

DOCKETED

Docket Number:	24-OIIP-03
Project Title:	Informational Proceeding on Non-Energy Benefits and Social Costs
TN #:	262476
Document Title:	Sonoma Clean Power Authority Comments - Sonoma Clean Power Authority Comments on Non-energy Impacts Order Instituting Informational Proceeding Scoping Workshop
Description:	N/A
Filer:	System
Organization:	Sonoma Clean Power Authority
Submitter Role:	Public Agency
Submission Date:	3/27/2025 12:02:02 PM
Docketed Date:	3/27/2025

*Comment Received From: Sonoma Clean Power Authority
Submitted On: 3/27/2025
Docket Number: 24-OIIP-03*

**Sonoma Clean Power Authority Comments on Non-energy Impacts
Order Instituting Informational Proceeding Scoping Workshop**

Additional submitted attachment is included below.



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Santa Rosa, CA 95404

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March 27, 2025

California Energy Commission
Docket Unit, MS-4
Docket No. 24-OIIP-03
715 P Street,
Sacramento, CA 95814

Submitted Electronically

RE: Sonoma Clean Power Authority Comments on Non-energy Impacts Order Instituting Informational Proceeding Scoping Workshop

Dear Vice Chair Gunda, Commissioner Gallardo and Commission Staff:

Sonoma Clean Power Authority (SCP) is pleased to provide comments on the California Energy Commission (CEC) Non-Energy Benefits and Social Costs Order Instituting Informational Proceeding (OIIP) Scoping Workshop.

SCP is the public power provider for Sonoma and Mendocino counties, serving a population of about a half-million. SCP operates our Customer Center in downtown Santa Rosa, to help customers understand bills and learn how to transition to 100% renewable energy for their homes, businesses, and cars. Our agency is dedicated to expanding our renewable portfolio while advancing energy sector decarbonization and enabling equitable access to clean, renewable, and reliable power for all our customers.

As a Community Choice Aggregator (CCA), SCP bridges gaps between policy-making venues and community scale interests. Our governance structure is designed to enable local government to make investments in our communities and to innovate in a manner that supports the people we serve. It is in this spirit that SCP enthusiastically supports the CEC's efforts to incorporate non-energy impact (NEI) metrics into its planning, program and decision-making processes. We are honored to share this opportunity to empower voices from the communities we serve and uplift important messages within our region.

We appreciate this opportunity to provide comments. It is our hope that we may continue to serve as a supportive resource throughout this OIIP. Thank you for your time and consideration. Please feel free to reach out with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Jorge', with a long horizontal flourish extending to the right.

Adam Jorge

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A handwritten signature in black ink, appearing to read 'Claudia Sisomphou', with a large loop on the left and a horizontal flourish on the right.

Claudia Sisomphou

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Appendix - Comments on Non-energy Impacts Order Instituting Informational Proceeding Scoping Workshop

The following comments are submitted in support of the CEC's effort to scope, identify, evaluate, and incorporate NEIs into future planning actions, program development, and decision-making processes. Our comments reflect SCP's direct experience engaging with local communities through our Empower Initiative¹ (Empower), which was developed to: (1) incorporate a suite of community concerns and priorities into our decision-making processes; (2) improve the reach, relevance, and impact of our outreach and offerings; (3) respond to the needs and priorities of those most impacted by energy system inequities.

I. Sonoma Clean Power's work developing Empower can provide insights into our customers' top NEI priorities.

A. Origins of Empower

Several years ago, Sonoma Clean Power recognized its struggles reaching its entire customer base with its educational efforts and program offerings, which are aimed at both reducing greenhouse gas emissions and electricity bill costs. SCP recognized that this gap in engagement was disproportionately affecting customers who are low-income, renters, English-language learners, hard-to-reach, marginalized, and whose communities lack infrastructure or services that enable participation (i.e. broadband connectivity, reliability concerns). SCP subsequently launched Empower, which created an agency-wide approach striving to bridge this gap and deepen engagement with the communities we serve by strategically targeting those who were historically underserved.

