

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 20A-___E

**IN THE MATTER OF THE VERIFIED APPLICATION OF BLACK
HILLS COLORADO ELECTRIC, LLC FOR APPROVAL OF ITS TRANSPORTATION
ELECTRIFICATION PLAN, READY EV, FOR PROGRAM YEARS 2021 – 2023 AND
FOR RELATED TARIFF APPROVALS.**

DIRECT TESTIMONY OF

THERESA I. DONNELLY

ON BEHALF OF

BLACK HILLS COLORADO ELECTRIC, LLC

May 8, 2020

SUMMARY OF THE DIRECT TESTIMONY OF THERESA M. DONNELLY

Ms. Theresa M. Donnelly is employed by Black Hills Service Company, as Senior Communications Program Manager. Ms. Donnelly describes Black Hills' Communication Strategy to provide information and education about Ready EV, describes the process to measure communication effectiveness, and she details an associated budget.

Ms. Donnelly testifies an effective Communication Strategy is necessary to address common consumer questions and concerns about EVs and to avoid potential customer confusion about Ready EV programs. She states customers need accurate and succinct information on EV infrastructure programs, rate options, and rebate programs as they make transportation decisions for their homes or businesses. Ms. Donnelly's testimony sets out a Communication Strategy that is designed to achieve the following primary objectives: increase awareness, promote informed decisions, promote transportation electrification, ensure simplicity, promote cost effective solutions, and ensure continuous improvement.

Ms. Donnelly addresses the many communication channels the Company will use to spread awareness of EVs and Ready EV programs. She also explains how the Communication Strategy will have customer specific engagement where the Company will provide both general information and educational materials to all customers, as well as more customer-specific information concerning individual program elements.

Ms. Donnelly testifies that Company will assess the effectiveness of the Communication Strategy as it is implemented through a combination of quantitative and programmatic measures. Yearly research will be used to gain a baseline measure of market awareness and understanding of EVs and the Ready EV programs through customer survey results and response rates, which will be conducted on a yearly basis.

Ms. Donnelly explains that the three-year Communication Strategy budget is a total of \$370,000. This budget reflects the use of internal resources and personnel for much of the Communication Strategy and external resources where the Company does not have adequate in-house expertise or available personnel.

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

AQCC	Air Quality Control Commission
AMI	Advanced Metering Infrastructure
AEG	Applied Economics Group
BHC	Black Hills Corporation
BHSC	Black Hills Service Company, LLC
BHEAP	Black Hills Energy Assistance Program
Black Hills or Company	Black Hills Colorado Electric, LLC
CIS+	Customer Information System Plus
CCOSS	Class Cost of Service Study
Communication Strategy	Customer Communication and Education Strategy
DCFC	Direct Current Fast Chargers
DSMCA	Demand Side Management Cost Adjustment
EV	Electric Vehicle
EV rates	newly proposed EV rates for charging
EVSE	Electric Vehicle Supply Equipment
FERC	Federal Energy Regulatory Commission
GHG	Greenhouse gas
IRS	Internal Revenue Service
kW	Kilowatt
LEAP	Low-Income Energy Assistance Program
LGS-S	Large General Service – Secondary
LGS-SEV	Large General Service Secondary EV rate schedule
LPS	Large Power Service
MDMS or MDM	Meter Data Management System
mTRC	Modified Total Resource Cost Test
NEBs	Non-Energy Benefits
NOPR	Notice of Proposed Rulemaking
PCT	Participant Cost Test
PIM	Performance Incentive Mechanism
PUC or Commission	Colorado Public Utilities Commission
PSCo	Public Service Company of Colorado
Ready EV or Ready EV Plan	Company’s first Transportation Electrification Plan
Ready EV programs	design elements of the Ready EV Plan
RIM	Rate Payer Impact Measure
RS-EV	Residential EV rate schedule
RS-1	Residential service rate schedule
SCADA	Supervisory Control and Data Acquisition
SGS-N or SGS-D	Small General Service
SGS-EV	Small General Service EV rate schedule
TEP	Transportation Electric Plan
TOD rates	time-of-day rates
WACC	weighted average cost of capital
ZEV	zero emission vehicle

DIRECT TESTIMONY OF THERESA I. DONNELLY

I. INTRODUCTION AND BACKGROUND

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Theresa I. Donnelly. My business address is 1515 Arapahoe Road, Tower 1, Suite 1200, Denver, CO 80202.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by Black Hills Service Company (“BHSC”). My position is Senior Communications Program Manager.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am testifying on behalf of Black Hills Colorado Electric, LLC (“Black Hills” or “Company”).

II. STATEMENT OF QUALIFICATIONS

Q. WHAT ARE YOUR DUTIES AND RESPONSIBILITIES IN YOUR CURRENT POSITION?

A. I am responsible for managing communications for all three of Black Hills Corporation’s electric utilities in Colorado, South Dakota and Wyoming, including transmission and distribution, renewable energy, and business development. I am also responsible for supporting Black Hills Corporation’s investor relations function.

