

Application No.: A.24-09-XXX
Exhibit No.: Liberty-04
Witness: J. Guenther



(U 933-E)

Liberty Utilities (CalPeco Electric) LLC

2025 General Rate Case

Before the California Public Utilities Commission

Chapter 4: Public Purpose Programs

Tahoe Vista, California

September 20, 2024

Liberty-04: Public Purpose Programs

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Liberty Utilities (CalPeco Electric) LLC: 2025 GRC

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1 I.

2 **PUBLIC PURPOSE PROGRAMS**

3 **A. Energy Efficiency Programs**

4 Liberty offers a variety of energy efficiency (“EE”) programs and measures designed to help
5 customers save energy and money. Liberty’s EE programs are available to both residential and
6 commercial customers. As detailed in the sections that follow, Liberty’s residential customer programs
7 include the Residential Audit Program and the Residential Rebates. For commercial customers, Liberty
8 offers the Small Commercial Audit Program and the Commercial and Public School Incentive Program.¹

9 Liberty forecasts \$466,783 annually for its EE programs from 2025 through 2027. The forecast is
10 based on a three-year average of actual program costs recorded from 2018-2019 and 2022 and excludes
11 the period from 2020-2021, during which the level of spend was abnormally low primarily due to
12 impacts associated with the COVID-19 pandemic. These impacts included limitations on facilitating in-
13 person audits and installations, lower commercial incentive participation and equipment installations
14 attributed to customers’ reprioritization of time and funding away from energy efficiency projects, and
15 manufacturing and supply chain issues. Additional factors included Liberty’s internal and external
16 program administration transitions during the 2020-2021 program years and the Tamarack and Caldor
17 fires, which prompted mandatory evacuations during the late summer months of program year 2021.²
18 The details of the recorded costs are provided in Table I-1 in Section 5 below. This historic average is
19 then escalated for inflation based on the Consumer Price Index (CPI). The escalation factor is derived
20 from analysis of CPI adjusted for inflation in January 2023 compared to January 2019.

21 The average cost of energy savings for Liberty’s EE programs, expressed as dollars per kilowatt
22 hour (\$/kWh), over the five-year period from 2018-2022 is \$0.23009. Typical lifetime savings from
23 water heaters, space heaters, LED lighting, air conditioning, and other EE measures are greater than 10
24 years and, according to a study from Lawrence Berkeley National Laboratory (LBNL) and American
25 Council for an Energy Efficient Economy (ACEEE), “EE programs are costing program administrators
26 about 2.4 cents per kWh saved over the lifetime of the EE measures installed.”³ Thus, Liberty’s average

¹ In Program Year (PY) 2022, the Public School Incentive Program was merged with the Commercial Incentive Program to more efficiently support the demand for potential projects with a combined incentive funding approach. 2022 Annual EE Report at p. 2.

² 2021 EE Report at p. 2.

³ <https://www.aceee.org/sites/default/files/cost-of-ee.pdf>.

1 cost of energy savings is on par with the average across residential, commercial, and industrial sectors.
2 Liberty's EE programs also support California's ambitious climate change targets and greenhouse gas
3 emissions reduction goals. The Inflation Reduction Act of 2022 (IRA) will also present opportunities for
4 Liberty to leverage our current EE programs to support and/or complement the IRA funded programs
5 available to customers during this General Rate Case (GRC) cycle.

6 In the 2022 GRC decision, the Commission authorized an annual amount of \$250,000 for
7 Liberty's EE programs.⁴ The authorized amount was based on Cal Advocates' recommendation that
8 Liberty's forecast should follow the downward trend seen during the period from 2019 through
9 September 2021. As the 2022 GRC decision did not issue until May 2023, Liberty's recorded costs for
10 the EE Programs exceeded the authorized amount in both 2021 and 2022. Absent Liberty's spending on
11 the EE Programs above the authorized amounts, Liberty's ability to contract with program implementers
12 would have been severely impacted, and elements of the EE programs would have been eliminated.
13 Historically, the authorized budgets have been approved as a total amount and not specifically divided
14 by program. Liberty allocates budget funding between programs annually based on program demand,
15 known projects in the forecast and other relevant factors. Additional descriptions of the EE programs
16 and cost effectiveness are detailed below.

