Application No: A. 08-06-002
Exhibit No.:
Witness: Mark W. Ward

In the Matter of the Amended Application of San Diego Gas & Electric Company (U 902 M) for Approval of Demand Response Programs and Budgets for Years 2009 through 2011. And Related Matters	))))))	Application 08-06-002

REBUTTAL TESTIMONY

OF MARK W. WARD

ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA
DECEMBER 15, 2008

REBUTTAL TESTIMONY
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I. INTRODUCTION

In accordance with the November 10, 2008 Assigned Commissioner and Administrative Law Judge's Scoping Memo and Ruling (the "Scoping Memo"), and the procedural schedule adopted therein at page 16, my Rebuttal Testimony responds to a number of issues raised by The Division of Ratepayer Advocates ("DRA"), The Utility Reform Network ("TURN") and The California Large Energy Consumers Association ("CLECA"). Each of these parties filed their Opening Testimony in this proceeding on November 24, 2008 addressing certain of SDG&E's Demand Response (DR) program and authorized budget proposals for the 2009 – 2011 DR program cycle. My Rebuttal Testimony is organized to respond to specific issues raised by each of these parties as noted in the sections below.

II. RESPONSE TO DRA

At page 5 of DRA's testimony, DRA witness Gokhale states that: "Although many of the current programs have not performed as expected, they have been able to continue because most programs have an inconsequential level of penalties for non-performance; and a few have no penalties." Notably, footnote 17 attached to this last statement reads: "The CBP program provides some penalties if the program delivers less than 50% of committed load reduction…".

SDG&E responds briefly to this statement with clarification regarding the specific non-performance penalty provisions contained within the Capacity Bidding Program (CBP). DRA's reference to the CBP as having "some penalties if the program delivers less than 50% of committed load reduction" is simply incorrect. In fact, Sheet 7 of SDG&E's Schedule CBP, presented in Appendix C of my Prepared Direct Testimony, clearly delineates a graduated scale of penalty provisions, which begin to apply in instances where between 90 – 100% of committed load reduction is delivered. And, at the less than 50% delivery level, the CBP program penalty provisions provides for zero capacity payment, as well as a reduced energy incentive payment. In spite of these significant penalty provisions, SDG&E has seen enrollment and participation in the Capacity Bidding Program increase in 2008. SDG&E believes that this program is crafted in a manner that provides both a variety of options for participants as well as a strong penalty provision to encourage performance.

III. REBUTTAL TO TURN TESTIMONY

A. Introduction

Beginning at page 29 of TURN's testimony, TURN witness Jeffrey Nahigian takes issue with a number of SDG&E's proposed 2009 – 2011 DR programs, activities and proposed authorized budgets. Mr. Nahigian generally develops two themes behind his analysis and his recommendations to either eliminate or reduce SDG&E's proposed programs, activities and authorized budgets. The first approach he utilizes is a review of SDG&E's monthly reports to the Commission on the status of DR programs, along with certain of SDG&E's data responses to TURN. The second approach utilized by Mr. Nahigian is what he terms as a "generic adjustment" to SDG&E's proposed 2009 – 2011 DR portfolio authorized budget "…based on the Commission's finding in SDG&E's AMI case (D.07-04-043) that AMI would provide benefits starting in the 2009 – 201(1—sic) demand response budgets that have not been accounted for by SDG&E in this filing." Mr. Nahigian uses the combination of these various approaches and his analysis to conclude that SDG&E's 2009 – 2011 DR programs proposed authorized budget is both overstated and duplicative of SDG&E's AMI project, and recommends a reduction of nearly 75%, or just over $37 million in SDG&E's proposed budget (see TURN—Nahigian, page 30, table 10).

When Mr. Nahigian uses the term "Budget" or "Budgets" with respect to SDG&E's DR programs and the proposals in this application, SDG&E notes that a more accurate reference would be to use the term "authorized budget or budgets", simply because SDG&E's DR program budgets, as proposed in this proceeding, represent its proposals for the Commission to authorize specific budgets. The mere authorization of those budgets is, first, not a guarantee that the authorized budget funding will actually be spent, and second, not an indication that ultimate rate recovery will reflect the total authorized budget levels. That is because SDG&E's DR program cost recovery mechanism, as described on pages 7 and 8 of the Application, functions only to record the level of actual expenditures (up to the level of the authorized budget) for subsequent rate recovery, and not to reflect the full authorized budget in rates, subject to refund for any subsequent under-spending of the authorized budget.

In the sections that follow, my Rebuttal Testimony refutes TURN's allegations that SDG&E's 2009 – 2011 DR programs proposed authorized budget is overstated based on historical program performance, and is somehow duplicative of previously-adopted AMI program budgets.

B. Recorded Costs From SDG&E's Monthly Reports to the Commission

TURN propounded a number of data requests to SDG&E through which TURN sought data regarding SDG&E's historical DR program performance and expenditures for the 2006 – 2008 program cycle. In addition to the information provided by SDG&E that is included as Attachment H to Mr. Nahigian's testimony, SDG&E responded to TURN's data requests by providing copies of its monthly reports previously provided to the Commission, detailing DR program event summary information and recorded expenditures.

At several locations within TURN's testimony, Mr. Nahigian makes recommendations that SDG&E's proposed 2009 – 2011 DR program proposed authorized budgets be reduced because SDG&E's historical 2006 – 2008 program cycle spending on these programs was only a small proportion of the authorized budgets adopted for those programs during that cycle. (See, for example, page 35 regarding M&E, page 37-38 regarding TA/TI, page 39 regarding CBP and BIP and page 42 regarding Customer Education). Mr. Nahigian apparently simply takes the recorded expenditures for each of these programs, compares those figures to the various programs' authorized budgets, and develops a ratio indicating the proportion of the authorized budget that SDG&E actually spent. He then simply uses that ratio to support each of his recommended downward adjustments to SDG&E's 2009 – 2011 program proposed authorized budgets.

Unfortunately, simply attempting to assess the proportion of actual expenditures relative to authorized budgets presents a misleading conclusion to the Commission that the budgets were overstated and does not provide a valid basis on which to justify TURN's recommended reduction to SDG&E's proposed 2009 – 2011 program authorized budgets. The primary reason for this is that the data reflected in the monthly DR program reports to the Commission, while indeed reflecting an accurate summary of DR activities, program events and expenditures, does not tell the full story behind a lower level of actual expenditures than had been budgeted.

