

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Modernize the
Electric Grid for a High Distributed Energy
Resources Future.

Rulemaking 21-06-017
(Filed June 24, 2021)

**CENTER FOR BIOLOGICAL DIVERSITY, GRID ALTERNATIVES,
THE CLIMATE CENTER, 350 BAY AREA, VOTE SOLAR, SIERRA CLUB AND
CLEAN COALITION OPENING COMMENTS
ON DRAFT TRACK 2 OUTREACH PLAN**

ROGER LIN
HOWARD CRYSTAL
CENTER FOR BIOLOGICAL DIVERSITY
1212 Broadway, St. #800
Oakland, CA 94612
Telephone: (510) 844-7100
rlin@biologicaldiversity.org

STEVE CAMPBELL
GRID ALTERNATIVES
1171 Ocean Ave
Oakland, CA 94608
(310) 735-9770
scampbell@gridalternatives.org

KURT JOHNSON
THE CLIMATE CENTER
1275 4th St. #191
Santa Rosa, CA 95404
Telephone: (970) 729-5051
kurt@theclimatecenter.org

CLAIRE BROOME
350 BAY AREA
26 Northgate Ave
Berkeley, CA 94708
Telephone: (510) 248-4095
cvbroome@gmail.com

STEPHANIE DOYLE
VOTE SOLAR
360 22nd St., Suite 730
Oakland, California 94612
Telephone: (858) 245-1539
sdoyle@votesolar.org

NIHAL SHRINATH
SIERRA CLUB
2101 Webster Street, Suite 1300
Oakland, CA 94612
Telephone: (415) 977-5566
nihal.shrinath@sierraclub.org

BEN SCHWARTZ
THE CLEAN COALITION
Telephone: (626) 232-7573
ben@clean-coalition.org

August 31, 2022

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Pursuant to Administrative Law Judge Hymes’ August 12, 2022 Ruling Noticing Electric Grid Education and Outreach Workshop (“Workshop”), the Center for Biological Diversity, GRID Alternatives, The Climate Center, 350 Bay Area, Vote Solar, Sierra Club and The Clean Coalition provide the following opening comments on the Draft Track 2 Outreach Plan.

I. Introduction

As an initial matter, we highlight the need to coordinate the Public Utilities Commission (“CPUC”) and Energy Commission’s (“CEC”) community engagement efforts to the greatest extent possible to achieve a high distributed energy resources (“DER”) future. The two agency DER-related efforts are complementary and should leverage one another to set the appropriate foundation for successful deployment of DERs in disadvantaged communities (“DACs”) and other Environmental and Social Justice (“ESJ”) communities.

In opening comments at the Workshop, Energy Division clarified that the CPUC proceeding focuses on the *anticipation* of a high DER future. This objective involves ensuring

that planning tools, processes and community engagement efforts are in place to facilitate rapid integration of DERs as we achieve a high DER future, or, preparing the grid to accommodate what is expected to be a high DER future and capture as much value as possible from DERs.

The CEC's parallel Order Instituting Investigation on DERs ("DER OIIP") plays an integral and complementary role to prepare for a high DER future. As noted at the Workshop, the CEC proceeding examines the full range of benefits of DER and explores policy options to grow DER beyond their current rate of adoption. Anticipating a "high DER future," both Commissions should also anticipate the success of these policy options and develop methods to forecast accordingly. This includes integrating both the growth scenarios and benefits (or "value" of DERs) for which the DER OIIP will develop the necessary methods.

As detailed throughout this comment, a joint agency effort to identify community needs, or benefits that DERs can offer ESJ communities, furthers both CEC and CPUC proceeding and overall agency goals. It is critical for the two complementary planning processes to include the identification and integration of DAC resident needs and benefits into expectations of future DER growth. The Commissions can then tailor and plan for the outcomes of DER deployment strategies to effectively meet those needs. Absent need-and outcome-based objectives for these proceedings, it is reasonably foreseeable that DAC needs will not be addressed in a high DER future, precluding our ability to meet California's SB 100 and other climate and equity goals. As the U.S. Department of Energy has emphasized:

For far too long, communities of color and low-income communities have borne the brunt of pollution to the air, water, and soil they rely on to live and raise their families. The clean energy revolution must lift up these communities that have been left behind, and make sure those who have suffered the most are the first to benefit.¹