17 **1. Residential Energy Audits Program**

18 The Residential Energy Audit Program is offered to all residential customers and is designed to
19 educate customers about ways to make their homes more energy efficient. Residential customers receive
20 a free home energy audit that helps them understand their energy usage and identifies no-cost, low –cost,
21 and/or investment opportunities. Customers receive a comprehensive audit report detailing
22 recommendations of applicable energy efficient and savings measures and other audit findings. Energy
23 Efficiency Kits customized and delivered to customers may include LED lamps, advanced power strips
24 (APS), low-flow kitchen and bathroom aerators, and high-efficiency showerheads. The Residential
25 Energy Audit Program also helps identify rebate opportunities and participation for residential
26 customers.

27 **2. Residential Rebates Program**

28 Under the Residential Rebates Program, residential customers are offered financial incentives on
29 qualified energy efficient products and home appliances. Liberty aligns residential rebate offerings with

⁴ Application 21-05-017 Settlement Exhibit 3.1.1.5. and Attachment 1, Appendix A at A-6.

1 other state-sponsored energy efficiency programs. Anticipating variability on measure offerings is
2 expected to keep the program cost-effective and equitable to all residential customers while also
3 focusing on energy saving potential. Liberty plans to base measure updates to current statewide energy
4 efficiency workpapers.

5 Liberty aims to enhance feasibility in residential rebate offerings for a broader customer base.
6 The Commercial Incentive Program has experienced success in delivering deeper energy savings on a
7 range of energy efficiency technologies such as lighting, HVAC, refrigeration system controls, and snow
8 making equipment in recent program years. Similar to the Commercial Incentives Program, Liberty
9 seeks flexibility in selecting and modifying measures based on current residential statewide workpapers.
10 The program strives to achieve energy savings while maintaining access to a variety of measures for
11 residential customers.

12 **3. Small Commercial Energy Audit Program**

13 The Small Commercial Audit Program provides free energy audits to small commercial
14 businesses and assistance in planning energy efficient upgrades. Like the residential energy audits, this
15 program helps commercial customers understand their energy usage, identify energy efficient
16 opportunities, and provide recommendations for energy efficient measures or upgrades. Customers
17 receive a comprehensive audit report with the findings and recommendations that include estimated
18 rebate and energy saving calculations for projects that could be eligible for rebates within Liberty's
19 Commercial Incentive Program.

20 **4. Commercial and Public School Incentive Program**

21 The Commercial and Public School Incentive Program assists commercial customers (including
22 public schools) with technical assistance in planning, procuring, and implementing energy efficient
23 upgrades. Liberty offers these customers incentives for efficiency upgrades based on energy savings for
24 the measures installed, such as lighting, cooling, kitchen equipment upgrades, controls, and
25 refrigeration. Along with prescriptive incentives, Liberty also offers custom incentives that are
26 calculated based on energy savings for peak and non-peak periods. Both incentives result in verifiable
27 energy savings to Liberty. As part of the Program, Liberty also provides local school districts with
28 energy audits and recommendations to assist in selecting and implementing cost-effective projects.

1 **5. Historic Costs of EE Programs**

2 The tables below show costs for EE Programs, energy savings in kWh and the cost of energy
 3 savings in \$ per kWh from 2018-2022 (**Error! Reference source not found.**), normalized total,
 4 average, and median for COVID pandemic years (

Table I-2
Pre/Post Pandemic Years 2018, 2019, 2022 – Cost of Savings

	Total	Average	Median
Costs (\$)	\$1,178,209	\$392,736	\$370,953
Savings (kWh)	5,835,788	1,945,263	1,670,740
\$/kWh		0.20189	0.22203

5), and the breakdown of recorded costs for EE programs during 2022 (**Error! Reference source**
 6 **not found.**).

