



November 24, 2021

Via E-mail (ESJActionPlan@cpuc.ca.gov)

Re: Comments of the Long Duration Energy Storage Association of California on the Environmental Social Justice Action Plan

Dear California Public Utilities Commission,

The Long Duration Energy Storage Association of California (the LDESAC) appreciates the opportunity to respond to the request for comment on the Draft Version 2.0 of the Environmental Social Justice Action Plan (ESJ Action Plan).

**I.
BACKGROUND**

The LDESAC represents a diverse mix of long-duration energy storage (LDS or LDES) technologies, and its members offer products and services along every stage of the value chain, from invention to design, engineering, manufacturing, project development, and full-scale renewables integration.¹

The LDESAC storage technologies currently include pumped hydro, compressed air, liquid air, zinc-air batteries, flow batteries, flywheels, molten salt, electrolytic hydrogen, thermochemical, and repurposed gravity wells. These technologies can be deployed in projects ranging from a few hundred kilowatts to several gigawatts. Some involve site-specific applications, while others can be deployed virtually anywhere. Some, such as pumped storage and concentrating solar thermal, are fully mature and have been commercially deployed around the world for decades, while others like liquid air and zinc, are only now becoming commercially available and require strong public support to advance their deployment.

The LDESAC is fully focused on promoting LDES technologies that are needed to meet California's equity, climate, and reliability goals.

¹ Our membership includes 247Solar, 7Skyline, Cat Creek Energy, Cupertino Electric, E-Zinc, GE Renewables North America, GreenGen Storage, Highview Power, Hydrostor, H2B2 USA, McMillen Jacobs Associates, Morse Associates, NextEra Energy Resources, RedoxBlox, Renewell Energy, Stantec and Zinc8 Energy Solutions.

II. THE LDESAC SUPPORTS THE ESJ ACTION PLAN

The LDESAC supports the work by the Commission to make environmental justice a priority and appreciates the opportunity to provide comments on the ESJ Action Plan.

To begin with, the LDESAC supports the statement that the Commission “is tasked with serving all Californians, and to do so effectively, it must acknowledge that some populations in California face higher barriers to access clean, safe, and affordable utility services.”² In addition, the LDESAC supports the Appendix A Action Plan which outlines roles and responsibilities. The LDESAC also supports the inclusion of a Tribal Consultation policy which should be promoted with all developers.

The LDESAC also thinks that “Goal 1: Consistently integrate equity and access considerations throughout CPUC regulatory activities” is an important priority.³ The LDESAC supports meaningful stakeholder engagement and appreciates the inclusion of environmental justice in the scope of all Commission proceedings.

However, the LDESAC would like to see modeling become more equitable. For one, the Commission could incorporate the new modeling tools and equity policies the California Air Resources Board (CARB) is using for the 2022 Public Scoping process.

The Commission should also incorporate the recommendations from the Greenlining report, “Fighting Redlining & Climate Change with Transformative Climate Communities. As noted in that report:

Transformative Climate Communities (TCC) is a community capacity-building model for fighting climate change, building economic prosperity and redressing the historic systemic disinvestment of low-income neighborhoods. The TCC model empowers the communities most impacted by poverty and pollution to choose their own goals, strategies and projects to reduce greenhouse gas emissions and deliver multiple tangible benefits.⁴

The LDESAC looks forward to working with the CPUC, TCCs and more to advance LDES and LDES can assist in the retirement of fossil fuel generation which are disproportionately located in ESJ communities. Currently, the LDESAC is working to advance LDES projects in ESJ communities.

² ESJ Action Plan, at p. 7.

³ ESJ Action Plan, at p. 20.

⁴ <https://greenlining.org/wp-content/uploads/2021/10/Fighting-Climate-Change-and-Redlining-with-Transformative-Climate-Communities-Final-Report.pdf>

**III.
CONCLUSION**

Based on the arguments presented above, the LDESAC recommends that the Commission adopt the proposals and recommendations provided above.

Respectfully submitted,

November 24, 2021

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