Use of a simple comparison of actual expenditures to budgeted expenditures as TURN has done fails to account for such variables as the actual number of program events versus the maximum number of program design events, on which SDG&E's authorized program budgets are based. Other variables, such as the number, duration and frequency of events has an impact on customer participation and results as well. As an example of this phenomenon, during the 2006 – 2008 program cycle, the number of actual program events triggered varied rather significantly from one year to the next. During 2006, for example, over 20 events were triggered across the portfolio of programs. The same figure for 2007 reflects a total of nearly 75 events, while during 2008, fewer than 10 program events were triggered. This variability, which is due in large part to summer weather patterns and the need for load reduction, reflects what would be expected to be a variation in program expenditures. By contrast, in preparing its program budgets, and in order to assure that sufficient funding is available should the maximum allowed number of program events be triggered, SDG&E assumes full activation of all program events.

SDG&E would also again remind TURN that, as discussed above and on page 7 of its Application in this proceeding, SDG&E's current cost recovery mechanism for its DR program costs, which has been proposed to be continued unchanged for the 2009 – 2011 program cycle, provides only for recovery of the authorized program budgets *which are actually expended*, and only up to the level of the authorized budgets. What that means, significantly, is that to the extent may SDG&E underspend on a given program budget, for whatever reason, only the amount of actual expenditure is recorded in SDG&E's regulatory accounts for eventual rate recovery. SDG&E believes this mechanism serves well to protect ratepayers, in that only the level of actual expenditures, and not the authorized forecasted level, is recovered in rates. There is no incentive through this ratemaking mechanism for SDG&E to overstate budgets and increase rates on the front end. And, as with all established regulatory accounts, all expenditures recorded relative to DR program activities remain subject to Commission audit as the Commission deems appropriate.

C. Relationship Between This Proceeding and SDG&E's AMI/Smart Meter Proceeding

In its testimony, TURN goes to great lengths in its efforts to discredit SDG&E's 2009 – 2011 proposed DR program portfolio and budgets, and concludes that a significant portion of the proposed authorized budgets are tied to specific AMI-related activities and are duplicative of the activities and funding approved for SDG&E's AMI proceeding by the Commission in D. 07-04-043. TURN proposes a significant reduction to SDG&E's proposed 2009 – 2011 DR program authorized budgets as a result of its conclusions. As discussed below, contrary to TURN's conclusions, none of the activities that SDG&E has proposed in its 2009 – 2011 DR portfolio, or the associated funding, are embedded within the activities and funding adopted for SDG&E's AMI effort, and are not duplicative of those efforts. TURN's attempt to reduce SDG&E's proposed 2009 – 2011 DR program portfolio and funding on this basis should be rejected by the Commission as an effort by TURN to take a second bite at the apple of prior challenges to SDG&E's AMI effort and funding.

TURN states, at page 32 of its testimony that it believes that: "It is both inappropriate and an affront to the whole regulatory process for SDG&E to seek additional funds for its AMI project when that project's entire reasonableness and funding has already been decided by the Commission." and argues that: "The Commission must stop this endless attempt to loot ratepayer funds in the name of 'AMI' and hold the utilities liable to the original funding levels associated with those projects." In support of its allegations and recommendations, TURN includes as attachments to its testimony an excerpt from SDG&E testimony filed by witness Mark Gaines in SDG&E's AMI Application, A. 05-03-015, along with SDG&E's response to TURN's data request 02-12 in this proceeding. TURN is simply wrong in its conclusions and characterization that, by this proceeding, SDG&E is seeking additional funds for its AMI initiative.

The simple fact is that SDG&E's AMI/Smart Meter initiative was, as TURN notes, approved by the Commission in D. 07-04-043, and that initiative is moving forward as approved as a stand-alone metering infrastructure. AMI will, when fully deployed and implemented, provide the basis for an expanded and enhanced metering of customers' energy usage patterns, and will facilitate the provision of information to customers on which they can become more educated on energy consumption patterns and make informed decisions as to their energy consumption patterns. None of that is to suggest that any of the AMI work will design, implement, administer or provide education as to the portfolio of SDG&E's DR programs.

It is true that the information that is expected to be made available to customers as a result of the AMI initiative can be used to inform customers about their potential ability to change their energy consumption patterns and achieve load reductions, but that can only happen if the customers are educated and made aware of the existence and function of DR programs, enroll in these programs, develop and implement strategies to achieve load reduction and, where appropriate install systems and equipment necessary to enable and activate load reduction strategies. It is these kinds of activities that are the focus of the

2009 – 2011 DR program portfolio, separate, distinct and incremental to SDG&E's AMI initiative, that are the subject of this proceeding and not, as TURN suggests, activities that were previously embedded within A. 05-03-015.

TURN further suggests that SDG&E has failed to account for a portion of the AMI benefits that were adopted by D. 07-04-023 in its 2009 – 2011 DR proposed program portfolio budget, and on that basis alone, has proposed a significant reduction to SDG&E's DR budget. Specifically, TURN cites, at page 30 of its testimony that: "SDG&E claimed that its AMI project would result in spending approximately half of its current annual demand response budgets…beginning in 2009…" resulting from SDG&E's AMI initiative. TURN continues, at page 31 of its testimony with its analysis of the testimony presented by SDG&E in A. 05-03-015, and cites specifically to Mr. Gaines' AMI testimony to produce its specific adjustments to SDG&E's proposed 2009 – 2011 DR programs budget.

Unfortunately, in developing its analysis and making its recommendations to reduce SDG&E's 2009 – 2011 DR programs proposed authorized budget, TURN has only selectively used portions of Mr. Gaines' AMI testimony to draw its conclusions, and has not taken both the entirety of that testimony and subsequent events into context. In so doing, TURN has overlooked several critical components of Mr. Gaines' AMI testimony and the implications from that. Mr. Gaines' AMI testimony consisted of 26 pages. TURN has included as Attachment F to its testimony only selected pages of Mr. Gaines' AMI testimony (pages MFG-19 through MFG-22, and MFG-26), and in so doing has not only eliminated the full context of that testimony, but has also failed to consider the full context of the limited selection of Mr. Gaines' testimony on which it has relied.

