

November 24, 2021

Via Email ([ESJactionplan@cpuc.ca.gov](mailto:ESJactionplan@cpuc.ca.gov))

California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**SUBJECT: Pacific Gas and Electric Company's Comments on the California Public Utilities Commission's Draft Environmental and Social Justice Action Plan, Version 2.0**

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Public Utilities Commission's (CPUC) Draft Environmental and Social Justice Action Plan, Version 2.0.

We share the CPUC's commitment to furthering the principles of environmental and social justice (ESJ) and we look forward to ongoing collaboration with the CPUC and other stakeholders to support the implementation of the Action Plan as an operating framework with which to integrate ESJ considerations throughout the agency's work.

Below, we are pleased to provide comments in response to the CPUC's Draft ESJ Action Plan, Version 2.0. We also describe how PG&E has worked to incorporate ESJ principles into our organization and how we aspire to better serve ESJ communities by expanding our engagement, collaboration, and partnerships.

**Our Focus on Supporting ESJ Communities**

At PG&E, we recognize our responsibility to understand and respect the needs of our neighbors, including low-income communities and Black, Indigenous, and people and communities of color. Our efforts are guided by our [Environmental Justice Policy](#), first established in 2001.

Since that time, PG&E has maintained a dedicated Environmental and Social Justice Manager to coordinate our ESJ efforts from an operational and policy perspective, including engaging with external stakeholders and assisting with internal capacity building as part of a broader companywide effort to better address the needs of disadvantaged and vulnerable communities (DVC).

We also maintain a Tribal Liaison and Deputy Tribal Liaison to lead PG&E's engagement with Native American tribal governments, communities, and organizations, including activities related to Public Safety Power Shutoffs (PSPS), wildfire safety and the development of sustainable, resilient communities.

More broadly, we embrace our foundational role in achieving California's goal of carbon neutrality and transitioning the state to a decarbonized and more climate-resilient economy. We believe clean energy should be affordable for and inclusive of all economic backgrounds. Our wide range of energy efficiency programs help customers reduce their energy use and save money. We also offer financial assistance programs to help customers who are facing financial challenges and who live in disadvantaged communities.

We also understand that some communities face increased challenges and hardship in adapting to changes in the climate. PG&E has taken steps to address system resilience and reliability, as well as engagement with communities, such as through our shareholder-funded Better Together Resilient Communities grant program, which supports community-driven efforts to build climate resilience. As part of the CPUC's Climate Adaptation Order Instituting Rulemaking (OIR), we are conducting a service area-wide assessment of climate vulnerabilities of PG&E's infrastructure, operations, and services. Part of this assessment will include direct outreach with DVCs to seek feedback about potential climate adaptation mitigation measures and needs.

To keep up with the rapid transformation of the energy industry, we are also focused on developing a workforce with the skills and expertise to operate our business safely, while also meeting the needs of our customers. PG&E's PowerPathway™ program continues to play a central role in our workforce development strategy and targets those who are out of work or under-employed and has a strong focus on enhancing opportunities for women and those who have served in the military.

PG&E also has a long history of support for supplier diversity and, last year, we spent \$3.88 billion—or 38.9% of our total expenditures—with diverse suppliers, the highest spend in the 40-year history of our supplier diversity program. PG&E's program includes a focus on capacity building to support the growth and development of small businesses and supports the competitive success of diverse businesses. PG&E also engages community-based organizations (CBOs) and advocacy group partners to provide educational opportunities that complement our technical assistance program objectives.

We recently adopted a [Human Rights Policy](#) in furtherance of our commitment to conduct our business in a manner that respects the human rights of all. In addition, to strengthen our efforts, we are working to develop a broader ESJ Framework for PG&E, with input from ESJ stakeholders and reflecting the ESJ principles established by the CPUC and other state and federal agencies. This includes an enhanced effort to integrate ESJ considerations into PG&E's planning, operations, and community engagement. It also includes a renewed focus on building internal capacity and competency to enable PG&E to better serve ESJ and disadvantaged communities, including Native American communities.

### **Comments on the CPUC's Draft ESJ Action Plan, Version 2.0**

PG&E commends the CPUC for its efforts related to the ESJ Action Plan and for taking a continuous improvement approach with vulnerable populations and ESJ communities. Among other areas, we support the CPUC's goals to provide resources to ESJ communities and organizations to support collaborative community engagement, including expanded technical assistance and direct grants (Goal 1). As proposed, direct grants from the CPUC to CBOs will help facilitate greater community engagement and collaboration with smaller organizations in ESJ communities, and complement efforts already in place by investor-owned utilities (IOU), including PG&E.

We also support the CPUC's goals to increase engagement with Native American Tribes, populations with access and functional needs (AFN), and ESJ community-based stakeholders to continue to move beyond outreach and public participation to collaborative community engagement, and to encourage

effective collaboration between CBOs and IOUs (Goals 2 and 5). This will build upon PG&E's current active collaboration with CBOs through our work with the National Diversity Council and various stakeholder advisory groups, including the Communities of Color Advisory Group, our California Community Advisory Group, and our Small Business Advisory Council. Each of these serves as a valuable forum for the exchange of ideas between PG&E and a diverse mix of community-based and civic organizations.

With regard to Goal 4, "Increase climate resiliency in ESJ communities," PG&E understands that there is a large degree of overlap between ESJ and DVC communities. It would be beneficial for the CPUC to provide additional guidance on how to leverage existing regulatory guidance for outreach to DVCs and how it may be used to benefit ESJ communities, rather than develop parallel mandates for outreach to overlapping communities.

We also applaud the CPUC for its enhanced focus on economic and workforce development in ESJ communities (Goal 7) and welcome the opportunity for more collaboration as we work toward an equitable and just transition to a carbon neutral future.

With regard to the definition of ESJ communities, we look forward to working with the CPUC and other stakeholders to help shape how to define which communities the CPUC considers as ESJ communities and how the CPUC ESJ Action Plan will apply to our work.

PG&E supports the overall goals and objectives of the Action Plan and we appreciate the opportunity to participate in this important dialogue with the CPUC and the communities we are privileged to serve. We also look forward to working with the CPUC and the other IOUs, as outlined in the Action Plan, to foster an ongoing spirit of collaboration with ESJ communities.

Sincerely,

A handwritten signature in blue ink that reads 'Carla Peterman'.

Carla Peterman