DOCKETED	
Docket Number:	16-OIR-06
Project Title:	Senate Bill 350 Disadvantaged Community Advisory Group
TN #:	272857
Document Title:	Item 6 - DACAG Comment Letter - Staff Proposal on Climate Adaptation - Approved
Description:	N/A
Filer:	Kim Todd
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	9/18/2026 3:00:29 PM
Docketed Date:	9/18/2026

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Rulemaking 18-04-019
Order Instituting Rulemaking to Consider Strategies and Guidance for Climate Change Adaptation

COMMENTS OF THE DISADVANTAGED COMMUNITIES ADVISORY GROUP ON THE ENERGY DIVISION STAFF PROPOSAL ON UTILITY CLIMATE ADAPTATION PLANNING

The Disadvantaged Communities Advisory Group (DACAG) appreciates the opportunity to comment on the Energy Division Staff Proposal on Community Engagement and Adaptive Capacity in Rulemaking 18-04-019.

The DACAG is an 11-member advisory group created by Senate Bill 350 (de León, Chapter 547, Statues of 2015) that advises CEC and the California Public Utilities Commission (CPUC) on how to design and implement policies and programs to be more effective on behalf of disadvantaged communities and in the achievement of our clean energy and pollution reduction goals.

DACAG strongly supports the Staff Proposal's effort to strengthen community engagement, incorporate community adaptive capacity into climate adaptation planning, and ensure that the communities most affected by climate change have a meaningful role in shaping the utilities' response.

We encourage the Commission to take one additional step that we believe is essential to achieving the Staff Proposal's purpose: establish a stronger and more binding connection between the Climate Adaptation Vulnerability Assessment (CAVA) process, the community input gathered through that process, and the investments utilities ultimately make.

I. Tribal and community engagement only has meaning if it informs action

Investing in resilience in communities with higher vulnerability to climate impacts and less adaptive capacity is crucial. Households with less of other kinds of adaptive capacity (e.g. ability to leave their homes) may need more electricity resilience, but a wide range of adaptive capacity measures are relevant here.

Understanding utility investments and their potential impact—or lack thereof—on improving resilience and adaptive capacity is an important step in better aligning the CAVA with utility decision-making. For the first part, the CAVA could and should be used to inform utilities' climate adaptation investments and how they affect practical adaptive capacity. This means a per-cycle evaluation of both investment and impact specifically in DVCs. The second part includes looking at broader utility investments and

assessing where an investment decision should perhaps be modified due to the CAVA findings, such as meeting energy requirements through higher investments in household weatherization measures in places with extreme heat rather than investing in utility-scale resources.

The Commission has appropriately recognized that meaningful community engagement cannot be an end in itself. The CAVA framework asks utilities to engage disadvantaged and vulnerable communities in identifying climate vulnerabilities, understanding community impacts and adaptive capacity, and considering appropriate adaptation strategies.

That work requires a significant investment of time and resources, not only by utilities but by the communities themselves. Community-based organizations, Tribal communities, local governments, residents, and other stakeholders devote substantial time and expertise to participating in these processes. They share lived experience that cannot be replicated through technical modeling alone.

There are currently no distinct tribal engagement requirements though Tribes are included in the definition of DVCs. Tribes must be engaged intentionally, respecting their statuses as sovereign nations with expectations for government-to-government consultation, and the DACAG supports the Energy Division's staff proposal for necessary improvements including public meetings, engagement across the diversity of California's tribal nations and communities, Tribal specific advisory groups, and invitation of Tribal representatives to participate in the broader advisory group.

As utilities are already investing in community engagement, that investment has value only if there is a credible pathway from what communities tell utilities to what utilities ultimately do.

The Commission's own materials recognize this challenge. The Staff Proposal identifies a concern that CAVA community engagement and the technical CAVA analysis can operate as separate activities, while also emphasizing the need for community input and adaptive capacity information to inform subsequent investment decisions.

Importantly, PG&E's recent comments confirm that this is not merely a stakeholder perception. PG&E describes a "structural misalignment" between the CAVA community engagement process and responsive outcomes, and acknowledges that existing processes can leave community engagement disconnected from the RAMP and GRC processes that actually determine investment outcomes.

The DACAG advises the Commission to address that disconnect directly, including by supporting a process to better align the CAVA with investments and requiring regular and concrete reporting on how information gathered through community engagement was used to shape or change investments decisions.

II. The Commission should require a clear CAVA-to-investment accountability framework

DACAG supports the Staff Proposal's community engagement requirements, but recommends that the Commission also establish a more explicit accountability mechanism connecting CAVA findings and community-informed priorities to actual utility investment decisions.

We do not suggest that every community recommendation must automatically become a utility investment. Climate adaptation requires technical analysis, consideration of systemwide reliability and safety, cost-effectiveness, and prioritization among competing needs. Rather, the Commission should require utilities to demonstrate what happened between community-informed CAVA findings and actual investment decisions.

At a minimum, utilities should be required to:

1. Identify the community-informed adaptation priorities and recommendations emerging from each CAVA process.
2. Identify the corresponding climate adaptation investments proposed in subsequent GRCs or other proceedings, including the CAVA findings, community input, vulnerability assessments, or adaptive capacity considerations supporting those investments.
3. Explain when a significant community-informed adaptation priority is not reflected in an investment proposal, including the reason it was not pursued and what alternative strategy, if any, will address the identified vulnerability.
4. Report on actual implementation of CAVA-related investments, not merely proposed investments, including where appropriate the location, population or communities affected, dollars invested, adaptation objective, and status of implementation.
5. Require analysis of how specific investment dollars are expected to impact any given adaptive capacity objective: not only report the amount of money that was spent in a target community or on a relevant topic, but quantify the benefit (e.g. in terms of improved resilience, reliability, or adaptive capacity) that has resulted from or is expected to result from that investment.
6. Provide a reconciliation between CAVA recommendations, proposed investments, authorized investments, actual expenditures, and quantified community resilience or adaptive capacity outcomes and benefits.