Mr. Gaines' testimony in A. 05-03-015, beginning with the pages that TURN has included in its Attachment F, presents SDG&E's discussion of Avoided Demand Response Program Costs that may result from SDG&E's AMI deployment. In several subsequent pages of this testimony, Mr. Gaines presented a number of qualifying issues surrounding SDG&E's ability to, in fact, reduce its DR program costs in future years. Specifically, at page MFG-21, lines 3-10, Mr. Gaines noted SDG&E's assumptions regarding customer awareness and participation in dynamic pricing and other DR programs, and the success of SDG&E's AMI CCAP efforts as relevant factors. Subsequently, beginning on line 11, Mr. Gaines noted SDG&E's assumption regarding the timing of SDG&E's AMI deployment, beginning in mid-2008. Although TURN included these specific pages in its Attachment, it failed to note these important issues.

Significantly, SDG&E's AMI assumptions regarding the potential future reduction of DR program costs included the following:

1. Full deployment of AMI across the service territory (with perhaps limited exceptions in extremely remote areas). That deployment was assumed to begin in 2008 and conclude in early 2011. Subsequently, because of the timing and logistics of meter vendor selection and other pre-installation activities, that deployment schedule has been delayed. I am informed that SDG&E now intends to begin full-scale deployment activities in the first quarter of 2009, and complete deployment some two years later, in the second quarter of 2011. By definition, the simple length of time necessary to deploy and fully integrate the AMI infrastructure will translate to a transition period before SDG&E is able to identify and phase in the possible reduction of DR programs. TURN apparently has assumed an automatic, fell-swoop elimination at the beginning of 2009, notwithstanding

SDG&E's AMI testimony assumptions and the changes to the deployment schedule on which it was based. Even SDG&E's AMI testimony provides for a scheduled ramp-up of AMI deployment and corresponding benefits, and does not suggest that the deployment would be completed instantaneously, nor the benefits derived immediately.

2. All C&I customers with demands over 20 kW, will participate in some form of dynamic pricing. SDG&E's assumption was also that such participation would be mandatory, which would obviate the need for certain of SDG&E's DR programs. As is discussed in my Prepared Direct Testimony, beginning at page MWW-18, SDG&E's new default Critical Peak Pricing program was just adopted by the Commission, and is being phased in. In particular, beginning in 2008, only the large commercial and industrial (C&I) customers with demands greater than 200 kW will be placed in a default CPP rate. (All C&I customers with appropriate AMI meters and communications are default CPP-eligible. SDG&E does have some customers with demands less than 200 kW with appropriate metering and communications, but the predominant customers are those with demands greater than 200 kW). Implementation of AMI for medium C&I customers, those with demands between 20 kW and 200 kW, will not begin until late 2009. Most notably, however, is that the new default CPP program contains an opt-out provision, by which customers can elect to remain on an existing DR program. That simple fact alone is different than SDG&E's AMI assumption, and presents the need for maintaining a portfolio of DR programs.

Similarly, SDG&E's AMI assumption regarding Residential customers was that its proposed Peak Time Rebate (PTR) program would be available following <u>completion</u> of the AMI rollout. The newly-adopted PTR program is discussed in my Prepared Direct testimony beginning at page MWW-23. Neither the CPP-D or PTR programs are fully in place yet, and will not be in 2009. TURN's blind assumption that 2009 is the clear point of demarcation after which all AMI benefits are fully available and lead to an immediate reduction in DR program activities and costs is simply inaccurate.

In fact, PTR will not be in effect for residential customers until 2010, and then only available to those customers with an installed Smart Meter. The AMI deployment schedule has been publicly available to parties such as DRA and the Utility Consumer's Action Network (UCAN) who have attended and participated in the Smart Meter Technical Advisory Panel (TAP) meetings. While TURN may have not been present at these meetings, both their witnesses in this proceeding were also witnesses on behalf of TURN in SDG&E's AMI proceeding. They certainly had available access to updated information regarding the AMI deployment schedule either directly or through counterparts with TURN or DRA, or through inquiries to SDG&E.

3. SDG&E's AMI application tied the attainment of the benefits to the AMI meter and systems deployment. Therefore, the anticipated operational benefits, a portion of which included the DR program avoided costs, cannot begin to materialize until at least the summer of 2011, following the now-anticipated completion of the AMI deployment process.

In sum, SDG&E believes that the entirety of its proposed 2009 – 2011 DR program portfolio and budget authorization proposals have been justified and should be approved. SDG&E's authorized AMI activities and funding are neither duplicative of nor do they displace SDG&E's proposed DR program activities and funding.

D. TURN's Program-By-Program Adjustment to SDG&E's 2009 – 2011 DR Program Portfolio

Beginning at page 33 of its testimony, TURN goes through a program-by-program discussion of several of SDG&E's 2009 – 2011 proposed DR programs and authorized budgets, and argues how each of the activities it identifies is duplicative of SDG&E's AMI funding. TURN then presents its proposed reductions to SDG&E's DR program funding.

1. Residential Automated Controls Technology Pilot (RACT). TURN argues that this proposed pilot "…is clearly an AMI-related program and therefore an AMI-related cost". As discussed at length in my Prepared Direct Testimony, beginning at page MWW-35, the proposed RACT pilot is directed specifically at Residential sector customers, most of whom have yet to be fully exposed to DR programs. The RACT is intended to test the customer acceptance and use of various load control devices and technology in determining what future program design characteristics and technologies to enable load reductions may prove successful within the Residential sector. The AMI infrastructure is intended to provide the electric meter, including an industry-standard Home Area Network (HAN) gateway into the home, making available to these customers information on which they may base decisions on their energy consumption patterns, but there is nothing embedded within the AMI infrastructure or adopted funding to include the cost, deployment, field testing or evaluation of the kinds of devices and technologies that are envisioned to be included within the proposed RACT pilot. Except for the HAN gateway, AMI funding did not include any enabling technologies for the Residential sector. AMI funding only included 57,000 Programmable Communicating Thermostats (PCTs) for the small/medium commercial customer segment. The proposed new RACT pilot program will, in fact, leverage the significant AMI investment, including the HAN communications

system, that was ultimately included in SDG&E's AMI settlement funding as part of an all-party settlement. None of the additional technology that SDG&E expects to test through the RACT pilot program was included in the AMI proceeding. SDG&E would certainly hope to leverage its AMI investment (including the HAN gateway) where it is cost effective to do so. The RACT pilot is intended to field test the various devices described in my Prepared Direct Testimony to determine what future role those may play in SDG&E's DR program portfolio, and as a possible means of leveraging investments.

