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Center for Sustainable Energy (CSE) Comments on Draft Scoping Order for the 2022 Integrated Energy Policy Report

Additional submitted attachment is included below.

March 22, 2022

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 22-IEPR-01
715 P Street
Sacramento, CA 95814

Re: Docket No. 22-IEPR-01– Comments of Center for Sustainable Energy® regarding the Draft Scoping Order for the 2022 Integrated Energy Policy Report Update

I. INTRODUCTION

The Center for Sustainable Energy® (CSE) appreciates the opportunity to comment on the Draft Scoping Order for the 2022 Integrated Energy Policy Report Update (2022 IEPR Update). CSE is a 25-year-old national nonprofit driven by one simple mission – decarbonize. We provide program administration, technical assistance, and policy advisement, and serve as a trusted resource helping government agencies implement successful sustainable energy programs. Our vision is a future with sustainable, equitable, and resilient transportation, buildings, and communities, and as such, we support holistic and long-term planning with an integrated approach.

CSE commends the California Energy Commission’s (Energy Commission) leadership in developing the 2022 IEPR Update and supports the Leading Commissioner’s proposed approach for the 2022 IEPR Update to serve as a model for future IEPs by compiling findings from existing and new proceedings into a short summary format. This dual approach will allow for a strong public record and provide greater opportunity to holistically measure progress towards statewide climate, decarbonization, and energy equity goals.

In particular, CSE strongly supports the Energy Commission’s goal to establish a comprehensive framework to operationalize equity and environmental justice in the agency’s policies, programs, investments, and practices. CSE is committed to embedding equity into every program we administer and the policies we support. As such, CSE centers its feedback on the establishment of an Equity and Environmental Justice (EJ) Framework (Framework) and offers the following specific recommendations:

- 1. *Coordinate with existing efforts to address equity definitions and non-energy considerations***
 - Review and update the Energy Commission’s Energy Equity Indicators, Story Map, and mapping application and assess their integration into the Framework.
 - Prioritize using the California Public Utilities Commission’s (CPUC) comprehensive guide on key equity and environmental justice definitions and concepts, which is outlined in the CPUC’s Environmental and Social Justice (ESJ) Action Plan: Version 2.0 Draft, as a foundational resource.
 - Consider the forthcoming “electric vehicle (EV) charging equity” definition being developed by the EV Infrastructure Strike Force.

- Monitor and coordinate with additional stakeholder efforts to identify non-energy benefits (NEBs) and develop definitions, structures, and cost-effectiveness methodologies for NEBs, as appropriate.
- 2. Leverage existing outreach and engagement efforts and frameworks**
 - Review, and adapt as needed, the California Air Resource Board's (CARB) SB 350 Outreach Strategic Roadmap, which outlines coordinated education, outreach, and engagement strategies.
 - Consider the framework to treat community engagement activities as program metrics or indicators that can be tracked and reported on, as delineated in the California Energy Efficiency Coordinating Committee's (CAEECC) Equity Metrics Working Group Final Report.
- 3. Include staff level training and development opportunities related to equity and environmental justice in the Framework**
 - Model the CPUC's ESJ Action Plan's dual approach, which centers equity and environmental justice in external facing policies, programs, and processes, as well as in internal staff and organizational culture initiatives.
 - Establish a staff-led Diversity, Equity and Inclusion (DEI) Working Group (similar to the CPUC's Working Group) or a Diversity and Racial Equity Task Force (similar to CARB's efforts).

II. COORDINATE WITH EXISTING EFFORTS TO ADDRESS EQUITY DEFINITIONS AND NON-ENERGY CONSIDERATIONS

CSE strongly supports the proposed establishment of an Equity and Environmental Justice Framework as part of the 2022 IEPR Update and specifically its inclusion of equity definitions and non-energy considerations. As the Energy Commission undertakes this important effort, we encourage robust coordination with other efforts to both leverage existing resources and ensure consistency. CSE recognizes that the Energy Commission has an existing Energy Equity Indicators Tracking Progress Report¹ that is used to monitor the implementation of recommendations from its Low-Income Barriers Study and the performance of state-administered clean energy programs in low-income and disadvantaged communities. However, the last Progress Report was published in June 2018; thus, CSE encourages the Energy Commission to develop an updated version. Additionally, the Progress Report is accompanied by a Story Map and mapping application² that would also benefit from being updated. CSE recommends that these two tools be updated to reflect more recent data and for the mapping application's interface to be revamped so that it has an interactive dashboard, is easier to navigate, and more easily differentiates data layers. As these three Energy Equity Indicators components are updated, CSE recommends that the Energy Commission assess their integration in the Equity and Environmental Justice Framework.