Q. PLEASE OUTLINE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

1 A. A summary of my education, employment history and experience is provided in
2 Appendix A.

3 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

4 A. Yes.
5

6 **III. PURPOSE OF TESTIMONY**

7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8 A. The purpose of my testimony is to describe Black Hills' Customer Communication and
9 Education Strategy ("Communication Strategy") to provide information and education
10 about its Transportation Electrification Plan ("Ready EV" or "Ready EV Plan") to our
11 customers, measuring the effectiveness of the Communication Strategy, and the
12 associated budget.

13 **Q. ARE YOU SPONSORING ANY ATTACHMENTS?**

14 A. No.
15

16 **IV. CUSTOMER COMMUNICATION AND EDUCATION STRATEGY**

17 **A. *OVERVIEW***

18 **Q. PLEASE BROADLY DESCRIBE THE NEED FOR AN EFFECTIVE**
19 **COMMUNICATION STRATEGY TO ENSURE THE SUCCESS OF READY**
20 **EV.**

21 A. Customers need clear, accurate, and relevant information from Black Hills to help them
22 understand the Ready EV electric rates and program options available to them. Ready
23 EV is a brand-new offering for customers, and it is thus important that we provide them

1 with reliable information so that they can make informed decisions tailored to their
2 needs. An effective Communication Strategy is also necessary to address common
3 consumer questions and concerns about electric vehicles (“EVs”), and to avoid potential
4 customer confusion about Ready EV programs. EV technologies are new and are
5 causing transformational change throughout the transportation system. Customers are
6 now being presented with multiple options when making transportation decisions.
7 Customers need accurate and succinct information from the Company on its EV
8 infrastructure programs, rate options, and rebate programs as they make transportation
9 decisions for their homes or businesses.

10 In addition, as discussed in the Direct Testimony of Michael J. Harrington, the
11 Communication Strategy is discussed as an element of Transportation Electrification
12 Plans in statute.

13 **Q. ARE BLACK HILLS’ CUSTOMERS CURRENTLY INFORMED ON**
14 **ELECTRIC VEHICLES?**

15 A. Generally, EV ownership is low in our service territory and EV charging options are
16 limited, as described by Company witness Mr. Aaron Carr. With this limited experience
17 with EVs and EV infrastructure, our customers may have low levels of awareness about
18 EV options and availability, EV charging types, public benefits of EVs, and the total
19 cost of EV ownership and use. Our Communications Strategy will leverage multi-
20 channel communication strategies informed by industry best-practices to increase
21 overall customer awareness of electric vehicles and Ready EV programs.

1 **Q. DID THE COMPANY REVIEW OTHER UTILITIES' COMMUNICATION OR**
2 **EDUCATION STRATEGIES WHEN DESIGNING ITS COMMUNICATION**
3 **STRATEGY?**

4 A. Yes. The Company reviewed external marketing collateral from utilities such as
5 Hawaiian Electric, Southern California Edison, and Sacramento Municipal Utility
6 District. The Company also leveraged the expertise of an EV program marketing
7 consultant, S Curve Strategies, to assist in the development of an EV education strategy.
8 The consultant provided insights into the EV education programs at other utilities
9 including San Diego Gas & Electric and Pacific Power. The Company is not seeking
10 cost recovery of expenses incurred in using S Curve Strategies to help inform the
11 Communication Strategy.

12 **Q. WHAT IS THE COMPANY'S OVERALL APPROACH IN DESIGNING AND**
13 **ROLLING OUT THE COMMUNICATION STRATEGY?**

14 A. The Company's approach is to leverage its existing relationship with its customers to
15 support the widespread adoption of EVs. The Company will use multiple
16 communication channels to increase customer awareness of Ready EV and its benefits.
17 The Company will seek to become a trusted and reliable source of information on EV
18 options and benefits. Over time, the Company will be able to evaluate the effectiveness
19 of its Communication Strategy and adapt it as needed to ensure positive results.

20 **Q. HOW WILL THE COMPANY SEEK TO ENSURE THAT CUSTOMERS WILL**
21 **HAVE A SATISFACTORY EXPERIENCE?**

22 A. From a communications standpoint, the Company will deploy an integrated customer
23 communication and education strategy to inform, educate, and engage customers on

1 Ready EV. The Company will provide easy-to-understand and engaging
2 communications and educational materials related to electric vehicle technologies and
3 options, rebate options, and rate options. The Company will also tailor messages to
4 specific customer segments eligible for Ready EV programs: residential, governmental,
5 commercial, and low-income customers. The Company's goal is to provide and
6 demonstrate helpfulness to participating customers.

7
8 ***B. COMMUNICATION STRATEGY***

9 **Q. PLEASE DESCRIBE THE COMMUNICATION STRATEGY GOALS FOR**
10 **READY EV.**

11 A. The Communication Strategy is designed to achieve the following primary objectives:
12 1. Awareness: Build general customer awareness of Ready EV through multiple
13 and convenient methods of communication.
14 2. Informed Decisions: Educate customers on Ready EV program details, allowing
15 customers to assess the pros and cons associated with their transportation options.
16 3. Promote Transportation Electrification: Ensure customers learn of the benefits
17 of transportation electrification and of the offerings of Ready EV, assisting in the
18 widespread electrification of the transportation sector.
19 4. Simplicity: Provide messaging and content that is clear and understandable,
20 including for the Company's bilingual customers.
21 5. Cost Effective: Rely primarily on internal Company resources to ensure that
22 Communication Strategy costs are prudent and reasonable.

