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CEJA SB 100 Comments

Additional submitted attachment is included below.

November 12, 2019

California Energy Commission
Docket Office
1516 Ninth St.
Sacramento, CA 95814

VIA DOCKET
Energy Commission Docket 19-SB-100

Re: 19-SB-100 SB 100 Joint Agency Report Charting a path to 100% Clean Energy Future

Dear Commissioners:

The California Environmental Justice Alliance (“CEJA”) submit these comments on the SB 100 Joint Agency Report. We welcome continued dialogue and collaboration with the California Energy Commission (CEC), California Public Utilities Commission (CPUC) and the California Air Resources Board (CARB) throughout its development.

CEJA is a statewide, community-led alliance of environmental justice organizations that work to achieve environmental justice by advancing policy solutions. CEJA represents thousands of community members living in the State’s most disadvantaged communities. We support power building in communities to create policies that help alleviate poverty and pollution.

SB 100 presents a vital opportunity to mitigate the negative impacts of climate change and air pollution from fossil fuels in our communities. Disadvantaged communities, however, are still the least likely to benefit from California’s transition to a clean energy future.¹ Our communities suffer disproportionately from the impacts of our fossil fuel economy.² California must prioritize environmental justice communities in the transition because our members need immediate, health, environmental, and economic benefits. We cannot leave these vital benefits up to chance. We must proactively plan for an equitable transition to a clean energy future that empowers those most impacted to lead.

¹ See, e.g., Cal. Public Util. § 454.52(a)(1) & [SB 350 Low-Income Barriers Study, Part A - Commission Final Report](#).

² <https://dornsife.usc.edu/assets/sites/242/docs/mindingthegap.pdf>

CEJA recognizes and supports the CEC's continued commitment to better meeting the needs of low-income and disadvantaged communities. CEJA recognizes the CEC's efforts to meaningfully engage³ with low-income and disadvantaged communities for community-led clean energy solutions.

For your consideration, CEJAs submits the following comments:

California must ensure SB 100 implementation doesn't increase pollution or other unintended consequences in environmental justice communities.

SB 100 implementation must avoid the potential unintended consequence of higher air pollution, especially in areas already breathing unhealthy air. California has some of the most polluted cities and areas in the country.⁴ Any additional pollution can exacerbate the health risks these communities already face. As California moves to a higher penetration of renewables, natural gas facilities may be called on to start, stop, and cycle more often. Natural gas plants emit more pollution during cycling than they do during steady-state operations. For example, one facility is permitted to emit up to 38 times as much during a start as it emits during steady-state operation. Some plants may be called to ramp on and off every single day. Another example was a facility in a severe nonattainment area in the Central Valley. This facility started and stopped nearly every single day last year and emitted over ten times as much nitrous oxide during starts as it did during steady-state operation.

There are additional potential air pollution risks and negative health impacts from biomass facilities, which may qualify as renewable resources. These facilities can emit dangerous particulate matter and harm nearby communities. SB 100 implementation must not exacerbate existing health inequities and burdens in environmental justice communities.

California should prioritize equity in every aspect of the transition in order to achieve a holistic and equitable approach in both the demand and supply side of the energy system when implementing SB 100:

Holistic approach

Implementing SB 100 requires decarbonizing the grid, which requires immediate action on the supply side of the energy system. However, the implementation should include a thorough analysis that evaluates how changes to the demand side of the energy system will impact the supply-side and vice versa. Ultimately, we recommend a thorough analysis of how the transition will impact those who are the most vulnerable and the potential non-energy benefits that could be leveraged in the transition.

³ <https://ww2.energy.ca.gov/sb350/DCAG/>

⁴ <https://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/most-polluted-cities.html>

SB 100 implementation will hopefully be the tool to not only decrease toxic and climate pollution, but the tool to create a new economy for the communities that need it most. With an approach that considers the entire system and its impact on environmental justice communities, there's more potential to avoid the problems that arise from siloing parts of the transition.

