

Environmental and Social Justice Action Plan Report 2025

November 28, 2025



A digital copy of this report can be found at:

Environmental and Social Justice Action Plan

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A Message from the Executive Director



Dear Employees, Stakeholders, and Partners,

I am proud to present the California Public Utilities Commission's (CPUC) Environmental and Social Justice (ESJ) Action Plan Version 2.0 Annual Report, the roadmap that many of us took together to ensure that equity, environmental sustainability, and social justice are integral to all aspects of the CPUC's work.

The ESJ Action Plan represents the CPUC's commitment to embedding the principles of ESJ across the agency's regulatory responsibilities. First adopted in February 2019, Version 1.0 of the Action Plan established a foundational framework with nine overarching goals, specific

objectives, and 95 actionable items. These initiatives fostered agency-wide collaboration, strengthened accountability, and created meaningful forward momentum toward inclusive and equitable policymaking.

Since then, the CPUC has made significant strides in integrating ESJ principles into its internal operations, decision-making processes, and external engagements. We cultivated a culture that meaningfully acknowledges the lived experiences of ESJ communities, guided by their feedback, and grounded in a commitment to equity. To achieve this, we established an internal implementation structure consisting of a Core Team and ESJ Liaisons from each division, ensuring these principles were deeply embedded in our day-to-day work.

In 2022, Version 2.0 of the ESJ Action Plan was updated to strengthen language and prioritize workforce development. Today, I am delighted to report that the insights we gained over the years through sustained engagement with community members, advocates, and stakeholders, reaffirmed our responsibility to all communities we serve.

Our mission at the CPUC is to regulate essential utility services to protect consumers, safeguard the environment, and ensure safe, reliable, and equitable access for all Californians. Since the 1990s, we have remained deeply committed to ESJ, consistently leveraging innovative strategies, tools, and resources to advance equity and deliver meaningful impact in ESJ and disadvantaged communities.

We are deeply grateful for the continued partnership and valuable feedback from our stakeholders. Together, we are shaping a more just, sustainable, and inclusive future for all Californians. By uplifting community-led solutions and empowering local voices, we are building collective strength to realize ESJ across the state.

I am incredibly proud of the dedication and collaboration that led to the successful implementation of 85 percent, equivalent to 80 of the 94 actions in the ESJ Action Plan Version 2.0. Most importantly, we collected many successful case studies that demonstrate achievements and are a testament to the commitment of our teams and partners that helped advance equity across policies, programs, services, initiatives, and much more.

Let us take a moment to celebrate this progress, and recommit to advancing meaningful change, equity, and lasting impact in the years ahead.

With Gratitude,

Rachel Peterson

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Executive Summary

The California Public Utilities Commission (CPUC) is committed to advancing inclusion, equity, and environmental and social justice (ESJ) across all its regulatory functions. In support of this commitment, the CPUC adopted the ESJ Action Plan Version 2.0 in April 2022 to build upon its foundational equity work. This plan guided the CPUC's efforts to ensure that historically underserved and vulnerable communities have access to safe, reliable, clean, and affordable utility services.

The ESJ Action Plan 2.0 includes nine strategic goals and 94 action items designed to embed ESJ principles into core CPUC operations, proceedings, and decision-making. Developed in collaboration with community-based organizations (CBOs), sister state agencies, and the Disadvantaged Communities Advisory Group (DACAG), the plan emphasizes transparency, accountability, and cross-agency coordination.

Implementation and Performance

Led by the Executive Director, Executive Division Deputies in collaboration with the Center of Excellence on Diversity, Equity, Inclusion, Accessibility, and Belonging (DEIAB) and ESJ, and supported by a Core Team and ESJ division liaisons, the CPUC built a strong governance structure to implement and track the ESJ Action Plan.

As of June 2025, the CPUC institutionalized ESJ principles across the CPUC's daily operations, work, and communities it served. Here are some key achievements and highlights:

- 80 of 94 action items (85 percent) were completed.
- Seven of nine ESI goals have achieved over 75 percent completion.
- **Four** divisions fully completed their assigned action items.
- The remaining 14 action items are in progress or under reassessment, with several expected to continue as part of longer-term initiatives.

Key Accomplishments by Goal

- Goal 1: Consistently integrate equity and access considerations throughout CPUC proceedings and other efforts
 - Institutionalized ESJ guidance in regulatory proceedings, improved access to CPUC processes through public education, and expanded engagement with underrepresented communities through the <u>Equity and Access Grant Program.</u>
- Goal 2: Increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health
 - Increased consideration of impacts to ESJ communities across many initiatives, including distributed energy resources, energy efficiency, building decarbonization, and more. Co-designed with stakeholders the Concurrent Application System (CAS) to streamline low-income program enrollment and initiated

innovative pilots like the Percentage of Income Payment Plan (PIPP) to address arrears and prevent disconnections.

- Goal 3: Strive to improve access to high-quality water, communications, and transportation services for ESJ communities
 - Supported broadband deployment for Tribal communities, enhanced water affordability frameworks, and advanced communications access for incarcerated individuals through affordability caps.
- Goal 4: Increase climate resiliency in ESJ communities
 Implemented Climate Adaptation Vulnerability Assessments (CAVAs) and Community Engagement
 Plans (CEPs) across major utilities, and initiated workshops and metrics development to better center equity in resilience planning.
- Goal 5: Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process and benefit from CPUC programs
 - Developed multilingual outreach materials, expanded community engagement strategies, and launched planning councils to improve support for Access and Functional Needs (AFN) communities during wildfire-related power shutoffs.
- Goal 6: Enhance enforcement to ensure safety and consumer protection for ESJ communities
 Increased coordination across safety and enforcement efforts, particularly for mobile home park residents
 and transportation, and monitored trends in consumer complaints from ESJ communities using new
 equity-screening methods.
- Goal 7: Promote high road career paths and economic opportunity for residents of ESJ communities
 - Partnered with the California Workforce Development Board to promote high road careers, hosted a statewide workforce development En Banc, and <u>strengthened labor equity in clean energy programs</u>.
- Goal 8: Improve training and staff development related to ESJ issues within the CPUC's jurisdiction
 - Integrated ESJ training into new employee onboarding, created internal tools such as the ESJ SharePoint hub, and supported continuous learning on equity, Tribal engagement, and inclusive facilitation practices.
- Goal 9: Monitor the CPUC's ESJ efforts to evaluate how they are achieving their objectives
 Launched equity metrics aligned with tools like <u>CalEnviroScreen</u>, strengthened data collection across
 programs, and advanced performance tracking for outreach and engagement efforts, particularly for
 vulnerable populations.

The CPUC's implementation of the ESJ Action Plan Version 2.0 marks a transformative step in embedding equity across California's utility regulatory landscape. With strong governance, measurable progress, and cross-sector collaboration, the CPUC is demonstrating leadership in aligning public utility regulation with ESJ priorities. The remaining action items will continue to inform the development of future ESJ initiatives, ensuring that the agency's mission evolves in response to community needs and equity-centered policy innovation.

Introduction



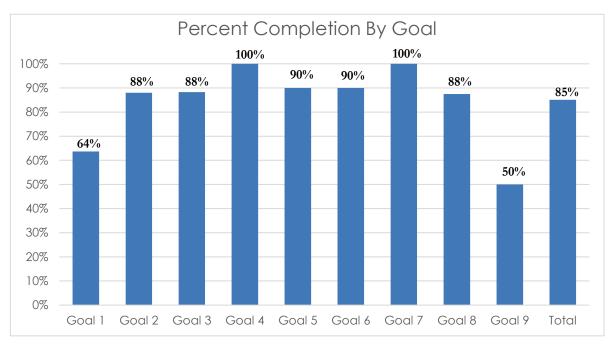
The CPUC is committed to embedding equity into its regulatory mission to ensure that all Californians, especially those in underserved and marginalized communities, have safe, reliable, and affordable access to essential utility services. Guided by the CPUC's core values of accountability, excellence, integrity, open communication, inclusion, and stewardship, Environmental Social Justice (ESJ) Action Plan proactively identifies and addresses access and service needs in communities. In 2019, the CPUC adopted its

first ESJ Action Plan, establishing a foundational roadmap to advance equity through nine strategic goals and 94 action items. Developed with input from CBOs, sister state agencies, and the DACAG, Version 1.0 marked a critical step in aligning agency programs and policies with ESJ principles. Building on that foundation, the CPUC adopted Version 2.0 of the Action Plan in April 2022, refining the framework with clearer language, a stronger focus on job quality and workforce access, and a streamlined set of 94 actionable items to be implemented over three years. This report highlights the CPUC's key achievements and continuous progress in implementing ESJ Action Plan 2.0 and illustrates how ESJ principles are systematically being integrated across the CPUC's work.

Project Performance Summary

The ESJ Action Plan's framework of nine overarching goals, clear objectives, and **94** concrete action items was developed with input from stakeholders, including CBOs serving ESJ communities, sister state agencies, and the DACAG. The public process ensured agency-wide collaboration, accountability, and forward movement in meeting ESJ principles.

To monitor compliance with the actions outlined in the ESJ Action Plan, the CPUC created an implementation structure to maximize effective coordination and sharing of lessons learned across the agency. A collaborative leadership oversight with the Executive Director, the Center of Excellence on ESJ, staff from the Executive, External Affairs, and Safety Policy Divisions made up the "Core Team," coordinating the implementation of the ESJ Action Plan 2.0. "ESJ Liaisons" from each division across the CPUC provided status updates on action items listed in the ESJ Action Plan. Alongside the Core Team, ESJ Liaisons participated in an ESJ Working Group which promoted the goals of the plan across the CPUC and increased staff capacity to address ESJ issues in their daily work.



	Goal 1	Goal 2	Goal 3	Goal 4	Goal 5	Goal 6	Goal 7	Goal 8	Goal 9	Total
Complete	7	22	15	4	9	9	5	7	2	80
Incomplete	4	3	2		1	1		1	2	14
Total	11	25	17	4	10	10	5	8	4	94

Since the adoption of Version 2.0 of the ESJ Action Plan in April 2022, the CPUC made substantial progress, completing **80** of the **94** action items, representing approximately **85 percent** completion. Many of the implemented activities include ongoing components that have been integrated into the CPUC's daily operations.

Among the nine strategic goals outlined in the plan, seven are more than **75 percent** complete. Four divisions successfully completed all assigned action items: the Consumer Protection and Enforcement Division, External Affairs Division, Human Resources Division, and the Safety Policy Division.

Approximately 15 percent of action items (14 total) remain in progress or are under review due to factors such as resource limitations, evolving priorities, and regulatory timelines. These remaining items may be addressed in the future or incorporated into ongoing CPUC initiatives. A detailed chart outlining the status of all action items is provided in Appendix B.

The following are accomplishments demonstrating efforts to systemically instill ESJ considerations into CPUC work, its culture, and implement Version 2.0 of the ESJ Action Plan. Additionally, case studies are featured in the report, highlighting the background, area of opportunity, solutions that were implemented, and the impact of its results by the numbers.



Environmental & Social Justice Action Plan Version 2.0

April 7, 2022

Key Highlights by Goal

GOAL 1: Consistently integrate equity and access considerations throughout CPUC proceedings and other efforts

The CPUC had two key objectives for Goal 1, including:

- 1.1 Build Systemic Approaches for ESJ Priorities
- 1.2 Expand Opportunities for Access

The Core Team and Liaisons from the Administrative Law Judge (ALJ), External Affairs, Executive Office, Office of the CPUC, and the Communications Division led 11 action items supporting Goal 1.