1 6. Continuous Improvement: Evaluate on an ongoing basis the Communication
2 Strategy to make it adaptive and responsive to customers' needs and interests.

3 **Q. WHEN IS THE COMPANY GOING TO BEGIN ITS COMMUNICATION**
4 **STRATEGY?**

5 A. Initial communications were implemented beginning in January 2020 to all of Black
6 Hills Corporation's electric customers through website content and social media.
7 Specific communication efforts that are tailored for customers in Colorado are expected
8 to generally begin after the filing of the Ready EV Plan, where the Company will build
9 momentum towards the first EV Ready Plan year of 2021, which will kick-off the major
10 elements of the Communication Strategy.

11 **Q. WHAT ARE THE MESSAGING THEMES THE COMPANY WILL**
12 **COMMUNICATE TO CUSTOMERS?**

13 A. Customers should understand how Ready EV works, program options and applicable
14 charger rebates that are available to them, technology options available to them, how
15 they can maximize new rate options by shifting load to off-peak times, and the benefits
16 of EVs to the general community. Messaging will include, at a minimum, the following
17 themes:

- 18 • Owning and driving an electric vehicle provides financial, environmental, and
19 societal benefits.
- 20 • Black Hills can address common consumer questions and concerns such as
21 electric vehicle range anxiety, vehicle cost, local vehicle inventory, etc.
- 22 • The Ready EV rebate application process is simple and convenient.

- 1 • EV time-of-day rates (“TOD Rates”) give customers more control over their
2 electric bill and offers opportunities to save money by shifting energy use away
3 from peak hours.
 - 4 ○ When a customer uses electricity is just as important as the amount used
 - 5 - the price charged per kilowatt-hour depends on the time of day
 - 6 electricity is used.
 - 7 ○ Energy rates are higher during the late afternoon, especially in the
 - 8 summer, when heavy air-conditioning use causes spikes in electricity
 - 9 consumption.
- 10 • Black Hills is a helpful partner to customers and a trusted source of information.
- 11 • Reducing peak energy use will benefit not just individual customers but the
12 whole Southern Colorado community because it could lessen Black Hills’ need
13 to build new power plants in the future and purchase power at peak market
14 prices.

15 **Q. WHAT COMMUNICATION CHANNELS WILL THE COMPANY USE TO**
16 **SUPPORT READY EV?**

17 A. The development and administration of the Customer Communications and Education
18 Strategy will include multiple communication channels and tactics. Examples of these
19 channels and tactics include the items discussed below.

- 20 ▪ Customer-facing website that leverages the existing Ready EV web page with the
21 expansion of content to include:
 - 22 ○ Rebate information and online application forms
 - 23 ○ TOD frequently asked questions, simple graphics, and helpful tips on saving
 - 24 energy and money
 - 25 ○ Low-income rebate program details
 - 26 ○ Downloadable bilingual program information and rebate forms

- Ready EV branded videos to build interest and excitement in EVs and Ready EV programs
- Educational videos to help customers learn and understand available rate options, including time-of-day rates
- Social media campaign that leverages integrated digital channels to inform, educate, and engage customers about Ready EV rebate programs and rate options and drive customers to the Ready EV website. The social media campaign will incorporate heavy use of Ready EV branded video segments to engage customers and build widespread awareness of EVs and Ready EV programs. Digital channels include:
 - Facebook
 - Instagram
 - LinkedIn
 - Twitter
- Email marketing that provides helpful information to Ready EV customers about TOD rates and money saving tips through targeted content. Emails will include links to program content resources through techniques that drive traffic to web and social media channels.
- Media relations that build broad consumer awareness about EVs and the Ready EV programs using best practices in media relations, including:
 - Ongoing reporter briefings
 - Local news releases
 - Op-eds
- Print campaigns that build awareness about Ready EV and the benefits of EVs through:
 - Residential bill inserts (annual)
 - Direct mail (post card mailings and “welcome” letters customized by customer segment)
- Customer call center will serve as a trusted source of information about Ready EV program options and TOD rates. The Company will develop Ready EV program content to inform call center agents about the rebate application process, TOD rate options, and about general information available to customers on the Company’s website.
- Engagement with trade allies to encourage the wide spread adoption of EVs, including with ride and car share companies, builders, and auto dealerships. Trade allies also include the Company’s qualified vendors that will provide Electric Vehicle Supply Equipment that is available for Ready EV rebates. The Company will partner and work with its qualified vendors to ensure customers are educated on a consistent basis on Ready EV programs.

- 1 ▪ Participation at trade shows and customer events where opportunities exist for the
- 2 Company to educate large amounts of customers about Ready EV.

