

**DOCKETED**

<b>Docket Number:</b>	19-ERDD-01
<b>Project Title:</b>	Research Idea Exchange
<b>TN #:</b>	226745
<b>Document Title:</b>	East Bay Community Energy Comments on 19-ERDD-01
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	East Bay Community Energy/Deidre Sanders
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/15/2019 5:17:22 PM
<b>Docketed Date:</b>	2/19/2019

*Comment Received From: Deidre Sanders*  
*Submitted On: 2/15/2019*  
*Docket Number: 19-ERDD-01*

**EBCE Comments on 19-ERDD-01**

*Additional submitted attachment is included below.*



February 15, 2019

Ms. Lorraine Gonzalez  
California Energy Commission  
Docket Unit, MS-4  
Docket No. 19-ERDD-01  
1516 Ninth Street  
Sacramento, CA 95814

**RE: Comments on Proposed Evaluation Criteria for Benefits and Impacts to Low Income and Disadvantaged Communities in EPIC Grant Funding**

Dear Ms. Gonzalez and Members of the California Energy Commission:

EBCE appreciates the California Energy Commission's ("CEC") request for input on the proposed evaluation criteria. EBCE is a Joint Powers Authority formed on December 1, 2016 by the County of Alameda and each of the following cities incorporated therein: Albany, Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Oakland, Piedmont, San Leandro, and Union City.<sup>1</sup>

EBCE believes that CEC staff have drafted strong criteria for identifying and prioritizing low-income households and disadvantaged communities. Our comments are aimed at enhancing these criteria by recommending development of additional indicators that identify individuals and households living in poverty in addition to current income and environmental indicators. Because of significant regional differences in living expenses we believe that income alone is insufficient to identify poverty, particularly in urban areas.

Additionally, the CEC should consider adapting use of CalEnviroScreen to identify communities ranked in the top 25% of the specific issue of focus for the grant program, combined with population indicators. This would help ensure alignment of research goals and community health and technical benefits. For example, communities ranked highly for transportation air quality impacts would be prioritized for electric vehicle RD&D research projects that focused on

---

<sup>1</sup> EBCE commenced service to Alameda County businesses and municipalities within its jurisdiction in June, 2018, and began service to residential customers on a rolling basis starting in November, 2018. EBCE is one of the largest Community Choice Aggregators ("CCAs") in the state serving approximately 1.4 million residents.

air quality benefits, or rural communities with poor water quality impacted by groundwater pumping and adverse air quality effects be prioritized for pump demonstrations, etc.

EBCE offers several specific comments on the proposed references and evaluation criteria to be used in solicitation manuals:

**I. EBCE supports the CEC’s proposed inclusion of the California Air Resources Board (“CARB”) mapping tool in solicitation reference materials.**

CARB’s Priority Populations Map is an appropriate tool to identify low-income communities because the tool relies on (1) low-income thresholds set at the county level, and (2) income measures that account for cost of living. County-level measures of poverty are an appropriate alternative to relying on Federal Poverty Guidelines alone, as is common practice, as they are by definition more granular. Additionally, the tool uses the Department of Housing and Community Development’s (“DHCD”) state income limit measures that include adjustments for areas where rental housing costs are unusually high relative to the median income.

EBCE does wish to express concerns that even with the proposed use of the DHCD data, in some regions poverty thresholds and income may not be clearly aligned and that residents with incomes above the official poverty threshold may be living in poverty as a result of high living expenses. The CEC may want to consider additional tools such as the California Poverty Measure, an enhancement of the US Census Supplemental Poverty Measure.

**II. Consistent with objectives outlined in its Triennial Investment Plan, the CEC should adopt additional criteria that evaluate whether a proposed project relies on data analytics and community engagement.**

The CEC has identified a strategic objective to support clean energy investment in disadvantaged communities and notes that “Greater analytic capacity and community engagement is needed to assess typical energy-use patterns, utility costs, and the energy-related quality of life for communities with and without clean energy community measures, and determine what non-energy benefits clean energy technology packages can provide.”<sup>2</sup> The Plan also highlights the need to develop data-driven tools for energy projects that target disadvantaged communities (p. 234), lower soft costs for deploying clean energy technologies

---

<sup>2</sup> Electric Program Investment Charge: 2018 – 2020 Triennial Investment Plan, p. 236. Adopted April 27, 2017. <https://www.energy.ca.gov/research/epic/17-EPIC-01/>

(p. 238), and to collect information that can be used in future policy and program design (p. 241).

As it evaluates project proposals, the CEC should make sure to consider whether the proposal relies on data-driven tools and community engagement. Including this additional evaluation criterion will help ensure the Investment Plan goals are met.

**III. More clarity is needed on the causal assumptions related to health outcomes that TD&D grants will support.**

Measuring localized health impacts, as currently proposed, may be challenging for several reasons. First, proposed evaluation criteria do not clearly describe how cause and effect will be attributed. Second, most public health data is available at the county level. How will beneficial health impacts be measured at the community level? Third, there are many different health impacts and benefits associated with energy projects. What health effects/outcomes related to energy will be prioritized in grant considerations? Finally, how will confounding and/or contributing health indicators be evaluated? How will “beneficial effects” be identified and attributed to the project/grant?

EBCE appreciates the opportunity to comment and looks forward to continuing to work with the CEC on these important issues.

Respectfully submitted,

/s/ Deidre Sanders  
Deidre Sanders  
Director, Government and Community Affairs  
East Bay Community Energy  
dsanders@ebce.org