

Exhibit No: SCG-06
Docket No.: R.13-11-005
Witness: Deanna R. Haines



**SECOND SUPPLEMENTAL PREPARED DIRECT
TESTIMONY OF DEANNA R. HAINES ON BEHALF
OF SOUTHERN CALIFORNIA GAS COMPANY**

October 23, 2020

Exhibit No: _____
Docket No.: R.13-11-005
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Order Instituting Rulemaking Concerning Energy
Efficiency Rolling Portfolios, Policies, Programs,
Evaluation, and Related Issues.

Rulemaking 13-11-005
(Filed November 14, 2013)

**SECOND SUPPLEMENTAL PREPARED DIRECT TESTIMONY OF DEANNA HAINES
ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY**

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

October 23, 2020

1 **DIRECT TESTIMONY OF DEANNA HAINES**

2
3 **I. PURPOSE AND BACKGROUND**

4 The purpose of my second supplemental prepared direct testimony on behalf of Southern
5 California Gas Company (SoCalGas) is to address activity that has occurred since my last testimony¹
6 and which is subject to the specifications ordered in the December 2, 2019 Assigned
7 Commissioner’s Amended Scoping Memo and Ruling for Order to Show Cause Against SoCalGas
8 (Scoping Ruling). The Scoping Ruling directs SoCalGas to submit testimony related to its energy
9 efficiency codes and standards advocacy and prescribes that the testimony specifically:

- 10
11 1) Explain how SoCalGas accounts for codes and standards advocacy (C&S) activities
12 including but not limited to all the items Cal Advocates asked about in its data
13 requests;
- 14 2) Provide account entries for all C&S work charged to the Demand Side Management
15 Balancing Account since June 1, 2018, including a description of its search to find
16 any additional entries not previously identified;
- 17 3) Explain why the C&S activities cited in Cal Advocates’ motion as in SoCalGas’s
18 Operation and Maintenance (O&M) and the General Rate Case (GRC) accounts were
19 charged to those accounts, and provides all relevant account entries for those items;
20 and
- 21 4) Provide any additional C&S-related charges in the O&M and GRC accounts and
22 explain how SoCalGas found them (as well as any accounting adjustments that may
23 have been made at any point to those charges).²

24
25 This testimony is limited to addressing activity that is subject to item 4 and has occurred
26 since my supplemental testimony, dated August 24, 2020. Consistent with D.18-05-041’s
27 prohibition and the time period within the scope of this OSC, my testimony addresses codes and
28 standards (C&S) activity since June 1, 2018 that is:

29
¹ Prepared Direct Testimony of Deanna R. Haines on Behalf of Southern California Gas Company (January 10, 2020).; *see also id.* at 4 (“SoCalGas reserves the right to supplement its testimony if it identifies other activity that is responsive to the Scoping Ruling’s requested information.”); Supplemental Prepared Direct Testimony of Deanna R. Haines on Behalf of Southern California Gas Company (August 24, 2020).

² Scoping Ruling, p. 4.

1 **A. California Energy Commission (CEC) 2022 California Energy Code Update**
2 **(Title 24)**

3 On March 5, 2019, the CEC opened a new docket, 19-BSTD-03, for the 2022 Energy Code
4 Pre-Rulemaking.⁵ The CEC updates the Energy Code (Building Energy Efficiency Standards) for
5 new construction of, and additions and alterations to, residential and nonresidential buildings on an
6 approximately three-year cycle. The last update occurred for codes effective January 1, 2020.
7 According to the CEC, its enabling statute requires that measures adopted be “cost effective, when
8 taken in their entirety, and when amortized over the economic life of the structure when compared
9 with historic practice.”⁶ The CEC has also noted that for the 2022 Energy Code update, they are
10 “considering options to modify compliance baselines and metrics to increase the Energy Code’s
11 support for the state’s carbon-reduction goals.”⁷

12 On September 30, 2020, the CEC held a Title 24 workshop on Indoor Air Quality.⁸ Seven
13 SoCalGas employees virtually attended the workshop.⁹ One SoCalGas employee provided
14 approximately two minutes of oral comments during the workshop. In addition, SoCalGas’s
15 consultant participated in the workshop by submitting technical questions during the question and
16 answer session of the workshop. The consultant’s fee was charged to accounts designated as ATL.
17 The seven employees who attended are salaried employees. One employee’s labor is charged to
18 accounts designated as BTL. The employee who provided oral comments charges a portion of their
19 time to accounts designated as BTL and a portion of their time to accounts that are designed as ATL.
20 I primarily charge my time to accounts that are designated ATL, but do charge a small portion of my
21 time to accounts that are designated BTL. The last four employees charge their labor to accounts
22 designated as ATL.¹⁰ However, as historical costs for the 2018-2019 period are part of the next
23 GRC that has not yet been filed, accounting can be subject to future adjustments during that cycle.

