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Comments on the Joint Agencies and California ISO Staff Report SB319 Draft Transmission Infrastructure Development Guidebook

Thank you for the opportunity to provide comments on the draft Electrical Transmission Infrastructure Development Guidebook. We appreciate the significant collaborative effort invested in developing the Guidebook and ongoing work to support a transparent, clean, equitable, and affordable electrical system for all Californians. We look forward to continued engagement as the Guidebook is refined and implemented.

Additional submitted attachment is included below.

COREHub
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January 22, 2026

David Hochschild
Chair
California Energy Commission
Docket Unit, MS-4
Docket Number 23-SB-319
715 P Street
Sacramento, CA 95814

Submitted online via Docket 23-SB-319

Re: Comments on the Joint Agencies and California ISO Staff Report: *SB319 Draft Transmission Infrastructure Development Guidebook*

Dear Chair Hochschild, Commissioners, and Staff:

The Redwood Region Climate and Community Resilience Hub ("CORE Hub") thanks you for the opportunity to provide comments on the Electrical Transmission Infrastructure Development Guidebook. We appreciate the need for a clear and concise guide for this complex system, particularly with the aim of furthering public transparency and participation, coordination among organizations, fulfillment of policy goals, and to reduce duplicative efforts. We applaud the intention of promoting efficiency while also safeguarding and advancing opportunities for Californians.

The CORE Hub enables community participation in equitable climate and energy transitions through network building, technical assistance and policy support, advocacy, and funding partner organizations leading key bodies of work in the Redwood Region. We are based at Humboldt Area and Wild Rivers Community Foundation, serving California Counties of Humboldt, Del Norte, and Trinity, as well as Curry County in Oregon. Our service area includes many Tribal Nations and Indigenous Communities, who have been stewards of the waters and lands here since time immemorial. Transmission development has historically excluded Tribal Nations and reinforced extractive industrial boom and bust practices. Historically, our region[1] has experienced significant and well-documented reliability and energy justice issues. Therefore, accessible and equitable transmission development in the Redwood Region requires remarkable care, consideration, and collaboration.

[1] See report: Arne Jacobson. *Power Behind the Redwood Curtain: A History of Electric Transmission and Natural Gas Infrastructure in Humboldt County.* Schatz Energy Research Center, 2025. https://schatzcenter.org/pubs/2025-Humboldt-Energy-Infrastructure-History.pdf

We envision the Guidebook becoming a vital tool for CORE Hub and our partners, and for the State's many more local, regional, and civic organizations involved in equitable, sustainable, and resilient planning and development. As counterparts on the ground for enabling a thriving California, we must engage with our power system and governing bodies to ensure the future of healthy local businesses, the provision of essential services such as hospitals and housing, and collaborate in novel ways to deliver clean, resilient energy to communities amidst climate and ecological change. In particular, we must fulfill overdue obligations to Native American Tribal Nations and communities.

To that end, our comments and questions for the Guidebook are intended to aid the CEC, CPUC, CAISO, and other state and federal regulatory and governing bodies through sharing our perspective as a unique user whose perspective is informed and shaped by how energy systems profoundly impact our rural, remote and Tribal areas. We hope our suggested revisions will enhance transparency, policy effectiveness, and smooth opportunities for efficiency and coordination. Finally, we offer comments on matters outside the scope of the Guidebook to inform policy progress in the years ahead.

Sincerely,

Katerina Oskarsson, Ph.D.
Redwood Region Climate and Community Resilience (CORE) Hub

A. Overall Assessment and the Central Role of Community Engagement

We find the draft Guidebook to be well organized, readable, and generally accessible to a broad audience. At the same time, the Guidebook would benefit from more explicit guidance for local community based organizations, governments, and networks on where, how, and why to engage in transmission planning and decision-making. Recent research[2] demonstrates that meaningful community participation is essential to timely and effective transmission deployment, particularly in ensuring local energy reliability and minimizing project delays. Clarifying engagement pathways would directly advance the Guidebook's stated goals of transparency and understanding amongst affected and interested parties.

[2] Adam Kurland, Nicole Pavia, Natalie Manitius, Kelsey Landau. *Beyond the Wires: Lessons from Transmission Lines Built with Community Benefits*. Environmental Defense Fund and Clean Air Task Force, 2025. https://library.edf.org/AssetLink/5oo47j6cy1jrc131hjm3i8140u0ak26j.pdf

B. Community Participation, Partnerships, and Equitable Planning Practices

California's clean energy future depends on building and upgrading transmission at unprecedented levels over the coming decade. Delivering this infrastructure smoothly and efficiently will require intentional, durable partnerships with communities—particularly disadvantaged and overburdened communities—to ensure development avoids harm, enforces protections, and delivers tangible local benefits. Embedding equity considerations into long-term transmission planning is therefore essential to achieving the State's climate, reliability, and environmental justice goals.