A central focus of these efforts was institutionalizing ESJ aligned practices across the agency. The Core Team coordinated a network of division liaisons, who served as primary links between their divisions and the ESJ initiative, helping embed equity considerations into day-to-day decision-making. Other actions strengthened collaboration with utilities, other state agencies, and community stakeholders, positioning the CPUC as both a learner and a leader in statewide equity practices.

Examples of key accomplishments:

- ALJ Division assessed the Intervenor Compensation program and recommended improvements to better support participation by those contributing meaningfully to CPUC decisions. (ESJ 1.2.1)
- External Affairs Division strengthened inclusive engagement by launching educational webinars to build capacity among CBOs, Tribal communities, and public officials, enhancing access to and understanding of CPUC processes. (ESJ 1.2.5)

CASE STUDY 1: CPUC Equity and Access Program – Expanding Community Engagement and Clean Energy Access (ESJ 1.2.2)

Background

The CPUC launched the Equity and Access (E&A) Grant Program in July 2023 via Resolution M-4871, with an initial \$30 million from the 2022 Budget Act (AB 179). Designed to amplify the voices of Tribal nations and CBOs, the program aims to increase equitable participation in CPUC decision-making and expand clean energy access in underserved communities. Due to state fiscal challenges, the \$30 million budget was adjusted to \$10 million. Ultimately, \$1.55 million in grant funding was awarded and the remainder reallocated to other state priorities.

The program is comprised of three grant accounts:

- Public Participation (**PP**) up to \$15,000 for participating in official CPUC decision-making activities.
- Equity, Engagement, and Education (EEE) up to \$200,000 for capacity-building grant projects.
- Clean Energy Access (**CEA**) up to \$500,000 for increasing access to CPUC clean energy programs.
 - » Clean Energy Access: LA County TECH (CEA-LAT) up to \$200,000 for CBO-led outreach and education on building decarbonization and clean heating technologies in LA County.

Area of Opportunity

Historically, low-income, limited English proficiency, tribal, and other communities need additional resources to participate in regulatory proceedings or benefit from clean energy initiatives.

Solution

The E&A Program was established to provide critical funding for participation in CPUC proceedings, regulatory education and technical training, cultural and linguistically relevant outreach, and community-driven clean energy program participation. The CPUC conducted outreach to CBOs and Tribal organizations to identify barriers to participation in decision-making processes and to provide input on program design and implementation.

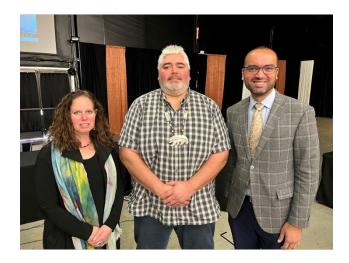
Results

Fourteen CBOs and Tribal organizations received funding through the PP and EEE grant accounts to support their representation and engagement of their communities in CPUC decision-making processes.

- Total funding supporting Tribal communities: \$728,300
- Total funding supporting other underserved communities: \$1,554,444.50
- Total Disbursed to Date: \$256,462.27
- Counties Reached by EEE Grants: 21 counties
- EEE Grants are ongoing, but so far, grantees have:
 - " developed strong partnerships with local environmental justice groups,
 - » achieved high turnout at outreach events,
 - » directly engaged in multiple CPUC proceedings,
 - » and received training from and effectively worked with technical consultants for policy advocacy.

Clean Energy Access: Los Angeles County TECH (CEA-LAT) Grant is now accepting applications from eligible CBOs in Los Angeles County. Offering up to \$200,000 in funding, this grant supports outreach and education efforts related to the Technology for Equipment and Clean Heating (TECH Clean CA) Initiative—an effort focused on building decarbonization, healthy homes, electrification technologies, and their health-

related impacts. CBOs committed to advancing clean energy and public health through community engagement are encouraged to apply. The application window closes on June 30, 2025.



Commissioners Darcie L. Houck and John Reynolds with Middletown Rancheria Chairman Jose Simon III at Twin Pine Casino & Hotel in Middletown discussing the future of telecommunications at the April 4, 2025, CPUC workshop on Carrier of Last Resort rules.



Commissioner John Reynolds and Executive Director Rachel Peterson attend the celebration of a community-driven solar project in January 2024 at St. Mary's Gardens in Oakland, which received funding through the CPUC's Solar on Multifamily Affordable Housing program.

GOAL 2: Increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health

CPUC has five key objectives for Goal 2, including:

- 2.1 Outreach and Engagement
- 2.2 Research and Analysis to Understand Impact
- 2.3 Move Towards Mutual Eligibility and Maximizing Impact
- 2.4 Address Impacts in ESJ Communities
- 2.5 Continue Ongoing Investment

The Energy Division primarily led 24 of 25 action items supporting Goal 2 and its key objectives.

Goal 2 calls for increased investment in clean energy resources to benefit ESJ communities, especially through improving local air quality and public health. This is achieved through increased outreach and community

engagement, research and analysis on public health impacts of current and new energy resources, as well as targeted programs, policies, and increased clean energy investments in ESJ communities.

The Energy Division successfully completed 22 action items under Goal 2. The remaining two action items are in the final stages of completion. The following case studies highlight two of the Energy Division's key initiatives under Goal 2.

CASE STUDY 1: Concurrent Application System (ESJ 2.3.2)

Background

In alignment with Action Item 2.3.2, the CPUC Energy Division was tasked with exploring ways to streamline application processes for low-income programs and improve coordination between low-income and clean energy initiatives.

This effort was driven by:

- Decision D.21-06-015, which directed large investor-owned utilities (IOUs) to work with stakeholders to develop a single online application platform for multiple low-income programs.
- <u>Senate Bill 1208</u> (2022, Hueso), which required the CPUC to establish a process enabling customers to concurrently apply for multiple assistance programs.

Together, these directives led to the development of the Concurrent Application System (CAS).

Area of Opportunity

Low-income Californians often navigate fragmented, complex application processes to access energy assistance programs. This creates barriers to participation and limits the impact of these programs, particularly when coordination between low-income and clean energy initiatives is lacking. A more integrated system was needed to simplify access, reduce administrative burden, and maximize program reach in underserved communities.

Solution

The CAS is a centralized digital platform designed to streamline access to multiple income-qualified energy programs through a single application. To develop the CAS, the CPUC:

- Consolidated stakeholder input from CBOs, low-income advocates, utilities, and state agencies on platform design and functionality.
- Prioritized user accessibility, eligibility screening, and program integration across energy assistance offerings.

Results

The CAS is expected to significantly improve access to utility assistance for low-income Californians by: (1) Increasing program participation through a simplified and user-friendly interface; (2) Reducing administrative hurdles for both customers and program administrators; (3) Enhancing coordination between state and utility-run energy programs; (4) Supporting long-term affordability and energy burden reduction in disadvantaged communities.

- The CAS is being further developed to be adopted as a statewide online platform that allows customers to apply for CARE, FERA, ESA, and other energy programs through a unified interface.
- Phase I of CAS is currently in development, with full launch expected in late 2026.
- A Phase II proposal to expand the platform's programs and features will be submitted in Q3 2025 as part of the ESA/CARE/FERA proceedings.

CASE STUDY 2: Long-Term Payment Plans and Pilots for Arrears & Disconnections (ESJ 2.4.2)

Background

In response to Action Item 2.4.2, the CPUC committed to exploring long-term solutions to address customer arrears and disconnections, particularly for low-income and ESJ communities.

Following the end of California's utility disconnection moratoriums in 2021, the CPUC prioritized bill relief mechanisms to protect vulnerable customers. Three major initiatives emerged:

- Arrearage Management Plans (AMPs) forgive past-due electricity and gas bills for customers making consistent on-time payments.
- Percentage of Income Payment Plan (PIPP) Pilot caps monthly bills at a percentage of household income.
- CBO Case Management Pilot assists customers in navigating available arrearage protection programs through trusted local organizations.

Area of Opportunity

In the wake of the COVID-19 pandemic, many low-income customers were burdened with significant utility debt and at risk of disconnection. Traditional payment plans often lacked the affordability, accessibility, and support needed to meet these challenges. ESJ communities were especially impacted, highlighting the need for innovative, community-informed, and scalable solutions to reduce energy insecurity.

Solution

To address these challenges, the CPUC launched an integrated set of pilot programs:

- AMPs allow customers to eliminate arrears by making timely payments going forward, with forgiven debt recovered through the Public Purpose Program Charge.
- The PIPP Pilot, launched in October 2021, sets monthly bill caps at 4% of household income (3% electric, 1% gas), with two income tiers based on Federal Poverty Guidelines (FPG), offering affordability thresholds for CARE-enrolled customers.
- The CBO Case Management Pilot empowers local organizations to assist customers in high-burden communities with arrearage protections, focusing on outreach, education, and individualized support.

Results

The CPUC's coordinated approach has provided ongoing disconnection protections, introduced affordable, income-based payment models, and strengthened community engagement by leveraging trusted CBO partnerships. Together, these pilots are informing a longer-term affordability strategy for California's energy sector. Pending evaluation results, the CPUC will determine whether to extend or scale these pilots beyond September 2026.

- Over **400,000** customers have participated in AMPs, receiving protection from disconnection through structured payment relief.
- The PIPP Pilot has enrolled more than **15,000** customers, providing predictable monthly bills, though total charges may vary due to taxes and fees.
- As of June 2025, the CBO Pilot enrolled over **1,500** customers, with participating households collectively owing more than **\$2 million** in arrearages.
- Program evaluations are scheduled for 2025 and 2026, which will inform potential program extensions or modifications.

GOAL 3: Strive to improve access to high-quality water, communications, and transportation services for ESJ communities

CPUC has four objectives for Goal 3, including:

- 3.1 Equitable Clean Transportation
- 3.2 Water Customer Resilience
- 3.3 Extend Rail Safety to ESJ Communities
- 3.4 Extend Essential Communication Services to ESJ Communities

The Consumer Protection and Enforcement Division, Water Division, Rail Safety Division and Communications Division led 17 action items supporting Goal 3 objectives. These objectives included advancing equitable broadband deployment, improving the affordability of communications services, and engagement of ESJ communities in the CPUC processes. This included major initiatives across infrastructure development, transportation access, affordability, Tribal engagement, and services for incarcerated individuals.

Highlights of Key Accomplishments:

- Communications Division executed the <u>California Advanced Services Fund (CASF) Tribal Technical Assistance Program</u> to help Tribes address barriers to broadband deployment. Since 2020, the program has awarded \$6 million to more than 40 Tribes and inspired the allocation of an additional \$5 million in Local Agency Technical Assistance funds, all of which are now fully awarded. (ESJ 3.4.3)
- Communications Division advanced Incarcerated Persons Communications Services (IPCS) policy through Rulemaking R.20-10-002. The CPUC adopted an interim \$0.07 per-minute cap on prison voice calls and is considering permanent caps, including on video calling, guided by a staff proposal led by the Communications Division, which proposed a \$0.045 per-minute cap. (ESJ 3.4.5)
- Railroad Safety Division and External Affairs Division instituted ongoing coordination framework to strengthen communication and responsiveness, resulting in the resolution of multiple homeless encampments along rail corridors and enhanced safety for vulnerable populations. (ESJ 3.3.2)
- Water Division implemented initiatives such as the Rulemakings evaluating Affordability (ESJ 3.2.2), Acquisition (3.2.4), and Low-Income Rate Assistance Programs (3.2.1) to expand customer assistance programs, monitor drought-related measures and water affordability through annual affordability reports, and assess equity concerns related to water system consolidation.



