

Application No: A.19-11-
Exhibit No.: _____
Witness: Toni Mathews

Application of SOUTHERN CALIFORNIA
GAS COMPANY (U 904 G) for adoption
of a 2020 Flex Alert Marketing Campaign.

Application 19-11-_____
(Filed November 22, 2019)

CHAPTER 1
2020 FLEX ALERT MARKETING CAMPAIGN
PREPARED DIRECT TESTIMONY OF
TONI MATHEWS
ON BEHALF OF
SOUTHERN CALIFORNIA GAS COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

November 22, 2019

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1 **DIRECT TESTIMONY OF TONI MATHEWS**

2 **I. OVERVIEW AND SUMMARY**

3 **A. Purpose**

4 The purpose of my prepared direct testimony is to describe Southern California Gas
5 Company’s (SoCalGas) proposal for SoCalGas’ 2020 Flex Alert Marketing Campaign, as
6 ordered in Decision (D.)19-07-010.¹ The SoCalGas 2020 Flex Alert Marketing Campaign is
7 focused in the Los Angeles area and builds on actual experience with the 2016, 2017, 2018, and
8 2019 campaigns with a structure modeled after those prior campaigns. The total estimated costs
9 included for the California Public Utilities Commission’s (CPUC or Commission) approval in
10 this Application are \$8.9 million.

11 The above amount includes SoCalGas’ proposed estimated 2020 Flex Alert Marketing
12 Campaign budget of \$3.3 million. The amount actually incurred during the 2020 Flex Alert
13 season may be less and will be dependent on how many actual “Flex Alerts” are called by the
14 California Independent System Operator (CAISO) in the summer of 2020, as well as the timing
15 of this Application’s approval.² Additionally, SoCalGas includes in this Application the costs
16 incurred during the previous two Flex Alert campaigns (2018 and 2019), which are recorded in
17 the Marketing Education and Outreach Memorandum Account (MEOMA) as described below
18 and in Chapters 2 and 3, Direct Testimonies of Reginald M. Austria and Michael Foster,
19 respectively.

¹ D.19-07-010, p.12, OP 3 states “Southern California Gas Company (SoCalGas) shall file an application by December 1, 2019 seeking authorization for a 2020 Flex Alert paid media marketing campaign focused on customers in the Los Angeles area.”

² Any underspending balance at the end of the campaign will be addressed in connection with SoCalGas’ annual Public Purpose Program (PPP) surcharge rate update filing for rates effective January 1 of the following year.

1 **B. Regulatory Background**

2 In 2015, the Commission reached a decision on the transfer of responsibility and funding
3 of the CAISO Flex Alert Program after CAISO noted that *unpaid* media activities during Flex
4 Alert events were effective and would continue to provide an important tool for meeting grid
5 needs.³ D.15-11-033 found that CAISO would maintain the Flex Alert brand, but the paid media
6 program funding provided by the investor-owned utilities’ (IOUs) ratepayers would no longer
7 continue. The Decision found that ratepayer funding of the Flex Alert program was unnecessary
8 after 2015⁴, and that the electric IOUs should integrate Flex Alert messaging into their local
9 marketing, education, and outreach activities to help maintain awareness of the program and
10 support the CAISO’s unpaid activities, which were effective at generating awareness to the
11 public in the Los Angeles Basin.

12 Subsequently, in response to a October 2015 gas leak at SoCalGas’ Aliso Canyon natural
13 gas storage facility (Aliso Canyon), on January 6, 2016, the Governor directed the Commission
14 and the California Energy Commission (CEC), in coordination with the CAISO, to take all
15 actions necessary to ensure the continued reliability of natural gas and electricity supplies during
16 a moratorium on gas injections into the Aliso Canyon storage facility.⁵

17 In response to the Governor’s directive and acting within the scope of this proceeding,
18 the Commission initially ordered SoCalGas to provide up to \$11 million of funding for 2016
19 marketing, education, and outreach (ME&O) activities for the purpose of reducing the risk of
20 natural gas and electricity curtailments in the Los Angeles Area.⁶ Of this funding, \$5 million

³ D.15-11-033, p. 9.

⁴ D.15-11-033, COLs 3 and 4.