2. <u>Codes and Standards (C&S)</u>. Demand Response is treated as a separate and distinct regulatory proceeding addressing the portfolio of programs and funding. In order to reflect that, SDG&E has included in this proceeding a specifically-focused DR C&S program to support DR activities. This component of the C&S work was not included in either SDG&E's AMI proceeding or in SDG&E's Energy Efficiency (EE) application. In my Prepared Direct Testimony, both at page MWW-64 and in Appendix B, SDG&E described the DR-specific nature of the C&S program and funding included in this proceeding, as distinct from that which it included in the EE proceeding.

The primary function of the DR C&S program is to <u>***prevent future electricity crises through electric load reduction during times when the grid is at near capacity.***</u> The DR C&S program helps achieve these results through its work with state and federal agencies in modifying existing standards or setting new codes into law. Enhancements to codes and standards lead to DR in two ways; by advancing the identification and early adoption of innovative technologies, and by establishing building and appliance standards for technologies. These activities were not included in SDG&E's AMI proceeding activities or funding. As addressed in SDG&E's EE proceeding, the primary function of the C&S

EE program ***is saving energy and capturing resource and societal benefits from California's diverse energy efficiency efforts.*** The C&S program helps achieve these results through its work with state and federal agencies in modifying existing standards or setting new codes into law. Enhancements to codes and standards lead to significant electric and gas energy energy consumption reduction in two ways; by advancing the identification and early adoption of innovative technologies and equipment, and by establishing building and appliance standards.

While both the EE and DR C&S programs advocate for building and appliance code enhancements, the rationale and technologies for doing so are quite different. Because of that, SDG&E has separated the overall program into its distinct DR and EE-related components, and has included each in its respective proceedings.

C&S case study evaluations will concentrate on DR-related matters, including Load Management Devices, DR training and support of local building officials and advocacy within the homebuilding, and building contracting industries in addition to working closely with industries that manufacture and supply load management devices. Costs associated with work on these issues are not charged to EE or to AMI, but are appropriately reflected as DR C&S program activities and costs. SDG&E believes that the proposed authorized budget for the Codes and Standards DR program properly reflects activities in support of DR programs that were not a component of the AMI funding.

3. Measurement and Evaluation (M&E). TURN's challenges to SDG&E's proposed activities and funding for M&E activities are discussed in the Rebuttal Testimony of Kathryn Smith.

4. Technical Assistance and Technical Incentives (TA/TI). TURN takes issue with SDG&E's proposed TA/TI program authorized budget for the 2009 – 2011 program cycle and recommends in its Table 11 a significant reduction in SDG&E's proposed budget. TURN's first allegation in support of its proposed SDG&E budget reductions ties back to TURN's testimony concerning SDG&E's AMI proceeding, and the discussion therein regarding potential future reductions to SDG&E's DR program costs following the completion of the AMI deployment and transition of customers to mandatory dynamic pricing. The issues regarding the relationship of this proceeding to SDG&E's AMI proceeding are discussed in section C above, and will not be repeated here. While it is accurate that SDG&E's AMI testimony passage that TURN has quoted on page 36 of its testimony noted that: "…a portion of the TA/TI budget can also be reduced beginning in 2009.", as discussed above, the mere delay in the deployment schedule for the AMI infrastructure in and of itself is reason to not immediately reflect any such possible reduction in SDG&E's TA/TI budget. It is not until the infrastructure is fully in place and customers are actually placed on default dynamic pricing tariffs that the potential impact on the TA/TI program can be assessed for future budget and program structure proposals.

TURN also bases its recommended reduction in SDG&E's TA/TI budget in part on SDG&E's response to TURN's data request No. 2, Question 12, which TURN has included as Attachment G to its testimony. TURN apparently has taken SDG&E's response in the context of TURN's question regarding the leveraging and integration of SDG&E's AMI program to mean that the costs identified in SDG&E's response are included within SDG&E's AMI activities and funding, and are therefore duplicative and should be excluded from this proceeding. That is simply not the case, and is not an accurate characterization of SDG&E's response.

Just as is addressed in Section C.1. above regarding the RACT program, none of the costs associated with SDG&E's TA/TI program activities are included within SDG&E's AMI funding. Rather, as is discussed in detail in my Prepared Direct Testimony, beginning at page MWW-46, the TA/TI program is specifically directed at performing audits and assessments at customer facilities to identify and quantify potential load reductions that can be achieved through customer participation in a DR program. The program further provides incentives to customers who choose to acquire and install technologies, such as energy management systems and automated load control devices, which will enable various load reduction strategies. SDG&E's AMI funding contains no such activities or funding.

TURN's second allegation opposing SDG&E's proposed TA/TI budget relies again on its analysis of SDG&E's historical spending of TA/TI budgeted funds. TURN concludes that since SDG&E spent "very little" on the TA and TI programs in 2006, and ramped up the activities in 2007 and 2008, but still spent below the authorized budget levels, its proposed reductions to SDG&E's budget are appropriate.

Once again, although TURN has cited the ramping up of the TA/TI programs over the current 2006 – 2008 program cycle, it has not taken those ramping up efforts into consideration in its review of historical spending. One key component that TURN has apparently overlooked is the fact that the newest component of the TI program, and that which provides the largest incentive level, is the Auto-DR program. That program was new in 2007, and was expanded in 2008. That short amount of history cannot provide, as TURN suggests, an adequate basis for TURN's conclusion that "…during 2007 and 2008 both the TA and TI programs were up and running as planned". Further, as noted in my Prepared Direct Testimony, at page MWW-48, the recent adoption of SDG&E's Default Critical Peak Pricing program is expected to generate a resurgence of interest in the TA/TI program, as customers become more familiar with dynamic pricing, the added motivation that a critical peak pricing rate structure creates for customers to achieve load reductions and the benefits that can be derived from participation in DR programs. TURN's simplistic look at historical spending is simply no indication of the interest and participation in TA/TI in the future. And again, the proposed authorized TA/TI budget is just that…an *authorized* budget, which would only be reflected in rates to the extent it is actually spent. SDG&E believes that, for all the reasons set forth in my Prepared Direct Testimony, TA/TI will remain as a central component to the DR program portfolio, and is essential in helping customers identify DR opportunities and to help offset the costs of technology-enabled participation.