Table I-1
EE Programs Recorded Costs and Cost of Energy Savings 2018-2022

	2018*	2019	2020	2021	2022	Total	Avg
Costs (\$)	\$439,884	\$370,953	\$181,517	\$267,885	\$367,372	\$1,627,611	\$325,522
Savings (kWh)	2,882,400	1,670,740	731,200	506,700	1,282,648	7,073,688	1,414,738
\$/kWh	0.15261	0.22203	0.24825	0.52869	0.28642		0.23009

*Note: During 2018, Liberty experienced higher demand for both the Residential Energy Audit and Commercial Incentive Program achieving energy savings through several LED retrofit opportunities. Please see Liberty’s 2018 EE Report.

Table I-2
Pre/Post Pandemic Years 2018, 2019, 2022 – Cost of Savings

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\$/kWh		0.20189	0.22203

Table I-3
2022 Energy Efficiency Programs – Cost Breakdown

Cost Description	2022 Total Costs	% of Total
Administrative Costs - Labor & Overhead	\$68,745	19%
Marketing, Education, and Outreach	\$10,335	3%
Residential Energy Audits	\$137,965	38%
Small Commercial Energy Audits	\$19,263	5%
Commercial Incentives	\$60,867	17%
Commercial Incentives - Contractor Implementation	\$70,197	19%
Total	\$367,372	100%

B. Solar Incentive Program

In the last GRC, Liberty proposed to modify its Solar Incentive Program (SIP) to refocus on income qualified customers and renters. The launch of the new SIP was delayed from 2022 as Liberty awaited the issuance of the GRC Decision. In that decision issued in May 2023, the Commission authorized \$420,000 annually for the SIP. The new SIP design was finalized in the second half of 2023 based on the authorized amount and planned for launch in 2024.

Liberty’s SIP currently provides financial support for installations including but not limited to affordable residential housing, entities that serve low-income residents, food banks, shelters, and Title 1 public schools. Selected projects are eligible for up to \$250,000 to offset as much as 100 percent of the total project cost. SIP is directly administered by Liberty’s staff who are responsible for outreach and marketing, application management, and internal coordination with Liberty metering and engineering

1 teams. For 2025-2027, Liberty forecasts the annual costs for SIP as shown in **Error! Reference source**
2 **not found.** below.

Table I-4
Proposed SIP

Program Year	Incentive Budget	Administrative Budget	Total Budget
2025	\$330,000	\$90,000	\$420,000
2026	\$330,000	\$90,000	\$420,000
2027	\$330,000	\$90,000	\$420,000
Totals	\$990,000	\$270,000	\$1,260,000

3 During this GRC cycle, Liberty’s SIP will continue to support underserved customer segments
4 by focusing incentives where long-term energy savings from solar net metering can lower the cost of
5 living at multifamily residences, and where energy savings at community-based entities can result in
6 more customer serving programs. As the development of additional multifamily workforce housing units
7 is projected to remain a high priority for the majority of communities, SIP is uniquely positioned to
8 directly benefit residents to lower energy bills. Growth is also expected in community-based
9 organizations that support residents of workforce type housing and energy cost-savings from solar
10 installed through the SIP can be directed toward expanding programs and broadening the reach of these
11 organizations.

12 During this GRC cycle, Liberty will be promoting resiliency efforts for customers through the
13 SIP. Applicants will be encouraged to add battery energy storage to common areas that can provide
14 power in the case of winter outages or Public Safety Power Shutoff (PSPS) events. While SIP will not
15 directly fund energy storage, the inclusion of energy storage in applications will result in higher
16 application scoring and potentially earn incentives to cover a greater share of the total solar system cost.

17 **C. Transportation Electrification**

18 Liberty’s Transportation Electrification (TE) programs and projects are designed and
19 implemented to help promote widespread adoption of electric vehicles. Liberty proposes to recover
20 costs for TE projects and programs as authorized and directed by the Commission’s decisions from the
21 Order Instituting Rulemaking (OIR) to Continue the Development of Rates and Infrastructure for
22 Vehicle Electrification (DRIVE) proceeding, specifically, Decision (D.) 18-09-034 on the Priority

Review and Standard Review Transportation Electrification Projects, and D.19-11-017 on the Transportation Electrification Pilots for Schools and Parks Pursuant to Assembly Bills (ABs) 1082 and 1083. Liberty categorizes its TE projects into five programs for reasonableness review: 1) Phase I programs pursuant to Senate Bill 350 and D.18-09-034, 2) Phase II programs pursuant to ABs 1082 and 1083 and D.19-11-017, 3) Electric Vehicle Infrastructure (EVI) Rule 24 projects pursuant to AB 841, 4) Plug-in Electric Vehicle Submetering Protocol pursuant to D.22-08-024, and 5) Transportation Electrification Policy and Investment pursuant to D.22-11-040.

