

DOCKETED	
Docket Number:	22-ERDD-03
Project Title:	Clean Hydrogen Program
TN #:	253399
Document Title:	Electric Power Research Institute, Inc. Comments - Response to Draft Solicitation Concept for Distributed Clean Hydrogen Production with Onsite End Use
Description:	N/A
Filer:	System
Organization:	Electric Power Research Institute, Inc.
Submitter Role:	Public
Submission Date:	11/30/2023 1:03:55 PM
Docketed Date:	11/30/2023

*Comment Received From: Electric Power Research Institute, Inc.
Submitted On: 11/30/2023
Docket Number: 22-ERDD-03*

Response to Draft Solicitation Concept for Distributed Clean Hydrogen Production with Onsite End Use

Additional submitted attachment is included below.

November 30, 2023

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**Electric Power Research Institute's Response to CEC's Request for Comments:
H2ONSITE Draft Solicitation Community Engagement, Benefits, and Impacts
Requirements**

The Electric Power Research Institute, Inc. (EPRI) respectfully submits the enclosed comments on the California Energy Commission's (CEC) *H2ONSITE Draft Solicitation Community Engagement, Benefits, and Impacts Requirements*. EPRI appreciates the opportunity to contribute to the public feedback on the community engagement, benefits, and impacts requirements. EPRI hopes that its comments and technical feedback will be valuable to the CEC.

1. Is the Community Engagement, Benefits, And Impacts task proposed in this document realistic, reasonable, and feasible?

The tasks proposed in this document are realistic, reasonable, and feasible. The Community Engagement, Benefits, and Impacts tasks outlined in this document follow best practices. Additionally, the suggestions made in the following responses can further strengthen those tasks.

2. What would be the appropriate level of funding for the proposed Community Engagement, Benefits, and Impacts task?

The appropriate level of funding depends on the implementer and the size of the award. In the absence of the overall scope and reach, it is difficult to comment on this. However, tasks should be specific, measurable, achievable, relevant, and time bound (SMART). There are CBP best practices around using SMART goals tied to metrics to display firm commitment to CBP tasks. EPRI's Equitable Decarbonization Interest Group ([EDIG](#)) team has performed research on leading practices of community engagement while simultaneously working on CBPs, and there is widespread agreement that ample resources must be dedicated to CBP and engagement work. This may include hiring someone with equity, environmental justice, or public participation skillsets to perform community benefits plan execution and/or community outreach. This may also include budgeting for day-care, dining, or compensation for community members' involvement in community benefits planning and engagement. When assessing what an appropriate level of funding would be for CBP and community engagement tasks, it is helpful to begin with understanding what community needs and wants are and overlaying this information with company resources to determine the appropriate level of resource allocation to achieve the desired community benefits/engagement outcomes.

3. Should CEC require all funded projects to track and report on specific key indicators for community benefits and localized health impacts?

Through the research and collaboration of EPRI's EDIG, tracking and reporting key indicators for equity, environmental justice, community benefits and localized health impacts has been identified as leading practices for community engagement processes. EDIG was originally

launched in 2021 and includes energy companies, community leaders, and other stakeholders. EDIG works to share and develop best practices, enables collaborative dialogue and research, explores metrics and screening tools relating to environmental justice, and facilitates strong and inclusive community advisory structures. One example of such research from EDIG includes [Understanding Equity and Justice Toolkit](#), wherein equity metrics and recommendations were coalesced from a variety of community-based organizations, advocates, researchers, and state and local agencies. Tracking and reporting on these indicators to advance transparency and equity was identified by many as an important aspect of the community engagement process. Metrics tied to CBP tasks are considered a best practice alongside the SMART goal formatting to ensure accountability and commitment to CBP and engagement tasks. Many CBPs have metrics tied to tasks and milestones which result in tracking specific data to be able to accurately report on promised CBP and engagement metrics.

