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**Comments of GRID Alternatives on the Initial Workshop for the
Non-Energy Impacts Informational Proceeding**

Additional submitted attachment is included below.



October 21st, 2024

California Energy Commission
Docket Unit, 24-OIIP-03
1516 Ninth Street
Sacramento, CA 95814-5512

VIA DOCKET
Energy Commission Docket 24-OIIP-03

Re: Comments on the Initial Workshop for the Non-Energy Impacts Informational Proceeding

Dear Commissioners and Energy Commission Staff:

GRID Alternatives (“GRID”) is the country’s largest nonprofit that builds community-powered solutions to advance economic and environmental justice through renewable energy. Since 2004, we’ve installed clean energy technologies for over 30,000 income-qualified households across the country. In California, GRID and its eight regional offices statewide administer and implement equity-focused distributed energy resource programs including the Disadvantaged Communities - Single-family Solar Homes (DAC-SASH) program and the Solar On Multifamily Affordable Housing (SOMAH) program (as part of a multi-nonprofit program administration team). We welcome the Commission’s exploration of ways to integrate non-energy benefits into its decision-making processes, and we appreciate the opportunity to submit the following comments.

In addition to being a clean energy installer and program administrator, GRID is also a workforce development organization that provides job training to individuals, especially those from disadvantaged backgrounds, across several jurisdictions in California and across the country. Since the start of 2024, GRID has trained 522 individuals on the basics of solar installation and assisted in placing 162 individuals in full time employment, with even more anticipated to be placed after completing their training this year. GRID believes that job creation and local economic growth occurring as a result of investment in clean energy and decarbonization are both important non-energy benefits that should be taken into consideration in resource planning and decision-making processes.

GRID appreciates the presentations and discussions that took place in the Initial Workshop for this proceeding on October 7th, 2024. We were especially encouraged to see the California Environmental Justice Alliance presentation highlighting the success of the SOMAH Program in providing both bill savings for tenants- with over 41,750 tenant units served as well as over 1,000 paid solar training job

opportunities since the start of the program.¹ SOMAH is an example of a clean energy investment that provides valuable non-energy benefits to communities that should be fully incorporated in the decision making process of the Commission and other policymakers.

We also support the many speakers in the workshop who emphasized the importance of meaningful community engagement, including the Rocky Mountain Institute's principle of shared power that supports leadership and voices from communities on the frontlines who are directly affected by climate and energy policies. GRID shares this principle in our work, and supports incorporating any and all strategies that make it easier for frontline communities to engage in policy-making processes, including the valuation of non-energy benefits.

There is a growing body of research that models how to capture the benefits of investments in clean energy and decarbonization projects. The US EPA published a guide for state and local governments on quantifying the benefits of energy efficiency and renewable energy in 2018.² This guide includes tools for estimating economic benefits including but not limited to: employment, economic output, personal income/earnings, and gross state product.³ The UCLA Luskin Center for Innovation has published several reports related to the economic benefits of renewable energy and energy efficiency investments. One such report found that the LADWP's Home Energy Upgrade Program's investment of \$956,938 in 2016-17 yielded a total labor income of over \$3.3 million dollars in Los Angeles County.⁴ These examples point to the work that has already been done in this area, and can be emulated by the Commission when considering how to incorporate non-energy workforce and economic benefits.

GRID also believes that there are exciting opportunities at the intersection of non-energy economic benefits from the Commission's investments and the Commission's Justice Access Equity Diversity Inclusion (JAEDI) Framework, by specifically incorporating the economic development benefits of Commission investments with Disadvantaged Business Enterprises (DBEs). Administered nationally by the federal Department of Transportation, the DBE program is specifically designed to create a formal structure for remedying the historic and current inequities called out in the JAEDI Framework.⁵

It is worth noting that GRID staff members from the National Tribal Program were requested to speak at the convening; but unfortunately did not fit within the agenda of the hearing due to time constraints. GRID would like to encourage the Commission to establish a distinct process of engagement with California Tribes on the topic of non-energy benefits. In one collaborative effort between the Karuk Tribe and UC Berkeley around data sharing and associated metrics for food security, there was an outline of protections created for all cultural and intellectual property which included a review process from the Karuk Advisory Board, Review Committee, and Tribal Council.⁶ This example illustrates how the Tribe and the university established guiding principles for research into the issue of food security and prioritized community engagement, benefits to the Tribe, educational opportunities for Tribal youth, and confidentiality. It is critical that Tribal priorities be integrated into the work of non-energy benefits; and

¹ SOMAH Program Impacts. [Link](#).