3

4 **Q. OUT OF THE COMMUNICATION CHANNELS DESCRIBED, DOES THE**

5 **COMPANY HAVE ANY EXAMPLES OF MATERIALS THAT COULD BE**

6 **USED TO SUPPORT READY EV?**

7 A. Yes. Regarding website materials, the Company has already developed

8 www.blackhillsenergy.com/EV as a dedicated resource to feature content relating to

9 Ready EV programs. The web content includes information on the benefits of owning

10 and driving electric vehicles, including affordability, maintenance and fuel savings,

11 convenience, and environmental impacts. The website also offers customers detailed

12 information on how to apply for residential and commercial EV charger rebates. This

13 information is generalized for all of Black Hills Energy's electric customers. However,

14 going forward, as the Company's Ready EV Plan is approved by the Commission, the

15 Company will update the website accordingly with information specific to Colorado on

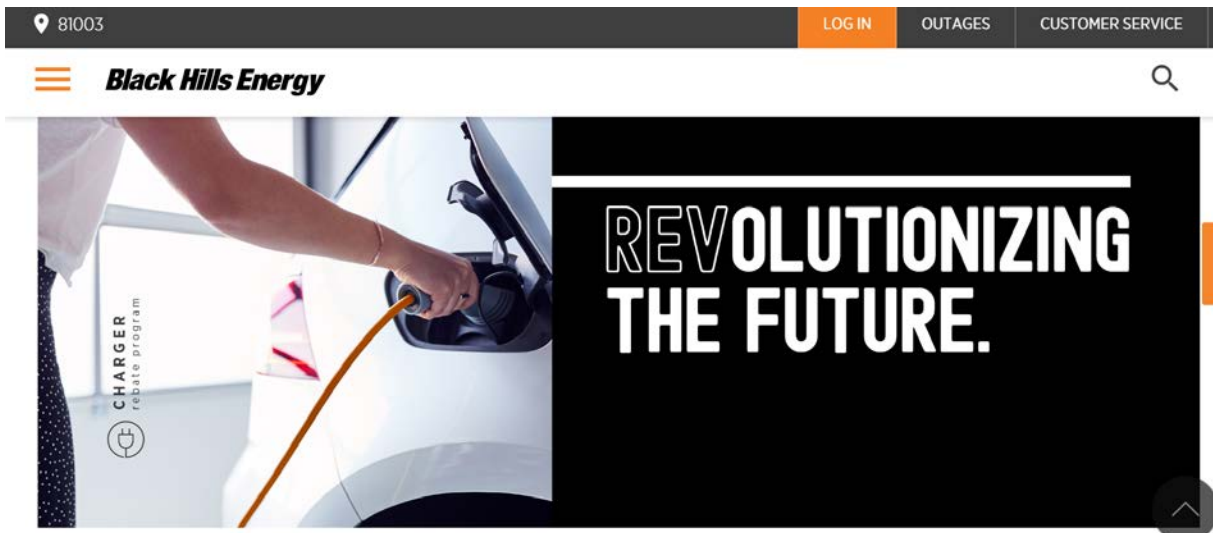
16 the new or changed program offerings including information on the new time-of-day

17 rate offerings.

18 Below, in Figure TID-1, is the Company's Ready EV website, provided as a

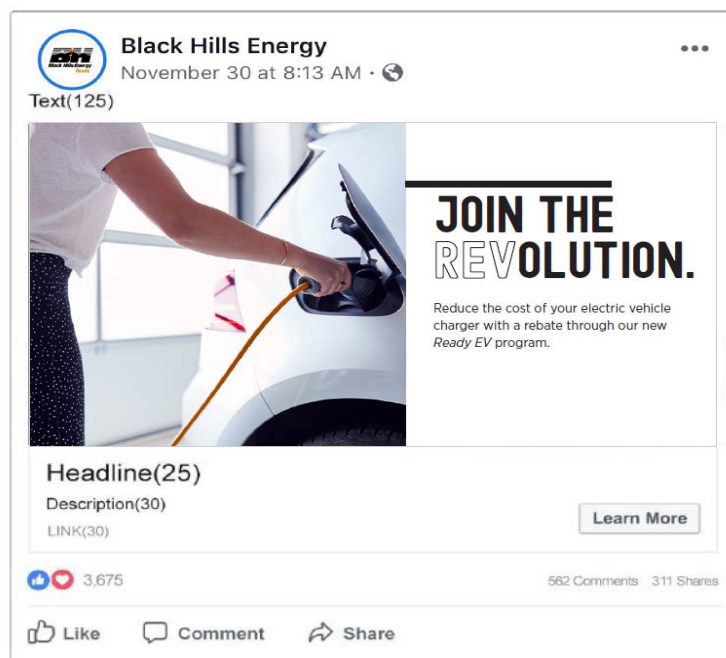
19 screenshot.

Figure TID-1: Ready EV Website



In addition, regarding social media, the Company presents the following illustrative example in Figure TID-2 that is designed for Facebook to illustrate types of marketing materials that will be used to support Ready EV.

Figure TID-2: Facebook



1 An example of our print materials is provided in Figures TID-3 and 4, showing
2 for illustrative purposes a bill insert (front and back) and a mock-up of a customer
3 postcard handout, respectively.

4 **Figure TID-3: Bill Insert**

5 **(Front of bill insert)**



1

(Back of bill insert)

INTRODUCING *READY EV.*

With more than 40 different types of electric vehicles (EVs) on the market, they're becoming more popular than ever. Best of all, battery ranges have increased while the cost of the vehicles has been steadily decreasing.

At Black Hills Energy, we're excited to support the EV revolution with the launch of our new rebate program, *Ready EV*. This program is dedicated to reducing the cost of EV chargers for both our residential and commercial electric customers.