4. What additional requirements should CEC consider to ensure that funded projects bring direct benefits to communities?

EPRI's EDIG team and collaborators consistently identify understanding the needs and wants of the community as a necessary step to ensuring direct community benefits. This requires performing stakeholder identification and performing early community engagement prior to proposal writing or project start. A simple pathway to cultivate this early engagement is to connect with external affairs and community outreach personnel within the organization to gain insights on how much of this work they may already be doing. As external representatives of the organization, it is important to engage with external affairs colleagues primarily. This initial step can be paired with community mapping and environmental justice screening which is a best practice among CBPs. Tools like the [Climate and Economic Justice Screening Tool](#) or [EJScreen](#) are pertinent steps to understanding the landscape of the community and getting a sense of historical underpinnings related to environmental justice. Performing these initial screening steps helps to center work related to community benefits or engagement on underserved and disadvantaged communities, which is the crux of performing community benefits work.

Outside of requiring initial engagement and community mapping, EPRI recommends the CEC considers requiring collaborative community engagement methods, such as Community Advisory Committees (CACs) (e.g., Citizens Advisory Councils or Community Advisory Boards). CACs can enable meaningful and sustained engagement throughout the project, provide expertise on the community to fulfill community needs, help build capacity and trust in the community, and contribute to the project as decision-makers during planning, execution, and management of the project. Assembling a CAC may involve additional resource commitments, such as a stipend for members as well as providing childcare, elder care transportation, meals at committee meetings, internet access, and computer equipment. Although these additional resources may be necessary, CACs have been identified as a best practice for community engagement through EPRI's EDIG, community leaders and community benefits/engagement practitioners. There are many examples from companies successfully assembling CACs, such as those found [at Ontario Power Generation](#) and [Dominion Energy](#). Clear guidelines on how to best do so have also been established. The CEC could at least consider adding "convening a CAC" as a community engagement example listed under Section IV, in the first bullet point.

EPRI recommends the CEC consider requiring accountability mechanisms for community benefits and engagement, such as Workforce Agreements, Community Benefits Agreements, Community Workforce Agreements, Good Neighbor Agreements, Project Labor Agreements, Project Management Agreements, or Collective-Bargaining Agreements. These agreements can be either contractual or memorandums of understanding (MOUs), and can provide both the

project developers and the community a more formal agreement to assist the community engagement process. These agreements can assist in trust building, resolve disagreements ahead of project deployment, secure local jobs to fulfill workforce needs, increase empowerment and civic engagement in the community, clearly state the benefits and opportunities the community will realize, and equitably align the resources needed by the workers and communities. Workforce and Community Agreements are a best practice that has been identified EPRI's EDIG, government entities, and community leaders. The CEC may consider adding "creating Workforce and Community Agreements" as a community engagement example listed under Section IV, in the first bullet point.

In addition to Workforce and Community Agreements, the CEC could require other conflict resolution mechanisms. Community engagement typically involves stakeholders with diverse perspectives and priorities, which can sometimes lead to conflict. To avoid escalation and maintain constructive communication during the community engagement process, one should plan ahead of time for this to minimize the impact that it could have on the community engagement process and the project as a whole. Conflict resolution mechanisms can include mediation techniques, involvement from a Community Advisory Committee (CAC), hiring a neutral third party with experience in community engagement and conflict resolution, or other collaborative methods to resolve conflicts.

Under Section IV, it states that "The project must submit Pre- and Post-installation and End-of-Project Community Benefit and Impact Reports as part of a technical task in the scope of work and project schedule." One of the bulleted items states that the reports should "Summarize and analyze indicator data collected after the system has reached stable operation." EPRI recommends that the CEC be clear about how long this data should be reported. The CEC should require the data to be reported up to plant end-of-life. EPRI has a history of research into plant decommissioning, site redevelopment, and how to approach equipment nearing end of life. EPRI has specifically researched [Equity and Environmental Justice Considerations for Coal-Fired Plant Repowering](#). Best practices and lessons learned on community engagement, workforce development, and economic impacts from this research could be applied to locations where hydrogen has been produced and used. It is important to remain transparent with the community up to the end of life of the plant.

