

DOCKETED

Docket Number:	17-IEPR-08
Project Title:	Barriers Study Implementation
TN #:	220797
Document Title:	Imperial Irrigation District Comment Letter SB 350 Barriers
Description:	N/A
Filer:	System
Organization:	Sean Neal
Submitter Role:	Public
Submission Date:	8/15/2017 4:54:50 PM
Docketed Date:	8/15/2017

Comment Received From: Sean Neal

Submitted On: 8/15/2017

Docket Number: 17-IEPR-08

Imperial Irrigation District Comment Letter SB 350 Barriers

Additional submitted attachment is included below.



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August 15, 2017

Via e-Comment Portal

California Energy Commission
Docket Unit
Docket No. 17-IEPR-07
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Re: *In the Matter of: 2017 Integrated Energy Policy Report (2017) IEPR, Barriers Study Implementation, Docket No. 17-IEPR-08*
Imperial Irrigation District Comments in Response to August 1, 2017 Workshop

Imperial Irrigation District (“IID”) herein offers comments pursuant to the California Energy Commission’s (“Commission”) July 20, 2017 “Notice of Joint Agency Workshop on Senate Bill 350 Low-Income Barriers Study Implementation” and August 1, 2017 Workshop. IID thanks the Commission for the opportunity to provide comments on these issues, which are important to IID and its customers.

As IID presented at the August 1 Workshop, IID has implemented several initiatives to improve access to renewable energy by low-income communities. For example, IID’s eGreen program serves participants under IID’s Residential Energy Assistance Program, as well as other IID energy customers who would like to receive the benefits of solar without the need for installing an individual rooftop system. Such individually installed systems are out of reach for many of IID’s customers in the Imperial and Coachella valleys, due to limited financial resources. The eGreen program provides customers with the opportunity to benefit from clean, locally produced energy, that would not otherwise be an option. IID is seeking to develop this program via a power purchase agreement for 60 megawatts of solar energy.

IID has found that it can improve its efforts to provide access to renewable resources to low-income customers by taking into account feedback from its constituents. Based upon feedback from its customers, IID found that it could improve the means through which it informs the public regarding services it provides. IID had not been providing information on its available programs at churches and other faith-based community

centers. Based on feedback provided by customer groups, IID initiated the process to disseminate information regarding its programs at these locations.

At the August 1 Workshop, Staff, the Commissioners and stakeholders discussed interest in collecting information as to the percentage of utilities' customers within their service territories that could be described as disadvantaged communities ("DACs"). To assist in that effort, IID estimates that roughly 70% of its service territory is designated as DAC according to CalEnviroScreen. Approximately 86% of the contract accounts within the DAC designation are residential.

IID also cautions, as it has in prior comments, that relying exclusively on CalEnviroScreen when assessing locations to implement measures to improve access to renewable resources or areas eligible to receive grants or funding to improve environmental health may inadvertently deny services to significant parts of the population in need. IID's customers may include those that qualify as low income due to high cost of living or other factors that may not be captured by CalEnviroScreen. Such customers may also not be adversely affected by pollution or other air or water hazards as compared to other customers, but still would qualify as low income, are sensitive to energy prices and otherwise do not have access to renewable resource or products that improve energy efficiency. IID believes that the Commission and other state agencies should keep a broad view on eligibility for services and funding that could be provided to improve low income customers' access to renewable resources and energy efficiency.

IID thanks the Commission for the opportunity to submit written comments. IID looks forward to further dialogue on these issues.

Respectfully yours,

/s/ Tony Allegranza

Tony Allegranza
Energy Manager, Operations