¹ U.S. Dept. of Energy, Promoting Energy Justice, *available at* <https://www.energy.gov/promoting-energy-justice>

II. What additional steps or actions should be added to the Draft Track 2 Outreach Plan? *The CPUC should develop a Community Engagement Plan that addresses both Tracks 1 and 2 and leverages and coordinates with the CEC's related DER efforts.*

In October 2021, the Climate Center, Sierra Club, 350 Bay Area, GRID Alternatives, the Center for Biological Diversity, and Wild Tree Foundation submitted joint comments regarding engaging DAC, ESJ and other vulnerable communities. The comment included community outreach recommendations, and overall, requested that the CPUC develop a community engagement plan with the goal of maximizing “local community benefits, particularly resilience” with high DER deployment to ESJ communities.²

At the May 23, 2022 Track 2 kickoff workshop, parties again requested a community engagement plan, identifying the opportunity to “put at the front of the queue communities with historically low DER adoption rates.”³ Those parties stressed that this community engagement plan should determine how a high DER future can serve the needs of ESJ community residents.⁴

Here, we clarify the need for this community engagement plan that spans the CPUC proceeding's Tracks 1 and 2, and includes related CEC efforts, specifically, but not limited to, the DER OIIP and the 2022 Integrated Energy Policy Report (“IEPR”) Update. It is important to leverage both agencies' community engagement efforts given the scale of the endeavor to meaningfully identify community needs for planning and ultimate deployment of DERs to deliver associated community benefits. Moreover, it makes sense to combine all of the engagement efforts into a single community engagement plan given the multiple overlapping

² R.21-06-017 Joint Reply Comments on Engaging Environmental and Social Justice and Other Vulnerable Communities (October 7, 2021) at 3.

³ See Proposed Process Amendments to Center Community Engagement and Achieve Environmental and Social Justice Goals (May 3, 2022) available at <https://gridworks.org/wp-content/uploads/2022/05/Center-for-Biological-Diversity-presentation-DSO-Evaluation-Kickoff-Workshop.pdf>, slide 3, citing Inequitable access to distributed energy resources due to grid infrastructure limits in California, Brockway, Conde and Callaway, available at <https://escholarship.org/uc/item/6pc2k2tv>

⁴ *Id.* at slide 4.

pieces of necessary community engagement that span across CPUC proceeding tracks and agency efforts. As detailed below, this combined plan should focus on specific ESJ community needs, or services that can be provided by high DER penetration: for example, reduced gas demand and the retirement of polluting local gas plants.

Finally, a community engagement plan must be informed by a guiding principle, and a funding mechanism that enables meaningful partnerships with community-based organizations (“CBOs”).

A. A Comprehensive Community Engagement Plan is Necessary to Achieve a High DER Future.

Community engagement efforts under the CPUC proceeding Tracks and the CEC’s DER OIIP and 2022 IEPR Update should not be piecemealed. Leveraging each agency’s community engagement efforts furthers the commitment the CPUC and CEC made at the June 1, 2022 Lead Commissioner Workshop for the DER OIIP to coordinate the CPUC proceeding, 2022 IEPR Update and the DER OIIP.

Track 1 of the CPUC proceeding is currently scoped to create and implement a Community Engagement Needs Assessment to determine what communities want and need from distribution planning.⁵ Track 2 of the CPUC proceeding should expand on that endeavor to determine how DERs can offer solutions for certain identified ESJ community needs; which distribution system operator (“DSO”) model(s) can take these ESJ community needs into account and enable DER solutions? In other words, which DSO models can “unlock [ESJ community] economic opportunities for DERs to provide grid services [and meet ESJ community needs or provide community benefits]?”⁶

⁵ CPUC Workshop Presentation Slide 15.

⁶ See *id.* Slide 16; and R.21-06-017 Assigned Commissioner Scoping Memo Ruling (November 15, 2021) at 6.

At the same time, the DER OIIP seeks to “describe and quantify the full range of DER benefits,” including “decarbonization, reliability, cost savings, local, societal and non-energy benefits (e.g., resilience, jobs, pollution reduction),” and “estimate the magnitude of DER adoption/deployment needed to fully realize the full range of benefits.”⁷ The 2022 IEPR Update is also determining non-energy benefits (“NEBs”).⁸ There is significant overlap between CPUC proceeding Tracks and related CEC efforts in identifying, considering and ultimately delivering ESJ community benefits. This warrants close coordination between the CEC and CPUC as well as both Tracks 1 and 2 of the CPUC proceeding and related CEC efforts.

