

Application No: A.12-08-XXX
Exhibit No: SCG
Witness: Andrew Steinberg

Application of Southern California
Company (U-904-G) for Approval of
Statewide Marketing, Education and
Outreach Program and Budgets for Years
2013 through 2014

Application 12-08-xxx

CHAPTERS V and VI

PREPARED DIRECT TESTIMONY OF

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SOUTHERN CALIFORNIA GAS COMPANY

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

August 3, 2012

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V. STATEWIDE ME&O OVERSIGHT AND PERFORMANCE METRICS

The purpose of this testimony is to present Chapters V and VI of the Southern California Gas Company (“SoCalGas” or “SCG”) Statewide Marketing, Education and Outreach (“ME&O”) application, which generally cover performance metrics, governance, and cost allocation and revenue recovery matters. The testimony in Chapter V specifically has been developed in unison with the other California Investor Owned Utilities (“IOUs”) participating in the collaborative statewide effort, and thus reflects a joint proposal.¹

With respect to the proposed revenue requirements addressed in Chapter VI, it is helpful to clarify that the funds specifically submitted for Energy Efficiency (“EE”) have not been requested in other Applications for cost recovery purposes, so in order to fund those SCG Statewide ME&O activities, it is necessary for the Commission to authorize the requested expenses. While the proposed EE-related ME&O funds were previously disclosed as part of the 2013-2014 EE portfolio Application (“A.”) 12-07-003 for the purposes of complying with the requirement to provide a cost effectiveness assessment, the costs were not included in the revenue requirement proposal. This treatment is in compliance with Decision (“D.”) 12-05-015,² Ordering Paragraph (“OP”) 117, that directs the IOUs to file a standalone ME&O program Application with the Commission.

A. STATEWIDE OVERSIGHT AND STAKEHOLDER ENGAGEMENT

D.12-05-015, OP 124, directs PG&E and the California Center for Sustainable Energy (“CCSE”) to “consult with Commission Staff, Californian Energy Commission Staff, local

¹ The noted California IOUs include Pacific Gas & Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and the Southern California Gas Company.

² Titled “Decision Providing Guidance on 2013-2014 Energy Efficiency Portfolios and 2012 Marketing, Education, and Outreach.”

1 governments, and other relevant entities as identified by agency Staff, in the design and oversight
2 of the [ME&O] program and shall establish appropriate stakeholder feedback, coordination, and
3 governance structures based on this consultation.”

4 In prior years, the Statewide ME&O program model for stakeholder input and
5 coordination has been based on the prevailing Commission directive for statewide EE programs.
6 To select the vendor in 2009 to run the previous Statewide ME&O program, a Peer Review
7 Group (“PRG”) of interveners was assembled to advise on the selection of the implementer as is
8 required pursuant to the EE Policy Manual.³

9 During the program implementation in 2010-2011, the IOUs and CPUC staff met with
10 the statewide vendors to assess the progress of the campaign and to coordinate on key issues.
11 For the remainder of 2012⁴ and 2013-2014, SCG proposes to build from the existing working
12 group model and meet on a quarterly basis as a Statewide ME&O Program Advisory Group
13 (“PAG”). This would be comprised of the IOUs, CPUC staff, and interested parties such as the
14 CEC, local governments, and other entities, along with the statewide implementer. The PAG
15 will serve to:

- 16 (1) Promote transparency in the [IOUs’] decision-making process;
- 17 (2) Provide a forum to obtain valuable technical expertise from stakeholders and non-
18 market participants;
- 19 (3) Encourage collaboration among stakeholders; and
- 20 (4) Create an additional venue for public participation.

³Energy Efficiency Policy Manual, Version 4.0, Section VI.

⁴Pending completion of Statewide ME&O oversight work by implementer under the direction of PG&E.

1 It is envisioned the PAG would closely collaborate and coordinate regarding the
2 Statewide ME&O program. Meetings would be called by PG&E as the lead IOU, and the IOU
3 responsibility for leading these meetings would rotate periodically.