CPUC Water Division staff tour San Jose Water Company's distribution system to review the operational processes that support a reliable water supply during emergencies.

CASE STUDY 1: Maximize Customer Assistance Programs (CAPs) and Arrearage Management Plans (AMPs) for Low-Income Water Customers (ESJ 3.2.1)

Background

Order Instituting Rulemaking 17-06-024 directs Class A water utilities to continue to suspend disconnections of customers with water utility bill debt accumulated during the time the statewide water moratorium is in effect, until the sooner of further notice and direction from the CPUC or February 1, 2022. In the meantime, this decision adopts improvements to the exchange of low-income customer data between energy and water utilities to help ease customer access to low-income assistance programs. This decision also provides guidance to Class A water utilities for requesting recovery of unpaid bills associated with the COVID-19 pandemic through their Catastrophic Event Memorandum Accounts. Finally, this decision continues monthly reporting of water utility bill payment and collection data and orders Class A water utilities to pursue data reporting refinements through public working sessions.

Area of Opportunity

During the pandemic there was a moratorium issued on shutting down utility services and an expansion of CAPs, to keep up with payment plans there was a need for greater tracking of these programs.

Solution

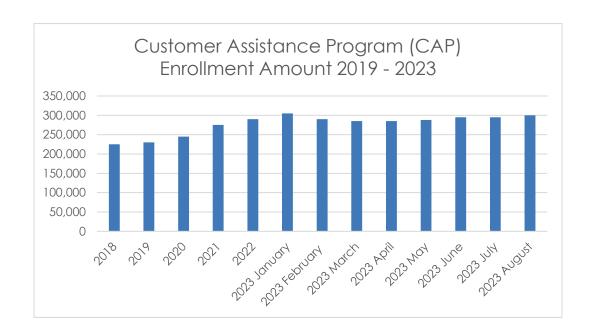
- R.17-06-024 requires water companies to report statistics on customer arrearages, enrollment in CAPs, disconnections for non-payment of bills, and more on a regular basis. Water Division staff analyze the statistics and distribute results for the benefit of CPUC Commissioners and policymakers.
 - » As of March 2023, the number of water utility customers enrolled in Customer Assistance decreased to 302,764 in January from December's high 306,877, with over 25 percent enrollment of all residential customers. Enrollment is now **more than 35 percent above** the 2019 average of 223,547, the last full year before the COVID pandemic began.
- CPUC and Water Division staff worked closely with California's Community Services and Development
 Department (CSD) to implement the Low-Income Households Water Assistance Program (LIHWAP) to
 distribute federal funds to assist low-income households with water bill arrearages and those struggling
 with high water bills.

Results

Decision 24-01-034 closed the proceeding and required going forward all Class A water utilities to file on February 1, May 1, August 1, and November 1 of each year reports in the docket of Rulemaking 17-06-024 of the data in Appendix G to this decision, including narrative explanation and analysis of the trends of customer debt and disconnection and submit an Excel version of the quantitative data to the CPUC's Water Division.

The following Table and Figures demonstrate some of the findings illustrating an increased enrollment in programs for assistance and helping with arrearage management and a decrease in debt.

Utility	Number of Customers	Total Amount of Relief	Average Relief Per Customer
California Water Service Company	4487	\$2,821,580	\$629
Golden State Water Company	1125	\$771,700	\$686
San Jose Water Company	831	\$842,775	\$1,014
California-American Water Company	1240	\$1,087,312	\$877
San Gabriel Valley Water Company - Fontana and LA	1076	\$473,131	\$440
Suburban Water Systems	421	\$392,751	\$933
Liberty Utilities - Park Water	309	\$317,676	\$1,028
Great Oaks Water Company	52	\$36,593	\$704
Liberty Utilities - Apple Valley Ranchos	216	\$158,317	\$733
Total	9757	\$6,901,834	\$707



CASE STUDY 2: Broadband For All (ESJ 3.4.2)

Background

California and the federal government have many programs designed to expand broadband deployment in communities that lack access to broadband infrastructure, including many ESJ communities. The need for this infrastructure was starkly highlighted during the COVID-19 Pandemic, as rural communities, including a disproportionate share of Tribal and low-income communities, lacked broadband infrastructure necessary to equitably participate in distance learning, telehealth, and other essential services as in-person activities were curtailed or suspended as a public health measure.

Area of Opportunity

During and following the COVID-19 Pandemic, California and the federal government allocated substantial new resources to expanding broadband deployment, including **\$2 billion** for a new Federal Funding Account for last-mile broadband service. Communities that lacked broadband were more aware than ever of the pressing need to obtain these resources and deploy them in ways that would benefit the entire population. Tribal entities have significant experience starting enterprises to solve problems, and broadband fit squarely within the rubric of essential services. Municipalities and other public entities were becoming aware of the need for broadband as an essential service to serve their constituents and needed help accessing newly available resources.

Solution

- The CPUC conducted a rulemaking proceeding to establish a program to distribute the \$2 billion in last-mile grants. The rules prioritized grants to communities with the greatest need, incentivized projects making significant commitments in ensuring affordability of service and emphasized opportunities for projects that would be sponsored or owned by Tribal entities, municipalities, or non-profit providers.
- \$50 million was set aside for Local Agency Technical Assistance grants to Tribal and local governments, including a \$5 million set-aside exclusively for Tribes, to conduct pre-application project development work and prepare project proposals that would meet program rules and advance key community priorities.
- The CPUC established a Broadband Caseworker Team to engage directly with Tribes, public entities, and small Internet Service Providers (ISPs) to understand the grant and operational landscape from the prospective applicant's perspective and support prospective applicants in navigating program rules and the dynamics of establishing new last-mile broadband networks.

Results

At the end of the first round of Federal Funding Account awards, the CPUC awarded over \$1 billion in grants for projects spanning 52 counties across California. This consisted of 113 projects funded statewide benefiting 2 million Californians with improved connectivity, with 94 projects offering an affordable plan for income-qualified customers and 74 projects offering a low-cost plan for all customers. Another \$550 million is set to be allocated to the program in future budget years.

In the first application round, the CPUC received **87 applications** from Tribes, public entities, and non-profits, and **73 projects** serving primarily ESJ communities were awarded funds. Eight Tribal ISPs received grant funding in the first round. Beyond the FFA awards, the CPUC's Tribal Technical Assistance program has been used by **over 50 California Tribes** to assist with solving problems of access to communications services.

As the CPUC moves toward the next round of FFA funding as well as upcoming funding rounds for the federal Broadband Equity, Access, and Deployment (BEAD) program and CPUC's existing slate of broadband funding programs through the California Advanced Services Fund (CASF), Communications Division will integrate lessons learned from the first FFA grant round and plans to leverage relationships developed during this period of close collaboration with representatives of Tribal governments, local governments, and CBOs to continue funding broadband deployment in communities where it is most needed and can deliver substantial community benefits in terms of affordability, reliability, and equitable participation in society.



CPUC President Alice Reynolds and Communications Division Deputy Executive Director Ana Maria Johnson during the Plumas Sierra Telecom PST Portola FFA Broadband visit.



Director of the California
Department of Technology, Liana
Bailey-Crimmins, CPUC staff, and
others at the groundbreaking of
the Middle Mile Broadband
Initiative with the Yurok Tribe. Over
2,299 unserved residents across
Humboldt and Del Norte Counties
gained access to 10 Gbps
internet, supporting critical
services in education, healthcare,
and public safety

GOAL 4: Increase climate resiliency in ESJ communities

Goal 4 focuses on increasing climate resiliency in ESJ communities. Goal 4 aims specifically to ensure the adaptative capacity, or the ability to respond to daily and extreme climate change-related events, of ESJ communities is considered and incorporated into relevant programs and activities. The Energy Division and Safety Policy Division led four action items supporting Goal 4.

- Safety Policy Division developed situation analysis and geospatial tools that visualize the impacts of climate change and emergency events on utility infrastructure, outages, and vulnerable communities. These analyses and geospatial tools were presented across CPUC divisions, supporting discussions related to CPUC Policy. (ESJ 4.1.2)
- Through a series of workshops, Energy Division began to develop a framework for integrating resiliency
 planning and evaluation into grid planning policy by advancing equitable resiliency metrics, exploring
 existing and potential resiliency standards, and testing these standards in practical applications. (ESJ 4.1.3)
- Safety Policy Division also proposed a new Risk Assessment Mitigation Phase (RAMP) requirement directing IOUs like Pacific Gas and Electric (PG&E) to integrate CalEnviroScreen data into its risk mitigation planning. This proposal ensures utilities prioritize safety investments in disadvantaged communities. (ESJ 4.1.4)

CASE STUDY 1: Climate Change Adaptation Planning with Emphasis on Disadvantaged Vulnerable Communities (ESJ 4.1.1)

Background

Action Item 4.1.1 of the ESJ Action Plan directs the CPUC's Energy Division to initiate climate change adaptation planning with a focused emphasis on Disadvantaged and Vulnerable Communities (DVCs). This work is being implemented through the Climate Adaptation Proceeding (R.18-04-019), which requires California's large IOUs to assess and plan for long-term climate risks to their infrastructure and services.

Under this proceeding, IOUs must submit Climate Adaptation Vulnerability Assessments (CAVAs) every four years to evaluate how climate impacts may affect their energy infrastructure and operations in the coming decades. These assessments may inform investment decisions through general rate cases. Additionally, IOUs are required to submit Community Engagement Plans (CEPs) one year prior to each CAVA, detailing how they will engage with DVCs during the assessment process.

Area of Opportunity

DVCs often experience the worst impacts of climate change yet are least equipped to respond to and recover from disruptions to energy access. Historically, these communities have also had limited opportunities to shape the planning processes that inform resilience investments in their neighborhoods.

Solution

The CPUC has structured a planning process that centers community engagement and equity in long-term climate adaptation. IOUs must engage with DVCs before, during, and after the development of their CAVAs, and their CEPs must outline how they will assess energy reliability, understand local climate vulnerabilities, and implement best practices in community engagement.

Southern California Edison (SCE), Pacific Gas and Electric (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Gas Company (SoCalGas) have all submitted their first CEPs and CAVAs, completing the initial cycle between May 2021 and May 2025.

In Phase II of the Climate Adaptation Proceeding, the CPUC is evaluating how to improve the equity analysis in CAVAs and address community engagement challenges such as capacity limitations and consultation fatigue. In Fall 2024, CPUC staff held three workshops to explore updates to CEP guidance and identify potential metrics to quantify benefits to DVCs. Additional workshops on climate adaptation equity metrics are planned for Summer 2025.

Results

- SCE, PG&E, SDG&E, and SoCalGas have completed their first round of CEPs and CAVAs, with the process spanning from 2021 to 2025.
- CEPs have provided a structured guide for IOUs to collaborate with DVCs in shaping adaptation planning and identifying local energy resilience needs.
- The CPUC has initiated an equitable approach to long-term climate adaptation planning by requiring
 utilities to engage DVCs throughout the vulnerability assessment process, helping ensure that the voices
 of those most at risk from climate impacts are incorporated early and consistently.
- In phase II of R.18-04-019, the CPUC is currently considering making improvements to assess equity in CAVA development. The CPUC issued a Ruling in June 2023 signaling that it will consider improvements to community engagement such as challenges of capacity and consultation fatigue as well as improvements to measurement of community adaptive capacity. To address these issues, staff executed three workshops in Fall 2024 to consider refinements to CEP guidance and establishing metrics to demonstrate quantitative benefits to DVCs. The CPUC anticipates holding additional workshops on climate adaptation equity metrics and community engagement in summer 2025.
- The climate adaptation planning process has established a precedent for integrating climate vulnerability assessments with community-centered planning.