Is an EV in your future? Here are a few of the benefits to going electric.



Affordability

EVs are becoming more affordable thanks to federal tax incentives and a growing vehicle inventory.



Maintenance and fuel savings

It's cheaper to charge the battery than to fill up the gas tank. With fewer tune-ups and no oil changes, vehicle maintenance costs less, too.



Convenience

With an EV, you'll save time by eliminating trips to the gas station. Instead, charge your EV at home while you sleep, or at a public charging station while you work or run errands.



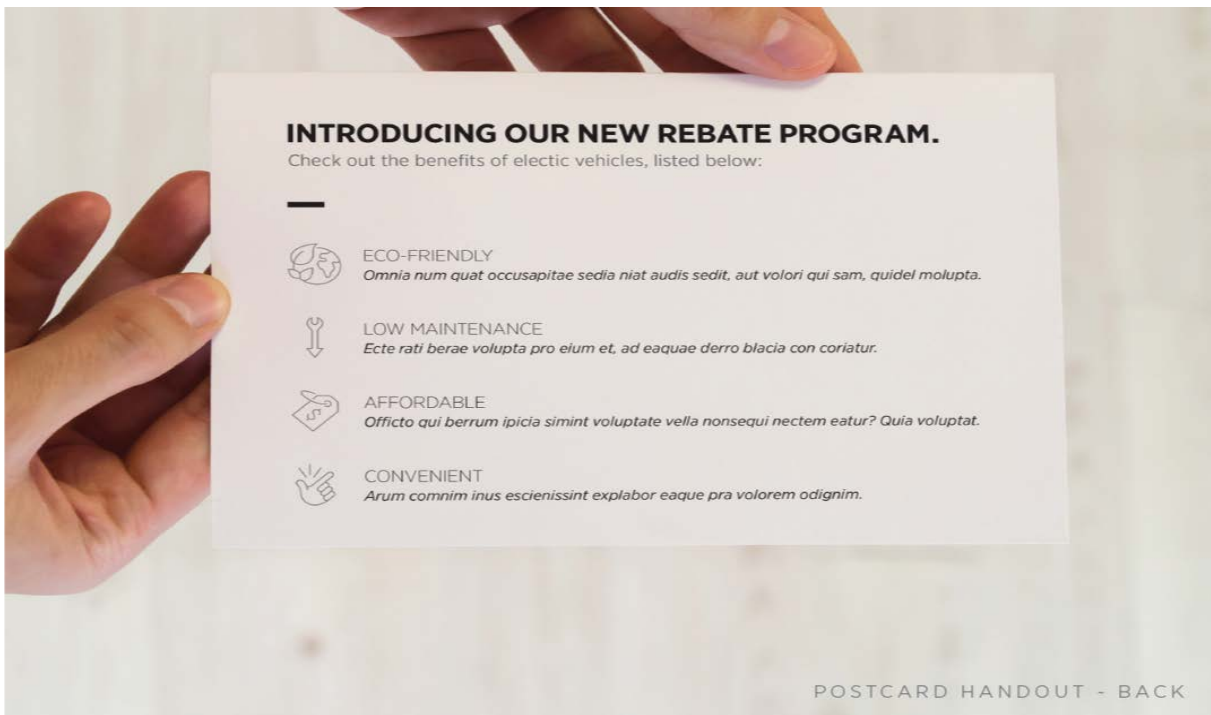
Help the environment

When considering both direct and life-cycle emissions, EVs outperform conventional vehicles.

Buying any vehicle is a big decision, and making the switch to electric adds even more to consider. If you have any EV questions or want to learn more about our charger rebates, visit blackhillsenergy.com/EV.

2

Figure TID-4: Customer Postcard



Q. PLEASE PROVIDE ADDITIONAL DETAIL ON THE COMPANY'S PROPOSED USE OF THE CUSTOMER CALL CENTER TO BENEFIT READY EV?

A. In our mailers and emails, the Company will ensure our toll-free call center number is highly visible so customers can be easily directed to a representative who can address their specific questions regarding Ready EV. The Company will develop content (messages and talking points) and training to inform these call center agents about Ready EV programs, as well as how the agents can compare a customer's existing rate with the new time-of-day rate at any given month. The Company's call center will have Spanish speaking capabilities, serving our bilingual customer needs.

1 **Q. HOW WILL THE COMPANY USE DIGITAL AND SOCIAL MEDIA**
2 **ADVERTISING METHODS TO SUPPORT WIDESPREAD AWARENESS OF**
3 **EVS AND READY EV PROGRAMS?**

4 A. The Company will use cost-effective, search-based ads, display advertising and search
5 engine optimization methods (“SEO”) to drive traffic to the Ready EV website and
6 increase engagement on its social media channels.

