

November 24, 2021

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Via email to ESJActionPlan@cpuc.ca.gov

**Comments of the Center for Sustainable Energy® regarding the California Public Utilities
Commission’s Draft Environmental and Social Justice Action Plan Version 2.0**

The Center for Sustainable Energy® (CSE; www.energycenter.org) is pleased to provide comments regarding the California Public Utilities Commission’s (CPUC, Commission) Draft Environmental and Social Justice (ESJ) Action Plan Version 2.0. CSE commends the Commission’s efforts to integrate and prioritize equity and environmental and social justice principles and considerations throughout its policies, processes, and programs.

CSE is a 25-year-old national nonprofit, headquartered in San Diego, with a single word mission: Decarbonize. We provide program administration, technical assistance, and policy advisement services to a diverse set of stakeholders across the clean energy and transportation sector. As a nonprofit without members or donors, CSE serves as a trusted resource helping government agencies implement successful policies and technology programs that use funds in the best interest of consumers, ratepayers, and the public.

CSE provides these comments based on our experience helping to shape equity stakeholder processes and policies, as well as designing and implementing local and statewide electric vehicle (EV), EV infrastructure incentive, and distributed energy resources (DER) programs across multiple jurisdictions. Many of these programs are equity-centered or have equity elements, such as increased incentives for low-income households. In California, CSE is pleased to work with the CPUC in administering the Solar On Multifamily Affordable Housing (SOMAH) Program and the Self-Generation Incentive Program (SGIP).

CSE offers comments and suggestions regarding the following Action Items and resources:

- Ensure that community-based organizations (CBOs) are part of the development of the ESJ Definition Framework, as indicated in Action Item 1.1.5
- Make publicly accessible the updates to “Appendix C: Key ESJ Definitions & Statutes”
- Support Action 1.2.2 to “Launch Pilot Program for Participation of Community Based Organizations (CBOs)”
- Support Action Item 9.1.1 to develop “Metrics to Measure Impact, Community Outreach & Engagement”

CSE’s recommendations are discussed in detail below.

Ensure that community-based organizations (CBOs) are part of the development of the ESJ Definition Framework, as proposed in Action Item 1.1.5

CSE looks forward to the development of an ESJ Definition Framework as it will facilitate the alignment of definitions and corresponding eligibility criteria amongst the various equity programs. In order to reflect community-identified needs and solutions in the development of this systemic approach, CBOs should be part of the creation process. Developing this Framework should not be solely an internal CPUC process.

Based on our experience, equity definitions and any associated processes to develop them are very personal endeavors for communities, and as such, these efforts need to include their voices and perspectives. CSE is part of the Equity Stakeholder Working Group (WG) that helped the City of San Diego develop its Climate Equity Index (CEI) Report.¹ We saw firsthand how crucial it was to have a community-driven process to develop the CEI and the report's climate equity definition, which was tailored to the input of the CBOs and other stakeholders in the WG. This process was mirrored during the creation of the City of Chula Vista's own CEI and climate equity definition.² The definition arrived at was very similar to that of the City of San Diego's, but it was modified to include priority topics for community stakeholders in Chula Vista.

Make publicly accessible the updates to "Appendix C: Key ESJ Definitions & Statutes"

CSE applauds the Commission for cataloguing key ESJ and equity definitions and statutes in Appendix C of the Draft ESJ Action Plan Version 2.0. A multitude of these types of definitions exists, and it will be very helpful to have them easily accessible in one central repository that will be regularly updated. The cover page of this appendix currently states, "This resource will continue to be updated and available internally on the CPUC ESJ SharePoint website." CSE encourages the Commission to make updates to this resource publicly accessible by posting revised versions on the CPUC's ESJ Action Plan webpage. External stakeholders, such as CBOs, advocates, and program administrators and implementers, will greatly benefit from being able to reference to this resource in proceeding filings, public comments, and other venues.

