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Advancements in Energy Affordability Representation

Dear Commissioners:

Thank you for the opportunity to submit comments on the 2026 Integrated Energy Policy Report Update proceeding on energy equity and environmental justice.

I am a researcher at PSE Healthy Healthy Energy, where I study non-energy impacts of energy transitions across the United States. My work focuses on the current state of energy affordability for states, utilities, and households, as well as strategies that can help ensure that the benefits of the energy transition reach all communities through electrification, distributed energy resources, energy efficiency, rate design, demand response, and other strategies.

Energy equity and environmental justice are difficult to quantify, especially in a way that can be incorporated into program design, investments, forecasts, and planning. Results from the Commission's Energy Equity Indicators makes analysis of equity and justice implications more explicit and will help to track progress.

Energy affordability should remain at the center of this work. Too many households cannot currently afford their energy bills, and the preliminary affordability data presented through the Energy Equity Indicators process shows that the annual assistance needed for low-income households is very large, likely reaching into the billions of dollars statewide. Existing programs such as CARE and FERA are essential, but they do not fully close the affordability gap as rates continue to increase. For example, SDG&E's January 2026 bundled electric rate change alert reported an 11.4 percent increase in bundled residential average electric rates.

Solutions to improve affordability vary substantially based on fuel use, housing type, climate, appliance stock, building efficiency, medical and accessibility needs, household size, transportation needs, rooftop solar, batteries, and rate structure. Regional average bill or average cost burden, even at local scales like census tract or zip code, can hide the households most exposed to rate increases and can also hide the interventions most likely to help. This is why I believe that the next phase of the Energy Equity Indicators should move towards more granular data products that can connect bills, home and occupant characteristics, seasonal timing, and technology pathways.

As the CEC continues this work, I respectfully recommend the following priorities.

First, the CEC should develop privacy-protective ways to publish low-income energy consumption and cost data at useful geographic scales and disaggregated by a poverty metric such as the federal poverty level. Disaggregation by poverty is vital in order to

ensure low-income household affordability struggles are not averaged out by higher-income households. Moreover, monthly or three-month cumulative cost data would be especially useful because seasonal bill strain is directly relevant to program design and this approach would help identify the time of year bills are most likely to strain incomes and when assistance is most needed.

Second, the CEC should explore methods for pairing billing and/or meter data with essential demographic, housing, and energy consumption variables such as income or home type as these are important considerations for program eligibility. The CEC should also use meter data to better identify what households are using energy for to inform cost-effective interventions such as bill assistance, weatherization, heat pump deployment, appliance replacement, demand flexibility, storage, and rate design. This recommendation is consistent with CEC's future goals to incorporate OPEN DSM (tools to measure demand side program impact) to better understand deployment efficient and affordable appliances.

Third, the CEC should develop datasets that track distributed energy resources, EV charging, and demand flexibility adoption in low-income and disadvantaged communities. As costs fall and systems like virtual power plants, managed charging, storage, and potentially plug-in solar mature, equity analysis should inform which households would benefit most from new technologies. The Energy Equity Indicators can help distinguish between the unique needs of specific communities such as bill assistance, upfront capital support, or tenant-focused solutions, and opportunities such as communities where grid-beneficial technologies could reduce both household costs and system costs.

Increased data and metrics will help researchers such as myself identify pathways that can provide benefits to households with a focus on those most burdened by the current energy system.

Respectfully submitted,

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