- 4 • *IOU Responsibilities:* PG&E or an assigned IOU proxy responsible for organizing
5 quarterly PAG meetings. IOUs will lead the strategy of the program. PG&E, on
6 behalf of the IOUs will directly oversee the implementer.
- 7 • *PAG Responsibilities:* Advising on program strategy and implementation.
- 8 • *Implementer Responsibilities:* Implementation of the strategy through an approved
9 tactical plan and the associated budget. The program implementer and the utilities
10 will meet on a basis to be determined for timely and accurate decision-making to
11 ensure maximum success for the Statewide ME&O program in 2013-2014.

12 The PAG should leverage the already-established meeting frequency of other statewide
13 programs and meet quarterly for official updates. The specific budgetary thresholds for CCSE
14 purchasing authority will be determined once the IOUs Statewide ME&O Applications are
15 approved and will be documented in the 2013-2014 implementer contract.

16 **B. 2012 AND 2013-2014 IMPLEMENTER ENGAGEMENT**

17 In D.12-05-015, OP 123 directs the utilities to contract with CCSE “no later than July 1,
18 2012 to begin activities to allow them to fully implement the program beginning in 2013. A total
19 of at least \$500,000 shall be allocated to CCSE for the remainder of 2012. The budget for 2013-
20 2014 shall be proposed in the utility 2013-2104 applications.” Subsequently, PG&E requested
21 and received an extension to fully execute its contract with CCSE. At this time, PG&E and
22 CCSE have a signed contract to begin the implementation of the Statewide ME&O activities.

1 For the remainder of 2012, the scope of work between CCSE and PG&E, on behalf of the
2 other utilities, covers four objectives: a) stakeholder coordination, b) website analysis and
3 consolidation, c) brand stewardship and marketplace coordination, and d) brand assessment,
4 research, and preparation for transition to the Energy Upgrade California (“EUC”) brand. The
5 contract for the aforementioned activities is approximately \$4 million and is covered under OP
6 118 which directs that the IOUs “may spend a maximum of \$5 million in 2012 out of the 2010-
7 2012 statewide marketing, education and outreach energy efficiency budget on Energy Upgrade
8 California marketing and outreach to transition to a larger umbrella for the statewide campaign in
9 2013-2014.”

10 For 2013-2014, PG&E, on behalf of the IOUs will enter into a contract with the
11 implementer that will include but not be limited to the implementation of the Statewide ME&O
12 strategy, management of any agencies, implementer staff time, and stakeholder coordination.
13 This contract will be developed pursuant to Commission approval of the IOUs’ Statewide
14 ME&O Applications.

15 **C. PERFORMANCE METRICS**

16 Performance metrics are a component of program design and provide the necessary
17 insight to program performance. In D.09-09-047, the Commission approved programs and
18 budgets for the 2010-2012 EE portfolios of the IOUs and explicitly recognizes that performance
19 metrics should be linked to program activities and goals as identified in program logic models.⁵

20 The Commission defines Program Performance Metrics (“PPMs”) as “objective,
21 quantitative indicators of the progress of a program toward the short and long-term market

⁵ D.09-09-047, p. 92.

1 transformation goals and objectives in the Strategic Plan.”⁶ The Commission also identifies
2 PPMs as essential to track the progress of each program towards the Commission’s market
3 transformation goals.⁷

4 Commission Resolution E-4385, issued on December 6, 2010, approved PPMs for the
5 IOUs for 2010-2012 statewide EE programs and subprograms, including ME&O. The three
6 PPMs identified by that resolution for the ME&O program were written explicitly for the
7 previous Statewide ME&O brand and the marketing strategy developed for the 2010-2012
8 program cycle. This included an emphasis on grassroots and social networking activities
9 associated with the early phase of the 2010-2012 program strategy. Given the transition of the
10 ME&O brand to EUC, additional direction and clarification from the Commission, and the shift
11 in emphasis of the associated marketing activities and goals, the PPMs approved for the prior
12 ME&O program do not accurately reflect the proposed ME&O program. Consequently, it is
13 necessary to modify the PPMs to reflect the ME&O program strategy and goals outlined in this
14 application.

15 The Commission further directed the IOUs to submit completed Program Performance
16 Indicator worksheets and tables⁸ and directed the IOUs to report performance metrics on an
17 annual basis.⁹ SCG proposes that a similar process for creating and reporting of PPMs be
18 followed for the 2013-2014 Statewide ME&O program.