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¹ City of San Diego. San Diego's Climate Equity Index Report.

https://www.sandiego.gov/sites/default/files/2019_climate_equity_index_report.pdf

² City of Chula Vista. Draft Chula Vista Climate Equity Framework.

<https://www.chulavistaca.gov/home/showpublisheddocument?id=22124>

Support Action 1.2.2 to “Launch Pilot Program for Participation of Community Based Organizations (CBOs)”

CSE strongly supports the launch of a pilot grant program to increase the access and participation of CBOs in CPUC programs and processes.

CSE administers the statewide Clean Vehicle Rebate Project (CVRP) for the California Air Resources Board, which has a Community Partners Network³ as a key equity program component. This network is a statewide coalition of 18 CBOs that helps break down EV barriers in low-income communities and communities of color and deliver information on CVRP increased rebates and other stackable incentives, including those for EV charging infrastructure. The CBOs are compensated to conduct tailored and culturally appropriate community outreach and engagement activities, and they also share insights and feedback to help develop policies and programs. Through this work, we have seen firsthand the positive impact of having deep partnerships with CBOs and compensating them for their expertise, not only for education and outreach efforts but also to help inform policies and program design. The launch of a pilot grant program to increase the access and participation of CBOs in CPUC programs and processes will positively impact future policies and programs.

Support Action Item 9.1.1 to develop “Metrics to Measure Impact, Community Outreach & Engagement”

CSE strongly supports the ESJ Core Team in the development of community outreach and engagement metrics, criteria, and other guidance to ensure that utility programs conduct and measure meaningful and effective outreach and engagement. CSE was recently part of the California Energy Efficiency Coordinating Committee’s (CAEECC) Equity Metrics Working Group (WG). We were the lead WG member to develop the recommendation and rationale for consideration of community engagement as an indicator that can be tracked and reported on as counts and types of community engagement activities for energy efficiency portfolio programs.⁴ This perspective varied from that of the Investor-Owned Utilities and some of the other program administrators who preferred to treat community engagement as solely a principle.

Accordingly, we encourage the ESJ Core Team to review our CAEECC Equity Metrics WG proposal, which includes recommended community engagement activities to be tracked and reported on during the different phases of program development: design, implementation, and

³ “Community-Based Organizations Are Critical to Achieving EV Equity”.

<https://energycenter.org/thought-leadership/blog/community-based-organizations-are-critical-achieving-ev-equity>

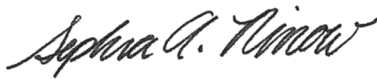
⁴ CAEECC Equity Metrics Working Group Report, pages 29-33: https://4930400d-24b5-474c-9a16-0109dd2d06d3.filesusr.com/ugd/849f65_422f2a5a35bb4bcbababe50e7eccc6f2.docx?dn=Final%20EMWG%20Report_10.20.2021.docx

assessment. These activities were adapted from the California Air Resources Board's Community Inclusion Guidance for its Sustainable Transportation Equity Project (STEP).⁵

Conclusion

CSE appreciates the opportunity to provide these comments in support of the CPUC's Draft ESJ Action Plan Version 2.0. We look forward to continued collaboration with the CPUC and other stakeholders in advancing and embedding equity and environmental and social justice in the Commission's work.

Sincerely,



Sephra A. Ninow, J.D.
Director, Regulatory Affairs
Center for Sustainable Energy®
3980 Sherman St., Suite 170
San Diego, CA 92110
Tel: (858) 244-1186
sephra.ninow@energycenter.org



Fabiola P. Lao
Senior Equity Policy Manager
Center for Sustainable Energy®
3980 Sherman St., Suite 170
San Diego, CA 92110
Tel: (858) 429-5157
fabiola.lao@energycenter.org

⁵ Sustainable Transportation Equity Project's (STEP) Community Inclusion Guidance. https://4930400d-24b5-474c-9a16-0109dd2d06d3.filesusr.com/ugd/849f65_c20ff8e70e4e4d299457425028da3840.pdf