CSE also strongly urges the Energy Commission to prioritize using as a foundational resource the California Public Utilities Commission's (CPUC) comprehensive guide on key equity and environmental justice definitions and concepts, which is outlined in Appendix C of the CPUC's Environmental and Social

¹ [Energy Equity Indicators Tracking Progress](#), June 25, 2018.

² [Energy Equity Indicators](#), accessed on March 31, 2022.

Justice (ESJ) Action Plan: Version 2.0 Draft.³ CSE has deep expertise in equity definitions, and we consider this appendix to be one of the most comprehensive compilations of equity definitions and broader environmental justice concepts as they relate to the transportation and clean energy sectors. Significant agency staff time and stakeholder engagement has been devoted to the development of Appendix C, incorporating feedback from equity and environmental justice advocates and communities as well as from the CPUC and Energy Commission’s Disadvantaged Communities Advisory Group (DACAG). The ESJ Action Plan’s definition for “ESJ communities” aligns with the DACAG’s “disadvantaged communities” definition outlined in its “Equity Framework”. Furthermore, CSE has been involved in the drafting of numerous equity definitions at the statewide and local level, and this work requires a lengthy public engagement process because it takes time for different stakeholders with often diverging perspectives to agree upon a definition. This is especially the case when existing definitions are not taken into consideration, and unnecessary resources are used due to duplicative efforts. As the Energy Commission drafts its own equity definitions, CSE recommends it leverage Appendix C of the ESJ Action Plan as a starting point to ensure continuity with existing definitions and create a more efficient process.

Moreover, a definition CSE encourages the Energy Commission to consider as it develops its Equity and EJ Framework is the “electric vehicle (EV) charging equity” definition being developed by the EV Infrastructure Strike Force (Strike Force).⁴ CSE is part of the Strike Force’s Equity Work Group (WG), which has been developing this definition for many months and will include it in an upcoming report to the full Strike Force. The Energy Commission currently chairs the Strike Force’s Public Policy Advisory Committee, and, as such, will have visibility to this report.

In addition to leveraging existing definitions, CSE recommends that the Energy Commission monitor and coordinate with ongoing efforts to identify and quantify non-energy benefits (NEBs), as appropriate. NEBs, such as air quality, public health, and economic benefits, have emerged as important equity considerations for making clean energy investments; however, defining and quantifying such benefits remains a challenge that remains to be addressed by the Energy Commission and the CPUC. While CSE believes California’s state agencies must provide coordinated direction on incorporating NEBs into clean energy programs and projects, we encourage the Energy Commission to utilize the research and analysis being undertaken by various organizations and stakeholder groups. For example, the California Energy Alliance’s Cost-Effectiveness Metrics (CEM) Working Group⁵ is currently exploring cost-effectiveness definitions, structures, and methodologies to include energy equity and NEBs, including an examination of Lawrence Berkeley National Laboratory’s efforts in assessing the non-energy impacts of energy efficiency.⁶ CSE expects stakeholder efforts, such as those of the CEM Working Group, will not only be helpful to the Energy Commission as it develops its Equity and EJ Framework but also inform its broader deliberations on the 2022 IPER Update.

³ CPUC’s [Environmental & Social Justice Action Plan: Version 2.0 Draft](#): “Appendix C: Key ESJ Definitions and Statutes”, pages 62-84.

⁴ [EV Infrastructure Strike Force](#), accessed on March 21, 2022.

⁵ [CEA’s Cost-Effectiveness Metrics \(CEM\) Working Group](#), accessed on March 21, 2022.

⁶ [Evaluating and Quantifying the Non-Energy Impacts of Energy Efficiency](#), December 2016.

