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Recommendations for Community Benefit Agreements

Additional submitted attachment is included below.

November 10, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Docket #: 26-OIR-04 - Emergency Rulemaking Amending the Opt-In Regulations

Dear California Energy Commission Members and Staff,

On behalf of Ascend Advisors LLC, a public affairs and government relations consulting firm, I write to offer strategic recommendations for improving the Community Benefit Agreement (CBA) process to assure that all Californians benefit from energy projects.

Ascend Advisors is focused on helping organizations navigate government, advance policy priorities, and build strategic partnerships that turn ambitious ideas into actionable solutions and measurable public impact.

I appreciate the California Energy Commission's (CEC) efforts to provide a more efficient and predictable permitting pathway for California's energy infrastructure. CBAs represent an important opportunity to ensure that energy infrastructure investments deliver meaningful and lasting benefits to the communities where projects are developed.

My comments focus on strengthening the CBA process with the following recommendations for your consideration:

- **Establish clear expectations for meaningful community engagement.** Applicants should document how they identified and engaged affected community organizations, particularly organizations representing communities closest to proposed projects. The goal should be meaningful participation, not simply securing a signed agreement. We need a transparent process that demonstrates whose voices were heard and how community priorities shaped the outcome.

- **Make workforce development a meaningful community benefit.** Encourage agreements to incorporate locally relevant workforce strategies, including Registered Apprenticeships, pre-apprenticeships, career and technical education, and partnerships with labor unions, community colleges and workforce boards. These should connect residents to actual employment opportunities, not merely provide general training commitments. Community benefits should go beyond one-time financial contributions. Energy projects can create lasting economic mobility by connecting local residents to quality jobs, apprenticeships, and career pathways.

- **Establish measurable outcomes, reporting, and accountability.** Encourage agreements to specify deliverables, responsible parties, implementation dates, and

methods for evaluating results. Examples include apprenticeship placements, local hiring outcomes, community investment expenditures, and completion of promised projects. The measure of a successful CBA should not be whether an agreement was signed, but whether promised benefits were delivered.

- **Provide standardized guidance without prescribing identical agreements**. Develop model provisions, a community engagement checklist, and clear documentation expectations. Preserve flexibility for communities to negotiate benefits appropriate to local conditions, project size, and project impacts. The CEC should standardize the process, not the outcome. Communities have different needs, and agreements should reflect those differences while meeting consistent standards for transparency and accountability.

- **Lastly, a question for the record:** What happens when commitments are not fulfilled? Will the CEC establish a consistent process for reviewing compliance reports, resolving implementation disputes, and ensuring CBA obligations come to fruition for years to come?

Thank you for the opportunity to comment and should you have questions on the comments and recommendations provided, please do not hesitate to reach me at teresa@ascendadvisorsllc.com.

Sincerely,

Teresa Acuña
Founder & Principal Consultant