



Joseph Mock
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011
Tel: 213.244.3718
Fax: 213.244.4957
JMock@socalgas.com



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

Re: Comments of Southern California Gas Company and San Diego Gas & Electric Company on the Environmental Social Justice Action Plan, Version 2.0

Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) hereby submit comments on the Draft Version 2.0 of the CPUC's Environmental and Social Justice Action Plan (ESJA) served to multiple service lists on November 1, 2021. The guidance and goals reflected in the ESJA supports our values and the way we strive to connect with the communities we serve. This broader effort will help guide and prioritize our investments and decisions on energy infrastructure, outreach, and communication to advance climate equity.

While we continue to support the goals and objectives of the ESJA, we also recommend inclusion of all technological solutions for the most reliable and resilient energy systems across ESJ communities; holistic evaluation of the health of buildings; and development of open-source mapping tools for public use. We recommend the ESJA specifically call out technology inclusion to meet the reliable and resilient needs of the energy systems across ESJ communities. We believe "[d]ata analysis and mapping of audit data and incident reports to understand geographic distribution and potential ESJ cumulative impacts" will be beneficial and valuable. We recommend the mapping tool be open source, so that the public is also able to it.

Currently, the transportation sector accounts for almost 50 percent of the State's greenhouse gas (GHG) emissions and over 80 percent of the state's NOx (a precursor to ozone) and diesel soot; therefore it is critically important to accelerate electric vehicle (EV) adoption (including both battery electric and fuel cell EVs) through investments in charging and refueling infrastructure. Version 1.0 of the ESJA, which focused on data and collaboration, has evolved to more fully consider the broader need for accessible transportation through electrification. This is critical for equity and access to clean transportation for all. Moreover, while focusing on pollution issues in many of the communities located along freight corridors, it is imperative to consider clean fueling infrastructure like hydrogen refueling stations to allow for the transition from diesel heavy duty trucks to a cleaner and diesel soot free transport sector. For transportation electrification to be successful, we believe charging and refueling infrastructure, which is foundational, must be bolstered to lead the way.

Both utilities value strategies that do not create disparate impacts or produce unintended social consequences, especially since our most at-risk customers are those facing the disproportionate effects of climate change, and rising energy costs. To that end, we are exploring the use of data and digital technologies with stakeholders inside and outside our organization. These technologies will help us measure, track, and report how we serve vulnerable communities to better understand which portions of our service territory are most impacted by GHG emissions. Additionally, this effort will help guide and prioritize our investments and decisions on energy infrastructure, outreach, and communication to advance climate equity.

One of the key takeaways from the CPUC proceeding was how the CPUC can learn from AB 617 Community Air Protection implementation; including monitoring programs to support the development and implementation of emission reduction strategies and enforcement actions designed to improve local air quality and reduce exposure. We recommend that the CPUC add an action item to Appendix A section 2.4, Address Impacts in ESJ Communities, that reflects the goals of the AB 617 program while encouraging the CPUC to learn from and implement community input through community-based organizations (CBOs) and leveraging ongoing efforts of sister agencies.

Putting into action our joint core value to Champion People, SDG&E and SoCalGas promote “Outside In” community outreach by actively engaging external, community-based, and nonprofit stakeholders who provide continuous constructive feedback and partner with us on meeting the needs of diverse and underserved communities through sustainability initiatives. We also applaud the CPUC’s commitment to deepen engagement with California Native American Tribes and believe its commitment to tribes through a living ESJA will be impactful. Both utilities support further involvement with CBOs to assist with CPUC activities and decision-making processes, while also recognizing limitations of CBO resources and focus areas. Additionally, we are supportive of exploring appropriate funding sources and compensation models to support these enhanced efforts.

Finally, both SoCalGas and SDG&E are committed to further develop partnerships to increase diversity in science, technology, engineering, math, and field roles where diversity has been historically underrepresented. Additionally, we will continue to work to integrate the CPUC’s ESJA into our sustainability actions where reasonably possible, with a focus on enhancing outreach and public participation opportunities for ESJ communities to meaningfully participate in the State’s decision-making process and benefit from programs.

Conclusion

SoCalGas and SDG&E appreciate the opportunity to submit these comments on the Draft ESJA, and look forward to working with the CPUC and stakeholders in achieving its goals and objectives.

Sincerely,

/s/ Joseph Mock

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Director, Regulatory Affairs