19 In particular, SCG proposes to modify two of the prior PPMs and eliminate the third as a
20 reporting metric that the Statewide ME&O program is responsible for. One new PPM is also
21 proposed. The two modified metrics are:

⁶ D.09-09-047, p. 91.

⁷ D.09-09-047, p. 98.

⁸ D.09-09-047, Appendix 2.2 and Appendix 2.3.

⁹ D.09-09-047, Ordering Paragraph 12, p. 368.

- (1) Customer awareness and knowledge of key elements of the Energy Upgrade California brand among customers targeted by Statewide ME&O program activities, and
 - (2) Customer awareness and knowledge of specific energy management concepts and/or actions promoted by the Statewide ME&O program among customer groups targeted by program activities.

The proposed new metric is:

- (3) Customer intent among customer groups targeted by Statewide ME&O program activities, to participate or engage in DSM programs.

10 During the 2010-2012 Program cycle, a third metric included: “The number and type of
11 energy efficient actions self-reported by customer groups specifically targeted by grassroots and
12 social networking phase of the program.” Because the strategy outlined in this Application is
13 aimed at driving customers to local ME&O efforts, which can be more relevant and specific to
14 the customer’s needs, a metric that identifies specified actions is not appropriate for the
15 Statewide ME&O program.

16 SCG proposes that the IOUs be responsible for measuring and achieving the metrics.
17 The utilities will conduct a pre-campaign benchmarking study to establish a baseline. A post-
18 campaign study will measure the results of the campaign and will be reported on an annual basis
19 as outlined above. The data for reporting on these metrics will be collected, analyzed and
20 reported on a statewide basis by an independent research firm contracted through the IOUs in
21 collaboration with Energy Division and in accordance with the California Evaluation Protocols.
22 As appropriate and relevant, additional tracking data collected via the implementer agencies, the

1 web portal and other resources may also be considered for this purpose (e.g., for the electric
2 utilities, distinct Demand Response program evaluation efforts).

3 The program implementer will be responsible, through the terms outlined in the 2013-
4 2014 contract and scope of work, for set tasks and activities that will support the achievement of
5 the above metrics. Included in the 2013-2014 scope will be a requirement for the program
6 implementer to capture and retain data in connection with its work that may be necessary for
7 monitoring and reporting of the metrics, and/or other reporting requirements. Lastly, the 2013-
8 2014 contract and scope of work will include metrics that will act as a performance scorecard for
9 the implementer. These metrics will quantify efficiency and performance to ensure that
10 ratepayer dollars are used prudently and support the outlined PPMs.

11 For the 2013-2014 program cycle, the IOUs propose reporting information for each year
12 of the cycle. As outlined in this Application, marketing activities will most likely be ramping up
13 during the second and third quarters of 2013. As noted above, ongoing data collection and
14 tracking research is likely to be conducted for the IOUs by other entities (e.g., marketing
15 agencies). Although reporting is proposed on an annual basis, this market research can be used
16 to guide mid-course corrections and ongoing tactical decisions for the 2013-2014 program
17 activities to insure the program is utilizing the most effective strategy and tactics to achieve its
18 goals.

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1 **VI. SCG PROPOSED COST RECOVERY AND REVENUE REQUIREMENTS**

2 **A. INTRODUCTION**

3 Pursuant to the direction in D.12-05-015 that the Statewide ME&O proposal be filed in a
4 separate application, SCG hereby presents the associated revenue requirements and
5 recommended cost recovery plan to the Commission for review in this proceeding. As noted
6 above in Section V.F., SCG included the proposed Statewide ME&O EE budget in A.12-07-003
7 for cost effectiveness calculation purposes only, but did not request cost recovery in that
8 application. SCG thus requests the Commission approve approximately \$4 million in total
9 funding for 2013-2014, associated with the statewide EE marketing activities described in
10 Chapter III.

11 In addition, this is the proceeding by which SCG presents other (non-EE) Statewide
12 ME&O efforts. Because SCG is a gas-only utility, this namely consists of Energy Savings
13 Assistance Program funding, and does not include allocations of costs for other programs
14 relevant to utilities that provide electric services (such as Demand Response, Dynamic Pricing,
15 or Smart Grid, among others).¹⁰ SoCalGas also receives funding for the California Solar
16 Initiative – Thermal (“CSI – Thermal”) program, and provides the authorized level for reference
17 purposes. As described in Chapter II by witness Gillian Wright, SCG does not propose to
18 combine the funding for CSI programs with other Statewide ME&O costs for ratemaking
19 purposes at this time. SCG will seek 2013 and/or 2014 funding and cost recovery for other
20 Statewide ME&O activities other than those requested in this application through the appropriate
21 regulatory proceeding already established for that particular funding.