Under Section IV, it states that "The project must include community engagement as a technical task in the Scope of Work," and lists some objectives that should be accomplished. The third bullet point states that they should "Develop a clear and concise communication strategy that outlines the goals, objectives, and methods of engagement." EPRI recommends the CEC require the communication strategy to specifically use SMART (Specific, Measurable, Achievable, Relevant, and Timely) goals. Furthermore, the CEC should consider requiring the communication strategy to also outline the resources and roles needed to fulfill those goals, objectives, and methods of engagement that will be stated in their strategy. Finally, the CEC could require that the communication strategy also prepare a timeline, establish specific milestones, and identify feedback and evaluation strategies that will track the success of engagement strategies. These recommendations are modeled off of best practices and common steps for community engagement identified in the Office of Clean Energy Demonstration's [Guidance for Creating a Community Benefits Plan for the Regional Clean Hydrogen Hubs](#)".

Under Section IV, it states that "The project must include community engagement as a technical task in the Scope of Work," and lists some objectives that should be accomplished. EPRI's EDIG subject matter experts also recommend that rather than stipulating precisely how projects should perform community engagement, instead emphasize the importance of creating

meaningful engagement plans that embed input from community members to determine the most effective and feasible methods of engagement. Meaningful engagement, as understood from EPRI's [Landscape Review of Community Engagement Leading Practices](#), includes collaborative, inclusive, equitable, and empowering engagement pathways. This refers to continuous public input, in a two-way forum, throughout an acting entity's decision-making process and on specific issues where input shapes action. This may take the form of public town halls, community advisory committees, memorandums of understanding, public voting, surveys, or task forces, but are realistically dependent on the community's needs, wants, and desired outcomes per project. In summary, the CEC should make it clear that meaningful engagement goes beyond holding public meetings and using community platforms to inform the public, and the communication plans submitted to the CEC for these projects should reflect that.

5. What type of technical assistance is required to ensure equitable participation and project success, and why? Please provide relevant comments regarding other considerations not explicitly listed above.

EPRI recommends the CEC require technical assistance in educating the community on these highly technical topics. Communities can be interested in learning about the economic, environmental, and societal ways that these technologies can impact them. However, understanding highly technical topics, such as the basics of hydrogen, can take time and effort. Visible demonstrations of how the technology works and what the impacts are should be used as much as possible. For example, demonstrating data, in a clear and simple way, on what the tangible health and economic impacts that the production of hydrogen using electrolysis can have could help the community grasp how these projects may impact them. Additionally, bringing community members to a demonstration site to see the technology themselves may also be beneficial. EPRI recommends the CEC require collaboration with trusted organizations in the community, such as Community-Based Organizations (CBOs), to identify the technical needs of the community. CBOs may already have established educational events or meetings open to the public. Communities can be overwhelmed with information and have a limited amount of time. Therefore, instead of adding additional events, projects should consider partnering with these CBOs to leverage their existing events and communication channels. Furthermore, if a project plans to conduct public-facing technology demonstrations, they can partner with CBOs to facilitate these events.

Under Section IV, it states that "The project must include community engagement as a technical task in the Scope of Work," and lists some objectives that should be accomplished. The fourth bullet point states that they should "Hold public meetings, in-person and virtually..." To fully and equitably participate in virtual meetings, community members may need technical assistance in acquiring internet access and computer equipment. To fully and equitably participate in in-person meetings, community members may have transportation and childcare needs. Additionally, to fully and equitably participate in any type of meeting, technical assistance may be needed to provide information in languages spoken in the community. EPRI recommends the CEC consider these avenues of technical assistance to ensure equitable participation and project success.