SDG&E believes that TURN's concerns over SDG&E's proposed TA/TI authorized budget may be alleviated either in part or fully by SDG&E's proposal, discussed at page MWW-69 of my Prepared Direct Testimony, to maintain the existing "isolation" of the TA/TI program for purposes of the budget flexibility and fund shifting proposals first adopted by the Settlement Agreement (to which TURN was a party) approved by D. 06-03-024 and proposed to be continued in the 2009 – 2011 program cycle. SDG&E proposes that TA/TI be maintained as a separate program category, but with the addition of a lesser 25% fund shifting component. And, as identified at page MWW-53 of my Prepared Direct Testimony, all applications for the payment of TI incentives must be accompanied by supporting documentation, as well as the completion of a load shed test to verify the performance of the equipment and technology for which the incentive is requested. Just as with all other categories of SDG&E's DR program expenses, all accounts remain subject to audit as the Commission deems appropriate.

5. Capacity Bidding Program (CBP). TURN recommends a reduction to SDG&E's proposed CBP authorized budget, once again only based on its analysis of historical program spending. As is discussed above, TURN's analysis of historical program spending does not take into consideration many of the variables that drive program spending, including the number of program events that may or may not have been called and changes in the level of customer enrollments in the program. In the particular case of CBP, just as TURN's data indicate, this was a new program within the 2006 – 2008 program cycle, having become effective in mid-2007. As discussed by Ms. Smith, and as noted in my Prepared Direct Testimony at page MWW-27, the CBP program has seen recent participation growth, particularly with added participation of third-party aggregators. TURN's simplistic conclusion that SDG&E's historical spending on the CBP program is a reliably predictive indication that the proposed authorized budget for the 2009 – 2011 cycle should be reduced is based on an incomplete analysis, and is simply inaccurate and not reasonable.

6. Base Interruptible Program (BIP). TURN recommends a reduction to SDG&E's proposed 2009 – 2011 authorized budget for the BIP program, again based on its simplistic analysis of historical program spending, and consistent with SDG&E's projection that the BIP program will maintain an enrollment of 5 MW by 2010. TURN notes that current enrollment is at 4.8 MW. Based on this level of expected steady enrollment, TURN merely bases its analysis on historical spending for 2008.

As discussed above, the historical spending for BIP, as well as any other DR program, is not necessarily reflective of future performance of that program. TURN's analysis overlooks the impact on budgeted spending as a result of the actual number of program events that were triggered as compared to those on which the program budget were based. The BIP program is no different from most of SDG&E's other DR programs, in that far fewer than the number of maximum program design events were triggered during not only 2008, but also in 2006 and 2007. For example, compared to the program's design maximum of 10 events per year, SDG&E activated just 2 BIP events in 2008, and just 3 in 2007. With fewer events activated than the program design, it is a logical outcome that fewer program incentives were paid than had been budgeted.

TURN's recommendation to SDG&E's proposed 2009 – 2011 BIP budget is simply unwarranted.

7. Emerging Technologies (DR-ET). As discussed at length in my Prepared Direct Testimony, beginning at page MWW-59, the DR-ET program differs from AMI in very fundamental ways. While AMI is involved in the communication, connectivity and control of every smart meter, it does not address the demonstration and evaluation of technologies and strategies involved in achieving demand response. DR-ET fills this role by identifying and funding technology research and demonstrating and evaluating technologies and strategies that optimize demand response from different customer segments. For the 2009 – 2011 program cycle, DR-ET projects are expected to include DR technology and strategy testing at hotels and hospitals, Data Centers, water treatment plants, telecom sites, grocery stores, etc. No projects of this type are part of the AMI program. Additionally, DR-ET actively participated in the statewide DRBizNet technology demonstration and was

involved in the early development of the Auto DR pilot. SDG&E's involvement in important projects like these occurred through the DR-ET program and outside of AMI program participation or deployment.

Some of the key functions of the DR-ET program include: (a) identify, demonstrate and evaluate new enabling technologies for DR program implementation, (b) fund technology research, promote and support new DR technologies and strategies for different types of customers and (c) conceptualize and develop technology plans for achieving the long-term zero energy performance goals (by 2020 in residential buildings and 2030 in commercial buildings) outlined in the California Energy Efficiency Strategic Plan (CEESP). The CEESP calls for utilities to partner with other organizations such as manufacturers, utilities, national laboratories, the CEC and the DOE to develop new, "game changing" technologies that will transform the market.

For the 2009 – 2011 program period several capital intensive projects are planned – a few of which are noted above. These demonstration projects have the potential for delivering considerable demand response. Reduction in available DR-ET funds, as TURN has recommended, would result in incomplete or inconclusive demonstrations and evaluations of these projects and/or elimination of several projects altogether. SDG&E believes that DR-ET program is an essential component of the proposed DR program portfolio, and that its proposed authorized funding be kept at the requested levels to support these projects and the greatly expanded effort required to achieve the CEESP goals. The entire scope of this activity is beyond that which was included within SDG&E's AMI funding. AMI did not fund any future research, development or evaluation of emerging technologies.

8. Customer Education, Awareness and Outreach. Consistent with the theme throughout its testimony, TURN argues that SDG&E has failed to account for the AMI deployment and an accompanying reduction to its proposed authorized budget for 2009 – 2011 DR Customer Education, Awareness and Outreach activities and associated budgets. For all the reasons previously discussed and the delay in the deployment of the AMI infrastructure, the evaluation of the outreach activities included within the Customer Education, Awareness and Outreach budget that might be candidates to be scaled back or eliminated as a result of the completion of the AMI deployment cycle have not yet been determined, and it is premature to do so.

The activities within the Customer Education, Awareness and Outreach program that SDG&E proposes for the 2009 – 2011 DR program cycle are described in detail in my Prepared Direct Testimony, beginning at page MWW-55. With the recent introduction of the new CPP-D and PTR programs, as well as the current delays in the AMI deployment cycle, SDG&E believes that it is even more important that a vibrant portfolio of DR programs be maintained and that education and outreach efforts continue to encourage customer participation. This effort s made even more significant by the fact that the summer of 2008 was, by normal weather standards, very mild, and resulted in far fewer DR program events being activated than might otherwise have been expected. The obvious result of that is that many customers may have become disengaged with DR programs and information. SDG&E believes that a heightened level of education and outreach may well be necessary in 2009 to re-energize customers and ensure that program enrollments and participation be maintained as we enter the new program cycle.