⁵ <https://www.ca.gov/archive/gov39/2016/01/06/news19263/index.html>.

⁶ D.16-04-039.

1 was used to support paid “Flex Alert” advertising, focused on customers.⁷ The Commission also
2 authorized SoCalGas to utilize up to an additional \$6 million to implement the targeted
3 marketing education, and engagement (ME&E) campaign called “Conserve Energy SoCal”⁸ that
4 was proposed in SoCalGas’ March 25, 2016 comments.⁹ In May 2017, the Commission ordered
5 SoCalGas to spend up to an additional \$11 million for the same purpose, to address the same
6 concerns about potential 2017 curtailments.¹⁰

7 In July 2017, the Commission and the Division of Oil and Gas and Geothermal
8 Resources (DOGGR) formally determined that Aliso Canyon is safe to operate, any risks of
9 failure had been identified and addressed, and well integrity had been verified.¹¹ Thus, since at
10 least July 19, 2017, Aliso Canyon has been operationally available for withdrawals and
11 injections and ready to provide customers with a valuable and reliable source of energy and to
12 protect the region against the risk of gas and electric curtailments.¹²

13 In 2018, the Commission issued a ruling seeking comments on whether SoCalGas should
14 continue to fund the Flex Alert and Conserve Energy SoCal programs.¹³ In its comments on the
15 Ruling, SoCalGas argued that Flex Alerts should not continue to be dependent on SoCalGas
16 funding and that further funding for Conserve Energy SoCal was not needed as SoCalGas
17 already provides and tailors messaging in its service territory that promotes energy efficiency

⁷ *Id.*

⁸ *Id.*

⁹ Response of Southern California Gas Company (U 904 G) to Ruling of Assigned Commissioner, March 25, 2016, pp. 5-11.

¹⁰ D.17-05-004.

¹¹ SB 380 Findings and Concurrence Regarding the Safety of the Aliso Canyon Gas Storage Facility, Joint DOGGR and Commission Open Letter, July 19, 2017, available at http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/News_and_Updates/OpenLettertoSoCalGasandPublic.pdf; *see also* D.18-09-032.

¹² Accordingly, the costs included in this Application are for expenditures incurred effective January 1, 2018, and prior costs are subject to CPUC review in a future proceeding.

¹³ Administrative Law Judge (ALJ) Stephen C. Roscow’s March 5, 2018 request for comment.

1 and conservation.¹⁴ In D.18-07-008, the Commission ordered SoCalGas to provide up to \$5
2 million to CAISO to support paid Flex Alert advertising focused on customers in the Los
3 Angeles area.¹⁵ The decision did not authorize continued funding for the “Conserve Energy
4 SoCal” campaign.¹⁶

5 On April 23, 2019, the Commission issued a ruling seeking comment on whether
6 SoCalGas should continue to fund the Flex Alert and Conserve Energy SoCal programs.¹⁷ In its
7 comments, SoCalGas pointed out that the Commission had already ended the “Conserve Energy
8 SoCal” campaign in D.18-07-008 and argued that Flex Alerts should not continue to be
9 dependent on SoCalGas funding.¹⁸ However, in D.19-07-010 the Commission ordered
10 SoCalGas to provide up to \$5 million to CAISO to support paid Flex Alert advertising and also
11 ordered SoCalGas to file an application by December 1, 2019, proposing a 2020 Flex Alert
12 campaign focused on customers in the Los Angeles area.¹⁹

13 **II. OVERVIEW OF SOCALGAS’ FLEX ALERT CAMPAIGNS**

14 **A. SoCalGas’ 2016-2019 Flex Alert Campaigns**

15 SoCalGas has been directed each summer beginning in 2016 to implement a paid
16 marketing campaign called the Flex Alert Campaign to support the CAISO. A Flex Alert is a
17 voluntary call for consumers to conserve electricity when there is a predicated shortage of energy
18 supply. CAISO determines when a Flex Alert should be called and typically issues one when

¹⁴ SoCalGas Comments to March 5, 2018 Email Ruling Soliciting Comments from Parties (March 16, 2018).

¹⁵ D.18-07-008.

