

DOCKETED

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Comment on 24-OIIP-01, Recommendations for Energy Equity Indicators

Additional submitted attachment is included below.

California Energy Commission
715 P Street
Sacramento, CA 95814

VIA EMAIL
EnergyEquityIndicators@energy.ca.gov

March 12, 2026

RE: Comment on Order Instituting Informational Proceeding on Justice, Access, Equity, Diversity, and Inclusion (24-OIIP-01), Recommendations for Energy Equity Indicators

Dear California Energy Commission,

The Center for Biological Diversity (“Center”) submits these comments to inform the Justice, Access, Equity, Diversity, and Inclusion (“JAEDI”) Informational Proceeding to support the Energy Equity Indicators (“EEIs”) and apply them to further improve California energy programs and planning. Additionally, this comment letter recommends that all divisions of the California Energy Commission (“CEC”) and other relevant agencies integrate the EEIs into energy planning and investment efforts. We look forward to discussing our comments below and supporting the Energy Assessment Division to strengthen the uptake of the EEIs tool.

I. The EEIs Are Needed to Fill the Gap in Missing Energy Equity Data and Inform Accurate and Relevant Planning.

To begin with, the Center commends the Energy Assessment Division for acknowledging the need for more relevant energy equity data. Recognizing the gap in current mapping and screening tools paves the way for the EEI tool as a timely and vital asset to inform energy planning. The proposed energy equity metrics, including reliability (power outage duration and frequency), clean energy adoption, socioeconomic conditions, energy burden, energy affordability, and public health, have great potential to improve CEC investment and planning decisions.¹ Layering energy equity data sets will offer planners the chance to recognize the intersection of injustices and reaffirm community experiences with quantitative data.

We also appreciate the Energy Assessment Division’s comprehensive and inclusive approach to designing the EEIs. The tool acknowledges California communities as diverse and

¹ California Energy Commission, JAEDI Equity Tools Workshop, (September 15, 2025), *available at* https://energy.zoom.us/rec/play/RdE8jG6Hwoq4-8rhHcbDQ49Y791eK6k5OVX5L6sC6dp94bICkZD-7SDd1D2Xai718Arm3Ra0JE9y2JVN.Hb9PFLub8gIyb3M8?eagerLoadZvaPages=sidemenu.billing.plan_management&accessLevel=meeting&canPlayFromShare=true&from=share_recording_detail&startTime=1757952303000&componentName=rec-play&originRequestUrl=https%3A%2F%2Fenergy.zoom.us%2Frec%2Fshare%2Fp5YR-WbFs4-99STVnl8cQFMxMKDvak2zoidXIBNxoXOyKT1JoXlMilR1x7nQLaT.2xmMFcOMZlcqht17%3FstartTime%3D1757952303000

unique entities by providing detailed and granular data, offering a chance to understand energy issues at local scales. Additionally, we support the commitment to ensuring the user experience of the tool is equitable. The EEIs reduce barriers to comprehension by defining relevant terms and including a high-level summary data layer for users with less data experience. Accounting for how users will interact with the tool ensures that all communities can be empowered by the data and employ it to represent their lived experiences.

Additionally, the Center supports the Energy Assessment Division's new methodology for representing energy affordability in California. Historically, the California Public Utilities Commission ("CPUC") utilizes the Affordability Ratio by weighing household income, essential services bills, and other essential utility services.² This analysis fails to account for household size, leaving out a crucial factor in understanding a household's true energy burden. The EEI's Affordability Index factors in household size and household transportation fuel costs, creating a more equitable and accurate portrayal of financial burdens faced by households.³ We encourage all divisions of the CEC, the CPUC, and relevant California agencies to adopt the methodology to assist in quantifying energy affordability.

We also encourage the Energy Assessment Division to expand the Affordability Index to factor in metrics that represent a household's ability to maintain energy affordability to ensure solutions are sustainable over the long term.

II. The CEC Should Deploy the EEIs as a Preliminary Planning Tool to Understand Local Contexts and Community Impacts Before Investments and Decisions Occur.

To ensure that progress towards justice continues, our organizations urge all divisions of the CEC to utilize the EEIs to understand local contexts to inform energy planning, investments, and decision-making. Currently, CEC-approved projects often neglect to analyze the full scope of preexisting conditions and project impacts on local communities. For example, the CEC's Electric Program Investment Charge ("EPIC") Program invests California ratepayer funds into projects aiming to advance the energy transition. Specifically, the program allocates a minimum of \$375 million to target disadvantaged communities ("DACs")⁴ and \$150 million toward low-income communities.⁵ It is unclear, but it seems that the CEC classifies EPIC projects as beneficial to a DAC or low-income community only by ensuring the project is located within these designated communities. The limited analysis, however, risks passing out millions of California ratepayer funds to projects that fail to fully analyze the positive and negative impacts on the communities they are meant to uplift.

² California Public Utilities Commission, *Affordability Ratio*, (2019), available at <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/affordability/affordability-ratio>

³ *Supra*, fn. 1.

