

November 24, 2021

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94110

The Protect Our Communities Foundation
4425 Park Blvd, Suite 309
San Diego, CA 92116

Re: Comments on the PUC Environmental and Social Justice Action Plan

The Protect Our Communities Foundation (PCF) would like these following comments to be included on the California Public Utilities Commission *Environmental and Social Justice (ESJ) Action Plan*. As an introduction, PCF agrees that the Commission should vote in favor of the ESJ Action Plan. In addition, PCF believes that the ESJ Action Plan would serve the communities it is intended by converting the Action Plan into an ordinance to strengthen the accountability that can help serve underserved communities. PCF supports the framework to advance climate resiliency in communities of concern.

Expanding Access

We believe it is essential to include, seek, and apply information received from community-based organizations (CBO); in order to understand the needs, gaps, and areas to improve; while implementing a framework that will address the intended communities. Many social justice organizations, including the NAACP Environmental and Climate Justice Program reference a key strategic element by bringing those impacted together, so they are included in the solutions. The ESJ Action Plan shows it is intended to expand access to communities of concern, low-moderate income, and those underserved and under representative. PCF supports expanding access to ESJ communities.

Intervenor Compensation

During the CPUC's webinar November 10, 2021 and November 17, 2021 the topic of the intervenor compensation (ICOMP) was discussed from section 1.2 Expand Opportunities for

Access. Specific pain points by CBOs were shared and the need for improvements was acknowledged by the PUC staff. PCF would like to ask specific details for the ICOMP assessment from section 1.2.

Inquiries for Section 1.2 (Assessment and Expanding Access)

PCF would like to ask for an equity assessment on the backlog ICOMP lists. In addition, provide details for addressing the backlog along with providing recommendations as a result of the assessment within a timeline of 6 months, and not to exceed twelve months. Rationale for this proposed timeline includes the impacts of COVID on BIPOC and communities of concern, as well as the impact to capacity for CBOs to keep their work going; especially for those that represent these communities and rely on volunteers from these communities. PCF believes the proposed timeline of 2-3 years for recommendations is significantly too long to expand access where there are known problems to correct, and the status quo discourages access to proceedings that impact BIPOC communities. This information should be a priority in helping to expand access to nonprofit CBOs to the PUCs proceedings.

Considering the PUC has the most updated information regarding the backlog for intervenor compensation, PCF would like to ask that the details will be provided to address the number of backlog claims from the reports they published online (i.e., November 1, 2021 report)? As an observation from the November 1, 2021 ICOMP list, it does appear that most of the backlog requests are from the environmental and social justice community-based organizations (approximately 161 claims out of 228 listed). The PUCs assessment for intervenor compensation should also evaluate the rationale for rate adjustments.

PCF would like to recommend the backlog of ICOMP base on the first in first out (FIFO) approach, include mechanisms for those gaps that would place an intervenor compensation claim on the backlog to be addressed in a timely manner, three to six months.