

DOCKETED

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ITEM 9 - Draft – Proposed for Consideration at the DACAG Meeting on August 21, 2020

August 21, 2020

RE: SB 100 Joint Agency Report, Docket #: 19-SB-100

To the California Energy Commission, Public Utilities Commission and Air Resources Board,

The Disadvantaged Communities Advisory Group (DACAG) has reviewed the comment regarding the SB 100 Joint Agency Report submitted by the Center on Race, Poverty & the Environment and the Central California Asthma Collaborative to the Air Resources Board, Energy and Public Utilities Commissions (Joint Agencies) on June 12, 2020 (Comment).

As SB 100 is a key component of the State's climate and renewables' policy frameworks, the Joint Agencies must prioritize equity in implementing the bill, and adequately address equity in the Joint Agency Report. Our Advisory Group was formed pursuant to SB 350, the Clean Energy and Pollution Reduction Act. The Act requires the Public Utilities and Energy Commissions to address the costs and benefits of energy resources to DACs. We therefore concur with the need for the Joint Agency Report to address non-energy benefits and social costs of energy resources, as described in the Comment. We look forward to working with the Joint Agencies to determine how best to integrate adequate consideration of non-energy benefits and social costs.

The DACAG also agrees that no Joint Agency Report scenario should include combustion. As stated in the Comment, there is no mention of combustion as a zero-carbon option in SB 100 and no support for the continuation of fossil fuel generation plants in the statute's legislative history.

Finally, as stated at the July 2020 DACAG meeting, we request coordination with the Air Resources Board's Environmental Justice Advisory Committee to assist in the equitable implementation of SB 100.

Sincerely,