This overlap is significant as each effort, whether in different tracks, or in different agencies, complement one another to achieve adequate identification and ultimate delivery of community benefits. For instance, limiting identification of community needs to simply planning (Track 1, Distribution Planning Process), misses the opportunity to include those community needs in the design of a DSO model to actualize and maximize delivery of community benefits. Fundamentally, what communities need from distribution planning will be driven by their underlying energy needs and preferred solutions. In regards to maximizing the “value” that DERs can offer, the Scoping Ruling for Track 2 asks whether the CPUC should pursue a similar performance based ratemaking framework as that used in Hawaii. Meeting ESJ community needs or delivering community benefits with DERs is certainly a relevant metric for any such endeavor.

Similarly, Track 2’s consideration of cost-effectiveness must include the appropriate costs and benefits relevant to ESJ communities, such as NEBs. The CPUC proceeding’s focus

⁷ CEC Workshop Presentation Slide 4.

⁸ See e.g. Scoping Order for the 2022 Integrated Energy Policy Report Update (Establishing a Framework to Center Equity and Environmental Justice Throughout CEC Efforts).

on community engagement will undoubtedly be improved by the CEC’s efforts to determine those NEBs, whether in the DER OIIP or the 2022 IEPR Update. Overall, already-scoped objectives in Tracks 1 and 2 of the CPUC proceeding, the CEC’s DER OIIP and the 2022 IEPR will complement each other, warranting close coordination to maximize community benefits that DERs can deliver, as detailed below.

B. Examples of Community Benefits that a Community Engagement Plan Should Verify and Further Develop.

We provide the following examples of community needs that a Community Engagement Plan should verify and expand upon. We also describe how each community benefit could inform DER planning, DSO/grid architecture, or the growth (forecasts) of DER generally.⁹

- (i) Economic development, for instance, ownership of DER assets: targeting of behind-the-meter (“BTM”) resources can meet this community need. It is critical for planning efforts to determine an equitable (re)distribution process where a high DER future prioritizes each neighborhood receiving a fair share of resources to move towards a balance between growth and restoration from past injustices.¹⁰ This is consistent with Goal 2 of the CPUC’s ESJ Action Plan: “increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health.”
- (ii) Resiliency: a community resilience hub is an obvious example, but a community engagement plan could go further to determine what other specific DERs could be coupled with a resilience hub to meet community needs, for instance:
 - Renewable energy and revenue production through small-scale energy projects
 - Energy storage and local microgrid development for off-the-grid-resilience and disaster recovery strategies

⁹ These examples and descriptions are informed by the SB 350 Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-income Customers and Small Business Contracting Opportunities in Disadvantaged Communities (December 2016) (“Barriers Study”) available at https://assets.ctfassets.net/ntcn17sslow9/3SqKkJoNIvts2nYVPAOmGH/fe590149c3e39e51593231dc60ecccff/TN214830_20161215T184655_SB_350_LowIncome_Barriers_Study_Part_A_Commission_Final_Report.pdf.

¹⁰ See generally Hernandez, J., Race & Place in Sacramento, Sept 2021, A report for the City of Sacramento to support preparation of the Environmental Justice Element of the Sacramento 2040 General Plan Update, available at https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/General-Plan/2040-General-Plan/Race_Place_Nov-2021.pdf?la=en