¹⁶ *Id.*

¹⁷ Administrative Law Judge’s April 23, 2019 Ruling Soliciting Party Comment.

¹⁸ Comments of SoCalGas to Ruling Soliciting Comments from Parties, (May 1, 2019) pp. 1-2.

¹⁹ D-19-07-010, p. 12, OP 3.

1 extremely hot weather increases the demand for electricity in the State beyond supply.²⁰ The
2 Flex Alert is one of CAISO’s methods to manage consumption in the State. The CAISO
3 coordinates other system alerts, warnings, and emergency protocols that are issued when
4 operating reserves or transmission capacity limitations threaten the ability of the CAISO to
5 safely and reliably operate the grid.²¹

6 The campaign ordered in 2016 authorized SoCalGas to spend \$5 million for Flex Alerts
7 and every subsequent year has allowed SoCalGas to spend “up to \$5 million” for Flex Alerts. In
8 D.17-05-004, regarding the Conserve Energy SoCal Campaign, the Commission directed that
9 “we expect that sufficient funding will be used to ensure that 2017 results are similar to the
10 results achieved by the program in 2016.”²² At the time, SoCalGas built both the Conserve
11 Energy SoCal and Flex Alert Campaigns to achieve the results identified in D.17-05-004. The
12 Conserve Energy SoCal and Flex Alert Campaigns were designed to be complimentary to each
13 other. Since both campaigns began in the summer with Conserve Energy SoCal running through
14 December, messaging and media campaigns were tiered so that the efforts would not cannibalize
15 each other. The Flex Alert campaign promoted electricity conservation tips due to high
16 electricity consumption in the summer. Conserve Energy SoCal also promoted electrical
17 conservation in the summer and then switched to natural gas conservation messaging for colder
18 weather in the winter.

19 The strategy used to plan and implement the 2016 Flex Alert campaign was reevaluated
20 in 2017, and from 2017 onwards, SoCalGas designed a segmented budget that supported a strong
21 education and awareness campaign for Flex Alert messaging with a reserve activation budget

²⁰ California ISO Flex Alert, available at <https://www.flexalert.org/what-is-flex-alert>.

²¹ California ISO System Alerts, Warning and Emergencies, available at <http://www.caiso.com/Documents/SystemAlertsWarningsandEmergenciesFactSheet.pdf>.

²² D.17-05-004, p. 15.

1 allocated to support 10 days of CAISO issuing an active Flex Alert. This allowed for SoCalGas
2 to plan a campaign that would educate customers about the Flex Alert and also have the ability to
3 switch messaging to support a Flex Alert activation requesting immediate conservation.

4 **B. Challenges and Evaluation Results**

5 The electric IOUs do not fund CAISO's Flex Alert Campaigns, as D.15-11-033 found
6 that the electric IOUs should integrate Flex Alert messaging into their local ME&O activities.²³

7 The impacts of Flex Alerts are difficult to measure and verify due to the nature of mass
8 market campaigns. SoCalGas is aware of at least two studies which have measured the energy
9 impacts from Flex Alerts in California. The first study²⁴ conducted a load impact evaluation of
10 California's Flex Alert program for Program Year 2013. The primary objective of the evaluation
11 was to estimate the extent to which consumers reduced their energy consumption during Flex
12 Alerts in 2013. Two Flex Alerts were called in the summer of 2013, on July 1 and 2, both
13 targeted only to Northern California, which is located in Pacific Gas and Electric Company's
14 (PG&E's) service territory. In addition, a localized Flex Alert was called on April 16, 2013 for
15 the San Jose area, particularly Santa Clara and Silicon Valley, after vandalism severely damaged
16 transformers at a substation in the area. As a result of the geographical targeting of these events,
17 this study only involved analysis of system load and residential dynamic load profile (DLP) data
18 for PG&E. The primary finding from this study was that no statistically significant (*i.e.*,
19 measurable) reductions in energy consumption could be attributed to the Flex Alerts. The
20 individual hourly load impact estimates range widely, from one value representing a 220
21 Megawatts (MW) (1.2 percent) load *reduction* to another representing a 600 MW load *increase*.

²³ D.15-11-003, COL 4.