² US EPA. *Quantifying the Multiple Benefits of Energy Efficiency and Renewable Energy*. 2018. [Link](#).

³ Id., Chapter 5

⁴ UCLA Luskin Center for Innovation. *Economic Benefits of Energy Efficiency Programs*. [Link](#).

⁵ US DOT. *Disadvantaged Business Enterprise (DBE) Program*. [Link](#).

⁶ Karuk Tribal Council (2015) 'Karuk tribe protocol with agreement for intellectual property rights of the Karuk tribe: Research, publication and recordings'. Available at: [Link](#). (Accessed Oct 21, 2024).

often, the most holistic and ethical integration of Tribal values and priorities are by creating distinct processes tailored to that of California Tribes. Another example of this is the California Natural Resources Agency (CNRA) identifying their Tribal Stewardship Strategy as a result of their numerous Tribal consultation efforts with California Tribes to reach the state's goal of 30% land conservation by 2030. This separate strategy provides capacity training and resources to both Tribes and community based organizations to increase readiness of Tribes to co-manage and partner with the CNRA to incorporate traditional ecological knowledge. The Commission would find it beneficial to borrow best practices from agencies such as the CNRA to engage California Tribes more effectively and increase Tribal participation. Additionally, any collaboration with California Tribes and objective findings should be made easily available to the Tribes first and foremost in partnership with the Commission. Since regulation from governments often outpaces adequate Tribal consultation, greater efforts are needed to engage with these communities for accurate data and identification of unmet needs. Tribal self-determination is critical to recognize; Tribes must be able to define their own non-energy benefits separately without Western valuation and frameworks being imposed on their respective communities.

The Commission has a working consultation framework that needs to be further explored and developed with California Native American Tribes especially around the follow through and implementation of consultation. Consultation is when both sides of an issue have the opportunity and are given the background data to inform opinions and discussion. Every Tribe has its own tribal government process for decision-making that is mandated by distinct tribal constitutions. The Commission should make sure that its decision-making timelines and processes are congruent with those of tribal governments.

Finally, while we applaud the Commission's crucial efforts to quantify a broader range of non-energy benefits, this quantification work should always bear in mind that not all meaningful value is quantifiable; dollars are not an objective, universal measuring stick.⁷ Indeed, among other reasons, some relational and intrinsic values are constituted by a refusal to treat them as equivalent to tradable commodities. Valuable human relationships like friendship and family certainly work this way; and many Indigenous worldviews, for example, assign similarly anti-quantitative relational values to lands, waters, and other beings as well.⁸ Ignoring these values by using only a quantitative-only framework for non-energy benefits amounts to assigning a default low or zero value to them, which goes against what the Commission's constituents often want, as well as what social and environmental sustainability often need. GRID encourages the Commission to engage with social ecological economics (SEE),⁹ qualitative methodologies,¹⁰ relational valuation,¹¹ and other established means of ensuring that decisions aren't distorted by too narrow a view of what has value.

⁷ See generally, e.g., Routledge Handbook of Ecological Economics (ed. Clive Spash, 2017).

⁸ See id., ch. 22, "Pluralism and incommensurability," by John O'Neill; Kimmerer, Robin Wall, *Braiding Sweetgrass* (2013).

⁹ Clive L. Spash, "A tale of three paradigms: Realising the revolutionary potential of ecological economics," *Ecological Economics*, Vol. 169 at 106518 (2020). [Link](#).

¹⁰ E.g., chapters 29-37 in Routledge Handbook of Ecological Economics (Q methodology, input-output analysis, deliberative valuation, and other methods).

¹¹ Himes, Austin, and Barbara Muraca. "Relational values: the key to pluralistic valuation of ecosystem services." *Current opinion in environmental sustainability* 35 (2018): 1-7.

Thank you for your consideration of our input. We look forward to collaborating with the Commission and other stakeholders in identifying the best methodologies and practices for including non-energy benefits into investment planning and decision-making processes.

Sincerely,

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