

November 24, 2021

Via E-Mail

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

Re: Draft Environmental & Social Justice (ESJ) Action Plan 2.0

Dear Monica Palmeira and the ESJ Action Plan Core Team:

Southern California Edison (SCE) appreciates this opportunity to comment on the CPUC's revised ESJ Action Plan. We strongly support the overall goals of the Plan to ensure that the ESJ community and priority populations have equal access to the CPUC process, have their positions adequately considered during regulatory proceedings and implementation activities, receive adequate investments in clean energy and climate resiliency resources, and obtain increased access to economic and job opportunities, as well as other key priorities.

SCE seeks to operate its business consistent with similar principles. We consider the needs and concerns of ESJ communities as we conduct our business, and as we work actively to expand access to clean energy and resiliency resources within these communities. We look forward to collaborating with the CPUC in its ESJ efforts as we develop active partnerships within ESJ communities and priority populations. We further look forward to actively engaging in those rulemakings and activities the CPUC initiates to advance Action Plan goals in a way that is equitable and cost-effective to both ESJ communities and the balance of SCE's customers.

SCE has only a few minor comments on the plan itself.

1) On page 1 of the Executive Summary, it says, "The ESJ Action Plan consists of 9 overarching goals...", which are then listed. However, the listed goals are from Version 1.0 of the plan, as is the 95 action item count. Listing old goals in the Executive Summary may cause confusion, particularly because they are referred to in the present tense. Instead, we recommend changing the goals in the Executive Summary to match the Version 2.0 phrasing consistent with pp. 4-5 and pp. 20-23.

2) On pages 4 and 10, the Action Plan indicates that all goals have remained the same except for Goal 7. However, Goals 1, 6, 7, 8, and 9 have all been reworded, although Goal 7 has changed most significantly to include the new concept of high roads jobs. It would be helpful to acknowledge that five goals have changed, although only one has changed significantly.

3) SCE supports the streamlined objective statements in Version 2.0, with the details of proposed and potential future action items to achieve these objectives left for further development through more in-depth discussion with stakeholders. Higher-level objectives will likely be more durable in the face of changing circumstances.

Once again, thank you for this opportunity to comment on the Draft ESJ Action Plan 2.0. As written, the plan advances the CPUC's ESJ goals while retaining a fair, impartial, and cost-effective process for all stakeholders. We look forward to constructively engaging on this topic with the CPUC and other interested stakeholders as this plan is implemented in the years ahead.

Sincerely,

/s/ Tara Kaushik

Tara Kaushik

Managing Director, Regulatory Relations