¹⁰ Thus, SCG does not propose a separate Statewide budget for Flex Alerts as suggested in D.12-05-015, p. 299. This will be provided in the testimony of the other California IOUs that provide electric service.

1 The scope of SCG's Statewide ME&O proposal does not include previously proposed or
2 authorized local ME&O efforts, except in describing how Statewide ME&O efforts will be
3 closely coordinated with local ME&O efforts, as discussed in Chapter 4 by witness Octavio
4 Verduzco. Local utility ME&O programs and activities for EE are currently pending in A.12-07-
5 003, or are authorized within other Commission regulatory proceedings. SCG does not request
6 funding or propose changes to any of the local ME&O ratemaking in this application.

7 **B. CURRENT COST RECOVERY**

8 The current Statewide ME&O EE budget and associated revenue requirement was
9 authorized in D.09-09-047.¹¹ The authorized level of \$6,341,089 covered the 2010-2012 period,
10 and was included in the Gas Public Purpose Program Surcharge (or G-PPPS tariff rate) allocated
11 to customers according to the EE / DSM Direct Benefits method authorized in D.05-09-043.
12 Spending through June 2012 of the current program cycle is shown in Table 6-1, below, along
13 with other estimated expenditures as directed by the Commission.¹² Consistent with D.12-05-
14 015, Conclusion of Law 71, unspent Statewide ME&O funds were included in the estimated
15 balancing account overcollection used to offset EE program portfolio budget expense in A.12-
16 07-003.¹³

¹¹ See D.09-09-047, p. 226.

¹² These include a share of the third party implementer contract for activities during 2012, funding for continuing successful American Recovery and Reinvestment Act programs during 2012, and costs associated with the Statewide ME&O program web portal maintenance in 2012.

¹³ SCG proposed the balancing account estimate reflected in A.12-07-003 to be updated according to customary practice for inclusion of the overcollection in customer rates.

Table 6-1

Category	2010	2011	2012	Total
Budget	\$2,113,696	\$2,113,696	\$2,113,696	\$6,341,089
Expense	\$77,271	\$526,279	\$432,824 /1	\$1,036,374
2012 CCSE /2	n/a	n/a	\$403,725	\$403,725
2012 ARRA /3	n/a	n/a	\$1,393,300	\$1,393,300
2012 Web Portal /4	n/a	n/a	\$61,708	\$61,708
Unspent Funds	\$2,036,425	\$1,587,417	-\$177,861	\$3,445,981

/1 Reflects expenses through June 2006 only.

/2 Final value not available at time of preparing testimony; for illustrative purposes only, value shown represents \$3.847 million statewide budget multiplied by SCG portion of total ME&O in D.09-09-047.

/3 Final values not available at time of preparing testimony; for illustrative purposes only, values shown reflect estimated amounts as of July 30, 2012.

^{1/4} Reflects maximum SCG contribution towards \$588,000 expense ceiling.

SCG received funding for Statewide ME&O ESAP activities for the 2009-2011 program cycle pursuant to D.08-11-031. In D.09-10-012, the Commission clarified for years 2010 and 2011 an annual authorized funding level of \$167,000.¹⁴ With respect to 2012, the current Proposed Decision (“PD”) in A.11-05-018 regarding the 2012-2014 program cycle authorizes \$100,000 for the instant year.¹⁵ The difference between the current 2012 ME&O bridge funding and the corresponding authorized funding will be recorded to the ESAP Memorandum Account and trued-up in G-PPPS rates effective January 1, 2013.

The CSI – Thermal statewide marketing expenses have been previously approved by the Commission. SCG is assigned costs of \$1,836,000 effective for the period June 2011 – June

¹⁴ Decision Authorizing Large Investor Owned Utilities' Expenditure of 2010 – 2011 Low Income Energy Efficiency Marketing, Education and Outreach Budgets Held in Abeyance by Decision 08-11-031, Attachment A.