²⁴ Christensen Associates Energy Consulting, "2013 Impact Evaluation of California's Flex Alert Demand Response Program," February 28, 2014.

1 The study concluded “that none of the estimates can be judged to be significantly different from
2 zero, due to uncertainty around the estimated values.”²⁵

3 The second study²⁶ evaluated the SoCalGas Flex Alert and Conserve Energy SoCal
4 Campaigns in 2016. During 2016, Flex Alerts were called on June 20, July 27, and July 28.
5 The study estimated that Flex Alert customers reduced electricity demand by 0.024 kWh/hr on
6 average during Flex Alert events. This resulted in a total reduction of 5.5 MW/hr across the total
7 population of 223,378 residential customers in the targeted zip code areas (this figure excludes
8 residential customers participating in other demand response and net energy metering programs).
9 Demand reduction estimates for the July events are statistically significant at a 95% confidence
10 level. To put these results in context, according to the CAISO Summer Assessment²⁷, the 2016
11 annual CAISO peak demand in Southern California was 27,679 MW. Further, a 2018
12 Commission report²⁸ states “California households consume electric service at an average rate of
13 534 kWh per month in the summer months. The residential customers in the Los Angeles and
14 Coastal Counties region use 506 kWh per month[.]” It should be noted that the Opinion
15 Dynamics study caveated that given that the awareness of Flex Alerts stayed constant throughout
16 the campaign, it was unclear how much of this reduction was due to the Flex Alert brand equity
17 and how much was due to the Conserve Energy SoCal Campaign.²⁹

²⁵ *Id.*, p. 3.

²⁶ Opinion Dynamics, “Aliso Canyon Marketing, Education and Outreach Effectiveness Study,” August 2017.

²⁷ California ISO, “2017 Summer Loads & Resources Assessment,” May 11, 2017.

²⁸ California Public Utilities Commission, Policy & Planning Division, “Delivery Consumption & Prices for Utility Service within California,” January 18, 2018, available at [https://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/About_Us/Organization/Divisions/Policy_and_Planning/PPD_Work/PPD_Work_Products_\(2014_forward\)/California%20Regions%20Final.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/About_Us/Organization/Divisions/Policy_and_Planning/PPD_Work/PPD_Work_Products_(2014_forward)/California%20Regions%20Final.pdf).

²⁹ Opinion Dynamics, “Aliso Canyon Marketing, Education and Outreach Effectiveness Study,” August 2017, p. 15.

1 **III. 2020 FLEX ALERT CAMPAIGN PROPOSAL**

2 For its 2020 Flex Alert Campaign Proposal, SoCalGas plans to build on its prior
3 experience in creating and implementing Flex Alert Campaigns and will model its 2020 Flex
4 Alert Campaign on past campaigns, taking into account the number of Flex Alerts typically
5 called and the amounts actually spent by SoCalGas during past campaigns. SoCalGas also plans
6 to make some enhancements and changes to the 2020 media campaign to maximize support in
7 the event of a Flex Alert activation. For example, TV will be removed from the plan because it
8 has one of the highest costs per thousand impressions (CPM) and consumption trends are moving
9 away from broadcast TV. There will be an increase in expected expenditures through digital
10 channels such as mobile video, mobile display, search display, and paid social and online video,
11 which are efficient at delivering CPMs and drive traffic to the Flex Alert website. SoCalGas will
12 place marketing ads created by a third-party vendor, which are original to the Flex Alert
13 campaign. In order to use the same marketing ads, the licensing rights must be negotiated with
14 the voice-over talent and the music rights owner; which is included as a cost in the proposal.

15 Any digital placements that can direct a customer to a webpage will link to the
16 www.flexalert.com page, which is operated and maintained by CAISO. Per the Commission’s
17 decision in D.16-04-039³⁰, an Advisory Group, which consisted of representatives from the
18 CPUC, SoCalGas, Southern California Edison (SCE), CAISO, local utilities, city representatives,
19 and others was created to communicate and align energy messaging in the region. The Advisory

³⁰ D.16-04-039, OP 4 (“Southern California Gas Company (SoCalGas) shall establish an advisory group that shall act as a partner with the utility throughout its implementation efforts. SoCalGas shall convene regular meetings of this advisory group and, to the extent practicable, SoCalGas shall implement the recommendations made at these meetings. SoCalGas shall summarize the results of these meetings in the monthly reports that it submits to the Energy Division in compliance with this decision.”)

