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Comment Received From: Fabiola Lao
Submitted On: 12/16/2022
Docket Number: 22-TRAN-03

CSE's comments on the CTP Community Benefits Staff Kickoff Workshop

Additional submitted attachment is included below.

December 16, 2022

California Energy Commission
Docket Unit, MS-4
Docket No. 22-TRAN-03
715 P Street
Sacramento, CA 95814

Re: Docket No. 22-TRAN-03– Comments of Center for Sustainable Energy® regarding the Clean Transportation Program Community Benefits Staff Kickoff Workshop

Center for Sustainable Energy® (CSE) appreciates the opportunity to comment on the Clean Transportation Program (CTP) Community Benefits Staff Kickoff Workshop (Workshop) held on November 29, 2022.

CSE is a national nonprofit that is transforming markets for clean transportation and distributed energy resources through software-enabled program design, program administration, and policy analysis and guidance. CSE administers innovative programs for governments, utilities, and the private sector across the U.S., including the California Electric Vehicle Infrastructure Project (CALeVIP) on behalf of the California Energy Commission (CEC). CSE's independence and data-driven approach have made it a trusted resource and partner for over 25 years.

CSE commends the CEC for starting a public process to develop a Community Benefits Framework to assess, track and improve community benefits of CTP investments. Moving beyond a location-based view of CTP benefits will help ensure the state's electric vehicle (EV) charging goals are implemented in an equitable manner to deliver health, environmental, and economic benefits to communities.

CSE is committed to centering equity into every program we administer and the policies we support. As such, we offer the following specific recommendations in response to the CEC's questions posed during the Workshop and request for feedback:

1. Consider the alignment of the definition of a community with the definitions outlined in the CEC's recently released Draft Justice Access Equity Diversity and Inclusion (JAEDI) Framework.
2. Consider, as a starting point, the comprehensive list of non-energy benefits (NEBs) and example benefit metrics in the Draft JAEDI Framework.
3. Support the proposed five-step process to track the benefits of CTP projects.

1. Consider the alignment of the definition of a community with the definitions outlined in the CEC’s recently released Draft Justice Access Equity Diversity and Inclusion (JAEDI) Framework.

CSE encourages CTP staff to consider aligning the definition of a community with the proposed “Justice Communities”¹ definition outlined in the CEC’s recently released Draft JAEDI Framework that was developed as part of its Draft Integrated Energy Policy Report (IEPR) 2022 Update. “Justice Communities” is being proposed as a broad umbrella term that includes the following three designations: 1) disadvantaged communities (pursuant to Senate Bill 535 and based on CalEnviroScreen 4.0); 2) low-income communities (pursuant to Assembly Bill 1550); and 3) underserved community² (pursuant to Assembly Bill 841).

The community definition being developed for the CTP Community Benefits Framework is part of a larger ecosystem of equity definitions, not only internally at the CEC through its Draft JAEDI Framework, but one that also includes existing efforts at other agencies. Recognizing that interconnectedness and coordination are inherent to successful equity efforts, CSE recommended in our comments submitted on the Draft JAEDI Framework³ that the CEC consider the alignment, where feasible, of the proposed “Justice Communities” definition with the California Air Resources Board’s “Priority Communities” definition⁴ and the California Public Utilities Commission’s “Environmental and Social Justice Communities” definition.⁵ There are similarities in these three definitions (e.g., inclusion of the state’s disadvantaged communities’ designation), but there are also nuanced differences that should be discussed.

CSE recommends CTP staff monitor the development of the JAEDI Framework through the forthcoming Order Instituting Informational Proceeding (OIIP) on equity and environmental justice,⁶ as this will further ensure alignment and coordination of definitions. From a consumer perspective, aligning equity definitions will help reduce confusion among program participants and make for a more manageable process of stacking incentives within CTP and other CEC programs, as well as with other agencies’ electric vehicle and charging infrastructure programs.

¹ Draft 2022 IPER Update Report, page A-4, *available at* <https://efiling.energy.ca.gov/GetDocument.aspx?tn=247338&DocumentContentId=81732>.

² From Draft JAEDI Framework: “A community in which at least 75 percent of public-school students in the project area are eligible to receive free or reduced-price meals under the National School Lunch Program.” Draft 2022 IPER Update Report, page A-5, *available at* <https://efiling.energy.ca.gov/GetDocument.aspx?tn=247338&DocumentContentId=81732>.

