

DOCKETED

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Leadership Counsel for Justice and Accountability Comment Letter

Additional submitted attachment is included below.



October 28, 2016

California Energy Commission
Re: Docket No. 16-01R-02
1516 9th Street
Sacramento, CA 95814-5512

RE: California Energy Commission SB 350 Low Income Barriers Study Staff Draft
Recommendations

To Whom It May Concern:

Thank you for the opportunity to comment on the Staff Recommendation Draft: SB 350 Barriers Report. We, Leadership Counsel for Justice and Accountability, are writing to provide comments on the California Energy Commission's' ("CEC" or "Commission") SB 350 Low-Income Barriers Study Draft Recommendations report. Leadership Counsel for Justice and Accountability ("Leadership Counsel") 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.

First, we thank the California Energy Commission (CEC) for cohosting an SB 350 Low Income Barriers Workshop and taking the time to meaningfully engage residents in this process. We commend the CEC for addressing and incorporating some of our previous comments in the Low-Income Barriers Study Draft Recommendations Report. We support staff recommendations made in comments 7, 8, 9, 10, and 11. To highlight a few, we appreciate CEC's acknowledgement that families living in older homes face a real threats of asbestos, lead, etc. within their homes and need to remediate these when they are making their homes more energy efficient. Additionally, we strongly support the recommendation to collaborate with local community-based organizations to ensure strong community engagement. This is vital to ensure the success of many of the programs. Lastly, we would like to elevate the importance of working



towards strong workforce development opportunities that provide for upward financial mobility. We thus strongly support staff comment # 11 that would “require energy efficiency...companies that receive...funding to train and/or hire” locally.

These initial recommendations take first steps to address many barriers faced by rural and urban disadvantaged communities to create an energy efficient home. However, to strengthen and further ensure reliable efficient and affordable energy in the most impacted communities throughout the state, we would like to make following recommendations based on resident comments to achieve SB 350’s goals and California’s air quality targets.

Overall, there should be stronger and more concrete language with timelines where needed in order to ensure that pilot programs and recommended policies are implemented and enforced. Most of the suggested recommendations use ambiguous wording such as “should”, where stronger wording like “shall” and “will” would be a better fit. A timeline or planning process will ensure that these programs are carried out within a timely manner and demonstrate real benefits for the identified communities. The policies and pilot programs noted should also contain specific examples and concrete goals of identified projects in disadvantaged communities so as to guide those tasked with creating them. Programs and policies mentioned and those that come out of this report should ensure that they are benefitting *all* residents in disadvantaged communities including: renters, undocumented, mobile home communities, rural communities, tribal communities, and anyone who doesn’t have access to a reliable electrical source. Also, the term “low income” should be defined in this report and where appropriate, it should be changed from “low income” to only “disadvantaged communities” as these communities are all low income and they are also the most impacted from pollution. Disadvantaged communities identified by CalEnviroScreen will benefit the most from having access to renewable sources of energy.

Additionally, we offer the following comments to build in staff’s report:

Net Metering Expansion

We appreciate that our previous comments related to net metering expansion were integrated in the Draft Recommendation report, however, the net metering programs and policies should be expanded to include mobile home owners and renters. Many mobile home parks lack a metering system and pay whatever rate they are told to do so regardless of their effort to conserve energy. These rates can often be as high as their rent or land use fee and not fair for those who do their part in saving energy. Adding meters will not only benefit these residents who conserve energy, but this would also allow them to be eligible for solar panel under a community solar system.

Eligibility Criteria



Many of the current programs offered by the Energy Commission and other entities contain eligibility barriers that are not addressed in this report. For instance, some of these programs require residents to have a social security number presenting a challenge for undocumented residents. Some of the programs also require a certain energy usage level in order to qualify for certain benefits like solar panels, but most of these communities already reduce their energy usage to save money since they have very limited incomes. CEC should collaborate with relevant agencies to create a pilot program that allows for greater flexibility and assistance to residents who do not meet the current eligibility criteria.

Community Solar for Disadvantaged Populations

In order to identify disadvantaged populations that rent or own, it is essential to include other deeply energy insecure communities like tribal, rural, and mobile home communities. For this reason, section 3d in the report should be rephrased to the following: “Allowing funding to be used to support community solar for low-income customers including, but not limited to, tribal communities, rural communities, and mobile home communities.

Customer Service and Maintenance of Installation

In addition to recommendation #6, the the following comment should be incorporated: “As part of the pilot program that will provide full service support to tenants, businesses, and homeowners the Energy Commission and the California Department of Community Services and Development should incorporate a staff and crew training component to allow for better customer service and high standard installation in rural and disadvantaged communities.” Additionally, we recommend that pilot programs include support for regular maintenance and inspection of household installations.

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Thank you for your consideration of these comments and incorporation of some of our past comments. We look forward to continuing working with you to ensure that the needs of disadvantaged communities are considered when advancing the goal of SB 350. Should you have any questions, please contact Abigail Ramirez (aramirez@leadershipcounsel.org) or Grecia Elenes (gelenes@leadershipcounsel.org) at (559)369-2790.

Respectfully,

/s/

Abigail Ramirez