Climate Adaptation Community Engagement and Equity Workshop in Irvine on October 25, 2024.



The Climate Adaptation
Community Engagement and
Equity Workshop with CPUC
Commissioner Darcie L. Houck
(third from the left), City of Irvine
then-Mayor Farrah Khan (center),
DACAG member Senait Forthal
(third from the right), and CPUC
staff Cheryl Cox and Zara
Jamshed, October 25, 2024

GOAL 5: Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process and benefit from CPUC programs

CPUC has four objectives for Goal 5, including:

- 5.1 Improve Communication with ESJ Lens
- 5.2 Continue to Emphasize Engagement with CBOs
- 5.3 Build Pathways for Public Participation
- 5.4 Enhance Engagement with Particular ESJ Communities

The External Affairs Division, Consumer Protection and Enforcement Division, Safety Policy Division and The Office of the Tribal Advisor led 10 action items supporting Goal 5 objectives.

The External Affairs Division activities focused on engaging ESJ communities in the regulatory process, strengthening relationships with CBOs, and improving the accessibility of communications to benefit all communities and promote equitable outcomes. The Safety Policy and Consumer Protection and Enforcement Divisions worked to ensure ESJ communities are engaged in CPUC processes through targeted outreach activities.

Highlights of Key Accomplishments:

- External Affairs Division updated fact sheets and brochures to reflect current information and translated key consumer-facing materials into 16 languages including English, Korean, Chinese, Russian, Spanish, and Tagalog. (ESJ 5.1.1)
- External Affairs Division created and executed targeted engagement strategies to keep CBOs informed about CPUC programs and policy developments via regional monthly newsletters. (ESJ 5.2.1)



CPUC Safety Policy Division staff discuss strategy and goals at an all-employee meeting in 2024.



Administrative Law Judge David van Dyken and CPUC staff conduct a Public Forum regarding updates to the Deaf and Disabled Telecommunications Program (DDTP) at the Greater Los Angeles Agency on Deafness (GLAD.)



Members of the public attending a Public Participation Hearing in Clovis.

CASE STUDY 1: 5.4.1 Engage and Serve Communities with Access and Functional Needs (AFN)

Background

The CPUC regulates privately owned electric utilities across California. This includes three IOUs PG&E, SCE, and SDG&E – as well as three Small Municipal Jurisdictional Utilities (SMJUs) - Liberty Utilities (CalPeco Electric) LLC, PacifiCorp and Bear Valley Electric Service, Inc. (BVES).



The IOUs and SMJUs have the option to proactively shut down power to reduce the risk of wildfire caused by electric infrastructure – a practice known as Public Safety Power Shutoff (PSPS). These PSPS events typically occur during certain conditions – such as high winds, dry vegetation, and low humidity – when wildfire ignition risk is high. PSPS emerged as a part of broader wildfire mitigation strategies developed in response to increasingly frequent and severe wildfires. The CPUC initiated Rulemaking (R.) 18-12-005 in 2018 to examine PSPS implementation by IOUs and

SMJUs. Recognizing that PSPS brings its own risk and hardships, particularly on Access and Functional Needs (AFN) communities, R.18-12-005 aims to mitigate these impacts, among other key issues.

AFN communities are defined in CA Government Code §8593.3 to include individuals who have developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, limited English

proficiency or who are non-English speaking, older adults, children, people living in institutionalized settings, or those who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or those who are pregnant. Some of these individuals may rely on electricity to maintain health and independence, for example, to power medical equipment, refrigerate medications, operate mobility or breathing devices, regulate temperature, or use communication tools. With adequate support, these electricity-dependent individuals can maintain necessary life functions and remain safe during a PSPS event.

The IOUs and SMJUs have submitted their annual AFN plans supporting PSPS and provided quarterly updates on implementation since 2020. Each year the IOUs and SMJUs formulate planning objectives. For 2025 annual plan revision, the IOUs and SMJUs developed the following planning objectives:

- Identifying new enhancements to programs and resources to mitigate the impact of PSPS
- Increasing awareness of IOU programs and services available before, during, and after a PSPS
- Identifying individuals who are Electricity Dependent
- Coordinating and integrating resources with the state, community, and utility to minimize duplication of
 efforts

The SPD monitors and assesses the annual AFN plans and quarterly updates submitted by the IOUs and SMJUs. The monitoring efforts include:

- 1) cross-referencing AFN Plans with the regulatory requirements and the prior year's AFN Plans,
- 2) analyzing quarterly update reports for progress and gaps,
- 3) collaborating with CPUC's Safety Enforcement Division on reviewing the AFN sections of the Post-Season and Pre-Season PSPS reports, and
- 4) engaging and participating actively in the Joint IOU/AFN Collaborative Council and Joint IOU/AFN Statewide Advisory Council meetings. CPUC uses this monitoring effort to evaluate whether they meet regulatory requirements and to identify areas of improvements in their support for AFN customers during a response.

Area of Opportunity

Prior to 2019, the IOUs and SMJUs provided different levels of service and resources to AFN communities during PSPS events. Additionally, the March 8, 2019, Scoping Memo for R.18-12-005 raised the question on how IOUs and SMJUs should identify "vulnerable populations" if a list of Medical Baseline (MBL) customers might not be sufficient for PSPS notification.²

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¹ AFN is defined by CA Government Code §8593.3 in CPUC D.19-05-042

² Assigned Commissioner's Scoping Memo and Ruling (Phase 1), dated March 8, 2019, in R.18-12-005

Solution

The CPUC issued three regulatory decisions through R. 18-12-005, establishing requirements for IOUs and SMJUs to support AFN communities before, during and after PSPS events. Through these three decisions, the IOUs and SMJUs have established mechanisms and requirements for better coordination and closer standardization of services and resources across IOUs and SMJUs during a PSPS in the following areas:

- Notification D.19-05-042: Requires IOUs and SMJUs to develop multilingual notification strategies tailored to AFN populations using multiple communication channels and make a diligent effort to identify AFN communities within their customer base.
- Annual Response Plan Development and Reporting D.20-05-051: Mandates the submission of annual AFN plans, beginning June 1, 2020, and continuing each by January 31, along with quarterly update reports.
- Interoperability of Response Plans D.21-06-034: Directs each IOU and SMJU to develop and revise
 their annual AFN plan using the Federal Emergency Management Agency (FEMA) 6-step planning
 process and include representatives of state agencies and AFN community organizations to guide the
 development, implementation and review of the plans. The standard allows for Planning interoperability
 between county, state and federal response agencies.

To meet the AFN-related regulatory requirements, the IOUs and SMJUs have used the Joint IOU/AFN Collaborative Council to establish priorities, and the Joint IOU/AFN Statewide Advisory Council takes these priorities and uses them to guide planning and preparedness efforts. These two groups represent more than thirty state agencies and CBOs along with six IOUs and SMJUs. ³ The Joint IOU/AFN Collaborative Council and Statewide Advisory Council meet quarterly and discuss and track progress on these priorities and identify emerging needs to support AFN communities.

Results

CPUC PSPS decisions have laid the foundation to have consistency in services and resources and strengthen collaborative planning efforts across IOUs, SMJUs, and key community and state agency partners in supporting AFN communities during PSPS.

IOUs and SMJUs have made meaningful progress in identifying electricity-dependent individuals supporting AFN communities during PSPS events. This includes support for over 400,000 customers collectively who have specific energy needs due to qualifying medical conditions under the MBL Program. ⁴ IOUs and SMJUs

³ Joint IOU/AFN Collaborative Council and Joint IOU/AFN Statewide Advisory Council meetings in March 2025

⁴ Pacific Gas and Electric Company's (U 39 E) 2025 Access and Functional Needs (AFN) Plan for Public Safety Power Shutoff (PSPS) Support, Bear Valley Electric Service, Inc. (U 913 E) Plan to Address Access and Functional Needs During De-Energization Events, 2025 Annual Access and Functional Needs Plan of PacifiCorp (U 901 E), and Liberty Utilities (CalPeco Electric) LLC's (U 933-E) Plan to Support Access and Functional Needs Populations During De-Energization Events, dated January 31, 2025, in R.18-12-005.

continue to identify individuals who are electricity-dependent, in addition to those enrolled in MBL, as part of their ongoing planning objectives to mitigate PSPS impacts on AFN communities.

Through the timely submission of annual AFN plans and quarterly updates, IOUs and SMJUs have reported increased alignment and consistency in services across their service territories. One example is the standardization of hotel accommodation offerings during PSPS events across IOUs, ensuring similar access to resources regardless of service area. Several IOUs also expanded transportation assistance and backup power programs to ensure continuity of care for electricity-dependent individuals. In addition, utilities enhanced outreach by increasing multilingual PSPS notifications and strengthening partnerships with CBOs to reach underserved AFN communities. The organizational framework has also helped guide enhancements to programs and strengthened coordination with state and community partners.

Support for AFN communities is structured across all phases of PSPS events – before, during and after – to mitigate PSPS impacts:

- Before PSPS events, IOUs and SMJUs focus on preparedness and outreach. Activities included customer education, preparedness training, and community engagement. A key milestone was the 2024 relaunch of the Prepare For Power Down (P4PD) website, which serves as a centralized resource for wildfire and PSPS readiness. The site offers a customizable preparedness checklist, MBL sign-up access, and downloadable materials for community partners. Another in-progress activity includes developing a framework (or best practices) to support AFN communities, with the intent to share it nationally.
- During PSPS events, IOUs and SMJUs work to deliver timely notifications, support through CBOs, and improved AFN offerings at Community Resource Centers (CRCs). The Joint IOU is working with members of Collaborative Council to compile and share resources, such as bed shakers offered through the American Red Cross.
- After PSPS events, IOUs and SMJUs conduct surveys to assess the effectiveness of AFN support. As part of these surveys, CPUC mandated three key performance indicators (KPIs) to support consistent tracking, while allowing flexibility to modify or adjust the KPIs. The IOUs, along with leaders from state agencies and AFN community, developed the 2022 2025 KPIs collaboratively to measure awareness of available resources, the impacts of PSPS and satisfaction with supports provided.

GOAL 6: Enhance enforcement to ensure safety and consumer protection for ESJ communities

The CPUC has four key objectives for Goal 6, including:

- 6.1 Protect ESJ Consumers
- 6.2 Conduct Proactive Action & Analysis in Transportation and Utility Enforcement
- 6.3 Apply ESJ Lens to CPUC Enforcement Policy
- 6.4 Maximize Opportunities with Utility Audits

The External Affairs, Consumer Protection and Enforcement Division (CPED), Safety and Enforcement Divisions (SED), and the Core Team led 10 action items supporting Goal 6.

The CPUC works to ensure that Californians have access to safe, clean, and affordable utility services. The Division initiatives supporting this goal prioritized community engagement emphasized a proactive approach to safety.

Highlights of Key Accomplishments:

- SED updated the notification process for Mobile Home Park (MHP) natural gas inspections. The new process improves transparency and engages owners and residents in the efforts to ensure the safety of the natural gas system in each MHP community. (ESJ 6.4.1)
- CPED collaborated with the Metropolitan Transit System and the San Diego Police Department to raise
 public awareness and develop a plan to address unlicensed individuals providing transportation service
 utilizing unlicensed vehicles. (ESJ 6.2.1)
- The Core Team supported the agency-wide adoption of the CPUC's enforcement processes through the development and application of an ESJ lens to enforcement policy. By analyzing internal enforcement data, a framework was established within which divisions were tasked with developing division-specific ESJ-focused monitoring and enforcement practices. These division-specific enforcement policies will be developed throughout the summer of 2025 and mark an important step toward ensuring that the CPUC's accountability mechanisms reflect ESJ priorities. (ESJ 6.3.1)



Ken Bruno, Program Manager, and the CPED Safety Promotion Team participated in the San Ysidro Wildcatting news conference to raise public safety awareness on November 13, 2024.