7 **Q. MOVING PAST THE COMMUNICATION CHANNELS, HOW WILL THE**
8 **COMPANY INFORM CUSTOMERS REGARDING THE NEW TIME-OF-DAY**
9 **RATES FOR EV CHARGING?**

10 A. EV drivers have the potential to see significant benefits from the Company’s new TOD
11 rates. The Company will highlight these benefits across each of our communication
12 channels. Communications will be developed to describe the TOD rates in simple and
13 easily understandable methods. Primary materials will include, but not be limited to, a
14 customer TOD overview document; frequently asked questions; simple graphs to
15 illustrate TOD rates, seasons, and time periods; and short educational video programs
16 to explain how TOD rates work. In addition, the Company will develop supplementary
17 communications materials that provide helpful information and tips about how bill
18 savings can be achieved through load-shifting; and how reducing consumption during
19 peak hours provides benefits to all customers. Depending on customer preference, the
20 Company will provide this information in English and Spanish.

21 **Q. WHAT IS THE SIGNIFICANCE OF THE OPT-IN NATURE OF THE NEW EV**
22 **RATES FOR PURPOSES OF CUSTOMER COMMUNICATIONS?**

1 A. The Company's new time-of-day rates for EV charging are significant from a
2 communications standpoint. The TOD rates are of an opt-in nature, allowing customers
3 to decide whether these rates best serve their interests. From a communication
4 standpoint, the Company will have the opportunity to educate its customers that they
5 have additional rate options available to them concerning the charging of their EVs. It
6 will be important for the Company to ensure that its customers are educated on their rate
7 options and the conditions of the Company's rebate programs, so they can make the
8 most informed decision when choosing their rate for EV charging.

9
10 **C. CUSTOMER SPECIFIC ENGAGEMENT**

11 **Q. WILL THE COMPANY ENGAGE IN COMMUNICATION AND MESSAGING**
12 **ACTIVITIES TO SPECIFIC CUSTOMERS BASED ON VARIOUS**
13 **PROGRAMS AVAILABLE TO DIFFERENT CUSTOMERS?**

14 A. Yes. The Company intends to both provide general information and educational
15 materials to all customers, as well as more customer-specific information concerning
16 individual program elements. The Company will customize its communications and
17 messaging activities according to the following segments and associated rebate
18 programs:

- 19 • Residential customers
- 20 ○ General interest customers
- 21 ○ New EV owners
- 22 ○ Existing EV owners

- 1 • Low-income residential customers
- 2 ○ General interest customers
- 3 ○ New EV owners
- 4 ○ Existing EV owners
- 5 ○ Multi-dwelling residents
- 6 • Business/commercial customers
- 7 ○ General interest customers
- 8 ○ Government and non-profit organizations
- 9 ○ Public and workplace charging rebate program
- 10 ○ DC fast-charging rebate program

11 **Q. HOW WILL THE COMPANY ENGAGE WITH RESIDENTIAL**
12 **CUSTOMERS?**

13 A. The residential class will require the most education on Ready EV programs, as the new
14 Residential EV rate is a whole-house rate. This means that residential customers opting
15 in will change to a time-of-day rate structure for all of their energy load. The whole-
16 house nature of the Residential EV rate extends beyond just EV charging, so residential
17 customers must be educated that a switch to this new rate option will involve an entirely
18 new rate structure. Residential customers need to be made aware that TOD rates will
19 give them the opportunity for bill decreases though the shifting of their energy demand
20 to off-peak hours.

21 For these reasons, the Company will engage with residential customers through
22 comprehensive communications and educational messages that build awareness about
23 rate structure and explain the differences between the current inclining block rate

1 structure and the TOD rate structure. The Company will thus not only inform residential
2 customers of their expanded rate option of the Residential EV rate, but also seek to
3 provide them with information whether the Residential EV rate option may allow them
4 to receive bill savings. Methods will include information contained from the customer
5 call center, the Company's website, and our other communication materials.

6 Residential customers will also need communication and education on the
7 Company's rebate offering for the purchase and installation of EV chargers, how those
8 rebates can be obtained, and what documentation and requirements are associated with
9 receipt of the rebates. Company witness Mr. P. Grant Gervais discusses the detail of
10 the requirements to obtain a rebate. From a communications standpoint, it is necessary
11 that the Company provide easy to understand information through transparent means of
12 the terms and conditions associated with receipt of the rebates.

13 **Q. HOW WILL THE COMPANY ENGAGE WITH COMMERCIAL AND**
14 **GOVERNMENTAL CUSTOMERS?**

15 A. The Company will engage with commercial and governmental customers using best
16 practices in "business to business" communications. Notably, the Company will create
17 communications specific to the commercial and governmental customer segments to
18 address essential information about the various EV chargers, Ready EV rebate
19 programs, rates, and technical requirements. The communications will include website
20 content, frequently asked questions, email communications, and follow-up
21 correspondence from Black Hills personnel to address account-specific questions. The
22 Company will also work with the qualified vendors eligible for Company rebates to
23 educate and inform commercial and governmental customers.

1 **Q. HOW WILL THE COMPANY ENGAGE WITH LOW-INCOME**
2 **CUSTOMERS?**

3 A. It is very important for Black Hills to focus on reaching and educating low-income
4 customers about program options under Ready EV. Significant communication efforts
5 will be necessary to reach this customer market. The Company will communicate to
6 this customer group that the Company has specialized rebate offerings for low-income
7 customers, where such rebates are designed to cover all or nearly all of the costs of
8 purchasing and installing EV chargers. In addition, the Company will provide
9 information to low-income customers about the ability for the installation of EV
10 chargers at multi-unit dwellings, as the Company has a rebate option available for multi-
11 unit dwellings. In addition, as new low-income customer programs are created, the
12 Company will continue to incorporate those offerings into its communication and
13 education efforts.