¹⁵ See ALJ Kim Agenda Decision Revision 1 in A.11-05-018, issued July 27, 2012, Appendix E.

1 2013, pursuant to Advice Letter 4274 and the Standard Services Agreement with the service
2 provider, Fraser Communications.

3 **C. PROPOSED COST RECOVERY**

4 In the instant proceeding, SCG requests the Commission approve a Statewide ME&O EE
5 budget of \$4,004,067 for 2013 / 2014, or \$2,002,034 per year. This represents a 5.3 percent
6 decrease from the amounts authorized for the 2010-2012 program cycle, which averaged
7 \$2,113,696 per year.

8 The proposed funding level was developed in unison with the other California IOUs, and
9 thus the noted methodology represents a joint-utility proposal, representing the amount SCG
10 would be allocated of the total Statewide ME&O budget. PG&E, on behalf of the other utilities,
11 will enter into a contract with a third party for the 2013-2014 period to implement the Statewide
12 ME&O program. SCG assumes it will receive periodic invoices from PG&E for its share of the
13 Statewide ME&O funding. Upon receipt of these invoices, SCG will record the invoiced
14 amount(s) into the appropriate balancing account for cost recovery.

15 The assigned SCG value represents the annualized funding from the 2010-2012 program
16 cycle and adjusted for the overall change in total EE portfolio funding proposed for 2013-2014.
17 The calculation is shown below:

- 18 • SCG total EE portfolio funding from 2010-2012 period per D.09-09-047: \$285
19 million
- 20 • 2010-2012 funding x (2/3) = \$190 million

- SCG proposed EE portfolio funding for 2013-2014 per A.12-07-003: \$179.96 million¹⁶
 - Ratio current authorized to proposed EE funding: 94.7 percent
 - 2010-2012 Statewide ME&O funding (annual) \$2,113,696 x 94.7 percent
 - 2013-2014 proposed Statewide ME&O funding (annual): \$2,002,034¹⁷

The ME&O ESAP budget regarding the 2012-2014 budget years is addressed in the pending proceeding A.11-05-018. The PD of ALJ Kim available at the time of this testimony grants SCG annual expenses of \$100,000 for 2013 and 2014 (*see* Appendix E of the PD).

Combining the proposed EE and proposed decision ESAP Statewide ME&O funds results in an annual funding level of \$2,102,034 for the 2013-2014 period.

SCG proposes continuation of G-PPPS for recovery of Statewide ME&O costs in customer rates. For funds associated with EE programs, SCG will continue cost allocation to customer segments using the EE/DSM Direct Benefits method. For funds associated with ESAP, SCG will continue cost allocation to customer segments using the Direct Benefits method for that program. These methods are consistent with the allocation of the non-Statewide ME&O costs for these programs.

Any excess or shortfall in actual revenues relative to authorized expense levels would be addressed by modifying the future level of PPP funds collected. The PPP surcharge is updated annually by Advice Letter each November, to be effective beginning January 1 of the following year.

¹⁶ Note as shown in Table 13 of SCG testimony submitted for A.12-07-003, the amount shown is \$175,958,559, which is \$179,962,626 minus \$4,004,067 for the two-year total proposed Statewide ME&O.

¹⁷ Values may not conform to totals precisely due to rounding.

1 As noted above, SCG does not propose to incorporate the CSI – Thermal Statewide
2 ME&O at this time, except to ensure the Statewide ME&O messages are coordinated. Funding
3 for this program has already been authorized pursuant to other proceedings, and costs are
4 recovered through gas transportation rates, rather than the PPP Surcharge. SCG proposes the
5 Commission continue to address cost recovery for the CSI – Thermal program in the existing
6 manner.

7 **D. BRIDGE FUNDING**

8 As noted in SCG testimony in A.12-07-003, in the event a decision in this proceeding is
9 not issued before January 1, 2013, bridge funding will be required to support the SCG EE
10 programs. D.09-09-047 provides authority to continue to operate into 2013 at the average 2012
11 expenditure level. In the event of a rolling budget trigger, SCG will address G-PPPS bridge
12 funding through the Advice Letter process, including a memorandum account to track the
13 difference between any bridge funding and the level authorized by the Commission. Any
14 difference between the EE funding recovered in 2013 rates prior to the final decision would be
15 subject to balancing account true-ups in rates in connection with SCG's annual PPP Surcharge
16 Rate Update filing.

