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Climate Adaptation Staff Proposal (R.18-04-019): Guidance on Community Engagement and Adaptive Capacity

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Disadvantaged Communities Advisory Group (DACAG) Meeting
August 21, 2026



California Public
Utilities Commission

Agenda

- Purpose and Guiding Questions
- Intro to Climate Adaptation
- Staff Proposal Methodology
- Proposed Improvements:
 - Community Engagement
 - Community Adaptive Capacity metrics
- Next Steps and Discussion

Guiding Questions for DACAG Discussion

- Does the Community Engagement Framework (CEF) balance seeking meaningful input from disadvantaged vulnerable communities (DVCs) with reducing engagement fatigue across the four-year Climate Adaptation Vulnerability Assessment (CAVA) cycle?
- Is the proposed IOU follow-up with communities sufficient for demonstrating the impact of community adaptation option priorities and investments on general rate case (GRC) applications?
- Do the Public Touch Points allow for transparency of proposed priorities/investments, two-way information sharing, and community knowledge capacity building?
- Are the proposed Tribal engagement requirements consistent with Tribal engagement preferences?

Climate Adaptation Proceeding - (R.)18-04-019

CAVA: Climate Adaptation Vulnerability Assessment

Purpose: Requires large energy IOUs to assess forecasted extreme climate impacts on energy infrastructure and IOU operations decades into the future and identify options to mitigate threats by developing and submitting to CPUC:

- **CAVAs** filed with CPUC every 4 years
- Community Engagement Plan (**CEP**) one year before their CAVA

Equity Targets: Disadvantaged and Vulnerable Communities (**DVC**) defined as: 1) Tribes, 2) 25% highest CalEnviroScreen scores, 3) median income less than 60% of state median

Informational: CAVAs can be used to inform nearer-term focus Risk Assessment Mitigation Phase (RAMP), general rate case (GRC) proposals, and other long-term planning proceedings. Every IOU has filed at least one CAVA to date.

CAVA Requirements – Most Recently Updated in August 2024

ED ministerial review every four years via Tier 2 advice letter to ensure CAVAs include:

1. Identify climate risk and conduct exposure analysis on infrastructure, operations, and service.
2. Consider the following climate risks: **Temperature, sea level, variation in precipitation (snowpack, flooding, drought, subsidence), wildfire, and cascading impacts.**
3. Utilize **best available climate science and modeling** requirements including baseline scenario, Global Warming Level approach, analyze specific degree scenarios (1.5 and 2 °C).
4. Consider green and sustainable remedies for vulnerable infrastructure.
5. Include **analysis of how IOUs promote equity in DVCs** based on their adaptive capacity.
6. Include summary of CEP work in the CAVA and attached CEP to CAVA.
7. Include off-ramp for assets with low climate risk with mechanism to reassess those assets in the future.
8. Must demonstrate **Incrementality, Prioritization, Cost-Effectiveness, and Justification of any post-CAVA investment requests in GRC** or other applications.

CPUC Definition: Community Adaptive Capacity

The ability to recover from the broad range of responses and adjustments to daily and extreme climate change-related events available to communities, including the ability and resources communities have to moderate potential damages, take advantage of opportunities, and cope with consequences.

Proceeding Scope to Consider Improvements

Phase 2, Task 2 Scoping Questions:

1.	Should the Commission refine requirements regarding consultations with DVCs and the preparation of CEPs adopted in D.20-08-046 with regard to large IOUs, including but not limited to:
1.1	Additional guidance regarding the purpose and intended outcomes of the CEP and DVC consultation processes?
1.2	Ways to reduce consultation fatigue and/or coordinate with other proceeding outreach processes?
1.3	Modifications to the definition of DVC adopted in D.20-08-026?
1.4	Additional guidance regarding consultation and collaboration with local governments during risk and vulnerability assessment processes? During adaptation proposal identification processes?
1.5	Refinement of Tribal consultation processes specific to climate adaptation matters?
1.6	Additional guidance regarding methods and scope for the determination of community adaptive capacity in CAVA analyses?
2.	What are the impacts on environmental and social justice communities of actions taken in this proceeding, including the extent to which requirements impact achievement of any of the nine goals of the Commission's Environmental and Social Justice Action Plan?