A wide range of policies and practices at the State, federal, and international levels already provide models for aligning infrastructure development with community well-being. These include community benefit agreements[3], revenue-sharing mechanisms[4], co-stewardship and shared governance approaches[5], and other tools designed to prevent adverse impacts while maximizing public value. We encourage that the Guidebook explicitly reference these established practices—within the recommended new chapter noted below, in other relevant sections, or as an appendix—and encourage policy innovation and collaboration among governments, private industry, and community and ecological stewarding organizations.

We strongly recommend adding a new chapter on community participation and partnerships in transmission planning. The new chapter should come after the introduction as a new Chapter 2 and include the value proposition and frameworks for community engagement, partnership, and tools to incorporate community benefits, protections, participation and accountability. Four recent reports offer best practice content to inform the new Chapter: i) *Rewiring for Justice: How California Can Power Equitable Transmission*[6], ii) *Beyond the Wires: Lessons from Transmission Lines Built with Community Benefits*[7], iii) *The PACE of Trust: A Framework by Community Voices for Advancing Transmission*[8], and iv) *Community Powered Progress: A Pathway to Greater Community Participation*

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[3] Statewide CBA efforts: Louise Bedsworth, Malcom Johnson, Katherine Hoff. *Community Benefits Policy Brief Tools and California Clean Energy Projects.* Berkeley Law Center for Law, Energy, & the Environment, 2024. https://www.law.berkeley.edu/wp-content/uploads/2024/10/Community-Benefits-Tools-and-California-Clean-Energy-Projects_CLEE-Report_Oct24.pdf

[4] Tribal and local land -based federal revenue sharing and management programs: *Protecting Public Land Revenue-Sharing Governments From the Fiscal Risks of Economic Transitions*. Center for American Progress, 2024. https://www.americanprogress.org/article/protecting-public-land-revenue-sharing-governments-from-the-fiscal-risks-of-economic-transitions/

[5] Stewardship and management agreements: Native American Rights Fund (NARF), the University of Washington School of Law, the Henry Luce Foundation, the Wilderness Society, the Bolle Center for People and Forests at the University of Montana, the Native American Law Center at the University of Washington School of Law, the Wilburforce Foundation, First Nations Development Institute. *Sovereign-to-Sovereign Cooperative Agreements.* University of Washington School of Law: Gallagher Law Library, 2025. https://lib.law.uw.edu/cooperative/introduction#s-lg-box-30948815

[6] Alexis Sutterman, Eddie Ahn, Peter Ton, Julia de Lamare. *Rewiring for Justice: How California Can Power Equitable Transmission*. Brightline Defense, 2025. https://mailchi.mp/brightlinedefense.org/rewiring-for-justice-transmission-report

- Quotation from page 1

[7] Adam Kurland, Nicole Pavia, Natalie Manitius, Kelsey Landau. *Beyond the Wires: Lessons from Transmission Lines Built with Community Benefits*. Environmental Defense Fund and Clean Air Task Force, 2025, pp. 7, 10, 12-19. https://library.edf.org/AssetLink/5oo47j6cy1jrc131hjm3i8140u0ak26j.pdf

[8] Americans for a Clean Energy Grid. *The PACE of Trust: A Framework by Community Voices for Advancing Transmission.* 2025. https://cleanenergygrid.org/wp-content/uploads/2025/01/PACE-Report_FINAL.pdf

in Transmission Infrastructure Projects[9]. *Beyond the Wires* notes that with the scale of transmission expansion required, traditional siting and engagement strategies are increasingly unworkable. They identify that proactive community engagement—where developers involve communities early in planning and offer tangible and locally relevant benefits—has become essential to building trust and cooperation and to minimizing delays in siting and permitting. Community benefits approaches have shown that aligning infrastructure deployment with community values and local cost-benefit considerations can reduce opposition, improve outcomes, and support timely project delivery. Additionally, the report describes that engaging communities during early planning phases—before routes or project designs are finalized—has been shown to reduce litigation risk, address concerns related to land use, cultural resources, and environmental impacts, and avoid costly redesigns that contribute to project delays.