California Highway Patrol, along with the CPUC's Transportation Enforcement Branch Supervisor, Rahmon Momoh, and staff at a joint operation in Placerville.

CASE STUDY 1: TEAM and CHANGES Program Updates (ESJ 6.1.1)

Background

The TEAM (Telecommunications Education and Assistance in Multiple-Languages) Program is a result of the CPUC's Consumer Protection Initiative (D.06-03-013), where the CPUC ordered protections or assistance for consumers with Limited English Proficiency (LEP). CHANGES (Community Help and Awareness of Natural Gas and Electric Services) was authorized by the CPUC in Decision 15-12-047.

Area of Opportunity

Understand the on-the-ground perspectives of Limited English Proficient consumers.

Solution

The External Affairs Consumer Affairs Branch (CAB) facilitated meetings with TEAM and CHANGES staff and the Low- Income Oversight Board (LIOB). Highlights include: all participating CBO reopening their offices to clients, an increase in in-person services and community events, and improved capacity to deliver remote support. Case assistance primarily focused on helping clients pay or reduce their utility bills. CBOs also resumed hosting education classes on-site or at nearby facilities, while outreach efforts were largely conducted through community event promotions and media channels.

Results

- Compared to the previous six months, case assistance is up by almost 38 percent, education attendance is up by 46 percent and outreach (by potential reach of community events and media) is up by almost 300 percent.
- Financial challenges are driving the increases LIHEAP, IOU/Non-IOU emergency funding & AMP represented **72 percent of all services.**
- Evaluation shows that the program is meeting its core objective to support LEP consumers to manage their energy services.
- Some improvements can be made in some areas, particularly data metrics, data entry, CBO case funding and geographical coverage (LA County and Central Valley). (Data from March August 2023)

GOAL 7: Promote high road career paths and economic opportunity for residents of ESJ communities

The CPUC has three objectives for Goal 7, including:

- 7.1 Maximize authority to promote high road opportunities
- 7.2 Educate on high road careers
- 7.3 Partner with utilities and sister agencies

The Core Team and External Affairs led five action items supporting Goal 7. These efforts strengthened workforce development initiatives, enhanced supplier diversity oversight, and deepened interagency collaboration. Collectively, they promote well-paying, sustainable careers, particularly for ESJ communities — and help embed equity across the CPUC's regulatory activities and programs.

Highlights of Key Accomplishments:

- The Core Team supported the implementation of a <u>Memorandum of Understanding with the California Workforce Development Board (CWDB)</u> to expand access to high road workforce training and opportunities. (ESJ 7.1.1)
- The Core Team educated CPUC staff through the development and dissemination of the white paper <u>Advancing California's Workforce for a Clean Energy Future</u>, which outlines policy definitions, legislative context, and integration examples. (ESJ 7.2.1)
- The Core Team deepened interagency coordination with the Contractors State License Board (CSLB) and Department of Industrial Relations (DIR), resulting in improved enforcement of prevailing wage laws and integration of workforce equity in CPUC programs such as <u>Solar on Multifamily Affordable Housing</u> (SOMAH), <u>The Disadvantaged Communities Single-Family Solar Homes</u> (DAC-SASH), and <u>Solar For All</u>. (ESJ 7.3.2)

• External Affairs completed an ongoing review of CPUC filings to monitor impacts on <u>supplier diversity</u> in ESJ communities. Although no proceedings have triggered formal actions yet, this process enhances the CPUC's responsiveness to emerging diversity-related issues. (ESJ 7.3.3)



Stephanie Green, Supplier Diversity Manager, presents at the CPUC Small and Diverse Business Expo, October 9, 2024.



Highlights from the CPUC Small and Diverse Business Expo in South San Francisco on April 4, 2024.

CASE STUDY 1: Work with the California Workforce Development Board to provide recommendations to CPUC proceedings to encourage utilities to foster high road career paths (ESJ 7.1.1)

Background

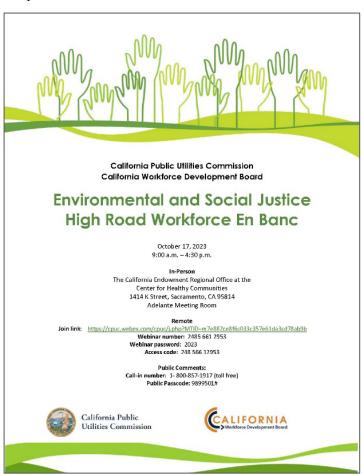
The CPUC regulates programs across many different sectors, from renewable energy to ensuring a clean water supply. Each of these programs can be part of delivering well-paying "high road" jobs across California, but this work requires the broad dissemination of best practices to diverse staff and stakeholders.

Area of Opportunity

To promote equitable economic opportunities, the CPUC signed an MOU with the California Workforce Development Board (CWDB). The goal is to support workforce programs that create well-paying, long-term careers, particularly for underserved communities, and integrate high road strategies into CPUC proceedings.

Solution

The CPUC and CWDB co-hosted the ESJ High Road Workforce En Banc in October 2023, convening over 200 stakeholders from labor, community groups, Tribal nations, academia, and utilities. The event highlighted best practices in workforce development and allowed participants to share successes and challenges. Materials from the event were made publicly available on the CPUC website and internal SharePoint, supporting staff and



sister agencies. Direct feedback from stakeholders also helped shape CPUC staff recommendations for integrating workforce components into proceedings.

Results

The En Banc fostered collaboration across sectors and elevated workforce development as a key strategy in advancing ESJ and climate goals. Input collected is now informing CPUC policy development. CWDB and CPUC continue to meet regularly, with CWDB offering guidance to other agencies like the CEC and CalTrans. The initiative laid a strong foundation for embedding high road principles into the CPUC's programs and regulatory work.

Resources

- The slides from the En Banc may be viewed <u>here</u>.
- A video recording of the En Banc may be viewed <u>here</u>.

CASE STUDY 2: Advancing Supplier Diversity & Economic Impact (ESJ 7.3.3)

Background

The CPUC's General Order (GO) 156 encourages IOUs, community choice aggregators, energy service providers and prime contractors to include women, minority, lesbian, gay, bisexual, and transgender (LGBT), disabled veteran-owned, and persons with disabilities business enterprises in procurement activities.

Area of Opportunity

Promoting open and transparent competition in the California private enterprise marketplace.

Solutions

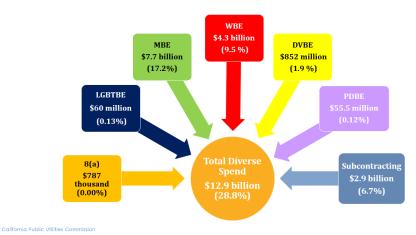
Participating utilities included plans on how they're going to increase procurement opportunities for diverse businesses and filed reports on the annual performance of those activities for the prior year.

Results

More than 50 IOUs, community choice aggregators, and energy service providers participated in the program.

More than \$13 billion in diverse supplier spending was delivered by regulated utilities across the energy, telecommunications, and water sectors.

2023 Utilities diverse suppliers Procurement Overview



GOAL 8: Improve training and staff development related to ESJ issues within the CPUC's jurisdiction

The CPUC has two objectives for Goal 8 including:

- 8.1 Bolster Staff Knowledge on ESJ Issues and Resources
- 8.2 Support Emerging Priorities and Skill Needs

CPUC completed seven of eight action items under Goal 8. Led by the Core Team, Executive Office, and Human Resources Division, these efforts focused on strengthening internal capacity to advance equity through staff training and the development of accessible shared resources. These efforts range from providing ESJ and community engagement training to launching internal tools like the ESJ SharePoint site. Collectively, these actions foster a more informed workforce that integrates ESJ principles into the CPUC's regulatory and operational decisions.

Highlights of Key Accomplishments:

- The Core Team collaborated with Human Resources to incorporate the ESJ Session at New Employee Orientation (NEO) into a regular part of CPUC's onboarding curriculum. The curriculum is periodically updated in collaboration with the Capitol Collaborative on Race and Equity (CCORE) team to reflect evolving best practices. (ESJ 8.1.2)
- The Core Team developed ESJ SharePoint and ESJ Action Plan webpages which are refreshed regularly to ensure relevance and utility for staff. (ESJ 8.1.3)

- The Core Team institutionalized community engagement training through a recurring onboarding series in collaboration with CCORE team and Human Resource division, contributing to increased use of ESJ tools and awareness across divisions. (ESJ 8.2.2)
- The Executive Office developed a curriculum in coordination with the State Tribal Liaison and incorporated it into the CPUC Onboarding Series. Training delivery and refinement will continue over time.
- The Executive Office integrated some of the Racial Equity Action Plan (REAP) concepts and conducted an organizational assessment to strategically align ongoing implementation of equity work to its newly established a Center of Excellence focused on Diversity, Equity, Inclusion, Accessibility, and Belonging (DEIAB), Equal Employment Opportunity (EEO), and ESJ for CPUC.
- Human Resource Division instituted Diversity Recruiting as mandatory training for interview panelists, and access to LinkedIn Learning courses has been expanded to support equitable hiring practices. The Human Resources Division continues to lead agency-wide learning through compliance training and leadership development offerings. (ESJ 8.2.3)
- Human Resource Division supported Meeting Facilitation for Staff through virtual training options available to all CPUC employees, including LinkedIn Learning modules. All these resources remain available for ongoing staff development. (ESJ 8.2.4)

Photo from left to right: CPUC ESJ Executive Leader, Energy Division ESJ Liaison with CEC Commissioner Gallardo and CEC staff at the CEC's JEDI Inclusive Pathways Workshop presenting CPUC ESJ Action Plan as a best practice. CPUC Talent Acquisition team speaking to participants at the Sacramento Career Fair.





CASE STUDY 1: Tribal Engagement Training (ESJ 8.1.4)

Background

Strengthening relationships with California Tribal communities is essential to honoring Tribal sovereignty and ensuring equitable outcomes. In alignment with state mandates, including consultation requirements, the CPUC has adopted its own Tribal Consultation and Tribal Land Transfer Policies. To uphold these commitments, CPUC staff must be trained in Tribal history, rights, and engagement practices to ensure respectful, informed, and equitable decision-making.

Area of Opportunity

Embedding knowledge of Tribal history, culture, and CPUC's legal obligations across all levels of staff—especially through onboarding and professional development—was a critical opportunity to ensure long-term institutional alignment with CPUC's values of equity, stewardship, and justice.

Solution

To enhance staff awareness, the CPUC developed a structured workplan focused on training and dissemination. In partnership with the California State Tribal Liaison, the CPUC created the "History – Tribes of California" curriculum, introducing staff to the historical, cultural, and legal foundations of CPUC-tribal relations. The CPUC then integrated this curriculum into its Onboarding Series under the Core Values module to ensure consistent access for staff.

Results

By embedding the training in the Core Values module of New Employee Orientation, the CPUC ensured broad and lasting integration of Tribal engagement principles into staff culture. This training supports implementation of the agency's Tribal Consultation and Tribal Land Transfer Policies, reinforcing the CPUC's legal and ethical commitments. It also contributes to the state's broader equity goals by operationalizing Executive Order B-10-1 and AB 52. Together, these efforts establish a foundation for more consistent, respectful, and informed engagement with Tribal governments, advancing CPUC's ESJ efforts and strengthening partnerships with California's Tribal communities.