⁴ California Energy Commission, *Commitment to Diversity*, available at <https://www.energy.ca.gov/programs-and-topics/topics/research-and-development/commitment-diversity>

⁵ *Id.*

Although EPIC’s analysis is inconsistent, the program has accurately classified and funded projects that truly and meaningfully benefit DACs and low-income communities. For example, the Chemehuevi Tribe in Havasu Lake, California, faced extreme energy vulnerabilities such as power outages, reliability concerns, and increased energy demand.⁶ To combat these concerns, EPIC supported the Community Scale Generation System, deploying a microgrid with energy storage, solar generation, and an energy management system to shift peak demand. Furthermore, during power outages, the community center can provide continuous power to support essential services to the community.⁷ The project successfully reduced electricity costs by 50%, and researchers estimate “over \$670,744 in energy savings from the solar PV system, \$74,463 from energy storage revenue streams, and \$38,910 in preventing costs due to sustained interruptions over a 20-year period.”⁸ It becomes clear that this EPIC project began by analyzing the local energy issues and context within a DAC, and then proposed action to improve the local community. Not only is this community benefiting from increased reliability and resiliency, but the tribe is also generating local wealth through deploying local clean energy resources.

In contrast, the EPIC program hands out millions of ratepayer dollars to projects that falsely claim to benefit low-income and DACs. For example, the Lakeview Farms Dairy Biogas-To-Electricity Project is classified as beneficial to DACs and low-income communities.⁹ The CEC awarded \$4 million of California ratepayer funds to process dairy manure into biogas to generate and export renewable energy to the electricity grid. Although the CEC claims the project benefits DACs and low-income communities, it fails to give an in-depth explanation of the community benefits. Instead, only mentioning, “the project will improve odor control through hydrogen sulfide removal, which is an important issue to dairy employees and benefits the local community.”¹⁰ Furthermore, Lakeview Farms is a private agricultural farm; according to their website, it is unclear if they provide any public resources or public health benefits to the local community.¹¹ Therefore, the CEC is distributing ratepayer money intended to benefit communities without first verifying the existence of or nature of community benefits.

The reality is that industrial dairy biogas production imposes detrimental impacts on nearby communities and the ecosystem. The surrounding communities face increased air and water pollution, manifesting in harmful health impacts.¹² By placing dairy biogas projects specifically in DACs and low-income communities, the CEC is directly contributing to and

⁶ California Energy Commission, *Demonstration of Community Scale Generation System at the Chemehuevi Community Center*, available at <https://database.epicpartnership.org/project/30148>

⁷ *Id.*

⁸ *Id.*

⁹ California Energy Commission, *The Lakeview Farms Dairy Biogas-To-Electricity Project*, available at <https://database.epicpartnership.org/project/30046>

¹⁰ *Id.*

¹¹ Lakeview Farms, *About Lakeview Farms*, available at <https://lakeviewfarms.com/about-us/>

¹² See e.g. Prepared Testimony of Dr. Dustin Mulvaney, Julia Jordan, and Leslie Martinez on behalf of Sierra Club and Leadership Counsel for Justice and Accountability on the Application of Southern California Gas Company and San Diego Gas & Electric Company for Renewable Natural Gas Tariff at 30-31, CPUC Docket A.19-02-015 (Oct. 14, 2019).

reinforcing environmental injustices while disguising their actions as beneficial. On top of that, the Lakeview Farms Dairy Biogas project is located near 11 other dairies to cluster biogas operations.¹³ Concentrating biogas operations intensifies the detrimental impacts on local communities. Since EPIC is funded by California ratepayer dollars, the DACs and low-income communities are in part paying for projects that directly harm their families and communities while increasing profits for private companies.

After comparing EPIC's Community Scale Generation System and the Lakeview Dairy Biogas Project, it becomes evident that the CEC is inconsistently and inequitably assessing project impacts to DACs and low-income communities. The Community Scale Generation System deploys clean energy resources to support and uplift DACs daily and during extreme disasters. The Lakeview Dairy Biogas Project fails to acknowledge the local community context, while disguising benefits beneath long-standing environmental injustices and cementing inequities. We call on the CEC to modify EPIC's project prioritization and evaluation process. Applying the Energy Assessment Division's EEIs as an initial analysis or screening tool will help the CEC understand local energy issues and community contexts and prioritize projects that target the inequities represented by data. Uplifting and integrating this tool into EPIC and other CEC programs will ensure that projects with similar positive benefits to the Community Scale Generation System will receive funding and proliferate energy justice throughout California communities.

III. Conclusion.

Finally, we appreciate the Energy Assessment Division's continuous mention of the need to center energy projects and investments on a human scale. From the impressive work by this division, it is clear that the EEIs team deeply cares about bringing justice to California energy systems, but we call on all divisions of the CEC to acknowledge the importance of the EEIs. We urge the CEC to utilize the EEIs throughout all CEC planning, investment, and decision-making processes to direct funding and create projects that truly benefit and uplift DACs and low-income communities. We look forward to collaborating and supporting the Energy Assessment Division to ensure equity is at the forefront of all CEC actions.

Sincerely,

/s/

Meya Saenz Zagar
Energy Justice Campaigner
Center for Biological Diversity

¹³ *Supra, fn. 9.*