We also recommend incorporating the three justice lenses from *Rewiring for Justice*:

- **"Recognition Justice** which acknowledges EJ communities face disproportionate environmental harms due to a long history of redlining, disinvestment, and discriminatory policies;
- **Procedural Justice** which commits to and sustains an inclusive and transparent planning process with early and active engagement with EJ communities; and
- **Distributive Justic**e which distributes the costs and benefits of the new clean energy and transmission system equitably amongst society."

The Guidebook should identify engagement points throughout planning processes, explain why these stages matter for communities and reference the three justice lenses noted above, and describe mechanisms for participation that ensure equitable outcomes.

An equitable transition will require early, meaningful engagement with affected communities and attention to cumulative impacts on public health, land use, economic well-being, air and water quality, and energy reliability. Consistent with the 2021 SB 100 Report, we recommend that the Guidebook incorporate explicit discussion of community interests and equity considerations in the section addressing SB 100 implementation, reinforcing that long-term transmission planning must contribute to decarbonization and healthier, more resilient, and more equitable communities across California.

C. Tribal Sovereignty and Government-to-Government Obligations

Given the Guidebook's extensive discussion of federal agencies, national policy coordination, and state permitting authorities, we strongly recommend the inclusion of a standalone chapter addressing Tribal sovereignty. This chapter should clearly describe Tribal Nations' sovereign rights, government-to-government consultation obligations, and the distinct legal frameworks applicable to transmission planning and development near Tribal lands or areas of cultural affiliation. Explicitly

[9] Acadia Center, Northeast Grid Planning Forum, Nergica. *Community Powered Progress: A Pathway to Greater Community Participation in Transmission Infrastructure Projects.* 2025. https://acadiacenter.wpenginepowered.com/wp-content/uploads/2025/08/Community-Powered-Progress-FORMATTED.pdf

addressing these issues is essential for legal compliance, respectful engagement, and effective planning.

D. Permitting, Consultation, and Indigenous Rights Frameworks

We recommend that the Guidebook further describe Tribal consultation requirements for each permitting authority and emphasize early consultation opportunities, as well as pathways and tools for co-stewardship and co-management. Additionally, referencing international frameworks such as the *United Nations Declaration on the Rights of Indigenous Peoples*[10] would help inform best practices for meaningful engagement and informed consent. The Schatz Energy Research Center's report titled *Permitting for Port Infrastructure to Support Offshore Wind in California*[11] offers an example of what this could look like.

E. Federal Agency Roles and Tribal Trust Responsibilities

For the federal agencies discussed in Chapter 4, we recommend documenting the roles of Tribal offices, bureaus, charters, and trust responsibilities within those agencies. Coordination with these offices is often legally required and should be clearly identified as part of transmission planning and permitting processes.

F. Ratepayer Impacts, Cost Allocation, and Financial Transparency

The Guidebook would be a greater resource if it included information on the relationship between transmission development and ratepayer costs. Key topics that warrant discussion include:

- Fixed and variable electricity rates;
- Transmission and system upgrade financing mechanisms;
- Cost allocation methodologies;
- Tariff assessment processes;
- The roles of regulatory authorities in financial decision-making; and
- Opportunities for public comment and engagement on ratepayer-related policies.

We recommend a dedicated chapter or appendix to address these issues to support informed public participation and accountability as this is critical background to understanding how decisions impact local needs and interests.

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[10] UN General Assembly. *United Nations Declaration on the Rights of Indigenous Peoples*. United Nations, resolution adopted 2 October 2007. https://www.un.org/development/desa/Indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf

[11] See pages 54-70: Awbrey Yost and Arne Jacobson. *Permitting for Port Infrastructure to Support Offshore Wind in California*. Schatz Energy Research Center, 2025. https://schatzcenter.org/pubs/2025-OSW-R4-portpermitting-SchatzCenter.pdf

G. Relationship Between Transmission Planning and Distribution Systems

Although the Guidebook is focused on transmission planning, it is vital to address core elements of electric distribution systems to ensure definitional consistency and user clarity. Specifically, the Guidebook should clarify as a subsection of Chapter 2 how bulk transmission development relates to distribution system upgrades, planning, and permitting, including how it relates to strategies for integrating distributed energy resources and community-scale renewable generation.

H. Definitional Consistency, Technical Clarity, and Utility Accountability

The Guidebook's definitions of transmission, power lines, and distribution based on voltage levels are helpful; however, inconsistencies across utility publications create confusion. For example, the Guidebook describes three levels of electrical transfer as bulk transmission, power lines, and distribution each with corresponding kV levels. Those distinctions are often inconsistent in public documents/websites from Pacific Gas and Electric and have implications on bulk system clarity and responsibility.

