

DOCKETED

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Comment Received From: Leticia Corona

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**Leadership Counsel for Justice & Accountability - Comments on SB 350 Draft
Barrier Study**

Additional submitted attachment is included below.



September 29, 2016

RE: Comments on SB 350 Draft Report on the Study of Barriers and Solutions to Energy Efficiency, Renewables, and Contracting Opportunities Among Low-Income Customers and Disadvantaged Communities

We, Leadership Council for Justice and Accountability, are writing to provide comments on the California Energy Commission's' ("CEC" or "Commission") SB 350 Draft Report on the Study of Barriers and Solutions to Energy Efficiency, Renewables, and Contracting Opportunities Among Low-Income Customers and Disadvantaged Communities ("Draft Study"). Leadership Council for Justice and Accountability ("Leadership Council") works alongside residents of disadvantaged communities throughout the San Joaquin Valley and Eastern Coachella Valley to eliminate injustice and secure equal access to opportunity regardless of wealth, race, income or place. Our work is shaped by community needs and priorities. We work directly with community leaders to identify solutions to community priorities, engage communities in decision making processes that impact quality of life and promote robust public process that are inclusive of all residents.

We thank you for the opportunity to submit comments to help guide the Commission and state legislators in creating viable solutions to address the Barriers low-income residents in disadvantaged communities face in accessing renewable energy programs and energy efficiency resources. We applaud the Commission in partnering with local community based organizations, including our organization and partners, throughout the state to co-host engaging community workshops. The community workshops on SB 350 barriers provided an opportunity for the Commission to hear directly from low-income residents from disadvantaged communities about the challenges they face in accessing renewable energy and energy efficiency programs. We firmly believe that early engagement, accessibility, responsiveness, and transparency lead to strong policies and programs that will advance and meaningfully meet the needs of all communities.

We offer the following recommendations based from resident's comments from the San Joaquin Valley and East Coachella Valley, some of the most contaminated communities in the State, in an effort to strengthen the current draft to ensure all Californians have access to affordable, accessible, and reliable sources of renewable energy and efficiency resources to achieve SB 350's goals and California's air quality targets.

Improving Access to Information about Current Renewable Energy and Energy Efficiency Programs

We reiterate and emphasize the need for improved community education and outreach and appreciate that this is included in the Draft Study. During the Fresno workshop, residents from both rural and urban communities expressed that one of the main barriers to renewable energy and energy efficiency programs is a lack of accessible information. Residents from disadvantaged communities face challenges in accessing such programs in their native language and unclear which agency to contact to receive information about the application process. We offer the following recommendations to be included in the Study:

- Information and correspondence about the existence of energy programs and services (such as CARE, LIHEAP, WAP, and the various others) must be translated for all monolingual, non-English speakers.
- Outreach must be done by state and local government agents to distribute information to residents. One potential method for conducting outreach is for CEC and/or private companies to partner with local, community-based organizations who have already gained the trust of the community to share information and conduct outreach.
- Contact information for energy companies and agencies must be distributed to residents, and customer service hotlines and phone representatives must be accessible in multiple languages.

Customer Service and Maintenance of Installations

Customer service for energy companies installing energy efficiency technology or other renewable energy installations must be improved. Fresno County and City residents expressed general dissatisfaction in the customer service they have received from energy companies. Many residents stated that when they contacted customer service about an issue, staff had been rude and unhelpful.

Additionally, maintenance staff should conduct regular home-visits and inspections to ensure installations are in good condition. One issue that residents currently face is that after energy efficiency technologies are installed in homes, they are not maintained. Many Fresno City and County residents spoke about their experiences of insulation wearing down after only a few months and faulty equipment.

We offer the following recommendations to be considered:

- All staff and crew should be provided with proper training and encouraged and incentivized to practice better customer service.
- Staff managers visit the homes after any work is completed to verify that the installations are working properly.
- Energy companies should implement better policies to ensure that residents are provided with newer, higher-quality products and technology.

Barriers to Qualifying for Programs: income eligibility criteria, energy usage requirements, and lack of renter and mobile home eligibility

In addition to information barriers, residents have also repeatedly expressed difficulties in qualifying for program due to counterproductive or overly burdensome eligibility requirements. In particular, residents

explained that many programs require households to exceed a certain energy usage in order to qualify for low income programs. However, many low income households are sensitive to the cost of energy and conserve energy. Since they do not reach the established minimum energy usage requirement for programs, they cannot access these programs even though they would greatly benefit from them. Therefore, greater flexibility is needed in eligibility criteria such as energy usage.

Some programs also require residents to have a social security number, which presents a challenge for undocumented residents. The entities in charge of these programs should be urged to reconsider this requirement, since undocumented residents are among the most disadvantaged. Also, opening up these programs would not only greatly benefit these residents, it would also greatly expand the climate impact of these programs and advance long-term energy solutions.

Finally, residents who would otherwise want to participate in these programs cannot do this if they rent a home, or if they rent or own a mobile home. Residents who rent or own mobile homes cannot participate in these programs because of constituents are required to provide an electric bill when applying for these programs, because they may not receive an individualized bill. A way to increase renewable energy usage and mitigate monthly electric charges in these cases would be to install a commuter solar power plants that is shared among the tenants in mobile home parks or among renters. Expanding a net metering program could be a solution in mobile home parks.

Also, many residents in disadvantaged communities in the San Joaquin Valley are not connected to natural gas service. Therefore they cannot benefit from programs offered through utility providers.

We recommend the following to improve eligibility barriers:

- Greater flexibility is needed in eligibility criteria, such as requirements for social security numbers and minimum energy usage.
- Program providers should allow ways for renters and mobile home owners to participate.
- Expand the Net metering program to all mobile home parks so customers could be eligible for solar panels under a community solar system.
- Expand natural gas service to residents who are not currently natural gas customers.

Barriers to Registering for Programs: financing technology, and diverse registration processes

Even if residents meet all of a program's eligibility requirements, they can find themselves stymied by complex registration processes. The fact that each program has a distinct process for registration means that community residents must navigate vastly different procedures every time they attempt to register for one of the available renewable energy or energy efficiency programs.

One way that the Fresno Equal Opportunity Commission has begun to address this problem is by "stacking" or consolidating its energy efficiency and renewable energy programs so that a resident who has qualified for one program, such as installation of solar panels, can automatically access other programs, such as home weatherization.

Community residents have also described the financial challenges to participate in some programs. For example, some programs require initial investments to install solar panels, which are outside of the capacity of many residents. These programs should be made more financially accessible, by either

lowering the costs or providing financial assistance or subsidies for the cost of installation of energy saving or renewable energy technology.

In order to overcome these barriers to registering for these valuable programs, we recommend that the following suggestions be included in the Commission’s study:

- Promote consolidation of programs wherever possible, so that residents can register for multiple programs at the same time.
- Promote standardization of registration processes for all renewable energy and energy efficiency programs available to low-income households.
- These programs should be made more financially accessible, by either lowering the costs or providing financial assistance or subsidies for the cost of installation of energy saving or renewable energy technology.

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Thank you for your consideration of these comments. We look forward to continuing working with you to ensure that the needs of disadvantaged communities are considered when advancing the goals of SB 350. Should you have any questions, please contact Leticia Corona at (559) 500-4420 or at lc corona@ leadershipcounsel.org.

Sincerely,

Leticia Corona
Community Advocacy Director, Leadership Counsel for Justice and Accountability