- EV recharging and revenue production
 - Neighborhood focused transit options
 - Energy resilience planning to ensure social and public health service delivery through crises and disasters
 - Energy asset management training and project construction; job placement and workforce development
 - Enhancing public health through asphalt heat mitigation (solar parking lot canopies) and extreme heat cooling centers
- (iii) Heating and cooling needs in climate zones: it has proven difficult to successfully implement demand response programs in certain climate zones, in particular in DACs and other ESJ communities. Demand flexibility options may face similar barriers that a community engagement plan can specifically target to address.
- (iv) Community-specific local air quality concerns: for instance, a particular community is overburdened by diesel particulate matter pollution from trucks or other indirect sources. Focused deployment of medium or heavy duty EVs to replace diesel trucks, with targeted deployment of bi-directional vehicle to grid integration may present a potential solution to meet community and overall grid reliability needs.
- (v) Workforce development: a high DER future presents an opportunity for DAC and other ESJ neighborhoods to not just participate in the regional economy as dependent users or purchasers of goods and services, but also as producers of goods and services with the ability to generate revenue that can be reinvested back into neighborhood development.¹¹ A community engagement plan could serve as an integral component to ensure that circular economic activity is encouraged at the neighborhood level. This includes local workforce development for the construction, installation, and management of certain aspects of DERs.
- (vi) Affordability: with a focus on NEBs and social costs, a community engagement plan can help determine cost-effective deployment of DERs. Even absent consideration of NEBs, DERs still allow for greater electrification and weatherization, which significantly reduce energy bills. And if accurately considering the full range of avoided costs, in particular from avoided transmission, distribution and generation buildout, high DER penetration could benefit all ratepayers.
- (vii) Specific cultural marketing, education and outreach needs to achieve a clean energy future: a community engagement plan could complement other state or local outreach efforts to achieve our decarbonization goals. A community engagement plan could help identify additional opportunities to address neighborhood level specific barriers to decarbonization, such as education on how

¹¹ *Id.*

electric cooking appliances do not supplant cultural or traditional cooking practices.

The community engagement plan should determine which CPUC proceeding Tracks and which CEC activities cover which outreach, engagement and partnership efforts, with the ultimate goal of determining local needs. Overall, a community engagement plan should develop place-specific information or data that begins to document the energy use in the DACs or other ESJ communities, and investigate potential sites to produce energy locally. Understanding the amount of energy needed in each community, along with the capacity for local energy production to meet those demands brings us closer to itemizing the resources and administrative processes required to put in place the system of soft and hard infrastructure needed for community sustainability, as required by SB 1000, AB 1550, SB 535, SB 350 and other state climate and equity policies.¹²

C. The Community Engagement Plan Should Be Informed by a Guiding Principle.

The CPUC’s “San Joaquin Valley Proceeding” is largely viewed as the model for successful community engagement.¹³ In that proceeding, the CPUC ultimately selected clean energy pilot projects under a guiding principle, developed in conjunction with community engagement that occurred throughout the proceeding. To ensure that community engagement efforts in this proceeding are likewise centered on community voices, this proceeding should include a similar guiding principle, for instance:

“A High DER future/DSO Model will advance community benefits including improvements to health, safety, reliability and air quality, and include local hire goals and/or a workforce development plan. Community support is a critical factor and will be considered along with the long-term benefits of improvements

¹² *Id.*

¹³ *See e.g.* CPUC ESJ Action Plan Version 2.0 at 36, 58, 103 (discussing lessons learned from CPUC Rulemaking 15-03-010).

to health, safety, reliability, air quality, and reduction of greenhouse gas emissions . . . and ensures bill savings and affordability for participants.”¹⁴

Just as in the San Joaquin Valley proceeding, the CPUC should also partner with trusted CBOs to develop and implement the community engagement plan. A meaningful partnership further requires adequate funding.

D. The Community Engagement Plan Must Be Developed and Implemented in Partnership with Community Based Organizations.

As the SB 350 Barriers Study determined, “[s]ome customers are hesitant to have data about them collected by government agencies,” and recognizing “low levels of trust . . . with respect to their energy utilities.”¹⁵ Design and implementation of the CPUC San Joaquin Valley proceeding pilot projects revealed the extent of this finding, and how partnerships with CBOs could positively contribute to eliminating this significant barrier. Similarly, Goal 5.2 of the ESJ Action Plan specifically “emphasize[s] engagement with CBOs” and the need to “deepen relationships and network connections with community-based organizations throughout the state.”¹⁶ The ESJ Action Plan notes how partnerships with CBOs can “deepen impact in ESJ communities.”¹⁷ Overall, “[p]artnerships with CBOs are essential to reaching and benefitting ESJ communities.”¹⁸ Furthermore, the CPUC and CEC must “[e]nsure these partnerships are resourced and that CBOs are given room to deploy a variety of strategies to meet community needs,”¹⁹ as discussed below.