17 Pursuant to D.12-06-030, ESAP is currently afforded month-to-month bridge funding
18 treatment until the time of a final decision in A.11-05-018. In the event a decision in that
19 proceeding is not reached prior to this Application, the regulatory account treatment employed
20 for the bridge funding period will track differences in revenues relative to adopted costs, and
21 provide for the necessary ratemaking true-ups.

1 **E. PROPOSED REVENUE REQUIREMENTS**

2 In consideration that the ESAP and CSI program Statewide ME&O amounts are
3 authorized in other proceedings, SCG asks the Commission to authorize the EE-related
4 incremental proposed revenue requirements for 2013 and 2014 of \$2,002,034 each year. Table
5 6-2 presents the annual allocation of revenue requirements by customer classification:

6 Table 6-2
7 Allocation of Revenue by Customer Class

Customer Segment	Allocation of Revenue by Customer Class (\$000's)
Residential	\$792
Core Commercial & Industrial	\$1,036
Gas Air Conditioning	\$1
Gas Engine	\$20
Natural Gas Vehicle	\$0
Noncore Comm. & Industrial	\$153
Electric Generation	\$0
System Total	\$2,002

8 The total G-PPPS rates, which include ESAP and EE programs, will incorporate any
9 available over- or under-collections in balancing accounts for program years prior to 2013. In its
10 2013-2014 EE portfolio application D.12-07-003, SCG prepared an estimate of its Demand-Side
11 Management Balancing Account (“DSMBA”) for year-ending 2012. The estimated
12 overcollection included unspent ME&O funds to be returned to customers, so it is not necessary

1 to address the DSMBIA in the instant Application. Table 6-1 provides information regarding
2 estimated unspent Statewide ME&O funds by year for reference.

3 Similarly, the G-PPPS rate in 2013 will reflect any revenue requirement true-ups
4 associated with Statewide ME&O for ESAP relating to the 2012 program year.

5 For illustrative purposes, Table 6-3 presents the Statewide ME&O budget for the EE and
6 ESAP programs for 2013-2014, not including estimated under- or over-collections in regulatory
7 accounts:

8 Table 6-3*

9 Category	2013	2014	Total
10 Energy Efficiency (Proposed)	\$2,002,034	\$2,002,034	\$4,004,067
11 ESAP (Proposed Decision)	\$100,000	\$100,000	\$200,000
12 Total	\$2,102,034	\$2,102,034	\$4,204,067

13 * Note table does not include CSI – Thermal statewide marketing contract with service provider effective from
14 6/20/2011 until 6/21/2013. SCG has a budget allocation of \$1,836,000 pursuant to the signed agreement.

15 This concludes my prepared direct testimony.

1 **QUALIFICATIONS**

2 My name is Andrew E. Steinberg. My business address is 555 West Fifth Street, Los
3 Angeles, California, 90013-1011. I am employed by SoCalGas as the Regulatory Policy and
4 Reporting Manager in the Customer Programs and Assistance Department.

5 In 1997, I received a B.A. in Economics and a B.A. in English Literature cum laude with
6 honors from the University of California, Los Angeles. I began employment in 1998 with
7 Micronics, Inc., a firm that provides consulting services pertaining to the violation of antitrust
8 laws and related economic damages. During my three years of experience at Micronics, my
9 responsibilities primarily included economic research and consulting, and oversight of the
10 preparation of expert witness testimony for antitrust proceedings.

11 In 2001, I began employment with the Sempra Energy Utilities in the Regulatory
12 Analysis Department with an emphasis on matters relating to gas transportation service. In 2005,
13 I transitioned to Regulatory Case Manager in the General Rate Case (GRC) and Revenue
14 Requirements Department, providing support for both SDG&E and SoCalGas. My primary
15 responsibilities included project management and support for the SDG&E and SoCalGas GRCs.
16 In May 2012, I assumed my current position. My responsibilities include the management of
17 regulatory support and assistance, as well as reporting activities for the Energy Efficiency and
18 Low Income customer programs offered by the company.

19 I have previously served written testimony before this Commission.