Staff Proposal Goals

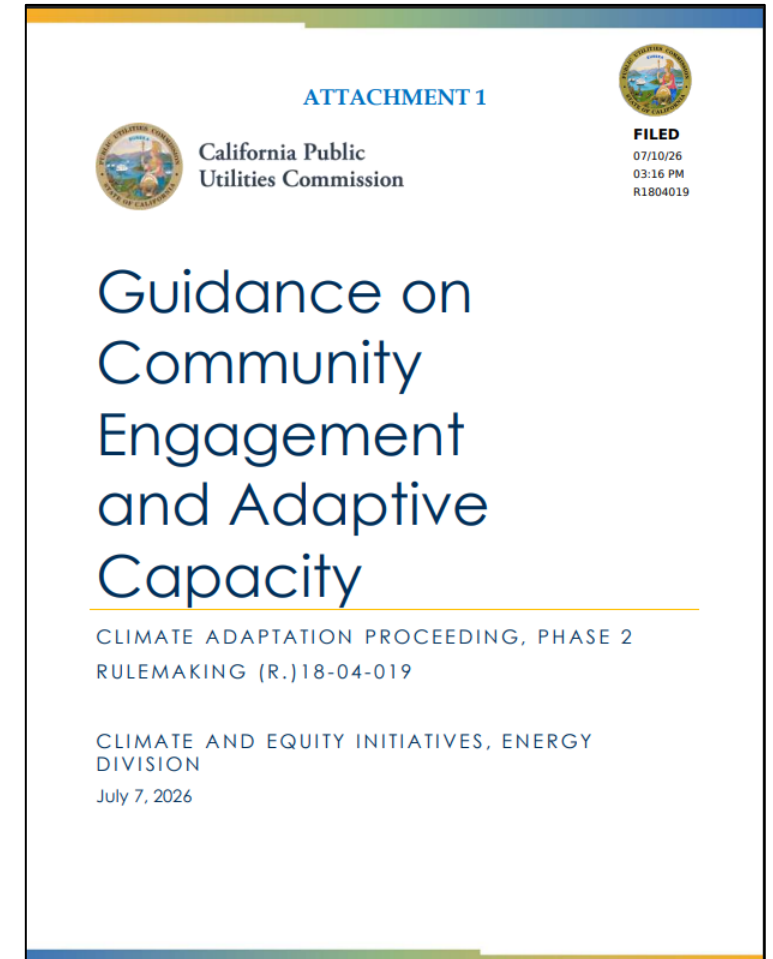
CAVA to meaningfully integrate technical analysis of climate vulnerability and DVC community engagement

- Integrate community engagement clearly with CAVA analysis development, proposals, and evaluation throughout the full 4-year CAVA Cycle
- Reduce consultation fatigue for DVC community members by providing meaningful opportunities for input and requiring IOUs to demonstrate of outcomes, including explaining climate related investments at GRC milestone
- Builds off many good IOU proactive practices, makes proposed improvement to formalized Commission guidance.

Staff Proposal Process

Methodology: Held 5 workshops over 15 months in Northern and Southern California with diverse stakeholder perspectives, including 51 panelists representing:

- IOUs
- Local governments
- Other State agencies
- Researchers
- Tribes
- Community-based organizations
- Academic experts



Community Engagement

Community Engagement Section

- Community Engagement Framework (CEF)
- Advisory Groups
- Tribal Engagement
- Improvement to CAVA Coordination Activities
- CEF Evaluations
- Additional Phase 2 Issues

Community Engagement Framework

Current Requirement: Community Engagement Plan (CEP) Submitted every four years, one year before the CAVA, as a compliance filing.

Proposed Modifications:

- CEF Plan submitted as Tier 2 Advice Letter
- 3 public Touch Point meetings held in IOUs' organizing regions that both provides outcome updates and gathers input for next milestones
- IOUs to consult with ED Staff on Touch Point format, agenda, DVC consultation
- IOUs to seek community feedback post-Touch Point, to be included in CEF Evaluation