1 Group agreed to marketing benchmarks to determine appropriate spend levels by channel and
2 these same benchmarks will continue to be used to evaluate campaign spend performance.

3 The Marketing Campaign includes the following features:

4 **A. Educational Campaign**

5 The Educational Campaign focuses on informing customers in the Los Angeles area
6 about the Flex Alert program and encourages customers to sign up to receive alerts. The main
7 message points highlight ways in which customers can conserve electricity when a Flex Alert is
8 issued. The campaign will be in English and Spanish and will target the Los Angeles Designated
9 Marketing Area (DMA) between June 1, 2020 through September 30, 2020. SoCalGas will
10 work with CAISO, like it has during past campaigns, to confirm the timeframe which will also
11 depend on the timing of the CPUC's approval of this Application. The marketing channels will
12 include radio, out of home, digital search, social media, online video, online radio, and
13 programmatic display. The goals for the educational segment of the campaign will be to deliver
14 impressions (i.e., an ad view, this is a marketing standard key performance indicator) and
15 encourage sign-ups for the Flex Alert notification.

16 **B. Trigger Campaign**

17 The Trigger Campaign is a designated set of funds reserved to provide an amplification
18 of activation messages in the event of a Flex Alert called by CAISO. The main message points
19 of this campaign are to communicate that a Flex Alert is in effect and conservation is needed at
20 that current moment in time. The activation will be prompted by the CAISO. This campaign
21 can support any Flex Alert activated between June 1, 2020 through September 30, 2020.³¹ Once
22 notified by CAISO, SoCalGas will direct their marketing team to activate the trigger channels to

³¹ The actual start date of the campaign will be dependent on if, and when, this Application is approved.

1 communicate the activation messaging. The channels for an activation will be radio, digital out
2 of home, and digital channels like social media, display and programmatic display (limitations
3 may occur; for example, radio spots are only scheduled during regular business hours).

4 **IV. 2020 FLEX ALERT CAMPAIGN BUDGET**

5 SoCalGas requests a total of \$3.33 million to implement the 2020 Flex Alert Campaign.
6 SoCalGas is proposing a base budget for the Educational Campaign of \$1.9 million, which is
7 similar to what SoCalGas has incurred in past years for the educational component of the Flex
8 Alert Campaign. SoCalGas is proposing an additional \$1.1 million to support the Trigger
9 Campaign. Each Flex Alert activation is budgeted for an additional spend of approximately
10 \$110,000 in the marketplace on top of the Educational Campaign to provide a significant
11 amplified alert to the Los Angeles Area. The specific amount incurred per Flex Alert may vary
12 depending on market conditions.

13 The below table shows the number of Flex Alert trigger days annually for 2016 through
14 2019, whether SoCalGas spent funds specifically for the trigger events that were called, the
15 budget delegated to SoCalGas through decisions from the Commission, and the actual costs that
16 were incurred. For each year there was an educational campaign as described in the above
17 section. The trigger campaign was only activated in years 2016 and 2017. No expenditures were
18 incurred by SoCalGas on trigger campaigns in years 2018 and 2019 due to the timing of the
19 decisions authorizing the Flex Alert budgets. In 2018, D.18-07-008 was approved on July 12
20 and Flex Alerts were called on July 24 and July 25. SoCalGas was in the process of purchasing
21 media during this time and therefore unable to activate trigger media. In 2019, the Flex Alert
22 was called on June 11 and D.19-07-010 was approved on July 18. In 2018 and 2019, CAISO
23 utilized earned media garnered through news coverage of CAISO's press release for both Flex

Alert activation days and did not utilize campaign funding support from SoCalGas.³² According to CAISO, the two days in 2018 of non-SoCalGas funded Flex Alerts saved over 990 MW (450 MW on July 24 and 540 MW on July 25), demonstrating that the non-funded earned media technique authorized in D.15-11-033 produced successful results.³³