Further, with the proposed elimination of several programs as discussed in my Prepared Direct Testimony, and the introduction of the new programs into the portfolio, SDG&E believes that renewed and expanded efforts are necessary to help customers understand the new programs, and identify the program options that may be best suited for them.

9. PEAK. TURN has recommended that SDG&E's PEAK Student Program be eliminated from funding in the 2009 – 2011 DR program portfolio. TURN contends that this program does not result in any load reductions, that it enhances SDG&E's corporate image, and that it does not address demand response. Without addressing the merits of the PEAK Student Program or TURNs' characterizations of it, SDG&E agrees to eliminate the PEAK Student Program from the DR program portfolio and proposed authorized budgets presented in my Prepared Direct Testimony. SDG&E expects to address the PEAK Student Program within its pending Energy Efficiency proceeding.

10. Optional Binding Mandatory Curtailment (OBMC) and Scheduled Load Reduction Program (SLRP). At page 6 of its testimony, TURN advocates that the Commission do what it can to either close or severely limit the OBMC and SLRP programs. As TURN notes, neither of these programs has provided significant DR results. The SLRP program, as TURN notes, was legislatively mandated in 2001. Neither the OBMC or SLRP programs have had significant enrollment for SDG&E, and today, neither has any participants. TURN urges the Commission to include the issue of eliminating SLRP on its next scheduled report to the Legislature.

In its last DR proceeding (A. 05-06-006), SDG&E included a proposal that SLRP be eliminated, but that proposal was denied by D. 06-03-024 as being inconsistent with

Legislative direction. SDG&E would support TURN's recommendations that both the OBMC and SLRP programs be scaled back or eliminated. SDG&E has not requested any incremental funding for either program in this proceeding, although the OBMC program was recently approved for continuation by the Commission as a component of SDG&E's 2008 General Rate Case, with minimal funding.

E. Use of the Advice Letter Process for DR Program Changes

At page 8 of its testimony, TURN addresses the proposals made by the utilities that the advice letter process be used to seek minor modifications or budget changes to their DR programs during the 2009 – 2011 program cycle. TURN argues that the Commission should reject this proposal, and should adhere to a prior ruling that any material changes to DR programs during the funding cycle be sought through an Application. TURN argues that use of an Application process would allow: "…all parties as well as the Commission a more thorough and detailed review of any proposed modification than would the evaluation of those modifications in advice letter filings."

SDG&E's proposal that the existing Advice Letter process by which DR program changes may be sought be continued for the 2009 – 2011 DR program cycle be continued is discussed beginning at page MWW-70 of my Prepared Direct Testimony. As discussed, the primary purpose of this process, which was agreed to by the Settling Parties in the 2006 – 2008 DR proceeding, and adopted by D. 06-03-024, is to propose what would be expected to be minor, specific program changes based on ongoing experience, and to help maintain a flexible program portfolio to accommodate program revisions. It is certainly not SDG&E's intent to circumvent review of these changes by interested parties or the Commission, but rather to seek approval of such changes on a much more expeditious timeline than could be accommodated through the filing of a new Application. SDG&E also believes that participating DR customers are better served by the Advice Letter process by which possible revisions and enhancements to DR programs can be more readily put in place.

IV. REBUTTAL TO CLECA TESTIMONY

A. Auto-DR

In its testimony at page 31, CLECA addresses SDG&E's Auto-DR program, and contends that SDG&E has said virtually nothing in its testimony about its Auto-DR plans for 2009 – 2011, and that it has not distinguished in its TI budget that proportion that is expected to be attributable to Auto-DR, proposed for continued funding at the existing $300/kW incentive level.

SDG&E believes that TA/TI and Auto-DR, which has been established as a key sub-component within the TI program, will continue to be an important component of the 2009 – 2011 DR program portfolio. SDG&E's plans for the Auto-DR program are discussed beginning at page MWW-52 of my Prepared Direct Testimony, as are SDG&E's proposed changes to the overall TA/TI program, beginning at page MWW-54. I believe that it is important to recognize that the Auto-DR component of the TI program is still very new, having just been established by the Commission in 2007, and expanded in 2008. SDG&E has not identified, and believes that it is premature to do so, wholesale changes to the program at this time, based on insufficient experience. That is not to say, however, that evaluation and consideration of technological changes and new technologies should not be considered. In fact, SDG&E's DR-ET program is intended to do just that. SDG&E would not necessarily exclude the consideration of any particular technology, whether that be new or existing, in the TI and Auto-DR programs.

Auto-DR provides and implements automated load shedding strategies, by virtually eliminating the human interface during a DR program event. Auto-DR enabled solutions obtain more reliable and more sustainable reductions through the automation of a load shed response and strategy. Since the initial inception of Auto-DR, the only SDG&E DR program to include Auto-DR enablement has been the Capacity Bidding Program (CBP), primarily promoted by aggregators. SDG&E intends to significantly broaden the use of Auto-DR by expanding its application to other DR programs, including the newly-adopted Default Critical Peak Pricing (CPP-D) program. SDG&E's strategy will be to identify those customers on CPP-D and work with them to identify the benefits of employing an Auto-DR strategy. The rate structure of CPP-D provides the customer with an incentive to reduce load during DR events, because failure to do so will result in much higher rates during the event. Auto-DR provides an excellent opportunity for the customer to shed load and accomplish that through initiated of pre-determined automated strategies.

In terms of the 2009 – 2011 proposed TA/TI budget, SDG&E's proposed TI authorized budget component of $12.7 million as cited by CLECA, was developed incorporating an assumption that approximately 75% of the incentive structure would come from Auto-DR related projects and installations. That figure, however, was merely an assumption in developing the proposed authorized budget, and was not intended to indicate a preference for any particular technology or application, and certainly not intended to in any way limit customer options or the exploration of various DR enabling technologies or Auto-DR standards-enabling technologies.

B. Multiple Program Participation

As addressed in my Prepared Direct Testimony, beginning at page MWW-72, SDG&E believes that the concept of Multiple Program Participation (MPP), by which participating customers are able to jointly enroll and participate in more than just a single DR program, is an important element of the DR portfolio. By permitting MPP, and establishing appropriate guiding criteria governing that participation, SDG&E believes that a greater level of DR can be achieved than could be achieved through restricting a customer's participation to just a single program. In its testimony, beginning at page 32, CLECA includes a discussion of the various utility proposals regarding MPP.