Ownership Opportunities

SB 100 allows California to start planning a resilient system that does not rely on fossil fuels, reduces air pollution, and creates green economic opportunities in the places of the State that need it the most. Environmental justice communities must benefit from these economic opportunities in our shift toward cleaner technologies. California must prioritize workforce development and pathways to community ownership of clean technologies for the environmental justice communities disproportionately impacted by our fossil fuel status quo.

We encourage the deployment of local clean energy resources to decarbonize the grid, and promote wealth-generating community ownership of assets. Community Solar paired with a storage system has the potential to create more affordable, clean, and resilient energy in communities with significant energy burdens.

Prioritize Climate Adaptation in SB 100 Implementation

California should increase resiliency in communities by installing distributed generation and storage technologies. Communities face greater risks and uncertainty because the multiplier effect climate change has on wildfires and other potential dangers such as extreme heat.⁵ Wildfires and the Public Safety Power Shut-Offs (PSPS) highlight the importance of bringing some communities solar, storage, and microgrids⁶ to ensure their lights stay on. Distributed generation and storage help us meet SB 100's goals and increase community and grid resilience. Wildfires are just one potential disaster that is exacerbated by the conditions that result from climate change. Even our current solutions to preventing wildfires such as PSPS have heightened the need to reduce transmission in heavily wooded areas and increase a web of localized energy solutions.

California must place a value on distributed generation and the safety benefits it brings our state. Failing to value distributed generation is a barrier to larger investments in these vital technologies. As we face more frequent blackouts and wildfires, these technologies provide necessary protection to our changing grid and climate. California must move beyond reactive, short-term planning by promoting climate adaptation in the implementation of SB 100.

⁵ See e.g. <https://www.ucsusa.org/resources/killer-heat-united-states-0>

⁶ See e.g. <https://blog.ucsusa.org/julie-mcnamara/microgrid-examples>; <https://www.energy.gov/articles/how-microgrids-work>

Demand Response/Energy Efficiency

California must evaluate how and when we use our energy. Decreasing our demand for energy during peak times can help customers decrease their bills and help the state manage its energy demand. If customers are given the tools to control their energy consumption there's a way to implement demand response technologies in a way that doesn't negatively impact environmental justice communities. Easily accessible and user-friendly demand response has the potential to help energy burdened communities save on their bills and decrease their demand for dirty energy. Furthermore, demand response paired with increased energy efficiency could provide vital bill protections for environmental justice communities as temperatures increasingly fluctuate in our rapidly changing climate.

Energy Efficiency is a powerful tool that not only decreases energy use and therefore decreases GHG emissions, and it also has the potential when done thoroughly and carefully to create local jobs, create healthy indoor air quality.

Managing and Prioritizing Decline of Fossil Fuels in Environmental Justice Communities

One of the biggest challenges facing the State right now is that we do not have a comprehensive plan for phasing out fossil fuels in a way that also protects communities from bad air quality and prioritizes the transition in environmental justice communities. Without a clear plan the State is reacting instead of systematically planning for a transition required to meet our state's climate goals. The cost of the transition on the health and economy increases exponentially the longer we delay our transition away from fossil fuels.

Just Transition

Transitioning away from an extractive economy gives us the opportunity to build one that is visionary, thriving, and regenerative. This process can be both healing and joyful. As we power down California's dirty fossil fuel infrastructure, we have an opportunity to create thousands of clean energy jobs and an entirely new system that transforms current and historic social injustices. Through this, we can equitably distribute the benefits of the clean energy future so that it works for everyone—not just a select few.

Just Transition is a concept originally developed by the labor movement, that's evolved to describe the environmental justice movement's goal to decarbonize our economy and the world with equity, workers and residents at the center. It's a framework for holistically building a better world from the ground up. It recognizes and is rooted in lessons from the carbon-based economy—who benefited? Who experienced hardship? Why, how, and most importantly, can we do better? It is a reminder that some places and peoples' economic livelihoods are dependent on activities that have a negative impact on the climate/environment and they deserve to be a meaningful part of our climate solutions. It is an invitation to make progress on many problems beyond climate change. It's a concept whose specific elements will vary according to the needs

and conditions across communities. One of the principles of environmental justice is we speak for ourselves, and different communities will define their needs, their creative solutions on their own terms.