This would give the Commission and stakeholders a way to determine whether the CAVA process is actually producing the outcomes it is intended to produce.

III. The Commission should not accept a system in which CAVAs and climate adaptation investments are effectively separate processes

DACAG is particularly concerned by the acknowledgement in the current record that CAVA engagement and downstream investment decision-making can function as separate processes.

If utilities are asking communities to devote substantial time to identifying climate vulnerabilities and adaptation priorities, but those priorities do not meaningfully inform the investments that follow, the Commission risks creating a process that is participatory in form but not in substance.

That is especially problematic for disadvantaged and vulnerable communities. Communities experiencing the greatest climate vulnerability often have the fewest resources available to participate in regulatory processes. Asking those communities to repeatedly share their experiences, identify priorities, participate in advisory groups, attend meetings, review materials, and provide feedback creates a significant opportunity cost.

The Commission should therefore be cautious about simply adding more engagement requirements without strengthening the accountability mechanisms that make engagement consequential. The best way to reduce engagement fatigue is not necessarily to ask communities to participate less. It is to make their participation matter more.

A community should be able to see, over time, what it told the utility, what the utility did with that information, what investments were proposed, what investments were ultimately authorized, and why. That transparency would strengthen trust and make future engagement more meaningful.

IV. Climate adaptation is also a ratepayer protection strategy

DACAG also encourages the Commission to view this issue through the lens of ratepayer protection.

Climate adaptation is not simply an additional category of utility spending. In many circumstances, proactive investment can reduce the magnitude of future disruption, damage, emergency response, and recovery costs.

The costs of failing to adapt can ultimately be borne by the same ratepayers who would bear the costs of prudent adaptation investments. For this reason, the question should not simply be whether a climate adaptation investment costs money today. The Commission should also ask what it costs ratepayers if the identified vulnerability is left unaddressed.

This is particularly important in disadvantaged communities, where climate-related outages, extreme heat, wildfire, flooding, and other hazards can impose disproportionate economic and health burdens. A resilient energy system should not simply restore service after a disaster. It should reduce the likelihood and severity of the harm in the first place. A serious commitment to implementing community-informed adaptation plans can therefore be understood as an act of ratepayer protection.

V. DACAG recommendations

Accordingly, DACAG recommends that the Commission:

1. Adopt the Staff Proposal's strengthened community engagement and adaptive capacity requirements.
2. Require each IOU to establish an explicit CAVA-to-investment linkage. Subsequent GRCs and other relevant investment applications should identify how the utility's proposed climate adaptation investments respond to CAVA findings and community-informed priorities.
3. Require utilities to explain material departures from CAVA-informed community priorities. Where a significant community-identified adaptation priority is not reflected in proposed investments, the utility should explain why and identify any alternative action being taken.
4. Require implementation and outcome reporting. Utilities should periodically report on actual climate adaptation investments, including how implemented investments correspond to CAVA findings and community priorities; and how those investments materially benefited or impacted DVCs.

5. The outcome and benefits metrics should be aligned with the CAVA metrics used to identify adaptive capacity in the first place. For example, if an investment is targeted towards a community with a low adaptive capacity metric, how and by how much did the investment improve the community's score on that metric? For qualitative metrics, a qualitative description of change in benefits can be included.
6. Direct Staff to develop a standardized reconciliation framework. The Commission should establish a consistent reporting structure allowing stakeholders to trace the progression from CAVA findings and community engagement, to proposed investments, to Commission authorization, and ultimately to actual implementation and outcomes.
7. Coordinate and explicitly integrate this framework with the Commission's GRC process. The CAVA should not operate as an informational exercise disconnected from the proceedings that determine utility investment. The Commission should ensure that community vulnerability and adaptive capacity information has a clear point of entry into those decision-making processes.
8. Evaluate adaptation investments in the context of avoided future costs and harms; as well as any non-energy benefits of proposed investments as it relates to communities' adaptive capacity. The Commission should consider the potential costs and ratepayer consequences of inaction, including potential disaster recovery, service disruption, health, and economic costs, when evaluating the reasonableness and prioritization of adaptation investments.

Conclusion

The DACAG appreciates the Staff Proposal's recognition that meaningful climate adaptation requires more than technical assessments of physical infrastructure. It requires understanding how climate hazards affect people and communities, particularly those with the least capacity to absorb the consequences.

The Commission should now ensure that the process does not stop there. Communities should not be asked to spend their time helping utilities develop climate adaptation plans if those plans have no meaningful connection to what utilities ultimately invest in.

The value of the CAVA process lies not only in better information, but in better decisions, and ones that build public confidence that utilities' regulated activities actually reflect community-informed priorities for climate adaptation. Strengthening the connection between community-informed CAVAs and actual utility investments would honor the time and expertise communities contribute, improve accountability, and help ensure that ratepayer dollars are spent proactively to reduce climate risk rather than reactively to recover from preventable harm.

DACAG therefore supports the Energy Division's Staff Proposal and respectfully recommends that the Commission strengthen it by creating a clear, transparent, and enforceable pathway from community input, to CAVA findings, to investment decisions, to implementation and accountability.

Respectfully submitted,

Disadvantaged Communities Advisory Group (DACAG)
California Public Utilities Commission