Table 1.1 – Past Flex Alerts Called and Budget Information (\$ in millions)

	2016	2017	2018	2019
# of Flex Alerts Called	3	4	2	1
Did SoCalGas incur costs on the Trigger Campaign?	Yes	Yes	No	No
Budget Authorized by Decision	\$5M	Up to \$5M	Up to \$5M	Up to \$5M
Actual Costs Incurred	\$4.83M	\$2.92M	\$2.72M	\$2.83M (estimated)

Using budget information, experience and lessons learned from the 2016 through 2019 campaigns, SoCalGas developed the budget in the following table for the 2020 Flex Alert Campaign.

Table 1.2 – Proposed Budget for 2020 (\$ in millions)

Proposed Flex Alert Campaign 2020	Budget Allocation
Education	\$1.880
Trigger Reserve for 10 Flex Alerts	\$1.100
Agency Fee and Talent Rights	\$0.345
Total	\$3.325

Based on historical data on the number of Flex Alerts called each year for 2016 through 2019, SoCalGas’ proposed 2020 Flex Alert budget is designed to cover up to ten Flex Alerts. In the

³² CAISO Flex Alert Press Releases, available at <https://www.flexalert.org/press-releases>.

³³ Pyper, Julia. “Californians Slash Energy Use to Protect the Electric Grid.” Greentech Media. July 31, 2018, available at <http://www.greentechmedia.com/articles/read/californians-slash-energy-use-to-protect-the-electric-grid>

1 event that less Flex Alerts are called during the 2020 Campaign, any excess dollars (if already
2 collected through rates) will be addressed in connection with SoCalGas' annual Public Purpose
3 Program (PPP) surcharge rate update filing for rates effective January 1 of the following year.

4 **A. Cost Recovery Requested**

5 The costs from the past Flex Alert campaigns (2016-2018) and the Conserve Energy
6 SoCal Campaign (2016-2017) have been recorded in the MEOMA established pursuant to D.16-
7 04-039. The 2019 Flex Alert campaign ended in October and costs incurred on this campaign
8 will also be recorded in the MEOMA. In D.19-07-010, the Commission ordered SoCalGas to
9 use the MEOMA to track costs associated with Flex Alert funding, as ordered in prior
10 decisions.³⁴ The Decision also noted that it “shall determine at a later time whether the balance
11 in the MEOMA should be incorporated into the rates of SoCalGas customers.”³⁵ SoCalGas
12 requests recovery for the actual 2018, estimated 2019, and proposed 2020 Flex Alert campaign
13 costs totaling \$8.9 million.

14 **Table 1.3 – SoCalGas' Request for Recovery of Costs³⁶**

	2018	2019 (estimated)	2020 (proposed)
Flex Alert Campaign	\$2.75 million	\$2.83 million	\$3.33 million

15
16 The associated revenue requirement and rate impacts are provided in Chapters 2 and 3 -
17 Testimonies of Reginald Austria and Michael Foster.

18 This concludes my prepared direct testimony.

³⁴ D.19-07-010, OP 2.

³⁵ *Id.*

³⁶ The costs shown for year 2018 are the balance in the MEOMA on September 30, 2019. This is an interest-bearing account and thus these costs are different than the actual costs spent in that year.

1 **V. QUALIFICATIONS**

2 My name is Toni Mathews. My business address is 555 West Fifth Street, Los Angeles,
3 California. I am currently employed by SoCalGas as Manager, Internal & External
4 Communications.

5 I joined SoCalGas in September of 2010 as a Customer Communications Advisor
6 focused on safety communications. Since then, I have had positions with increasing levels of
7 responsibility and now oversee all areas of marketing communications, social media, employee
8 communications, and executive communications.

9 Prior to joining SoCalGas, I worked in several positions covering corporate
10 communications, marketing, community relations, advertising and public relations for major
11 companies. I have been responsible for managing marketing programs, designing and
12 implementing company-wide internal communications, developing and executing large-scale
13 public relations strategies, and writing on behalf of executive leadership.

14 I have a Bachelor of Arts degree in Mass Communications from the University of
15 California, Berkeley, and a Master of Professional Writing from the University of Southern
16 California.