We recommend:

- Noting the different definitions across agencies and utilities with guidance on how to navigate those differences for effective engagement with decision makers in planning processes; and
- Including visual representations of system components and key distinctions.

Clear and consistent terminology and representation of interrelated systems is essential for public understanding, local government engagement, and accountability.

I. Policy Driven Needs, Decision-Making Frameworks, and Transmission Planning Processes

While the Guidebook identifies policy as a key driver of transmission decisions (e.g., in CAISO's expansion planning process, CEC's Integrated Energy Policy Report, California's clean energy goals informing CPUC's optimal resource portfolio, and reference to requirements for load serving entities to respond to state policy goals), we recommend further outlining which policies apply (where not currently stated), how they are prioritized relative to technical and economic factors, and points in planning processes when policy considerations are evaluated and open to public input. This would support more informed public understanding, meaningful engagement, and accountable governance.

Further, we recommend clarifying how policy considerations—including Tribal, state, federal, and local directives, distribution needs, strategic economic development opportunities, and energy justice matters—are incorporated into CAISO's Transmission Planning Process (TPP) and 20-Year Outlook as well as the US Department of Energy's National Transmission Needs and Planning Studies. Expanded discussion of how these policies are deemed relevant, weighted, evaluated, and translated into infrastructure investments would provide significant value to users.

J. Inter-Agency Coordination and Streamlined Community Engagement

We commend the ongoing coordination among the CPUC, CAISO, and CEC and the evolution of interagency memoranda of understanding. We encourage further alignment of community engagement efforts across agencies to reduce capacity burdens on affected and interested parties and to improve the efficiency and effectiveness of public participation.

K. Integrated Planning with Local, Tribal, and Regional Authorities

Throughout discussions of IRP, sensitivity portfolios, and other planning processes, the Guidebook would benefit from clearer explanations of how local governments, Tribal Nations, regional planning bodies, and economic development entities are engaged. These perspectives are critical for aligning transmission investments with regional growth strategies and public infrastructure planning. Further, such engagement can help address concerns up front, support more expeditious infrastructure upgrades/builds, and plan for maximizing local benefit over time.

L. Competitive Solicitations and Community Benefit Tools

For Phase 3 of the TPP, we encourage discussion of policy tools that can be incorporated into competitive solicitations, including community benefit agreements, Tribal benefit agreements, equitable scoring criteria, Tribal co-management opportunities, and structured evaluation of potential local negative impacts and benefits.

M. Landscape-Scale Planning, Federal Coordination, and Corridor Development

For landscape-scale planning initiatives, including transmission corridors, the Guidebook should address Tribal co-stewardship and co-management pathways, intergovernmental coordination, and early community involvement opportunities. Including visual tools such as corridor maps that identify Tribal territories, counties, and key natural features would further support planning transparency.

N. Regional and Western Planning Bodies

The Guidebook would benefit from greater clarity regarding participation, representation, and decision-making authority within Western Electricity Coordinating Council (WECC), Western Interconnection Regional Advisory Body (WIRAB), Committee on Regional Electric Power Cooperation (CREPC), Western Interstate Energy Board (WEIB), and related entities. In particular, the roles and decision making authorities of Tribal Nations and First Nations in these bodies should be clearly specified.

O. CPCN, Transmission Project Review, and Accountability

The Guidebook should provide more information about Certificate of Public Convenience and Necessity (CPCN) and Transmission Project Review (TPR) criteria, including which policies and

mandates influence project approvals, how criteria are evaluated, and which projects are subject to review. Clear descriptions of stakeholder engagement requirements and agency oversight would strengthen accountability.

P. Document Organization, Navigation, and Long-Term Usability

To improve legibility and future usefulness, we recommend enhancing the structural organization of the Guidebook by:

- Implementing a consistent numbering system for subsections within each chapter;
- Adding a detailed table of contents at the beginning of the document; and
- Incorporating external links throughout the Guidebook pointing to current policies, agency resources, technical studies, and points of contact.

These formatting amendments would support clearer cross-referencing, reduce ambiguity when citing sections, and allow users to access up-to-date information as policies and planning processes evolve.

Finally, we recommend that the Guidebook serve as a “point-in-time” resource, with annotated schedules for updates and opportunities for public feedback. This approach would enhance transparency and maintain relevance amid evolving technologies, policies, and energy system needs.

Thank you for the opportunity to submit these comments. We appreciate the significant collaborative effort invested in developing the Guidebook and ongoing work to support a transparent, clean, equitable, and affordable electrical system for all Californians. We look forward to continued engagement as the Guidebook is refined and implemented.

Sincerely,

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