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Support for Advancing the Clean Energy Transition While Protecting Communities and Ecosystems Topic

I support the intent to better understand and communicate the health, air quality, affordability, and community impacts of building and transportation electrification. These impacts are important and should be considered alongside GHG reductions and energy savings when designing programs, codes, incentives, and ratepayer-funded investments.

To further strengthen the initiative, I encourage the Commission to clearly define the specific decision-making gap this work is intended to address. It would be helpful to outline where existing information may be insufficient for ratepayer-protective electrification policy, and what specific questions new studies would answer that are not already addressed through existing research.

I strongly agree that health and air quality metrics deserve greater prominence. In this front it is important to acknowledge that life-cycle assessments and impact assessment methods can be highly sensitive to assumptions, system boundaries, input data, and methodological choices. If these metrics are not clearly defined, biased or are applied inconsistently, they could unintentionally create misleading signals when incorporated into programs, codes, incentives, or benefit-cost frameworks. For that reason, I encourage the initiative to prioritize transparent, standardized, and peer-reviewed methods, with input from industry, academia, public agencies, and other relevant experts. Clear guidance on required inputs, assumptions, uncertainty treatment, and appropriate use cases would help reduce bias, improve comparability across studies, and increase confidence in the results.

Finally, I suggest caution around commissioning new standalone dashboards or tools unless there is a clear long-term maintenance, governance, and user-adoption plan. In some cases, publicly funded tools can become difficult to use, poorly maintained, or disconnected from the needs of practitioners and the public. Rather than emphasizing development of new dashboards as an end in itself, the initiative may deliver greater long-term value by focusing on standardization, durable datasets, and guidance that can be used across existing platforms. For example, CEC could support a California-focused reference dataset (e.g. CA LCA commons), standardized reporting templates, required input assumptions, and methodological guidance similar in spirit to established LCA toolkits such as those developed by NETL. Where software tools are needed, priority could be given to well-maintained, transparent, and widely used platforms, such as openLCA, rather than creating new tools that may be difficult to sustain over time.

Overall, I want to express my support the broader goal of improving how health, air quality, affordability, and community impacts are evaluated. My suggestion is that the

initiative focus not only on producing new studies or dashboards, but also on creating trusted, standardized, transparent, and maintainable methods and datasets that can improve decision-making over time.