&E objects to this request as vague and ambiguous as to the phrase "approved in Decision (D.) 22-11-022. SDG&E notes that it responds to this request under the assumption that the stated phrase is modifying "Schedule TOU-ELEC" as opposed to modifying "ME&O for TOU-ELEC" because D.22-11-022 approved the rate but did not approve ME&O for the rate. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

Information regarding actual ME&O spending for Schedule TOU-ELEC is provided in the attached Excel file.

CAL ADVOCATES DATA REQUEST 13
DEMAND FLEXIBLE RATE APPLICATION – A.26-02-001
SDG&E RESPONSE
DATE RECEIVED: MAY 8, 2026
DATE RESPONDED: JUNE 3, 2026

QUESTION 5

Please list any Community Based Organizations (CBOs) that SDG&E partnered with to promote Schedule TOU-ELEC.

SDG&E RESPONSE TO QUESTION 5:

SDG&E has not partnered with any Community Based Organizations (CBOs) to promote Schedule TOU-ELEC.

QUESTION 6

Please provide, in Excel format, the ME&O budget that SDG&E planned for its dynamic export rate pilot program at the time that SDG&E began implementation of its dynamic export rate pilot in SDG&E Advice Letter 4407-E, effective April 13, 2024.[4] Please include cost categories, calculations, and monthly costs if available.

SDG&E RESPONSE TO QUESTION 6:

The ME&O budget SDG&E planned for its dynamic export rate pilot program is provided in the attached Excel file.

[4] SDG&E Advice Letter 4407-E, Implementation of Dynamic Export Rate Pilot Program Pursuant to Decision 23-11-006, March 14, 2024; Energy Division, Advice Letter 44070E/4407-E-A, Disposition Letter, October 21, 2024.

QUESTION 7
Please provide, in Excel format, a detailed breakdown of SDG&E's actual spending on ME&O for its dynamic export rate pilot program, approved in D.23-11-006.[5]

SDG&E RESPONSE TO QUESTION 7:

Information regarding actual ME&O spending for the dynamic export rate pilot program is provided in the attached Excel file.

[5] D.23-11-006, Decision Adopting Dynamic Export Rate and Pilot and Dismissing Application for Real Time Pricing Rate Pilot, November 15, 2023.

CAL ADVOCATES DATA REQUEST 13
DEMAND FLEXIBLE RATE APPLICATION – A.26-02-001
SDG&E RESPONSE
DATE RECEIVED: MAY 8, 2026
DATE RESPONDED: JUNE 3, 2026

QUESTION 8

Please list any CBOs that SDG&E partnered with to promote its dynamic export rate pilot program.

SDG&E RESPONSE TO QUESTION 8:

SDG&E has not partnered with Community-Based Organizations (CBOs) to support outreach for the dynamic export rate pilot program.

END OF REQUEST

ATTACHMENT C

SDG&E's Supplemental Response to Cal Advocates Data Request 08

CAL ADVOCATES DATA REQUEST 08
DEMAND FLEXIBLE RATE APPLICATION – A.26-02-001
SDG&E SUPPLEMENTAL RESPONSE
DATE RECEIVED: MARCH 24, 2026
DATE RESPONDED: APRIL 15, 2026

OBJECTIONS TO INSTRUCTIONS

1. SDG&E objects to the instructions to the extent they seek a verified response. SDG&E is providing responses in good faith and that it believes to be true and correct. SDG&E is not aware of any obligation to provide a verification to a data request.

2. SDG&E objects to the instructions to the extent they purport to require the individual(s) responsible for providing the response and/or designate the proper witness to cross-examine concerning the response. The responses reflect SDG&E's response as a Company to the requests and not the work of any one individual.

3. SDG&E objects to the instructions to the extent they state that the requests are ongoing in nature and require subsequent, supplemental information.

4. SDG&E objects to the instructions to the extent they request responses in multiple formats.

5. SDG&E objects to the instructions to the extent they provide shortened timelines for objections and requests for clarification.

EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.

2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.

3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.

4. These responses are made solely for the purpose of this proceeding and for no other purpose.

Subject to the foregoing general objections and express reservations, SDG&E responds as follows:

Data Requests

SUBJECT: REVENUE REQUIREMENT

QUESTION 1b:

b. Please provide the cost drivers associated with each of the costs, such as program scopes, breakdown of activities, etc. and provide the supporting information to explain the cost drivers in detail.

SDG&E SUPPLEMENTAL RESPONSE 1b:

Please refer to question 1.a.

Cost drivers associated with the billing system are primarily related to the level of effort required to develop, validate, and test the items identified in Data Request No. 2, Attachment C. While customer count does not affect costs, the customer classes included do. The estimates include all customer classes consistent with Decision (D.) 25-08-049. Additionally, SDG&E's proposal excludes NBT/NEM customers. Inclusion of these customers would result in higher estimated prices as billing system design, validation and testing for this customer set to be more complicated. Additional contributing factors are further described in the response to Data Request No. 03, Question 2.

The cost drivers for SDG&E's Evaluation, Measurement, and Verification (EM&V) are associated with the 1) development of a Request for Proposals (RFP), 2) bill impact analyses and evaluation plan development during the initiation phase, 3) load impact evaluation studies, including analysis of bill impacts, 3) customer research, including surveys assessing awareness, understanding, responsiveness, and barriers to participation, and 4) miscellaneous analytical, research, and labor support required for implementation. SDG&E anticipates hiring an external evaluation consultant to conduct the EM&V activities. SDG&E does not expect any of its estimated costs for EM&V to be significantly impacted by a change in program scope.

ME&O costs fall into four categories: Customer Research and Insights, Digital and Paid Media, Direct Customer Outreach and Education, and Program Management and Support. Costs for Customer Research and Insights include external vendor-led qualitative research and message development/testing to determine perceptions of DF and bill impacts, understanding of rate descriptions, effective channels, and testing customer-facing rate names. Research is expected to span multiple eligible customer segments including residential, business, agricultural, CCA/non-CCA, CARE/non-CARE, disadvantaged communities (DACs) and multiple climate zones, with potential follow-on research late in Phase 1 to refine Phase 2. Digital and Paid Media costs reflect the scale and mix of paid channels, including digital display/search/social, programmatic, high-impact digital, and print/out-of-home as appropriate, creative development, multilingual execution, and

ongoing optimization based on performance and findings from bill analysis, internal customer analytics and vendor research as well as the DF Pilot and LINA study. Direct Customer Outreach and Education costs are driven by developing and distributing education materials and targeted direct marketing, including email, plus outreach through CBOs and events. Across the ME&O plan, SDG&E plans to take a digital-first approach to mitigate costs, while recognizing that hard-to-reach populations may require other, more costly communication methods. Program Management and Support begins with pre-launch readiness activities like onboarding agencies, M&EO implementation planning, internal engagement of customer-facing teams, and development of digital infrastructure such as a dedicated landing page and updates to existing digital content. Following launch, Program Management and Support provides ongoing coordination to manage the phased rollout, align with CCAs/CBOs, and adapt targeting and messaging as insights from research, analytics, pilots, and measurement and evaluation become available.

SDG&E expects its estimated ME&O costs to remain relatively constant regardless of changes in final rate design or program scope with the following caveat(s): If a demand flexibility rate program is adopted and either residential customers are not eligible and/or unbundled customers are not eligible, ME&O costs associated with Customer Research and Insights, Digital and Paid Media, and Direct Customer Outreach would be significantly reduced (although Program Management and Support would remain largely unchanged).

END OF REQUEST