GOAL 9: Monitor the CPUC's ESJ efforts to evaluate how they are achieving their objectives

The CPUC has three objectives for Goal 9 including:

- 9.1 Establish Consistent Quantitative Metrics
- 9.2 Promote Meaningful Feedback Loops
- 9.3 Establish Accountability Measures

CPUC completed two of four action items under Goal 8. Led by the Core Team, Office of the CPUC, and Executive Division, these efforts focused on leveraging equity tools such as CalEnviroScreen, to identify and visualize vulnerable communities, including those with low incomes. These activities also emphasize metrics related to outreach, engagement, satisfaction, comprehension and experience. Collectively, these initiatives support the foundation for a more data-informed and equity-driven framework, enhancing the CPUC's ability to assess program impacts and serve ESJ communities.

Highlights of Key Accomplishments:

Executive Division conducted a study to improve the understanding of data collection and key ESJ indicators. The CPUC applies CalEnviroScreen in various proceedings (e.g., Water Cost and Rate Tracker, R.18-07-006 and Risk-based Decision-making Framework R.20-07-013) and requires performance metrics for Access and Functional Needs (AFN) populations during Public Safety Power Shutoff (PSPS) events. (ESJ 9.1.2)

CASE STUDY 1: 9.1.3 Geographic Distribution of Low-Income Programs + Ongoing Analyses

Background

ESJ Action Item 9.1.3 aims to establish a consistent practice of evaluating the geographic distribution of ESJ communities for CPUC's program participation and policy implementation. The initiative focused on equipping CPUC staff with geospatial and equity tools - such as CalEnviroScreen – to identify potential service gaps and promote equity in CPUC programs. This effort supports broader CPUC goals of identifying who benefits from CPUC actions and embedding equity into everyday regulatory practice.

Area of Opportunity

Prior to 2019, equity tools like CalEnviroScreen were used on limited instances by the CPUC. This presented a clear opportunity to promote consistent, cross-divisional use of geospatial analysis and to build internal capacity for identifying outreach gaps, especially in low-income and environmentally burdened areas.

Solution

To build agency-wide fluency in equity tools, the ESJ Core Team partnered with CalEPA's Office of Environmental Health Hazard Assessment to deliver CalEnviroScreen 4.0 training to CPUC staff in August 2022. This training, attended by more than 150 staff, laid the foundation for the broader adoption of equity mapping tools and analyses across the CPUC.

Results

Building on this foundation, CPUC divisions have increasingly integrated CalEnviroScreen into their work. The Safety Policy Division (SPD) uses CalEnviroScreen and other equity tools to analyze utility infrastructure, climate risk, and emergency planning, while the Water Division uses CalEnviroScreen to assess the affordability of water system service areas. These applications support efforts to identify underserved communities and inform equitable decision-making. In regulatory proceedings, the CalEnviroScreen tool is used more routinely. Administrative Law Judges (ALJs) often require rail applicants to submit CalEnviroScreen data and explain how their projects align with ESJ Action Plan goals. Additionally, investorowned utilities (IOUs) must use CalEnviroScreen for the ESJ Pilot Study Plan adopted in Decision D.22-12-027 of the Risk-Based Decision-Making Framework proceeding (R.20-07-013), further embedding equity into utility-led initiatives.

Conclusion

Through the implementation of Version 2.0 of the ESJ Action Plan, the CPUC has laid a strong and lasting foundation for equity-centered leadership. By equipping staff with the tools, training, and institutional support needed to integrate ESJ principles into every facet of their work, the agency is turning policy into practice, overall, fostering a culture of inclusion, accountability, and responsiveness at every level. Successfully implemented **85 percent** of the ESJ Action Plan Version 2.0 successfully implemented **80 of the 94** identified actions. This milestone reflects the unwavering dedication, collaboration, and innovation of our staff, divisions, and stakeholders. More importantly, it reflects our shared commitment to advancing equity across policies, programs, services, initiatives, and internal processes—from public proceedings and rulings to pilots, workshops, and community engagement.

Final Thoughts from Nancy Diaz, ESJ Executive Leader



Throughout this ESJ journey, the CPUC has demonstrated strong leadership in learning, implementing, and advancing environmental and social justice. In collaboration with leaders, employees, teams, and community stakeholders, the CPUC has developed a rich collection of case studies that reflect measurable achievements and meaningful impact across California's diverse communities. These stories are more than milestones. They are powerful evidence of transformation and a testament to what is possible when people come together to drive systemic change.

We extend our heartfelt appreciation to the many employees, leaders, community partners, and all stakeholders whose dedication, insights, and tireless efforts made this progress possible. Your contributions through leadership, collaboration, innovation, and advocacy were essential to our success. Every action, every voice, and every partnership has helped advance equity and justice in tangible, lasting ways.

As we look to the future, we remain anchored in the understanding that advancing environmental and social justice is not a single moment, but a continuous and collective responsibility of each of us. Our work must evolve alongside our communities, guided by a commitment to service, equity, and long-term vision.

As writer and activist James Baldwin once said, "The world changes according to the way people see it, and if you can alter, even by a millimeter, the way people look at reality, then you can change the world." And in the words of Dr. Martin Luther King, Jr., "Everyone can be great, because everyone can serve."

Together, let us celebrate how far we've come, and recommit to the journey ahead with purpose, passion, and the shared power to serve and make the seemingly impossible possible for our communities, our environment, our future, and our world.

Appendix A: Additional Case Studies

CASE STUDY 1: Understanding and Acting on Affordability Water Rates, 2.4.3: Pilot Utilization of Affordability Metrics in CPUC Proceeding, and 3.4.4: Continue Understanding Challenges of ESJ Communities with Communications Affordability (Water Division, ESJ 3.2.2)

Background

Through Order Instituting Rulemaking R.18-07-006, the CPUC sought to strengthen its oversight of affordability across IOU services, including water, energy, and communications. The CPUC holds a core responsibility to ensure that utility rates remain just and reasonable. This rulemaking was initiated to define "affordability" more clearly and establish consistent metrics for evaluating customer impacts, particularly in disadvantaged communities.

Area of Opportunity

The absence of a standardized affordability definition made it difficult to assess the burden of utility costs on customers. Many ratepayers, particularly those in low-income and vulnerable communities, have struggled to manage increasing utility bills, underscoring the need for a data-driven framework to evaluate the reasonableness of utility rates and their impact on affordability.

Solution

In Phase I, the CPUC adopted Decision (D.) 20-07-032, which established key affordability definitions and metrics, ordered IOUs to submit quarterly cost and rate tracking tools, and mandated the publication of an Annual Affordability Report. The key definitions and service thresholds included:

- Affordability was defined as the extent to which a representative household can pay for essential utility services given their socioeconomic status.
- Essential service levels were set at 600 cubic feet for water, baseline allowances by climate zone for electricity and gas, and 25/3 Mbps for broadband (to be upgraded to 100/20 Mbps).
- The Affordability Ratio (AR) was created to represent the share of disposable income spent on utility services after nondiscretionary expenses like housing.

In Phase II, D.22-08-023 directed utilities to include affordability metrics in applications that propose revenue requirement increases greater than 1%, including Tier 3 Advice Letters for water utilities. It also allowed these

metrics to be forecasted for future rates, aligned vulnerability assessment with CalEPA's CalEnviroScreen, and introduced a new classification, Areas of Affordability Concern (AACs), based on affordability metrics. A two-year evaluation period was established to gather stakeholder input and refine the overall affordability framework.

Results

- The rulemaking has created a robust analytical framework for assessing the affordability of utility services, ensuring that rate increases are evaluated not just by cost recovery needs but by their impact on household financial stability.
- The new definitions and metrics are supporting data-informed regulation, guiding both current rate reviews and future rate-setting policies to better protect affordability in vulnerable communities. The CPUC developed and adopted four core affordability metrics:
- 5) Affordability Ratio (AR) share of income spent on utilities after nondiscretionary costs.



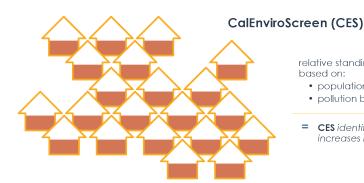
where utility services are least affordable for households at a particular point of the income distribution (e.g., AR_{20} is households at the lowest 20th percentile of income)

6) Hours at Minimum Wage (HM) – number of work hours required to pay utility bills.

Hours at Minimum Wage (HM)



CalEnviroScreen (CES) – to identify environmentally and socially vulnerable communities.



relative standing of community (census tract)

- population characteristics
- · pollution burden
- CES identifies communities least able to afford increases in charges for essential services

Areas of Affordability Concern (AACs) – communities identified through high AR values.

These metrics are now being used to assess whether proposed rate changes are reasonable and equitable, with particular focus on how low-income households and communities are affected.

CASE STUDY 2: Propose new RAMP requirement in the SMAP OIR proceeding to address ESJ in the RAMP reports (Safety Policy Division, ESJ 4.1.4).

Background

The Phase II Scoping Memo in R.20-07-013⁵ (the Risk-Based decision Making Framework that provides requirements for the utility risk assessment RAMP report) asks if the CPUC should consider impacts on the Environmental and Social Justice (ESJ communities of decisions and activities in that proceeding, including the extent to which actions taken here impact the achievement of any of the nine goals of the CPUC's ESI Action Plan.6

In February 2019, the CPUC adopted its ESJ Action Plan as a comprehensive strategy and framework for addressing ESJ issues in each proceeding. The CPUC approved version 2.0 of the ESJ Action Plan on April 7, 2022.7 The most recent update to the ESJ Action Plan reinforces its focus on equity, which is defined as "increasing access to power, redistributing and providing additional resources, and eliminating barriers to

⁵ Ordering Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities, July 16, 2020, at: https://apps.cpuc.ca.gov/apex/f?p=401:5::::RP,5,RIR,57,RIR::

⁶ Phase II Scoping Memo at 5.

opportunity, to empower low-income communities of color to thrive and reach full potential." The ESJ Action Plan includes one action item that is directly related to risk assessment. Action Item 4.1.4 "require[s] Investor-Owned Utilities (IOUs) to overlay planned infrastructure mitigations on the CalEnviroScreen⁹ map to identify what portions of the mitigations would occur within disadvantaged communities when geographic locations of proposed mitigations are known." This includes the Disadvantaged Community (DAC) proportion percentage of the mitigation in the RAMP narrative and the estimated risk reduction for the DAC portion.

Area of Opportunity

On November 2, 2020, the Scoping Memo addressed how proceeding R.20-07-013 may affect ESJ communities in any of the CPUC's nine ESJ Action Plan goals.¹¹ It asked the question: Should the CPUC consider impacts on ESJ communities, including the extent to which action impacts achievement of any of the nine goals of the CPUC's ESJ Action Plan, including the ESJ Pilot Study Plan?¹²

Solution

In the rulemaking proceeding R.20-07-013, Decision <u>D.22-12-027</u>, Ordering Paragraph 5 directs the IOUs to undertake an ESJ Pilot Study Plan (PSP) as part of each IOU's next RAMP filing. The CPUC directs IOUs to implement a pilot program utilizing CalEnviroScreen. This pilot is required to specifically include the Disadvantaged and Vulnerable Communities (DVCs), ¹³ and the outcomes of these studies are to be incorporated into RAMP filings beginning in 2024 and continuing thereafter.

⁸ ESJ Action Plan version 2.0. at 8.

