

DOCKETED

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Comment Received From: Ameer Raval

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APEN and CEJA SB 350 Barriers Study Revised Staff Draft Report Comments

Additional submitted attachment is included below.



SB 350 Barriers Study Revised Staff Draft Report Comments

Asian Pacific Environmental Network

California Environmental Justice Alliance

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RE: Comments of the Asian Pacific Environmental Network and California Environmental Justice Alliance on the Revised Staff Draft Report for the SB 350 Barriers Study, Part A

Dear Commissioners:

The Asian Pacific Environmental Network as part of the California Environmental Justice Alliance respectfully submit these comments in response to the Revised Staff Draft Report (“Draft Report”) for SB 350 Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities . CEJA is a statewide coalition of community-based organizations whose constituencies – low-income communities and communities of color – are disproportionately impacted by pollution and are on the frontlines of climate change. We unite the powerful local organizing of our members to create comprehensive opportunities for change at a statewide level. We represent approximately 30,000 Asian Pacific American, Latino, and African American residents throughout the State including in the San Francisco Bay Area, San Joaquin Valley, Los Angeles, Inland Valley, Central Coast, and San Diego/Tijuana area.

We applaud the Energy Commission for considering and incorporating many of our previous comments into the revised Draft Report. We are pleased with this version and see it as a significant improvement over the last draft. In these comments, CEJA discusses specific details that we would like improved in the final report to be considered for adoption.

I. CEJA Recommends that the Draft Report Should Supplement the Executive Summary with Visuals and Details Around Public Involvement

We are pleased to see the addition of the executive summary at the beginning of the Draft Report, providing a broad overview of the SB 350 Barriers Study, description of the research and community engagement process, highlights of the identified barriers, and a full list of recommendations. This section is crucial and has the potential to be shared widely with the public in order to support dissemination of the findings. In order to make this section clearer, we think the text should be supported with charts and other visuals. In particular, the report could include more figures and tables like the ones from Appendix A. These types of visual representations of the data are very helpful. Additionally, the *Next Steps* section at the end of the Executive Summary briefly highlights forthcoming implementation workshops in 2017. We recommend elaborating on this section more fully to include additional details regarding public involvement, information on next stages of the process, and description of the ultimate goal of this process.

II. CEJA Recommends that the Draft Report Should Elaborate on Customers Served by Existing Low-Income Energy Programs

In response to our previous comments, CEJA appreciates the inclusion of statistics related to current energy efficiency projects and solar installations serving low-income and disadvantaged communities as compared to the rest of the state (*Table 1*, pg. 18). We recommend adding an additional column that describes how many customers were helped by the programs in 2015. This number could also be compared to the total number of residents that are eligible for the program. This comparison is necessary to provide perspective on the issues and how disproportionate the benefits are spread through these communities as opposed to the rest of the population.

III. CEJA Recommends that the Draft Report Should Elaborate on the Integrated Recommendations by Section

CEJA was pleased to see the recommendations included and integrated into the body of the report. Within the report itself, many of the recommendations are merely repeated from the executive summary. It would be useful to have additional data within the body of the report detailing expected next steps to make these recommendations a reality, potential examples to model future work after, and any other details that would give a fuller understanding of the CEC's vision for the recommendations.

IV. CEJA Recommends that the Draft Report Should Describe the Demographics of Disadvantaged and Low-Income Communities in the Body of the Report.

As noted in previous comments, the Draft Report still relegates discussion of demographics of disadvantaged and low-income communities to *Appendix A: Low-Income Market Characteristics* (pg. 87 - 97). Some of this discussion should be included in the main body of the report to provide background and context describing the customers living in low-income and disadvantaged communities. As it stands in *Appendix A*, this section gets lost by being at the end of the report. The charts and graphs are very useful for understanding the population that the study is targeting.

V. CEJA Recommends that the Draft Report Should Better Integrate Community Comments Into Its Discussion and Analysis.

CEJA organizations supported the facilitation of Community Stakeholder Meetings across the State, which provided direct input on barriers and solutions from customers living in low-income and disadvantaged communities. Feedback from these meetings, drawn from the lived experiences of community members, are key reflections of community experiences and concerns. As such, they represent a critical component of the report and should be integrated more fully into the Draft Study. CEJA was pleased to see additional public comments integrated into the revised Draft Report, but the report still provides the majority of community concerns in *Appendix B*. These comments should be integrated throughout the report and be a driver for the solutions and recommendations. This can be done, for example, by integrating the major themes identified in *Appendix B* into the appropriate sections of the main report (pg. 99 - 100). Rather than an Appendix, this input could stand as a separate chapter in the body of the report. If this is not possible in the current structure, a summary of the community meetings in the body of the Draft Report would be more useful and reflective of the CEC's recognition of their importance.

VI. CEJA Recommends that the Draft Report Mention Targeting Benefits from Renewable Energy and Energy Efficiency Projects to Low-Income Customers including Disadvantaged Communities

As written, the Draft Report defines low-income customers and disadvantaged communities separately. The title of the report, for example, mentions disadvantaged communities only in regards to small business contracting opportunities. CEJA recommends that the Draft Report be explicit about delivering benefits from renewable energy and energy efficiency to low-income customers, including those in disadvantaged communities, as well as statewide.

Thank you for the time and consideration in reviewing these comments.

Sincerely,

Miya Yoshitani, Executive Director, Asian Pacific Environmental Network
Strela Cervas, Co-Director, California Environmental Justice Alliance