

DOCKETED

Docket Number:	22-ALT-01
Project Title:	2022-2023 Investment Plan Update for the Clean Transportation Program
TN #:	242651
Document Title:	The Greenlining Institute's CEC Equity Strategy Memo
Description:	N/A
Filer:	System
Organization:	The Greenlining Institute/Leslie Aguayo
Submitter Role:	Public Agency
Submission Date:	4/12/2022 12:37:31 PM
Docketed Date:	4/12/2022

Comment Received From: Leslie Aguayo
Submitted On: 4/12/2022
Docket Number: 22-ALT-01

The Greenlining Institute's CEC Equity Strategy Memo

Additional submitted attachment is included below.

Memorandum

To: Commissioner Patty Monahan and CEC staff
From: Leslie Aguayo
Date: March 2022
Re: Proposal for CEC Clean Transportation Investment Plan Equity Definition

Introduction:

The goal of this memo is to provide the California Energy Commission with guidance in the development of a definition for “equity”.

Background:

Since 2015, The Greenlining Institute has been on the CEC advisory committee with the goal of providing recommendations on how to maximize equity outcomes in the CEC’s yearly Clean Transportation Program [Investment Plan](#). The [Clean Transportation Program](#) (also known as Alternative and Renewable Fuel and Vehicle Technology Program) invests up to \$100 million annually in a broad portfolio of transportation and fuel transportation projects throughout the state. Historically, this has funded a mix of EV, natural gas, and biofuel investments. To date, that engagement has involved participating in bi-annual advisory committee meetings, submitting written comments, and meeting directly with CEC staff or lead transportation commissioner as needed. For more information on our engagement, see below.

- [Comments to the California Energy Commission Regarding EV Charging Incentive Projects](#)
- [Greenlining’s Comments to the California Energy Commission on the 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program](#)
- DACAG June 2019 comments (see [docket: SB 350 Disadvantaged Communities Advisory Group Comments on 2019-2020 Investment Plan Update](#))
- [Signed on to Earth Justice letter](#)
- [The Greenlining Institute Comments_CEC ZEV Infrastructure Plan Workshop Docket No. 21-TRAN-03](#)
(See docket: 02/04/2022)

Commitment to Equity and Disadvantaged Communities:

To date the CEC has committed to investing at least 50% of funds from the Clean Transportation Program Investment Plan to “projects that benefit priority populations, including low-income and disadvantaged communities”. According to the CEC’s \$1.4 billion 2021-2023 Investment Plan Update approved in November of 2021, “*The CEC recognizes project location is just one metric for evaluating the equity impacts of specific projects.*” The Greenlining Institute commends the CEC on its commitment to equity and their development of metrics beyond place to benefit low-income and disadvantaged communities. With considerable funding from state and federal sources for California’s clean transportation future and continued inequities that disproportionately plague low income and communities of color it is critical that the CEC clearly defines equity and identifies how investments will directly benefit disadvantaged communities.

Recommended Definitions of Equity:

[Greenlining definition of equity](#)

Equity is transforming the behaviors, institutions, and systems that disproportionately harm people of color. Equity means increasing access to power, redistributing and providing additional resources, and eliminating

barriers to opportunity, in order to empower low-income communities of color to thrive and reach full potential (P.93).

[CARB GGRF Fiscal Year 2021-22 Priority Population Targets](#)

“The California Air Resources Board (CARB), in conjunction with the administering agencies, develops program-level targets to drive investments that achieve **direct, meaningful, and assured** benefits to priority populations. Administering agencies must follow the requirements in [CARB Funding Guidelines](#) to demonstrate benefits under AB 1550. The Funding Guidelines require an analysis of each project to determine if the project meets the criteria for providing direct, meaningful, and assured benefits and addresses an important community need. AB 1550 requires the available monies for California Climate Investments be minimally allocated as follows:

- 25 percent to projects located within the boundaries of, and benefiting individuals living in, disadvantaged communities;
- 5 percent to projects that benefit low-income households or to projects located within the boundaries of, and benefiting individuals living in, low-income communities located anywhere in the State;
- 5 percent to projects that benefit low-income households that are outside of, but within ½-mile of, disadvantaged communities, or to projects located within the boundaries of, and benefiting individuals living in, low-income communities that are outside of, but within ½-mile of, disadvantaged communities.”
- [Evaluation Criteria for Providing Benefits To Priority Populations for CLEAN TRANSPORTATION AND EQUIPMENT](#)
- [Evaluation Criteria for Providing Benefits To Priority Populations for SUSTAINABLE TRANSPORTATION](#)

[AB 1389/ SB 726 language](#)

The California Energy Commission shall expend at least 50 percent of the moneys appropriated to the Alternative and Renewable Fuel and Vehicle Technology Program Program, as averaged over three-year periods, on programs and projects that **directly benefit or serve residents of disadvantaged and low-income communities and low-income Californians, and at least 50 percent of the funds for tangible location-based investments shall be expended in disadvantaged and low-income communities. Any of the moneys used for investments that fulfill both criteria shall count toward both requirements.**

Next Steps:

To date multiple groups of stakeholders have been tasked with providing a definition of equity and ensuing metrics, this includes the StrikeForce equity working group, internal CEC staff, DACAG, and AB 8 reauthorization legislative authors. The Greenlining Institute recommends the following guidance in the finalization of the CEC’s definition of equity.

1. Literature review and landscape analysis of definitions or codified terms of “equity”
2. Roundtable discussions with key equity stakeholders including community representatives from DACs to collect feedback on equity definitions
3. Propose set of recommended equity definitions to all parties involved in ideation process and survey for consensus on ideal definition
4. Understanding that this is an iterative process and the needle towards progress is ever moving, continue with steps 1-3 every other investment cycle.