E. The Community Engagement Plan Must Include a Funding Mechanism for CBO Participation.

¹⁴ This is the guiding principle from D.18-12-015 (at 10) authorizing San Joaquin Valley pilot projects, and replacing “Pilots” with “High DER future” or “Distribution System Operator (DSO) Model.”

¹⁵ Barriers Study at 48, citing Research Into Action et al, 2016.

¹⁶ CPUC ESJ Action Plan Ver. 2.0 at 24.

¹⁷ *Id.* at 31.

¹⁸ *Id.* at 53.

¹⁹ *Id.*

The CPUC has previously authorized compensating CBOs for vital marketing, education and outreach work “so they are able to accomplish the outreach . . . envisioned.”²⁰ Absent financial support, it is reasonably foreseeable that capacity limitations on CBOs will result in only cursory input, insufficient to set the stage for a high DER future. The CPUC’s Adaptation Proceeding is one example where lack of funding and meaningful CBO partnerships produced less than expected community engagement outcomes. In that proceeding, the CPUC authorized the IOUs to develop community engagement plans, but did not require partnerships or funding for CBOs. Consequently, the California Environmental Justice Alliance and the Natural Resources Defense Council filed protests to the Advice Letters that proposed community engagement methods. The CPUC nevertheless approved those engagement plans and subsequent vulnerability assessments, which remain without the adequate input of CBOs, and the outcome of the assessments is to date unclear. By contrast, targeted and focused long-term engagement that adequately leverages CBO relationships has proven far more successful.²¹

There are a variety of options that the CPUC and CEC can explore to fund community engagement efforts. For instance:

- (i) \$30 million in capacity building grants, requested in the California Budget.²²
- (ii) The Electric Program Investment Charge (“EPIC”) program. AB 523 allocates at least 25% of the EPIC Fund to support technology demonstration and deployment located in and benefitting “disadvantaged communities” as defined by SB 535, while also dedicating 10% of the fund to activities located in and benefitting ‘low-income’ communities as defined by AB 1550. In addition, the CPUC is currently

²⁰ D.18-06-027 at 83-84; *see also* D.18-12-015 at 82-85 (“the [funded] Community Energy Navigators” would be “key to the success” of the pilot program).

²¹ *See e.g.* GRID Alternatives, 2022 Marketing Education and Outreach Plan, *available at* https://gridalternatives.org/sites/default/files/2022-04/DAC-SASH%202022%20MEO%20plan_March%202022%20FINAL.pdf (achieving 82% of Installations Forecast in DAC-SASH Program).

²² *See* State of California, Budget Change Proposal (2022-23) *available at* https://esd.dof.ca.gov/Documents/bcp/2223/FY2223_ORG3360_BCP6164.pdf

considering the IOUs' EPIC 4 Projects that seek to determine "innovation priorities for DACs."²³ Several of the IOUs' proposals target DERs and can similarly target DACs and other ESJ communities. Funding for the current 5-year EPIC-4 cycle exceeds \$820 million.

- (iii) As noted by the Assigned Commissioner, the CPUC is exploring a pilot funding mechanism for community engagement. This is Action Item 1.2.2. of the ESJ Action Plan: explore concept of a paid CBO pilot program that aims to facilitate deeper involvement of CBOs in CPUC programs and processes. This CPUC proceeding offers a platform to launch this pilot.
- (iv) A Decision in the CPUC proceeding can authorize funding through a Request for Proposal process, as in the CPUC San Joaquin Valley Proceeding.²⁴ Alternatively, the CPUC could also authorize an Advice Letter process to establish a new memorandum account to record and recover costs associated with the development and implementation of a community engagement plan.²⁵

Overall, there is a stark contrast when comparing the substantial funding available for "traditional" intervenors in CPUC proceedings, such as the intervenor compensation program, or the funding available to members of the Procurement Review Group, and the lack of funding available to solicit community-level input. The CPUC and CEC should coordinate efforts to correct this imbalance, adequately value on-the-ground input and expertise, and maximize funding for this potentially significant community engagement effort.