At page 38 of its testimony, CLECA addresses one component of SDG&E's MPP proposal, and identifies CLECAs' concerns. CLECA responds on page 38 to the question of allowing DR customers to also receive PTR (SDG&E's new Peak Time Rebate program) rebates. Specifically, CLECA believes that customers participating in SDG&E's Summer Saver Air Conditioning Cycling program will receive PTR rebates for a load drop associated with the Summer Saver incentive, arguing that these customers will be paid twice for the same load drop, once through the Summer Saver Program and once through PTR.

SDG&E respectfully disagrees with CLECA's characterization that allowing customers to participate on both the Summer Saver and PTR programs will result in a duplicate incentive payment. This issue was addressed in my Prepared Direct Testimony at pages MWW-34 and MWW-35. SDG&E distinguishes the incentive payments made through the Summer Saver and PTR programs as distinctly different. The Summer Saver program incentive, a one-time $25/kW (for residential and small commercial customers at 50% cycling) or $50/kW (for residential customers at 100% cycling) enrollment incentive payment, is, repeating what was stated in my Prepared Direct Testimony, considered to be a capacity payment, made in exchange for the customer's enrolled *capacity* in the program, capacity over which the program maintains direct load control. The PTR program incentive, however, represents an energy incentive payment, and is only made to the customer based on specific load reductions achieved during PTR program events. The Summer Saver capacity payment is made with no specific tie to any load reduction, which the PTR energy credit rebate is made only on the condition of an actual measured load reduction. SDG&E does not consider these to be duplicative program incentive payments.

V. REBUTTAL TO AREM TESTIMONY

A. Participation in Settlement Discussions

As directed by the Scoping Memo, SDG&E has been participating in discussions and meetings with various parties to this proceeding, specifically including AReM, to address various Electric Service Provider ("ESP") issues raised by AReM in both their protest to the consolidated Applications in this proceeding and in their testimony. SDG&E believes that all the issues that were raised by AReM in its protest and testimony have been satisfactorily resolved, and therefore does not present any rebuttal testimony to those issues. As directed by the Scoping Memo, the report on the agreement will be provided by December 22, 2008.

VI. SDG&E'S REVISED 2009 – 2011 DR PROGRAM PORTFOLIO PROPOSED AUTHORUZED BUDGET

As discussed above, SDG&E has agreed with TURN's recommendation to remove the proposed PEAK Student Program from its 2009 – 2011 DR program portfolio and proposed authorized budget. Based on this revision, SDG&E's 2009 – 2011 DR Program proposed authorized budget is as follows:

	2009	2010	2011
Proposed Authorized Budget ($ million)	**$ 15.5**	**$ 16.1**	**$ 16.0**

The above figures replace and supercede the proposed program authorized budget figures as originally set forth on page MWW-17 of my Prepared Direct Testimony.

VII. APPENDIX A: REVISED 2009 – 2011 DR PROGRAM PORTFOLIO BUDGETS

As discussed above, SDG&E has agreed to modify its 2009 – 2011 DR program portfolio by removing the PEAK Student Program from the proposed portfolio. In order to reflect that change in the proposed 2009 – 2011 DR program portfolio budget, I have attached hereto as Appendix A a revised set of program budget tables. These revised budget tables supercede in their entirety the budget tables that were included as Appendix A to my Prepared Direct testimony.

This concludes my Rebuttal Testimony.

APPENDIX A

Proposed Demand Response Programs Authorized Budgets

Summary

	2009	2010	2011	Total
Programs				
Default Critical Peak Pricing (CPP-D)	$0	$0	$0	$0
Emergency Critical Peak Pricing (CPP-E)	$126,985	$106,867	$94,689	$328,541
Peak Time Rebate Program (PTR)	$0	$0	$0	$0
Capacity Bidding Program (CBP)	$1,998,657	$2,232,147	$2,601,179	$6,831,983
Base Interruptible Program (BIP)	$559,804	$554,642	$542,621	$1,657,067
Summer Saver Program	$0	$0	$0	$0
Residential Automated Controls Technology Program	$551,217	$544,415	$594,039	$1,689,671
Optional Binding Mandatory Curtailment (OBMC)	$0	$0	$0	$0
Scheduled Load Reduction Program (SLRP)	$0	$0	$0	$0
Sub-total: Programs	**$3,236,664**	**$3,438,070**	**$3,832,527**	**$10,507,261**
Technical Assistance and Technology Incentives				
Technical Assistance	$3,322,805	$3,337,097	$3,351,424	$10,011,326
Technology Incentives	$4,353,880	$4,274,764	$4,034,197	$12,662,840
Sub-total: TA and TI	**$7,676,684**	**$7,611,862**	**$7,385,620**	**$22,674,166**
Customer Education, Awareness & Outreach				
Customer Education, Awareness & Outreach	$1,800,754	$2,009,733	$2,218,722	$6,029,209
Flex Alert Network (FAN)	$626,943	$417,962	$208,981	$1,253,886
Demand Response - Emerging Technologies (DR-ET)	$717,743	$708,148	$716,604	$2,142,496
Sub-total: Customers Education, Awareness & Outreach	**$3,145,441**	**$3,135,844**	**$3,144,307**	**$9,425,591**
Permanent Load Shifting				
Gas A/C - Cypress	$49,992	$51,394	$52,799	$154,185
Refrigerated Zone Module - EPS	$49,992	$51,394	$52,799	$154,185
Sub-total: PLS	**$99,983**	**$102,789**	**$105,599**	**$308,370**
Additional Activities				
Measurement and Evaluation (M&E)	$1,167,100	$1,585,166	$1,352,559	$4,104,825
Codes and Standards	$200,000	$200,000	$200,000	$600,000
Sub-total: Additional Activities	**$1,367,100**	**$1,785,166**	**$1,552,559**	$4,704,825
Total: All Programs	**$15,525,872**	**$16,073,730**	**$16,020,612**	**$47,620,213**