1. Phase 1 Programs

Phase 1 programs include four Priority Review Projects (PRP) and one Standard Review Project (SRP). The single SRP, EV Bus Infrastructure was completed in 2021. Remaining Phase 1 PRP projects will close for new applications on December 31, 2024, or when all allocated funding has been reserved (whichever occurs first).

***Table I-5
Phase 1 Budgets***

Program	Capital	Expense - Rebates	Expense - Utility Admin	Expense - Total	Capital + Expense
<i>Priority Review Projects (PRP)</i>					
DCFC Project	\$2,195,085	\$1,600,000	\$204,915	\$1,804,915	\$4,000,000
Residential Rebate Program	\$-	\$1,500,000	\$100,000	\$1,600,000	\$1,600,000
Small Business Rebate Program	\$-	\$250,000	\$50,000	\$300,000	\$300,000
Customer Online Resource	\$-	\$-	\$240,480	\$240,480	\$240,480

The DC Fast Charger (DCFC) Project and Residential Rebate Program have been largely successful, with robust application activity and notable positive impacts. For the DCFC Project, two projects have been completed, and two additional projects are in construction planning. Liberty expects that the allocated funds will be fully reserved prior to the end of 2024, with installations continuing into 2025, followed by rebate payments.

Four hundred projects have been completed in the Residential Rebate Program. Residential customers receive a rebate of up to \$1,500 to reimburse actual costs to install qualified, managed charging-capable 240-volt chargers. The average rebate amount to date is \$1,441. Liberty expects to

1 reserve a total of \$1,000,000 for the Residential Charger Program, less than the target of \$1,500,000.
2 Despite the high rebate amount, Liberty customers indicate that the primary hurdle to participation is
3 securing a licensed electrical contractor to complete the installation.

4 Three installations have been completed in the Small Business Rebate Program, where customers
5 can receive up to \$2,500 for qualified projects. Liberty expects few additional applications for this
6 program through 2024, as the incentive amount is low compared to project installation and operating
7 costs. Additionally, many commercial customers choose the benefits of the EV Infrastructure Program
8 over the Small Business Charger Rebate as customers may only receive benefit from one of these
9 programs. Phase 1 request for recovery of Capital is detailed in the Capital Chapter, Other Capital
10 Projects section, Table I-9 of the GRC.

11 **2. Phase 2 Programs**

12 Phase 2 programs include two Standard Review Projects, the Schools Charging Program (AB
13 1082 Pilot) and the State Parks Charging Program (AB 1083 Pilot), as well as outreach to raise
14 awareness around the SRP programs. The Schools Charging Program closed to new applications on
15 April 29, 2024 (two years from the first executed program participation agreement). The State Parks
16 Charging Program will close December 31, 2024, unless allocated funding is reserved before that date.

17 Liberty has completed one project in the Schools Charging Program, and one installation is in
18 construction planning. Both installations provide Level 2 charging for electric school buses. Schools
19 report to Liberty that security and liability concerns about EV charging in school parking lots are a
20 significant reason for declining the offer for no-cost public chargers. Schools have expressed continued
21 interest in electric school bus chargers; however, the program is only authorized to support Level 2
22 charging, and most new electric school buses require DC or Level 3 charging which cannot be supported
23 by the program.

24 There have been no projects completed in the State Parks Charging Program. Liberty continues
25 to work with the California State Parks administration to finalize participation agreements prior to the
26 end of 2024. Liberty expects the allocated budget to be fully reserved. Liberty also expects to utilize the
27 full, allocated Outreach budget to support awareness of the charging installed through the Schools and
28 Parks Programs.