III. Are there Track 2 Outreach Plan areas that need more emphasis/additions? *The Track 2 Outreach Efforts must focus on determining how DERs can meet community needs.*

To achieve the ESJ Action Plan's Goal 2 (increased investment of clean energy resources to achieve benefits in ESJ communities), the CPUC recommends "outreach and engagement" in order to "understand impacts in ESJ communities," leveraging "cross-agency" efforts, and "address ongoing and legacy impacts in ESJ communities in the resilient, clean energy space,"

²³ See e.g. Joint IOU Presentation to DAC Advisory Group (August 2022), available at <https://efiling.energy.ca.gov/GetDocument.aspx?tn=245082&DocumentContentId=79209>

²⁴ D.18-12-015 at 81-83.

²⁵ See R.15-03-010, SoCalGas Opening Comments on Data Gathering Plan Proposed Decision at 2.

by “prioritize[ing] resilient, clean energy investments in ESJ communities.” Each of these objectives is rooted in determining community needs or the benefits to communities that clean energy resources, or DERs, can deliver. Said another way, it is imperative to determine how DAC and other ESJ communities can play a part in climate mitigation strategies to equitably achieve the State’s climate goals.

Consistent with the ESJ Action Plan recommendations and meeting the state’s climate and equity policies, it is important to focus Track 2 efforts on achieving these community benefits and addressing community needs.²⁶ As detailed above, there is some overlap with the Track 1 Community Needs Assessment, but the engagement tasks in Track 2 should go further to engage and partner with CBOs and ultimately community residents to determine community energy or related needs that DERs can address. It is imperative to consider these benefits in any cost-effectiveness determination, and DSO models must be designed to achieve these benefits.

Track 2 will also benefit from communicating key concepts, including how the CPUC and CEC roles function together around DERs and how these proceedings interconnect. This will assist listening session invitees in understanding their role in participating. Any technical information should be clearly connected to a “so what” for a community, what are the potential payoffs or challenges in participating in this engagement. Providing this language in a clear way ahead of time will allow listening session participants to understand the purpose of engagement, and lays expectations for what they should expect in a Future Grid Study. Supplementary educational materials could also further this engagement, including short graphic videos,

²⁶ See also U.S. Dept. of Energy, *Advancing Energy Equity in Grid Planning* (April 2022) at 12–19, *Integrating Equity in Grid Planning*, available at <https://netl.doe.gov/sites/default/files/netl-file/Advancing%20Energy%20Equity%20in%20Grid%20Planning.pdf>.

infographics, one-on-one time with CPUC or CEC staff, or other methods to communicate what is at stake for DACs and other ESJ communities in a high DER future.

In contrast, while community engagement to socialize or popularize DSO models, distribution grid operations or grid architecture is theoretically admirable and a good idea, in practice, the technical terminology surrounding DSO models or grid architecture likely imposes too great of a barrier for meaningful DAC or ESJ community resident engagement. It is more effective for the CPUC and CEC to focus limited resources to determine and plan for meeting community needs, and design a system to meet those needs, as outlined in the ESJ Action Plan.

In addition to centering DAC and ESJ communities to overcome historically disproportionate impacts and distribution of benefits, focusing Track 2 efforts on community needs or achieving community benefits also improves the overall design and eventual implementation of DSO models to achieve our climate goals. Vision Element 2B of the DER Action Plan details three planning processes (the CAISO Transmission Planning Process, the Integrated Resources Plan and the Distribution Planning Process) to address “local community and tribal conditions and community needs.” The CEC’s 2022 IEPR Update and DER OIIP are also relevant sources to consider, as well as any findings from the community engagement plan. For instance, adequate community engagement as detailed above will provide more granular information about load in DAC and ESJ communities, as opposed to the current practice of determining this information from interconnection applications that may not wholly convey BTM resources, demand response, energy efficiency or other DER grid solutions. Although this bears heavily on work in Track 1’s Community Needs Assessment, this inquiry necessarily overlaps with work in Track 2, the CEC’s DER OIIP and the 2022 IEPR Update, again warranting a holistic community engagement plan. As Dr. Kristov described at the Workshop,

“a DSO Model is an assignment of Roles and Functions to the DSO and specification of its required interactions with other Actors,” and importantly, “[a]lternative DSO Models should be evaluated based on how well they serve specified goals [performance requirements] and principles [meeting community needs, or achieving community benefits].”

IV. What unique Track 2 issues should be considered for tribal, rural, or disadvantaged communities, and local governments? *A Community Engagement Plan should seek to determine these unique issues.*

A community engagement plan is necessary to adequately determine the specific benefits that DERs can offer tribal, rural or DACs and local governments.

