DOCKETED	
Docket Number:	26-OIR-04
Project Title:	Emergency Rulemaking Amending the Opt-In Regulations
TN #:	273502
Document Title:	Central Valley Community Foundation Comments - Comments on Proposed Emergency Regulations for the Opt-In Certification Program (Docket No 26-OIR-04)
Description:	N/A
Filer:	System
Organization:	Central Valley Community Foundation
Submitter Role:	Public
Submission Date:	11/10/2026 4:50:16 PM
Docketed Date:	11/10/2026

Comment Received From: Central Valley Community Foundation
Submitted On: 11/10/2026
Docket Number: 26-OIR-04

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Additional submitted attachment is included below.

CENTRAL VALLEY COMMUNITY FOUNDATION

November 10, 2026

California Energy Commission
Docket Unit, MS-4
Docket No. 26-OIR-04
715 P Street
Sacramento, CA 95814

Re: Comments on Proposed Emergency Regulations for the Opt-In Certification Program (Docket No. 26-OIR-04)

Dear Chair Hochschild and Commissioners:

On behalf of the Central Valley Community Foundation (CVCF), thank you for the opportunity to comment on the proposed emergency regulations for the Opt-In Certification Program (Docket No. 26-OIR-04). We appreciate the California Energy Commission's efforts to refine and strengthen the community benefits process established under Assembly Bill 205 (AB 205), ensuring that communities hosting clean energy projects have a meaningful voice in shaping the benefits of these investments.

CVCF's mission is to "connect capital and communities for a 'just and thriving' Central Valley." Serving Fresno, Madera, Tulare, Kings, Merced, and Mariposa counties, we work to advance inclusive economic development and ensure that regional investments create lasting opportunities for the communities we serve. Through initiatives such as the Sierra San Joaquin Jobs (S2J2) Initiative, our region's California Jobs First collaborative, we are helping position the Central Valley to play a leading role in California's clean energy future while ensuring that the economic benefits of this transition are experienced locally.

The S2J2 region – Fresno, Madera, Tulare, and Kings counties – encompasses 15% of California's land mass and is projected to host at least 25% of the state's clean energy generation by 2040.[1] In addition to providing invaluable energy resources for the rest of California, reliable and affordable energy is essential to our region's own economic future supporting business growth, attracting new investment, and creating opportunities for quality jobs. As the Central Valley plays an increasingly vital role in meeting California's energy needs, it is critical that clean energy generation in our region translates into meaningful, lasting economic benefits for the communities hosting these projects.

The Central Valley's vital contribution to California's clean energy future should be matched by an equally significant commitment to the communities making that transition possible. Several regional realities underscore the importance of this approach:

[1] California Jobs First, The Playbook (January 2025), p. 50, report.

- **A critical role in California's clean energy future.** Utility-scale solar and other clean energy developments are reshaping the Central Valley's physical and economic landscape. These investments will be essential to meeting California's climate goals and supporting the state's long-term economic prosperity.

- **Persistent economic and environmental challenges.** Many communities across the region experience some of California's highest rates of poverty, environmental burdens, and adverse health impacts, making equitable access to the benefits of clean energy development especially important.

- **Disproportionately high household energy costs.** The region's lowest-income households spend on average between 21% and 29% of their income on home energy costs, more than twice the burden experienced by comparable households statewide. Residential electricity rates from the region's two primary utilities have increased by 69% to 101% over the past decade, while much of the region is classified as a utility "hot zone" – communities where households face particularly high electricity bills.[2]

- **An unprecedented opportunity for regional economic development and community investment.** Done right, the scale of clean energy development anticipated in the Central Valley presents a significant opportunity to attract investment, strengthen the regional economy, and deliver lasting benefits to local communities. Without meaningful investment from the State of California, however, these projects risk becoming extractive, benefiting the rest of the state without adequately benefiting the communities that host them. Community benefits and investments in a regional, clean economy should be commensurate with the contribution our region is making to California's energy future and informed by local priorities.

We encourage the Commission to adopt a two-track process, allowing the statutory updates to the Opt-In regulations to proceed on the emergency timeline while providing additional time for thoughtful consideration and meaningful community input on the community benefits agreement provisions. These agreements will shape how communities benefit from clean energy development for decades to come, making it essential that local priorities inform the process.

We welcome the Commission's efforts to strengthen the community benefits agreement process under AB 205 and support the community benefits recommendations outlined in the sign-on letter submitted by Leadership Counsel for Justice and Accountability, Communities

[2] Sierra San Joaquin Jobs (S2J2), Household Energy Burdens in the S2J2 Region, pp. 5–7, report.

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for a Better Environment, Jobs to Move America, Central California Environmental Justice Network, Union of Concerned Scientists, Central California Asthma Collaborative, Center on Race, Poverty and the Environment, and GRID Alternatives.

Thank you for your consideration and commitment to ensuring that California's clean energy future creates lasting opportunities first and foremost for Central Valley Communities.

Sincerely,



Ashley Swearengin, President & CEO
Central Valley Community Foundation