**Table I-6
Phase 2 Budgets**

Program	Capital	Expense	Total
Schools	\$3,861,000.00	\$-	\$3,861,000.00
Parks/Beaches	\$741,000.00	\$-	\$741,000.00
Outreach	\$-	\$85,000.00	\$85,000.00

3. Electric Vehicle Infrastructure – Rule 24

Liberty tracks the recorded costs of electrical distribution infrastructure on the utility side of the customer’s meter for all customers installing separately metered infrastructure to support charging stations, other than those in single-family residences, in its Electric Vehicle Infrastructure Memorandum Account (EVIMA). Project costs include excavation, trenching and backfilling, conduit and substructures, transformers, cables, services, in addition to any other unspecified equipment owned by Liberty and necessary for the installation of electrical distribution infrastructure. In addition, associated design, engineering, and construction work are to be considered core utility business and treated the same as other distribution infrastructure.

In 2023, Liberty had received 27 applications for service under the Rule 24 tariff, 10 of which were subsequently withdrawn by the customers. Five projects were in pre-design phase, two projects were in design and on hold by the customer, and ten projects were ready for construction. One Rule 24 project was completed at the end of 2023. While the Rule 24 work is tracked separately in the EVIMA, it is considered core utility business and included in the capital projects forecast.

4. Plug-in Electric Vehicle Sub-Metering

In D.22-08-024, the Commission adopted Plug-in Electric Vehicle Submetering Protocol (PEVSP) and Electric Vehicle Supply Equipment (EVSE) Communication Protocols. On December 5, 2022, Liberty filed its Tier 2 Advice Letter 206-E requesting approval of its Submetering Protocol Implementation Plan and revisions to all relevant existing tariffs. Liberty established the Submetering Protocol Implementation Memorandum Account (SPIMA) to track and record the incremental costs associated with implementing the submetering protocol, to be reviewed for reasonableness and cost recovery in Liberty’s next general rate case. In the Implementation Plan, Section 2, Estimated Costs,

1 Liberty forecasts a minimum of one full-time employee equivalent to work on submetering, or
2 approximately \$156,000 (including overheads).

3 **5. Transportation Electrification Framework (TEF) Funding Cycle (FC) 1**

4 In D.22-11-040, the Commission adopted a long-term policy framework for TE behind-the-meter
5 (“BTM”) infrastructure and directed Liberty and other investor-owned utilities (“IOUs”) to jointly fund
6 the program and associated activities. The FC1 framework includes a five-year (2025-2029) funding
7 cycle of \$1 billion between the California electric IOUs. The funding allocation is based on each IOU’s
8 percentage of electric sales for 2024. funds are disbursed to the Program Administrator. Pursuant to
9 D.22-11-040, total FC1 rebate funding in Liberty’s service territory shall be capped based on its funding
10 contribution, after deducting costs for program administration, technical support and evaluations, and
11 costs associated with the Locally Invested Transportation Equity (LITE) pilot program, Technical
12 Assistance (TA) programs, and marketing, education, and outreach (ME&O) programs.

13 Liberty’s share of the funding allocation is 0.31 percent, resulting in a total of \$3.133 million
14 over five years. Of the \$3.133 million, Liberty may only access 60 percent within the first three years.
15 Liberty is forecasting TEF administrative expenses based on Liberty's proportion of the total allocated
16 funding (i.e. 0.31 percent). The maximum amount authorized for administration, \$48 million, is used to
17 calculate the total available for administration of the TEF. Liberty’s internal administrative cost
18 estimates as well as Program Administrator’s estimated costs are shown in the table below.

***Table I-7
TEF Administrative Costs***

TEF FC1 Program Year	PA Administration	Liberty Administration	Total
2025	\$38,880	\$15,000	\$53,880
2026	\$33,751	\$16,000	\$49,751
2027	\$28,169	\$17,000	\$45,169
Total 2025- 2027	\$100,800	\$48,000	\$148,800

19 In addition to the program administrative costs described above, the Commission authorizes
20 spending for a Technical Assistance (TA) program, Marketing Education and Outreach (ME&O)

1 program, and Evaluation program.⁵ The three-year total for all IOUs is \$36 million, \$36 million, and \$3
2 million for TA, ME&O, and evaluation, respectively. Liberty’s proportion of 0.31 percent amounts to
3 \$232,500. The total non-incentive O&M TEF FC1 request for recovery in the 2025 GRC including PA
4 expenses, TA, ME&O, and evaluation is \$381,300.