Current
CAVA
Cycle

Year 4

90-Day Workshop
Feb 15

CAVA Due
Tier 2 AL
May 15

Year 1

Survey Due
Comp. Filing
May 15

RAMP

Year 2

GRC

Year 3

CEP Due
Comp. Filing
May 15



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Staff's Proposed CAVA cycle

Year 4

Touch Point 3
90-Day Workshop
Feb 15

CAVA Due
Tier 2 AL
May 15

Year 1

Evaluation
Report Due
Tier 1 AL
Feb 15

Touch Point 1
CEF Kick-Off
May 15

RAMP

Year 2

CEF Plan
due, **Tier 2 AL**
Nov 15

Year 3

Touch Point 2
Pre-Prioritization
Check-In
Nov 15

GRC

Four-Year
CEF Cycle
Climate
Adaptation



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Advisory Groups

Current Process: No requirement for IOUs to utilize advisory groups; each IOU proactively formed their own advisory groups to inform CEP creation and to conduct outreach in DVCs.

Proposed Modifications

- Meet publicly for transparency and broader stakeholder inclusion, seeking efficiencies of existing forums
- Reflect diversity of the region/service territory
- Advisory group members priority as lead panelists at public Touch Points
- Provide Tribal representatives with opportunity to participate in broader advisory groups, but IOUs required to create Tribal-specific advisory group

Tribal Engagement

Current Process: No distinct tribal engagement requirements outside of tribal inclusion in DVC definition

Proposed Modifications:

- Distinct Tribal Engagement Plan within CEF Plan
- Offer Tribal communities opportunities to participate in specific Tribal Advisory Groups
- Consider meeting efficiencies, guided by Tribe needs (e.g., existing forums)
- Consider unique status of Tribes as sovereign governments (e.g., Tribal stewardship; jurisdiction over utility matters)
- Prioritize in-person engagement on Tribal lands

Improvement to CAVA Coordination Activities

Current Process:

- IOUs are directed to describe in their CEPs outreach efforts to local non-governmental entities if local governments aren't "sufficiently engaged with [their] disadvantaged residents." (D.20-08-046)
- No guidance provided on coordinating with local governments, across CPUC proceedings, or with other State agencies.

Proposed Modification

- Modify D.20-08-046, OP 6 to provide direction to IOUs for describing engagement with local governments, state agencies and CPUC proceeding in their Tier 2 CEF Advice Letters

CEF Evaluations

Current Process:

- Post-CEP Survey conducted every 4 years, due 1 year after the CAVA submission
- Survey DVC Community (relevant CBOs, communities, and individuals) with whom engagement was conducted

Proposed Modification:

- Evaluation Report submitted once every four years, 9 months after the CAVA submission, via Tier 1 Advice Letter
- Feedback after each Touch Point
- Continuous IOU feedback portal
 - Advice letter to include all raw data from surveys and the feedback portal

Additional Phase 2 Issues

DVC Definition

- Do not change definition but consider broader at-risk communities in CAVA analysis, such as rural and disabled communities, within scenario comparisons (Adaptive Capacity Criteria 3C, sensitivity to pockets of vulnerability).

ESJ Action Plan 2.0

- ED's Staff Proposal is aligned with CPUC's ESJ Action Plan Goals including but not limited to:
 - Goal 1: Consistently integrate equity and access consideration throughout CPUC regulatory activities
 - Goal 2: Increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health
 - **Goal 4: Increase climate resiliency in ESJ communities**
 - **Goal 5: Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in CPUC decision-making processes and benefit from CPUC programs**
 - Goal 9: Monitor CPUC's ESJ efforts to evaluate how they are achieving their objectives

Adaptive Capacity

Eight Proposed Criteria: Adaptive Capacity Analysis and Metrics

Build off IOU Best Practices in CAVAs

Criteria distilled into three categories:

1. **Public Interest**
2. **Transparency**
3. **Data Resolution / Usefulness**



1. Public Interest Criteria

1A. Public Interpretability

- Using plain language and providing context

1B. Ground-Truthing through Community Engagement

- Ensuring data reflects lived experiences

1C. Investment Decision Interpretability

- Focusing on the end application of metrics

2. Transparency Criteria

2A. Auditability and Transparency in Data Sources and Methods

- Demonstrating methodology for replicability

2B. Reliability of Data and Methods

- Defaulting to public, State-operated sources

3. Data Resolution / Usefulness Criteria

3A. Ability to Compare across Time

- Tracking changes

3B. Ability to compare across Geography

- Consistent comparing

3C. Sensitivity to Pockets of Vulnerability

- Identifying acute barriers

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