Key components of a **Just Transition** to consider:

- Anticipate and organize a Just Transition for the gas delivery system workforce and any corresponding support services, such as customer service center staff and “call before you dig” workers.
- Develop a comprehensive strategy to ensure low-income and disadvantaged communities are empowered through, benefit from, and are not left behind in the transition.⁷
 - Produce a study/recommendation on the barriers preventing low-income customers from transitioning to all-electric buildings and residences
 - Conduct meaningful engagement with and involvement of low-income and disadvantaged communities throughout the gas transition. Meaningful engagement, at a minimum, includes outreach and education in multiple languages and coordination with community-based organizations;
 - Design bill protections for all low-income customers;
 - Develop programs and resources to enable communities to electrify, and prioritizing resources to transition low-income and disadvantaged communities;
 - Create a one-stop shop for low-income customers to allow them to pair the transition to electric technologies with other programs including energy efficiency, weatherization, and solar and storage installation; and
 - Ensure protections for renters to prevent displacement, including rent stabilization and just cause eviction protections.
 - Local Hiring requirements for renewable energy investments and projects.
 - Strong workforce protections

Meaningful Engagement and Community Outreach

Ultimately, the most important recommendation that links all of the aforementioned items is meaningful engagement and community outreach. In order to ensure that all the idiosyncrasies that result from the unique economic, social, geographical, and other factors are considered, community outreach is an essential piece for proper community planning. The workshops for the SB 100 Joint Report are a good first step in an effort to include the community in the decision making. Beyond that, we highly recommend the implementation include a strong effort with a regional emphasis to address each community’s unique needs. The CPUC administered San Joaquin Valley Affordable Energy Pilots meaningful community engagement serves as a model

⁷ <https://gridworks.org/initiatives/cagas-system-transition/>

for this process and an example of what happens when you respect the communities' right to self-determination.⁸

Community Engagement Framework:⁹

- Assessing the Communities' Needs.
- Establishing Community-Led Decision-Making. Rich community input and engagement strengthen the overall program design quality with stronger cultural competence, ensure local buy-in and investment, and deliver tangible local benefits rooted in the lived experiences of everyday people. Partner with community-based organizations to develop a decision-making process that ensures that decisions are based on community needs and priorities.
- Developing Metrics and a Planning for Tracking. Metrics should include both clean energy benefits like greenhouse gas reductions and community benefits such as local hires and residents' ability to pay their energy bills without sacrificing other essential expenses.
- Ensure Funding and program leveraging.
- Improve Outcomes. Ensure a continuous feedback loop to improve current and future programs' reach and impact in environmental justice communities

In conclusion, to start implementing SB 100, we need to develop a comprehensive plan that examines air quality and disadvantaged communities as well as the best locations for renewable energy and energy storage resources.

Specifically, we want to see a plan that:

- Minimizes air emissions during the transition;
- Examines the most effective locations for resources on the grid;
- Utilizes resources that reduce the impact on local communities to the maximum extent feasible;
- Prioritizes economic opportunities and resiliency for the most disadvantaged communities in the State;
- Allows affordable clean energy access for all Californians.

Thank you for your time and attention to this vital matter. We look forward to continue working with the CEC, CPUC, CARB and stakeholders on ensuring a just transition that benefits all Californians.

⁸ SJV Affordable Energy Pilots CPUC proceeding, R.15-03-010. <https://www.cpuc.ca.gov/SanJoaquin/>
⁹https://assets.ctfassets.net/ntcn17ss1ow9/4bcgrRiiymPoVKoMDCqPz/00aedde62e1bb8a2e4c5bdf1fc5e44da/Greenlining_EquitableElectrification_Report_2019_WEB.pdf

Sincerely,

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