⁹ CalEnviroScreen refers to the Office of Environmental Health Hazards Assessment's California Communities Environmental Health Screening Tool. Additional information available as of September 7, 2022, here: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

¹⁰ ESJ Action Plan version 2.0. at 43, Action Item 4.1.4.

¹¹ Draft Staff Proposal on Phase I, Track 2 Rulemaking 20-07-013, Safety Policy Division, April 21, 2022.

¹² The ESJ Action plan is available on the CPUC's website, available as of September 7, 2022 at: https://www.cpuc.ca.gov/news-andupdates/ newsroom/environmental-and-social-justice-action-plan.

¹³ See D.20-08-046 at 13, the CPUC's Decision on Energy Utility Climate Change Vulnerability Assessments and Climate Adaptation in Disadvantaged Communities (Phase 1, Topics 4 and 5). "A DVC for purposes of this proceeding consists of communities in the 25% highest scoring census tracts according to the most current versions of the California Communities Environmental Health Screening Tool (CalEnviroScreen), as well as all California tribal lands, census tracts that score in the highest 5% of Pollution Burden within CalEnviroScreen, but do not receive an overall CalEnviroScreen score due to unreliable public health and socioeconomic data, and census tracts with median household incomes less than 60% of the state median income."

Additionally, this pilot addressed several ESJ Goals through seven Action Items:

- 1) Consider equity and identify risk impacts to ESJ communities (include DVCs and non-DVCs) using CalEnviroScreen;
- 2) Consider investments in clean energy to mitigate risk in ESJ communities;
- 3) Consider mitigations that improve air quality and public health under the Assembly Bill (AB) 617 community air protection program;
- 4) Evaluate the impact of climate resiliency in ESJ communities;
- 5) Evaluate the impacts of wildfire smoke disproportionately impact ESJ communities;
- 6) Estimate risk mitigations in DVCs and non-DVCs; and
- 7) Enhance outreach & public participation for ESJ communities

The ESJ PSP is designed to ensure the IOUs incorporate equity considerations and address the needs of the most vulnerable populations, particularly DVCs, in their risk assessments and mitigation strategies. Key action items include reducing air pollution, enhancing climate resilience, and integrating ESJ principles into the CPUC's risk-based decision-making framework (RDF). The IOUs are required to consult with the Disadvantaged Communities Advisory Group (DACAG) and the Community-Based Organization Working Group (CBOWG) during the development of their PSP. Additionally, IOUs are required to host a public webinar on their ESJ pilot study during the planning phase.

PG&E is the first utility to implement the ESJ framework within its RAMP filing to improve how it assesses and addresses community concerns. In June 2023, PG&E presented the ESJ PSP to the CBOWG and DACAG for feedback, followed by a public webinar in July to gather stakeholder input. Incorporating this feedback, PG&E revised the ESJ PSP included in its 2024 RAMP filing, focusing on identifying equity issues affecting DVCs and evaluating cumulative impacts to prioritize actions that support sustainable communities. Using GIS mapping tools, PG&E identified Disadvantaged Communities (DACs), including low-income areas (below 80% median income) and those recognized under programs such as CARB's AB 617, Tribal Trust Lands, CalEnviroScreen 4.0 (top 25% and top 5% for pollution burden), U.S. Department

¹⁵ SPD Report on PG&E 2024 RAMP Application (A.) 24-05-008, November 8, 2024.

Note: PG&E 2024 RAMP, Appendix A, ESJ Pilot Study Plan at App A-1

Note: SPD Report on PG&E 2024 RAMP Application (A.) 24-05-008, November 8, 2024.

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¹⁴ D.22-12-027, OP 5.

¹⁶CalEnviroScreen is a mapping tool that helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects. CalEnviroScreen uses environmental, health, and socioeconomic information to produce scores for every census tract in the state. The tool is developed by the California Office of Environmental Health Hazard Assessment (OEHHA). The tool is available at OEHHA's website at https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

of Energy Disadvantaged Justice 40 communities, and Census Tract data from 2010 and 2020, based on ZIP codes and county boundaries.

Results

In accordance with CPUC Decision D.22-12-027, PG&E completed all seven required action items, as reported in its 2024 RAMP filing. The following outcomes from PG&E's ESJ PSP action items illustrate these efforts.

PSP Action Item #2: Consider investments in clean energy resources in the RDF as a possible means to improve safety and reliability and mitigate risks in DVCs.

In alignment with CPUC direction, PG&E is tasked with enhancing the risk reduction benefits of its Microgrid Incentive Program (MIP) and Community Microgrid Enablement Program (CMEP) to support clean energy access in DVCs. PG&E utilized two key programs:

- MIP aims to promote climate resilience and equitable access to microgrids for public health, safety, and welfare in DVCs, with a program budget of \$79.2 million. PG&E is currently collaborating with community applicants to allocate funding and develop microgrids on its distribution system.
- **CMEP** provides cost offsets (up to \$3 million per project) for essential microgrid infrastructure, such as isolation devices and controllers, in areas with significant resilience needs. The program prioritizes DVCs vulnerable to outages and is designed to enhance energy resilience across multiple customers.

Both programs are intended to improve safety, reliability, and risk mitigation in DVCs. However, the 2024 RAMP filing does not present quantifiable evidence of their impact on specific risks. PG&E references CPUC Decision D.21-01-018, stating microgrids can address climate-related inequities, but these benefits are not clearly connected to risk reductions in DVCs identified in the RAMP. In the evaluation of the PG&E RAMP report, SPD recommended that PG&E provide detailed analysis in its Test Year 2027 General Rate Case (GRC) filing, demonstrating how MIP and CMEP contribute to measurable improvements in safety and reliability for DVCs affected by risks identified in the 2024 RAMP. ¹⁷

Note: SPD Report on PG&E 2024 RAMP Application (A.) 24-05-008, November 8, 2024.

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¹⁷ PG&E 2024 RAMP Report, Exhibit PG&E-2, Chapter 7, pages 7-13 to 7-15.

PSP Action Item #5: Evaluate if the estimated impacts of wildfire smoke included in the RDF disproportionately impact DVCs.

In its 2024 RAMP, PG&E stated that its ESJ PSP aims to identify whether DVCs are disproportionately impacted by wildfire smoke. In addition to broader studies, it plans to integrate wildfire smoke analysis methodologies for evaluation.

Most of PG&E's discussion mentions the 2022 California Air Resources Board (CARB) Scoping Plan. ¹⁸ However, it is unclear whether PG&E reviewed any research conducted through CARB funding on the health impacts of exposure to wildfire smoke. ¹⁹ PG&E also referenced two academic articles which conclude that more information is needed about the health effects of wildfire smoke. From its review, PG&E concluded: ²⁰

CARB's Scoping Plan does not include any conclusions on the impact of wildfire smoke on DVCs;

CARB asserts that DVCs experience greater exposure to PM2.5²¹ pollution from all sources without identifying wildfire smoke as a significant contributor; and

There is consensus in other public studies that wildfire smoke impacts generally require further study.

In its evaluation of PG&E's 2024 RAMP filing, SPD found that PG&E failed to address well-documented research on the health impacts of wildfire smoke in California, particularly in disadvantaged vulnerable communities (DVCs). PD concluded that the ESJ PSP effort was a missed opportunity to perform a more rigorous review of the subject. In contrast, San Diego Gas & Electric (SDG&E) used "acres burned" as a proxy for wildfire smoke exposure in its 2021 RAMP filing—a method supported by the Mussey Grade Road Alliance (MGRA)²³ and acknowledged by SPD. SPD recommended that PG&E adopt this interim proxy in its 2027 GRC filing.

Note: SPD Report on PG&E 2024 RAMP Application (A.) 24-05-008, November 8, 2024.

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¹⁸ California Air Resources Board (CARB) Scoping Plan, December 2022.

¹⁹ More details can be found here https://ww2.arb.ca.gov/resources/documents/examining-health-impacts-short-term-repeated-exposure-wildfire-smoke

²⁰ PG&E 2024 RAMP Report, Exhibit PG&E-2, Chapter 7, page 7-21.

²¹ PM 2.5 stands for atmospheric particulate matter that consists of fine particles less than 2.5 micrometers in diameter.

²² Heaney, Alexandra, Jennifer D. Stowell, Jia Coco Liu, Rupa Basu, Miriam Marlier, and Patrick Kinney. "Impacts of fine particulate matter from wildfire smoke on respiratory and cardiovascular health in California." GeoHealth 6, no. 6 (2022): e2021GH000578.

²³ For details, see Mussey Grade Road Alliance (MGRA) Informal Comments to the Safety Policy Division Regarding Pacific Gas and Electric Company's RAMP Filing (Revision 1), October 11, 2024 at 29 and Mussey Grade Road Alliance Protest on SDG&E's 2021 RAMP Application, June 9, 2021 at 11-12.

CASE STUDY 3: Include ESJ filters in quarterly scanning of CAB complaints to identify trends and patterns of consumer issues in ESJ communities (Consumer Protection and Enforcement Division, ESJ 6.2.2)

In March 2024, UEB's ESJ Screening methodology saw an uptick in Abusive Marketing Complaints from customers of Wave Energy LLC in ESJ areas. Of the 17 complaints received in March 2024, 13 were found to be in ESJ territories (76%). UEB analysts continued to track the trends for Wave Energy LLC for the following months and found that the complaints tapered off, but not completely. In April 2024, UEB received 3 complaints (0 ESJ), May and June each received 11 complaints of which 4 complaints were ESJ (36%). UEB Analysts observed that CTAs seem to be ever present in ESJ territories although. Any Core Transport Agent (CTA)-related findings that the ESJ Screening Methodology finds is forwarded to UEB's CTA team.

Appendix B: Table of ESJ Action Items by Goal, Lead Division and Status

Goal 1: Consistently Integrate Equity and Access Considerations Throughout CPUC Proceedings and Other Efforts

Index	Action Item	Lead Division	Status
1.1	Build Systemic Approaches for ESJ Priorities		
1.1.1	ESJ Impacts in the CPUC Processes	Communications, Administrative Law Judge	In Progress
1.1.2	Institutionalize Implementation of ESJ Action Plan within Divisions	ESJ Core Team	Closed*
1.1.3	Tracking Federal Initiatives Related to Environmental Justice	Office of the CPUC	Closed*
1.1.4	Coordination with ESJ- focused Staff at Regulated Utilities	ESJ Core Team	Closed
1.1.5	ESJ Definitions: Catalogue and Assess Opportunities for Mutual Eligibility	Office of the CPUC	In Progress
1.2	Expand Opportunities for Access		
1.2.1	Evaluation of Intervenor Compensation Program (ICOMP)	Administrative Law Judge	Closed
1.2.2	Consider Funded Community Based Organization (CBO) Program	External Affairs	Closed*
1.2.3	Implementation of Tribal Consultation Policy	Executive Office (Tribal)	In Progress
1.2.4	ADA Accessibility of the CPUC Internet	IT and Support	In Progress
1.2.5	Provide "Participate in the CPUC" training via various methods	External Affairs	Closed*
1.2.6	Explore Capacity Building Initiatives	External Affairs	Closed*

Goal 2: Increase Investment in Clean Energy Resources to Benefit ESJ Communities, Especially to Improve Local Air Quality and Public Health