III. LEVERAGE EXISTING OUTREACH AND ENGAGEMENT EFFORTS AND FRAMEWORKS

CSE applauds the Energy Commission for recognizing the importance of meaningful and inclusive community engagement and outreach and making them key components of the Equity and EJ Framework. CSE encourages the Energy Commission to review and adapt as needed CARB's SB 350 Outreach Strategic Roadmap,⁷ which outlines five coordinated education, outreach, and engagement strategies. These include performing an outreach landscape assessment; strengthening, building, and maintaining partnerships; engaging priority populations to identify outreach transportation needs; developing consistent outreach messaging and materials; and measuring outreach efficacy. This Roadmap was developed in partnership with community-based organizations (CBOs) and equity stakeholders and is intended to be used by government agencies, program administrators, and CBOs. CSE highlights Appendix A, which is a comprehensive table of complementary and related outreach efforts and programs throughout the state.

A key element of community engagement and outreach work is evaluating the efficacy and success of these types of activities, which can only happen if agencies and program administrators track and report these, at a minimum. CSE recommends the Energy Commission consider the framework we co-developed to consider community engagement activities as program indicators for the California Energy Efficiency Coordinating Committee's (CAEECC) Equity Metrics Working Group Final Report.⁸ Table B1 categorizes different types of community engagement activities in three program development phases: during program design and to identify community needs and solutions; during program implementation; and during program assessment. The table is adapted from CARB's *Community Inclusion Guidance* for its Sustainable Transportation Equity Project (STEP),⁹ and it includes examples of meaningful community engagement activities that would demonstrate that a CBO has deep ties with and credibility in a community.

IV. INCLUDE STAFF LEVEL TRAINING AND DEVELOPMENT OPPORTUNITIES RELATED TO EQUITY AND ENVIRONMENTAL JUSTICE IN THE FRAMEWORK

In order to meaningfully center equity and environmental justice within Energy Commission activities, the Energy Commission must go beyond operationalizing these principles in its public facing policies, programs, processes, and practices (e.g., public workshop, proceeding). The Energy Commission has started to look internally at what it can do to improve its organizational culture efforts through its Inclusion Diversity Equity Access (IDEA) Initiative. CSE recommends the Energy Commission expand these efforts to include staff training and development opportunities, for both its leadership and staff levels, in a similar approach to what the CPUC has done through its ESJ Action Plan. For example, the CPUC has established a core ESJ team for the whole agency that collaborates with individual ESJ liaisons for each of its divisions.

A key aspect of bolstering staff knowledge on equity and EJ issues is to provide ongoing training on these topics to new and existing employees. Educational and skill needs should be continuously

⁷ [SB 350 Outreach Strategic Roadmap](#), accessed on March 21, 2022.

⁸ [CAEECC-Hosted Equity Metrics Working Group: Report and Recommendations to the California Public Utilities Commission and the Energy Efficiency Program Administrators - Final Report](#), October 20, 2021; pages 31-34.

⁹ [Community Inclusion Guidance](#) for STEP Applicants and recipients.

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assessed to support staff in their learning journey. Another way for the Energy Commission to enhance its staff's equity capacity-building is to participate in California's Capitol Collaborative on Race and Equity (CCORE) program,¹⁰ which is what its sister agencies, CARB and CPUC, have done. In this program, participants receive training to learn about, plan for, and implement activities that embed racial equity approaches into institutional culture, policies, and practices. CSE also recommends that the Energy Commission establish a staff-led Diversity, Equity and Inclusion (DEI) Working Group (similar to the CPUC's Working Group¹¹) or a Diversity and Racial Equity Task Force (similar to CARB's efforts¹²) as part of its IDEA Initiative. This would further demonstrate the Energy Commission's commitment to equity and environmental justice.

V. CONCLUSION

CSE appreciates the opportunity to provide these comments regarding the Draft Scoping Order for the 2022 IEPR Update. We look forward to continued collaboration with the Energy Commission and stakeholders in updating the IEPR to center equity and environmental justice in the agency's policies, programs, investments, and practices.

Sincerely,



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¹⁰ [Governing for Racial Equity: California's Capitol Collaborative on Race & Equity](#), accessed on March 21, 2022.

¹¹ CPUC's [Environmental & Social Justice Action Plan: Version 2.0 Draft](#), page 15.

¹² [Diversity and Racial Equity Task Force](#), accessed on March 21, 2022.