Check $47,620,213

Budget - 2009

	O&M	Capital	Incentives	Total
Programs				
Default Critical Peak Pricing (CPP-D)	$0	$0	$0	$0
Emergency Critical Peak Pricing (CPP-E)	$118,501	$8,484	$0	$126,985
Peak Time Rebate Program (PTR)	$0	$0	$0	$0
Capacity Bidding Program (CBP)	$864,683	$169,688	$964,286	$1,998,657
Base Interruptible Program (BIP)	$127,077	$12,727	$420,000	$559,804
Summer Saver Program	$0	$0	$0	$0
Residential Automated Controls Technology Program	$191,942	$334,275	$25,000	$551,217
Optional Binding Mandatory Curtailment (OBMC)	$0	$0	$0	$0
Scheduled Load Reduction Program (SLRP)	$0	$0	$0	$0
Sub-total: Programs	**$1,302,204**	**$525,174**	**$1,409,286**	**$3,236,664**
Technical Assistance and Technology Incentives				
Technical Assistance	$922,805	$0	$2,400,000	$3,322,805
Technology Incentives	$1,353,880	$0	$3,000,000	$4,353,880
Sub-total: TA and TI	**$2,276,684**	**$0**	**$5,400,000**	**$7,676,684**
Customer Education, Awareness & Outreach				
Customer Education, Awareness & Outreach	$1,800,754	$0	$0	$1,800,754
Flex Alert Network (FAN)	$626,943	$0	$0	$626,943
Demand Response - Emerging Technologies (DR-ET)	$700,774	$16,969	$0	$717,743
Sub-total: Customers Education, Awareness & Outreach	**$3,128,472**	**$16,969**	**$0**	**$3,145,441**
Permanent Load Shifting				
Gas A/C - Cypress	$49,992	$0	$0	$49,992
Refrigerated Zone Module - EPS	$49,992	$0	$0	$49,992
Sub-total: PLS	**$99,983**	**$0**	**$0**	**$99,983**
Additional Activities				
Measurement and Evaluation (M&E)	$1,167,100	$0	$0	$1,167,100
Codes and Standards	$200,000	$0	$0	$200,000
Sub-total: Additional Activities	**$1,367,100**	**$0**	**$0**	**$1,367,100**
Total: All Programs	**$8,174,443**	**$542,143**	**$6,809,286**	**$15,525,872**

Budget - 2010

	O&M	Capital	Incentives	Total
Programs				
Default Critical Peak Pricing (CPP-D)	$0	$0	$0	$0
Emergency Critical Peak Pricing (CPP-E)	$98,383	$8,484	$0	$106,867
Peak Time Rebate Program (PTR)	$0	$0	$0	$0
Capacity Bidding Program (CBP)	$861,593	$84,844	$1,285,710	$2,232,147
Base Interruptible Program (BIP)	$126,158	$8,484	$420,000	$554,642
Summer Saver	$0	$0	$0	$0
Residential Automated Controls Technology Program	$210,140	$334,275	$0	$544,415
Optional Binding Mandatory Curtailment (OBMC)	$0	$0	$0	$0
Scheduled Load Reduction Program (SLRP)	$0	$0	$0	$0
Sub-total: Programs	**$1,296,273**	**$436,087**	**$1,705,710**	**$3,438,070**
Technical Assistance and Technology Incentives				
Technical Assistance	$937,097	$0	$2,400,000	$3,337,097
Technology Incentives	$1,274,764	$0	$3,000,000	$4,274,764
Sub-total: TA and TI	**$2,211,862**	**$0**	**$5,400,000**	**$7,611,862**
Customer Education, Awareness & Outreach				
Customer Education, Awareness & Outreach	$2,009,733	$0	$0	$2,009,733
Flex Alert Network (FAN)	$417,962	$0	$0	$417,962
Demand Response - Emerging Technologies (DR-ET)	$703,906	$4,242	$0	$708,148
Sub-total: Customers Education, Awareness & Outreach	**$3,131,602**	**$4,242**	**$0**	**$3,135,844**
Permanent Load Shifting				
Gas A/C - Cypress	$51,394	$0	$0	$51,394
Refrigerated Zone Module - EPS	$51,394	$0	$0	$51,394
Sub-total: PLS	**$102,789**	**$0**	**$0**	**$102,789**
Additional Activities				
Measurement and Evaluation (M&E)	$1,585,166	$0	$0	$1,585,166
Codes and Standards	$200,000	$0	$0	$200,000
Sub-total: Additional Activities	**$1,785,166**	**$0**	**$0**	**$1,785,166**
Total: All Programs	**$8,527,691**	**$440,329**	**$7,105,710**	**$16,073,730**

Budget - 2011

	O&M	Capital	Incentives	Total
Programs				
Default Critical Peak Pricing (CPP-D)	$0	$0	$0	$0
Emergency Critical Peak Pricing (CPP-E)	$94,689	$0	$0	$94,689
Peak Time Rebate Program (PTR)	$0	$0	$0	$0
Capacity Bidding Program (CBP)	$851,179	$0	$1,750,000	$2,601,179
Base Interruptible Program (BIP)	$122,621	$0	$420,000	$542,621
Summer Saver	$0	$0	$0	$0
Residential Automated Controls Technology Program	$259,764	$334,275	$0	$594,039
Optional Binding Mandatory Curtailment (OBMC)	$0	$0	$0	$0
Scheduled Load Reduction Program (SLRP)	$0	$0	$0	$0
Sub-total: Programs	**$1,328,252**	**$334,275**	**$2,170,000**	**$3,832,527**
Technical Assistance and Technology Incentives				
Technical Assistance	$951,424	$0	$2,400,000	$3,351,424
Technology Incentives	$1,034,197	$0	$3,000,000	$4,034,197
Sub-total: TA and TI	**$1,985,620**	**$0**	**$5,400,000**	**$7,385,620**
Customer Education, Awareness & Outreach				
Customer Education, Awareness & Outreach	$2,218,722	$0	$0	$2,218,722
Flex Alert Network (FAN)	$208,981	$0	$0	$208,981
Demand Response - Emerging Technologies (DR-ET)	$712,362	$4,242	$0	$716,604
Sub-total: Customers Education, Awareness & Outreach	**$3,140,065**	**$4,242**	**$0**	**$3,144,307**
Permanent Load Shifting				
Gas A/C - Cypress	$52,799	$0	$0	$52,799
Refrigerated Zone Module - EPS	$52,799	$0	$0	$52,799
Sub-total: PLS	**$105,599**	**$0**	**$0**	**$105,599**
Additional Activities				
Measurement and Evaluation (M&E)	$1,352,559	$0	$0	$1,352,559
Codes and Standards	$200,000	$0	$0	$200,000
Sub-total: Additional Activities	**$1,552,559**	**$0**	**$0**	**$1,552,559**
Total: All Programs	**$8,112,095**	**$338,517**	**$7,570,000**	**$16,020,612**