Index	Action Item	Lead Division	Status
2.1	Outreach and Engagement		
2.1.1	Alignment & Coordination Across Marketing, Education & Outreach (ME&O) Plans	Executive Office (DEIAB/EEO/ESJ)	Under Review
2.1.2	Improve Feedback Loop from Customers to Foster Iterative Process in Program Design	Energy	Closed*
2.1.3	Continue Support and Coordination of the DACAG	Energy	Closed*
2.2	Research & Analysis to Understand Impact		
2.2.1	Study: Reliability and Emissions Impacts of Fossil Generation In and Around Disadvantaged Communities, including the Impact of Storage Alternatives	Energy	Closed*
2.2.2	Study: Societal Cost Test in Integrated Resource Plans	Energy	Closed
3.2.3	Study: Quantifying the Air Quality Impacts of Decarbonization in California	Energy	Closed
2.2.4	Study: Baseline of Greenhouse Gas Emissions of Small-Scale Biomass	Energy	In Progress
2.2.5	Providing Electric Program Investment Charge (EPIC) Research and Development Program Benefits to ESJ Communities	Energy	Closed*
2.3	Move Towards Mutual Eligibility & Maximizing Impact		
2.3.1	Distributed Energy Resources (DER) Action Plan	Energy	Closed
2.3.2	Consider Streamlined Application Processes and Enhance Coordination for Low Income and Clean Energy Programs	Energy	Closed*
2.3.3	Leverage Scale of California Alternative Rates for Energy (CARE) and Energy Savings Assistance (ESA) Programs to Cross-Refer to Other CPUC Initiatives	Energy	Closed*
2.4	Address Impacts in ESJ Communities		
2.4.1	Understanding Impacts to ESJ Communities in Biomethane Procurement	Energy	Closed

Index	Action Item	Lead Division	Status
2.4.2	Long Term Payment Plans and Pilots for Arrears & Disconnections	Energy	Closed*
2.4.3	Pilot Utilization of Affordability Metrics in CPUC Proceeding	Energy	Closed*
2.4.4	Net Energy Metering (NEM): Ensuring Equitable Incentives	Energy	Closed
2.4.5	Dynamic Pricing: Implementing Rate Flexibility & Management	Energy	Closed*
2.4.6	Long Term Gas Planning	Energy	Closed
2.4.7	Understanding Diesel Back Up Generators (BUGs) and Potential Impacts on ESJ Communities	Energy	Closed*
2.4.8	California Environmental Quality Act (CEQA): Opportunities for Alignment with Local Planning	Energy	Closed
2.5	Continue Ongoing Investment		
2.5.1	Establish Equity Segment of Program Administrators' Energy Efficiency (EE) Portfolios	Energy	Closed*
2.5.2	Continue Prioritization of ESJ Communities in Building Decarbonization Programs	Energy	Closed
2.5.3	Document Analysis of Investment in Electrification in San Joaquin Valley proceeding	Energy	In Progress
2.5.4	Continued Prioritization of ESJ Communities in Microgrid Incentive Program	Energy	Closed*
2.5.5	Improving Access to Electric Vehicle Charging for ESJ Communities	Energy	Closed*
2.5.6	Continue Tracking and Evaluation of Customer Generation Programs and Improve Effectiveness in Reaching ESJ Communities	Energy	Closed*

Goal 3: Strive to Improve Access to High-Quality Water, Communications, and Transportation Services for ESJ Communities

Index	Action Item	Lead Division	Status
3.1	Equitable Clean Transportation		
3.1.1	Implementation and Monitoring of Accessibility of TNCs and AVs	Consumer Protection & Enforcement	Closed*
3.1.2	Implementation of Clean Mile Standard and Impact on Drivers from ESJ Communities	Consumer Protection & Enforcement	Closed*
3.2	Water Customer Resilience		
3.2.1	Maximize Customer Assistance Programs (CAPs) and Arrearage Management Plans (AMPs) for Low-Income Water Customers	Water	Closed*
3.2.2	Understanding and Acting on Affordability of Water Rates	Water	Closed*
3.2.3	Water Resilience and Reliability in the Face of Drought	Water	In Progress
3.2.4	Incorporating ESJ Considerations into Consolidations of Small Water Companies	Water	Closed*
3.3	Extend Rail Safety to ESJ Communities		
3.3.1	Section 190: Grade Separation at Existing Crossings - Outreach & Prioritizing ESJ Communities	Rail	In Progress
3.3.2	Homeless Encampments: Continued Collaboration with Local Governments	Rail	Closed*
3.3.3	Opportunities for ESJ Comments in Environmental Letters	Rail	Closed*
3.3.4	Involving ESJ Communities in Rail Proceedings	Rail	Closed*
3.4	Extend Essential Communications Services to ESJ Communities		
3.4.1	Increase Collaboration and Knowledge Share Across Telecommunications Public Purpose Programs	Communications	Closed*
3.4.2	Implementation of \$6 billion Broadband Legislation	Communications	Closed*
3.4.3	Implementation and Lessons Learned from Tribal Technical Assistance Program	Communications	Closed*

Index	Action Item	Lead Division	Status
3.4.4	Continue Understanding Challenges of ESJ Communities with Communications Affordability	Communications	Closed*
3.4.5	Phone and Video Service for Incarcerated Persons	Communications	Closed*
3.4.6	Lessons Learned from Lifeline Assessment	Communications	Closed*
3.4.7	Continue Efforts to Increase Access to Lifeline Program for Vulnerable Populations	Communications	Closed*

Goal 4: Increase Climate Resiliency in ESJ Communities

Index	Action Item	Lead Division	Status
4.1	Emphasize Adaptive Capacity		
4.1.1	Initiate Climate Change Adaptation Planning with Emphasis on Disadvantaged Vulnerable Communities	Energy	In Progress
4.1.2	Consider Safety Policy Responses to Climate Change	Safety Policy	Closed
4.1.3	Framework for Integrating Resiliency Planning and Evaluation into Current Grid Planning Policy	Energy	Closed
4.1.4	Propose new RAMP requirement in the SMAP OIR proceeding to address ESJ in the RAMP reports.	Safety Policy	Closed

Goal 5: Enhance Outreach and Public Participation Opportunities for ESJ Communities to Meaningfully Participate in the CPUC's Decision-making Process and Benefit from CPUC Programs

Index	Action Item	Lead Division	Status
5.1	Improve Communication with an ESJ Lens		
5.1.1	Fact Sheets and Collateral Materials	External Affairs	Closed*
5.1.2	Translation of Key Documents and Collateral Materials	External Affairs	Closed*
5.1.3	Email Communication and Newsletters	External Affairs	Closed*
5.1.4	Interpretation Availability at CPUC Meetings	External Affairs	Closed*
5.2	Continue to Emphasize Engagement with CBOs		
5.2.1	Engage CBOs Statewide	External Affairs	Closed*
5.2.2	Deepen Relationships with CBOs in TEAM and CHANGES	External Affairs	Closed*
5.3	Build Pathways for Public Participation		
5.3.1	Best Practices for Virtual and Hybrid Meetings	External Affairs	Closed*
5.3.2	Public Participation in Transportation Proceedings	Consumer Protection & Enforcement	Closed*
5.4	Enhance Engagement with Particular ESJ Communities		
5.4.1	Engage and Serve Communities with Access and Functional Needs	Safety Policy	Closed
5.4.2	Bolster CPUC's Tribal Land Transfer Policy	Executive Office (Tribal)	In Progress

Goal 6: Enhance Enforcement to Ensure Safety and Consumer Protection for ESJ Communities

Index	Action Item	Lead Division	Status
6.1	Protect ESJ Consumers		
6.1.1	TEAM/CHANGES Program Updates	External Affairs	Closed*
6.1.2	Strategize Use of Consumer Affairs Data in ESJ Policies	External Affairs	Closed*
6.2	Conduct Proactive Action and Analysis in Transportation and Utility Enforcement	Consumer Protection & Enforcement	Closed*
6.2.1	Proactively Initiate Compliance Checks in ESJ Communities	Consumer Protection & Enforcement	Closed*
6.2.2	Include ESJ filters in quarterly scanning of CAB complaints to identify trends and patterns of consumer issues in ESJ communities	Consumer Protection & Enforcement	Closed
6.2.3	Expand Opportunities to Leverage Enforcement Action Settlements for ESJ Purposes	Consumer Protection & Enforcement	Closed*
6.2.4	Analysis of Potential Redlining in ESJ Communities by Transportation Network Companies (TNCs)	Consumer Protection & Enforcement	Closed*
6.2.5	Analysis of Potential Redlining in ESJ Communities by Transportation Network Companies (TNCs)	Consumer Protection & Enforcement	Closed
6.3	Apply ESJ Lens to CPUC Enforcement Policy		
6.3.1	Develop an ESJ Lens for New CPUC Enforcement Policy	Executive Office	Closed*
6.4	Maximize Opportunities within Utility Audits		
6.4.1	Develop a Community Engagement Step to Gas and Electric Infrastructure Safety Inspection Process	Safety Enforcement	Closed*
6.4.2	Data Analysis and Mapping of Audit Data and Incident Reports to Understand Geographic Distribution and Potential ESJ Cumulative Impact	Safety Enforcement	In Progress

Goal 7: Promote High Road Career Paths and Economic Opportunity for Residents of ESJ Communities

Index	Action Item	Lead Division	Status
7.1	Maximize Authority to Promote High Road		
7.1.1	Implementation of MOU with CA Workforce Development Board	ESJ Core Team	Closed
7.2	Educate on High Road Careers		
7.2.1	Share CPUC-specific Best Practices	ESJ Core Team	Closed
7.3	Partner with Utilities and Sister Agencies		
7.3.1	Expand the Impact of Best Practices	ESJ Core Team	Closed
7.3.2	Leverage Sister Agencies to Maximize High Road Opportunities for ESJ Communities	ESJ Core Team	Closed
7.3.3	Furthering Utility Supplier Diversity	External Affairs	Closed

Goal 8: Improve Training and Staff Development Related to ESJ Issues Within the CPUC's Jurisdiction

Index	Action Item	Lead Division	Status
8.1	Bolster Staff Knowledge on ESJ Issues and Resources		
8.1.1	Division-Specific Training on Incorporating ESJ Issues into Proceedings	ESJ Core Team	In Progress
8.1.2	ESJ Session at New Employee Orientation (NEO)	ESJ Core Team	Closed*
8.1.3	Web Resources - CPUC ESJ Action Plan Webpage and Internal ESJ Resource Website	ESJ Core Team	Closed*
8.1.4	Tribal Engagement Training	Executive Office (Tribal)	Closed
8.2	Support Emerging Priorities and Skill Needs		
8.2.1	Alignment with Upcoming Racial Equity Action Plan (REAP)	Executive Office (DEIAB/EEO/ESJ)	Closed*
8.2.2	Community Engagement Training for CPUC Staff	ESJ Core Team	Closed

Index	Action Item	Lead Division	Status
8.2.3	Advance Diversity, Equity, and Inclusion	Human Resource	Closed
8.2.4	Meeting Facilitation Training for Staff	Human Resource	Closed

Goal 9: Monitor the CPUC's ESJ Efforts to Evaluate How They Are Achieving Their Objectives

Index	Action Item	Lead Division	Status
9.1	Establish Consistent Quantitative Metrics		
9.1.1	Metrics to Measure Impact, Community Outreach & Engagement	Executive Office (DEIAB/EEO/ESJ)	Under Review
9.1.2	Data Collection: Standardizing Data Requests & Key ESJ Indicators	Office of the CPUC	Closed
9.1.3	Geographic Distribution of Low-Income Programs + Ongoing Analyses	ESJ Core Team	Closed*
9.2	Promote Meaningful Feedback Loops		
9.2.1	Metrics to Measure Satisfaction, Comprehension, and Experience	Executive Office (DEIAB/EEO/ESJ)	Under Review

^{*}Closed with ongoing activities



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