14 **Q. HOW WILL THE COMPANY ADDRESS PUBLIC TRANSPORT AND FLEET**
15 **NEEDS?**

16 A. As described by Mr. Aaron Carr, the Company is proposing to work with stakeholders
17 to design pilot(s) to address EV Ready programs for public transport and fleet. As those
18 pilots are designed and launched, the communications team will work collaboratively
19 to ensure that new messaging materials are created to reflect new pilot programs and
20 opportunities.

21 **Q. WILL THE COMPANY HAVE COMMUNICATION MATERIALS FOR**
22 **SPANISH SPEAKERS?**

1 A. Yes. As I have described, the Company will provide materials for Spanish language
2 preference speakers. An example includes a downloadable information sheet and FAQ
3 posted on the Ready EV website. In addition, the Company will incorporate bilingual
4 information on its direct mail and bill inserts, directing Spanish speakers to information
5 and resources on the website. The Company will also produce educational videos about
6 the time-of-day rates in English and Spanish.

7
8 ***D. MEASURING EFFECTIVENESS***

9 **Q. HOW IS THE COMPANY GOING TO MEASURE THE EFFECTIVENESS OF**
10 **ITS COMMUNICATION STRATEGY?**

11 A. The Company will use a combination of quantitative and programmatic measures to
12 assess the effectiveness of the Communication Strategy. Research will be utilized to
13 gain a baseline measure of market awareness and understanding of EVs and the Ready
14 EV programs. Once the Ready EV programs deploy, yearly research (for three years)
15 will be conducted to continue to measure awareness and growth of knowledge about
16 EVs and the Ready EV programs. The Company will establish metrics through a
17 combination of quantitative and programmatic measures including:

- 18 ▪ Customer survey results and response rates (establish baseline in Year 1). The
19 baseline survey will be designed to measure information such as the following:
20 • Overall awareness and understanding of EVs for customers
21 • Customers' desire for owning an EV
22 • Awareness of the Ready EV programs
23
24 ▪ Follow-up surveys in Years 2 and 3 will measure growth from the baseline and also
25 measure awareness of the communications and education strategy.

1 In addition, the Company will rely on program analytics to further assess the
2 effectiveness of the Communication Strategy. This will include social media tracking,
3 website tracking and analytics, email tracking and call center analytics.

4 **Q. HOW WILL THE COMPANY CONDUCT THE QUANTITATIVE AND**
5 **PROGRAMMATIC ANALYSES?**

6 A. The Company will use annual online surveys and a consultant (described below) to
7 measure overall awareness and understanding of EVs for customers, customers' desire
8 for owning an EV, and awareness of Ready EV programs. The Company will utilize
9 programmatic measures to analyze how customers engage and respond to our direct
10 mail, emails, website, and call center. These analytics will reveal, for example, how
11 many page views our EV Ready website gets and what links are clicked; social media
12 engagement; what types of email were opened and read; and how many participating
13 customers called the call center. The programmatic measures and analyses will be
14 directed and managed by internal Company resources.

15 **Q. HOW WILL THE ANALYSES HELP THE COMPANY ASSESS THE**
16 **EFFECTIVENESS OF ALTERNATIVE COMMUNICATION STRATEGIES?**

17 A. The Company will assess customer preferences and reaction to communications
18 methods to determine the types of messages and resources most likely to be read,
19 viewed, responded to, and understood. In an adaptive process, the Company will
20 continually refine its Communication Strategy to incorporate lessons learned through
21 customer engagement.

E. COMMUNICATION STRATEGY BUDGET

Q. IS THE COMPANY GOING TO BE IMPLEMENTING THE COMMUNICATION STRATEGY USING INTERNAL OR EXTERNAL RESOURCES?

A. Both. The Company will be using internal resources and personnel for much of the Communication Strategy and external resources where the Company does not have adequate in-house expertise or available personnel.

Q. WHAT ACTIONS WILL THE COMPANY'S IN-HOUSE RESOURCES BE PERFORMING?

A. The Company will direct the communications campaign planning and strategy, including the development of all content (web, social media, email, media relations, print, graphic design), and the overall execution of the campaign. In addition, internal resources will manage all elements of the production, deployment and analyses of the social media and digital advertising programs and SEO tactics. Internal resources will further manage all elements of the programmatic analyses to evaluate the effectiveness of the Communication Strategy.

While the Company will be leading the overall Communication Strategy and developing and implementing the majority of the campaign tactics, there are areas that require outside expertise.

Q. PLEASE DESCRIBE THE EXPERT SERVICES THAT WILL BE PROVIDED BY EXTERNAL RESOURCES.

A. The Company will engage expert services from a public relations agency, an advertising agency, a video production firm, and a mailing services firm. Concerning the public

1 relations agency, it will support the communications campaign planning and strategy,
2 customer messaging development, and provide content development services to include
3 Spanish translation services. The public relations agency will also support the planning
4 and execution of customer education events and dealer events.

5 For the advertising agency, it will assist in the planning of the market research
6 strategy (to include survey design, execution and analysis).