We appreciate Energy Division’s proposal to conduct listening sessions which are a viable means to begin gathering information from communities without delaying work on developing DSO models for consideration in Track 2. Although those listening sessions may present sufficient information to allow for the initial development of DSO models, we emphasize that those listening sessions cannot substitute or remove the need for a community engagement plan as detailed above.

The listening sessions can offer a *preliminary* insight into specific issues that should be considered for tribal, rural or DACs and local governments. To provide this preliminary insight, we recommend leveraging existing pilot programs or other outreach components of programs where entities are already funded to determine community energy needs, are familiar with the energy landscape and terminology, and do not need additional funding to participate in listening sessions. Potential entities that are already funded to determine somewhat overlapping issues include: the San Joaquin Valley pilot projects’ Community Energy Navigators; BUILD and TECH Building Decarbonization pilots and technical assistance teams; Energy Efficiency DAC/Equity Segment program outreach teams; and EV Vehicle to Grid Integration pilot

program staff. The ESJ Action Plan also identifies other entities that previous CPUC Decisions have requested IOUs to engage.²⁷

We reiterate that each of the above entities, although funded, are funded for specific tasks within their respective programs. This highlights the fact that their input is not a replacement for a targeted, focused and resourced community engagement plan specific to DERs and coordinated with the CEC.

V. What information should the Commission seek from listening session participants? What questions should the Commission pose to participants?

Consistent with the comments above, we offer the following recommendations:

- Describe the program that you work on and how the program, or your work involves addressing community needs or delivering community benefits.
- What are the best practices to identify community needs that can be addressed by DERs?
- Are there any community needs or community benefit examples that you can share?
- There are currently devices and services that can assist individuals in managing their energy use throughout the day. For example, smart thermostats can adjust cooling times to minimize costs. The CPUC expects that these devices and services will become more prevalent in the coming years. What barriers, if any, do you foresee in your community to implementing these devices and services?
- What types of energy devices or electric appliances do you need/want in your communities that you currently cannot access?
- Are you aware of harmful local energy generators that can be replaced or diminished by distributed/locally-generated energy?
- How could the CPUC and CEC improve their processes to achieve meaningful community outreach, engagement and ongoing partnerships?
- Who else should the CPUC invite for future listening sessions or future community engagement and partnership efforts?

²⁷ See e.g. CPUC ESJ Action Plan Ver. 2.0 at 104, citing D.20-03-004 (IOUs required to consider partnerships with: Community Organizations, including churches, schools, non-profits, medical clinics and hospitals, social service providers, legal services, and small businesses; and Local Government, including emergency services, public health departments, other service providers, and first responders.)

VI. Conclusion

For the foregoing reasons, we respectfully request that the CPUC coordinate with the CEC to develop a community engagement plan pursuant to the above recommendations.

Dated: August 31, 2022

Respectfully submitted,

_____/s/_____
ROGER LIN
CENTER FOR BIOLOGICAL DIVERSITY
1212 Broadway, St. #800
Oakland, CA 94612
Telephone: (510) 844-7100
rlin@biologicaldiversity.org

_____/s/_____
STEVE CAMPBELL
GRID ALTERNATIVES
1171 Ocean Ave.
Oakland, CA 94608
(310) 735-9770
scampbell@gridalternatives.org

_____/s/_____
KURT JOHNSON
THE CLIMATE CENTER
1275 4th St. #191
Santa Rosa, CA 95404
Telephone: (970) 729-5051
kurt@theclimatecenter.org

_____/s/_____
CLAIRE BROOME
350 BAY AREA
26 Northgate Ave
Berkeley, CA 94708
Telephone: (510) 248-4095
cvbroome@gmail.com

_____/s/_____
STEPHANIE DOYLE
VOTE SOLAR
360 22nd St., Suite 730
Oakland, California 94612
Telephone: (858) 245-1539
sdoyle@votesolar.org

_____/s/_____
NIHAL SHRINATH
SIERRA CLUB
2101 Webster Street, Suite 1300
Oakland, CA 94612
Telephone: (415) 977-5566
nihal.shrinath@sierraclub.org

_____/s/_____
BEN SCHWARTZ
THE CLEAN COALITION
Telephone: (626) 232-7573
ben@clean-coalition.org