5 In D.22-11-040, the Commission also required implementation of the Locally Invested
6 Transportation Equity (LITE) program. The LITE program will focus on local investments and provides
7 \$25 million total across the state with each pilot capped at \$4 million. It is uncertain if Liberty will have
8 any participants in the LITE program and as such, Liberty is not requesting recovery for the Lite
9 program in this GRC.

10 On June 03, 2024, The California Public Utilities Commission issued an Administrative Law
11 Judge’s Ruling initiating Track 1 and inviting party comments regarding transportation electrification
12 policy and infrastructure Rulemaking (R.) 23-12-008, effectively pausing elements and funding of FC1.
13 At this time, it is unknown whether or not Liberty will need to be authorized recovery for FC1 expenses
14 in this GRC.

15 **D. Mobile Home Park Conversion Program**

16 The Mobile Home Park (MHP) Utility Conversion Program is mandatory for utilities and
17 voluntary for MHP owners. Liberty plans to convert all MHPs willing to participate and meeting the
18 requirements of the program in its service territory. Pursuant to the cost recovery requirements of the
19 program, “review for reasonableness of “to the meter” (TTM) costs will occur in the general rate case
20 when costs are included in the rate base. Review for reasonableness of “beyond the meter” (BTM) costs
21 will happen in the first general rate case after service cutover.”⁶ In D.20-08-030, the Commission denied
22 Liberty request for inclusion of forecasted costs in 2019 rate base and directed Liberty to request
23 recovery of “actual” costs per D.14-03-021 and D.20-04-004.⁷

24 Liberty reports actual costs incurred for all converted parks in its 2019 and 2020 MHP Annual
25 Reports. Liberty converted three MHPs prior to 2021, and one MHP in 2023. The final phase of Tahoe
26 Verde closed to plant in late 2023. The MHPs in order of final cutover date, Skylark, Kings Beach, and

⁵ See D.22-11-040, Ordering Paragraph (OP) 4.

⁶ Decision (D.) 20-08-030 and D.14-03-021.

⁷ D.20-08-030 at p. 20.

1 Heavenly, as well as Tahoe Verde, which was completed in three phases, are listed with TTM and BTM
2 costs in the table below:

Table I-8
Mobile Home Park Recorded Capital

MHP Name	TTM Costs	BTM Costs	Total
Skylark	\$209,992	\$200,300	\$410,292
Kings Beach	\$246,059	\$235,071	\$481,131
Heavenly	\$736,328	\$327,379	\$1,063,707
Tahoe Verde	\$3,947,553	\$1,599,551	\$5,547,104
Total	\$5,139,932	\$2,362,301	\$7,502,233

3

Appendix A
Witness Qualifications

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
QUALIFICATIONS AND PREPARED TESTIMONY
OF JENNIFER GUENTHER

1 **Q. Please state your name and business address for the record.**

2 A. My name is Jennifer Guenther and my business address is 933 Eloise Ave, South Lake
3 Tahoe CA 96155.

4 **Q. Briefly describe your present responsibilities at Liberty Utilities (CalPeco Electric)**
5 **LLC.**

6 A. I am currently the Senior Manager, Customer Solutions of Liberty CalPeco.

7 **Q. Briefly describe your educational and professional background.**

8 A. I have a B.A. from UC Santa Cruz in Latin American and Latino Studies with a minor in
9 Sociology. I have over 13 and a half year's utility experience.

10 **Q. What is the purpose of your testimony in this proceeding?**

11 A. The purpose of my testimony in this proceeding is to sponsor Chapter 4: Public Purpose
12 Programs.

13 **Q. Was this material prepared by you or under your supervision?**

14 A. Yes, it was.

15 **Q. Insofar as this material is factual in nature, do you believe it to be correct?**

16 A. Yes, I do.

17 **Q. Insofar as this material is in the nature of opinion or judgement, does it represent**
18 **your best judgment?**

19 A. Yes, it does.

20 **Q. Does this conclude your qualifications and prepared testimony?**

1

A. Yes, it does.