



November 14, 2018

Thank you to all of the Commission staff for strategizing and engaging stakeholders on this forward-looking Environmental Justice and Social Justice (EJSJ) Action Plan. This plan makes outreach to EJSJ communities a state-wide priority and in doing so will incorporate the voices of our most vulnerable early in the public process to strengthen the resiliency of our neighborhoods while creating positive feedback loops to continue improving program outcomes over time.

MCE would like to offer our support in getting these efforts to go “the last mile.” While MCE does not speak for all Community Choice Aggregators (CCAs), CCAs are inherently community-based and have relationships with community leaders and community-based organizations (CBOs) that can help fortify some of the engagement and outreach strategies outlined in this plan. Local leaders and liaisons are the experts on the conditions and gaps in their community leading to the systemic inequalities which this action plan intends to address.

MCE recommends the consideration of the items below. These suggestions are based on the draft plan released on October 29, 2018.

Goal 1: Use CPUC’s planning, permitting, and regulatory role to advance social and environmental justice goals

- CCAs can help Action 5, *Identify appropriate CBOs and develop a system to assist in promoting proceedings in early stages*, through our existing community engagement strategies and groups, such as various Community Advisory Committees or MCE’s [Community Power Coalition](#). These groups can also be instrumental to the success of Goal 5, Action 6: *Create a list of community groups in EJSJs for outreach to appropriate groups about CPUC proceedings*.

Goal 2: Increase investment in clean energy resources to benefit EJSJ communities, especially to improve local air quality

- The recent update to the CalEnviroScreen tool to track metrics by census tracts has already been an incredible help in identifying our disadvantaged communities (DAC). However, the Commission should acknowledge that there are still ‘hidden communities’ not identified by this map. This is to say, disadvantaged enclaves and neighborhoods surrounded by a more affluent or less polluted community average that may still suffer a disproportionate burden of environmental or social harm. As such, in determining clean energy allocations, the CPUC should not use CalEnviroScreen’s qualification of DAC as the sole criteria for EJSJ investments, since hidden communities would therefore not qualify for these resources despite having a need for them, further excluding marginalized communities which aren’t obvious DACs.
- Acknowledging that the oversight of ports of authority (e.g., airports, shipping ports) and railways are under the jurisdiction of the federal government, how can the CPUC work with other jurisdictions to address the toxic air contaminants in nearby EJSJ communities due to these industries (e.g., coal dust, diesel particulate matter)?
- The Commission may want to consider using the IRP proceeding to foster an open and transparent process to engage stakeholders in a collaborative meaningful creation of



standardized reporting/methodology for LSEs to measure impact of local air pollutants to realize Action 3, *Optimize California's electric resource mix across GHG, cost, and reliability using the IRP process to effectively inform the CPUC's infrastructure and procurement decision, with early priority on reducing pollutants in disadvantaged communities; the IRP's ongoing analysis will examine the impact of different GHG emissions reduction scenarios on air pollution emissions in disadvantaged communities.*?

- Similarly can the 100% renewable or 100% carbon-free options offered by CCAs qualify for Action 11 (*Incentivize solar alternatives for customers who cannot participate in rooftop*)?

Goal 5: Enhance outreach and public participation opportunities in order for EJSJ communities to meaningfully participate in the CPUC's decision-making process

- To improve the current process, the Commission should make its website more user-friendly in order to increase access to public meetings. The Commission should also improve the audio quality of meetings. For instance, the Disadvantaged Community Working Group meeting held on October 30 had a call-in option, but the poor audio quality meant that much of the discussion was lost to those on the phone.
- To make sure that the Commission's public hearings and voting meetings can reach a wider range of audience, the Commission should work more closely with local government agencies and CBOs to publicize these events. The Commission should also ensure that the meeting or event facilitation is inclusive of EJSJ communities.
- Future public outreach should continue to be multilingual with special consideration given to ensuring that engagement strategies do not alienate undocumented residents since these oftentimes are the most vulnerable among our EJSJ communities. Outreach should be tailored to ensure that undocumented community members are aware of their eligibility for benefits and protections offered by the Commission. This same sensitivity should be applied to Goal 5, Action 7, *Develop or update outreach materials to support DAC outreach.*
- The Commission should find ways to invite EJSJ communities to participate in public hearings and commit to responding to issues raised by these communities and following up with community members.

Goal 7: Promote business and workforce development opportunities in EJSJ communities

- It is important to understand the barriers keeping businesses in EJSJ communities from knowing about GO 156, becoming certified, and accessing the Clearinghouse. While GO 156 certified businesses have faced barriers to participation in the utility industry, this does not necessarily mean that these business owners come from low-income areas, communities of color, or areas that are disproportionately burdened from disparate environmental and economic impacts. Therefore, additional programs may need to be created, or GO 156 may need to be adjusted to promote business and workforce development opportunities in EJSJ communities. Since most of these businesses are probably smaller and may not have the staff and resource to participate in the utilities' Request for Offers (RFOs), how can the CPUC encourage utilities to find creative solutions to improve the likelihood that qualified EJSJ GO 156 certified businesses can bid for?



- Related to Action 2, *Develop a series of workshops at the county or regional level to explore opportunities between these new partners and leadership from disadvantaged communities*, how can the certification process be simplified and streamlined to make it easier for qualified business enterprises to apply? Could the CPUC provide trainers at these workshops to walk smaller business through the process and help them achieve certification?

Thank you for your consideration of these suggestions,

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