7 The Company will engage with an external video production firm to develop
8 Ready EV branded videos and educational videos.

9 The Company will engage with an external mailing services firm to support the
10 direct mail components of the Communication Strategy. This will include printing
11 services and mailing services.

12 **Q. PLEASE PROVIDE THE COMPANY'S ESTIMATED BUDGET, BROKEN**
13 **DOWN BY CATEGORY, FOR EXTERNAL RESOURCES.**

14 A. The estimated budget is as follows.

Figure TID-5: Estimated Budget

COE Ready EV Budget			
Plan Component	Year 1	Year 2	Year 3
External Agency Support			
Public Relations	\$25,000	\$15,000	\$10,000
Advertising/Research	\$25,000	\$25,000	\$10,000
Outside Services			
Video Production	\$50,000	\$20,000	\$0
Direct Mail	\$10,000	\$10,000	\$10,000
Digital/Social Media Advertising	\$40,000	\$35,000	\$30,000
Display advertising			
Search (SEO)			
Events			
Community Events	\$15,000	\$15,000	\$10,000
Dealer Events	\$5,000	\$5,000	\$5,000
Total: \$370,000	\$170,000	\$125,000	\$75,000

The estimated budget identified above does not include internal costs associated with the Communication Strategy. Accordingly, these costs are the incremental costs associated with the use of outside resources to execute the Communication Strategy.

Q. IS BLACK HILLS' COMMUNICATION STRATEGY BUDGET OF \$370,000 REASONABLE?

A. Yes. The Company is tasked with undertaking activities to support the widespread electrification of the transportation sector, including through customer education and outreach programs that increase awareness of programs and benefits and encourage greater adoption of electric vehicles. The Company believes that its proposed Communication Strategy is designed to achieve these objectives, at a reasonable cost. The heavy reliance on internal resources and labor ensure the Company is using outside resources and engaging in expenditures where necessary and prudent to advance the objectives of the Communication Strategy.

1 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

2 **A. Yes.**

Appendix A

Statement of Qualifications

Theresa I. Donnelly

Ms. Donnelly graduated from the University of Colorado with a Bachelor of Science degree in Journalism and from Regis University with a Master's degree in Nonprofit Management.

An experienced communications strategist, Ms. Donnelly worked at Xcel Energy from 2003 to 2015 where she held senior level positions in key corporate communications functions including internal communications, marketing communications, issues management and creative services. During her tenure at Xcel Energy, Ms. Donnelly also served as Chief of Staff to executive leadership, Manager of Public Policy, and Director of Corporate Recognition.

In 2015, Ms. Donnelly was employed by SourceGas, LLC, as Director of Corporate Communications. In that role she had overall responsibility for the company's internal and external communications, media relations, crisis communications and social media strategy.

Following Black Hills Energy's February 2016 acquisition of SourceGas, Ms. Donnelly assumed the role of Senior Manager Communications. In this position, Ms. Donnelly is responsible for managing communications for all three of Black Hills' electric utilities in Colorado, South Dakota and Wyoming, including transmission and distribution, renewable energy and business development. She is also responsible for supporting the company's Investor Relations function which includes the writing and production of the company's annual report to shareholders.

In addition to her utility experience, Ms. Donnelly served as a public relations and marketing advisor to mid-sized and small businesses in a variety of industries including consumer products, public policy and nonprofit marketing and development. Prior to this, Ms. Donnelly was

employed by Coors Brewing Company (Molson Coors) where she served as Corporate Communications Manager with responsibilities in media relations, marketing communications, and executive speech writing.

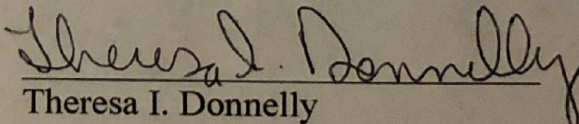
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO
PROCEEDING NO. 20A – E

IN THE MATTER OF THE VERIFIED APPLICATION OF BLACK HILLS COLORADO ELECTRIC, LLC FOR APPROVAL OF ITS TRANSPORTATION ELECTRIFICATION PLAN, READY EV, FOR PROGRAM YEARS 2021 – 2023 AND FOR RELATED TARIFF APPROVALS.

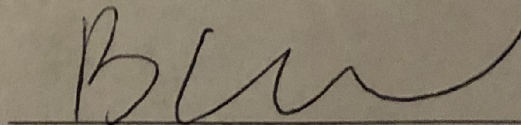
State of Colorado)	Affidavit Adopting
) SS.	Direct Testimony
City and County of Denver)	

Theresa I. Donnelly being duly sworn, states that she is the Theresa I. Donnelly whose Direct Testimony in the above-captioned proceeding accompany this Affidavit.

Theresa I. Donnelly further states that such Direct Testimony is a true and accurate statement of her answers to the questions contained therein, and that she does adopt those answers as her sworn Testimony in this proceeding.


Theresa I. Donnelly

On April 29, 2020, appeared Theresa I. Donnelly, not in my physical presence but rather appearing remotely by means of communication technology from 3854 Vrain Street Denver, CO 80212, known to me to be the person who executed the foregoing instrument, and acknowledged that he executed the same as his free act, and deed.


Notary Public

My Commission Expires: August 24, 2020