24 On October 14, 2020, two SoCalGas employees, as well as SoCalGas’s consultants met via a
25 Zoom video call with Commissioner McAllister and some CEC staff to discuss some of the issues
26 raised at the Indoor Air Quality workshop. The consultants’ fee was charged to accounts designated

⁵ California Energy Commission Docket Log, *available at*,
<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=19-BSTD-03>.

⁶ Notice of Lead Commissioner Workshop, CEC Docket No. 19-BSTD-03, docketed on September 17, 2019.

⁷ *Id.*

⁸ Indoor Air Quality is not itself necessarily related to energy efficiency codes and standards. However, as part of the CEC Title 24 docket, the CEC is considering issues related to Indoor Air Quality.

⁹ As this business meeting was available over the internet, it is possible additional SoCalGas employees viewed the meeting for their informational purposes.

¹⁰ One of the employees charged less than one percent of their time to BTL accounts during this time period.

1 as ATL. The two employees who attended are salaried employees. One employee charges a portion
2 of their time to accounts designated as BTL and a portion of their time to accounts that are designed
3 as ATL. The other employee charges their labor to accounts designated as ATL. However, as
4 historical costs for the 2018-2019 period are part of the next GRC that has not yet been filed,
5 accounting can be subject to future adjustments during that cycle.

6 On October 16, 2020, SoCalGas submitted a comment letter regarding the Indoor Air Quality
7 workshop. The comments provide additional scientific literature on Indoor Air Quality and provide
8 additional, technical information about sources and public health impacts of indoor air quality
9 pollutants including the particulate matter emissions from food and oils being cooked regardless of
10 stove type and how ventilation strategies can support mitigating these emissions.¹¹ Seven SoCalGas
11 employees, as well as SoCalGas's consultant, participated in drafting the comments. The
12 consultant's fee was charged to accounts designated as ATL. The seven employees who assisted in
13 drafting the comments are salaried employees. One employee charges a portion of their time to
14 accounts designated as BTL and a portion of their time to accounts that are designed as ATL. I
15 primarily charge my time to accounts that are designated ATL, but do charge a small portion of my
16 time to accounts that are designated BTL. The last five employees charge their labor to accounts
17 designated as ATL. However, as historical costs for the 2018-2019 period are part of the next GRC
18 that has not yet been filed, accounting can be subject to future adjustments during that cycle.

19 Although salaried employees do not typically track their time by activity or task, the
20 employees involved in the activity discussed above have kept track of their time associated with
21 working on these activities in light of this OSC. In addition, the consultant used by SoCalGas has
22 kept track of their time associated with working on Title 24 issues. None of the costs discussed
23 above are charged to accounts that are funded by the DSMBA and the employees' efforts in drafting
24 these comments were not undertaken as part of the two Statewide C&S advocacy programs that are
25 part of the EE portfolio.

26
27 This concludes my prepared direct testimony.
28

29 **III. QUALIFICATIONS**

30 My name is Deanna R. Haines. My business address is 555 West 5th Street, Los Angeles,

¹¹ Comments on Commissioner Hearing on Indoor Cooking, Ventilation and Indoor Air Quality, available at, <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=19-BSTD-03>.

1 California 90013-1011. My current position is Director of Environmental Policy at Southern
2 California Gas Company. The Environmental Policy organization, among other things, provides
3 policy support to SoCalGas and manages relationships with certain regulatory agencies. I joined
4 SoCalGas in 1988 and have been in my current position since April 2018. I have a Bachelor of
5 Science Degree in Chemical Engineering from University of Southern California and a Master's
6 Degree in Business Administration from University of Redlands. I have previously testified before
7 the Commission.
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