³ CSE’s Comments regarding the Draft IEPR Update, *available at* <https://efiling.energy.ca.gov/GetDocument.aspx?tn=247851&DocumentContentId=82156>

⁴ Priority Population Investments Map, accessed November 30, 2022, *available at* <https://webmaps.arb.ca.gov/PriorityPopulations/>.

⁵ CPUC’s Environmental & Social Justice Action Plan: Version 2.0, page 2, *available at* <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf>.

⁶ Draft 2022 IPER Update Report, page 101, *available at* <https://efiling.energy.ca.gov/GetDocument.aspx?tn=247338&DocumentContentId=81732>.

CSE also suggests staff include in the CTP community definition all California Native American Tribes,⁷ which are considered Priority Beneficiaries in the Draft JAEDI Framework. This differs from the U.S. Department of Energy's Justice40 criteria,⁸ which only includes federally recognized tribes, whereas the state recognition includes more tribes.

2. Consider, as a starting point, the comprehensive list of non-energy benefits (NEBs) and example benefit metrics in the Draft JAEDI Framework.

CSE suggests staff consider, as a starting point, the comprehensive list of non-energy benefits (NEBs) listed in the Draft JAEDI Framework's section describing the sixth best practice to embed an equity and environmental justice lens.⁹ This section is broken up into three subsections: 1) participant NEBs (e.g., lower energy burden, increased property value, improved health, safety and comfort); 2) utility NEBs (e.g., bill payment improvements, increased reliability for customers); and 3) societal NEBs (e.g., quality local job creation, improved air quality and other environmental benefits, avoided short- and long-term displacement, improved public health and reduced health care costs). CSE also recommends that benefits and metrics developed in the CTP Community Benefits Framework be coordinated with those being developed in the Draft JAEDI Framework, as well as with peer agencies' ongoing efforts to identify and quantify NEBs.

CSE also recommends staff reference the Draft JAEDI Framework's section titled, "Considerations for Benefits Metrics",¹⁰ as it develops the CTP Community Benefits Framework. This section includes a table of example benefit metrics and units for a variety of policy priorities, e.g., tracking dollars spent to engage with organizations and community members, including participation and notification of how input was used, as a way to measure an increase in energy democracy. Additionally, CSE recommends consideration of the job training metrics (e.g., percent of trainees who are local hires, average trainee wage, percent of trainees receiving government benefits, trainee job attainment and retention) used in the Solar On Multifamily Affordable Housing (SOMAH) Program,¹¹ which CSE administers as part of the Program Administrator (PA) team under the auspices of the California Public Utilities Commission.

3. Support the proposed five-step process to track the benefits of CTP projects.

CSE supports staff's proposed five-step process to track the benefits of CTP projects, specifically given its approach to include community feedback in the process, particularly in co-defining project benefits. As part of step three, CSE suggests that community benefits collected and recorded on an ongoing basis be

⁷ Draft 2022 IPER Update Report, page A-4, *available at* <https://efiling.energy.ca.gov/GetDocument.aspx?tn=247338&DocumentContentId=81732>.

⁸ Listed on slide 15 of the Community Benefits Staff Kickoff Workshop presentation, *available at* <https://efiling.energy.ca.gov/GetDocument.aspx?tn=247752>.

⁹ Draft 2022 IPER Update Report, page A-8, *available at* <https://efiling.energy.ca.gov/GetDocument.aspx?tn=247338&DocumentContentId=81732>

¹⁰ *Id.* at A-12.

¹¹ SOMAH Program Handbook Fifth Edition, pages 44-45, *available at* https://calsomah.org/sites/default/files/docs/SOMAH-Handbook_FifthEdition.pdf

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shared with community members as part of a public process and for this reporting to be publicly accessible in the CEC website. CSE also recommends that positive or negative changes in community benefits identified in step four be also discussed with community members through the public process mentioned above.

Conclusion

CSE appreciates the opportunity to provide these comments regarding the CTP Community Benefits Staff Kickoff Workshop. We look forward to continued collaboration with the CEC and stakeholders in the development of the Community Benefits Framework.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fabiola P. Lao', enclosed within a circular scribble.

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