B. Tools and Methodological Considerations

Through its research, SCP ultimately found that no singular "catch all" methodology could sufficiently encompass every indicator relevant to our most impacted communities. SCP believes that this understanding should be embraced at the outset of the CEC's NEI scoping process; flexibility will be needed to ensure considerations may be added, subtracted, modified, and/or expanded based on institutional capacity or as priorities shift over time. However, grounding an approach in accessible, public, and shareable tools is indispensable when scoping research on such complex topics.

As a starting point, SCP utilized several datasets and methodologies to determine which communities in its service area are most vulnerable to or impacted by: (1) sources of pollution; (2) socioeconomic issues; (3) challenges of affordability.

¹ Sonoma Clean Power, "Strategic Action Plan - Customer Offers & Incentives." 2025. [Online]. Section 2.2.1 pp. 5-7. Available: <https://sonomacleanpower.org/uploads/documents/Strategic-Action-Plan-12.24.pdf>

The tools used to evaluate and identify communities included:

- Human Development Index (HDI)
- CalEnviroScreen 4.0
- The California Public Utilities Commission's Affordability Ratio/Socioeconomic Vulnerability Index Analysis
- SB 535 Disadvantaged Communities Definitions

When combined, these distinct datasets allowed SCP to include a broader set of key indicators, including life expectancy, income, asthma rates, housing burden, linguistic isolation, and exposure to diesel particulate matter. SCP's "Empower Communities" are the resulting census tracts that were identified by one or more of the methodologies above, which were comparatively scored as highest/lowest.

C. Pros of this method

Maintaining simple and definable criteria provided SCP with tangible quantitative and qualitative baselines within our Empower Communities. Using these data points, SCP has been able to focus its outreach, sponsorship, and education efforts in its Empower Communities over the past two years. Additionally, the quantitative components of our assessment methodology resulted in outputs that align well with the qualitative data SCP had gathered about its service area. Finally, the nature of the output metrics means that any subsequent NEIs and benefits resulting from programs or initiatives may be measured/compared through the metrics and outputs of the above-listed tools.

D. Cons of this method

Deploying a simplified method with clear constraints is useful in establishing actionable priorities. However, narrowing focus also means that the resulting data does not paint the whole picture. One such example may be observed in how census tracts can hide vulnerable pockets of residents due to proximity to wealthier, resourced neighborhoods - this phenomenon is notable in a state like California, which demonstrates high geographic and socioeconomic variability. And while SCP is happy to share lessons learned by Empower, we would like to emphasize that this effort represents a stand-alone assessment that has not been tested in other service areas, and this method has not been standardized.

E. Results To-Date

Empower continues to serve as a key initiative driving internal coordination and prioritization for external engagement efforts. SCP previously employed best practices for community engagement (e.g., meeting groups at locations they are accustomed to) and equity efforts - such as doubling incentives for low-income customers - within the agency. Until Empower, we had not developed a coordinated vision for how our existing and future

offerings would provide benefits to marginalized communities, what success would look like if we achieved it, or which metrics best track our journey. Empower became a means to encapsulate the work SCP was already doing while also serving as a guide helping us create new strategies and allocate our resources appropriately in future efforts.

Empower provided a framework for customer needs and inputs to shape and prioritize our strategic planning efforts. One of the biggest shifts for the agency resulted in how we develop our customer offerings. Our Empower research has enabled our Programs Department to more fully consider the most impacted communities in our service area when conducting needs assessments and measuring potential impacts, prior to designing future customer offerings. Our recent Community Needs Assessments (Residential & Commercial², Transportation³, and Agricultural⁴) prioritized receiving feedback from customers in our Empower Communities.

Empower provides SCP with key outreach, education, engagement and relationship-building strategies necessary to further extend the benefits of our services to our communities. SCP is building relationships with community organizations and service providers in Empower Communities to nurture trust and better distribute information. We updated our community giving guidelines and simplified the process to request support from us; this has greatly improved the scope and quantity of requests we receive. Additionally, many more of these requests are submitted from groups without existing relationships to SCP, thereby offering new opportunities to reach communities where we previously observed limited engagement. Some key outcomes of the initiative in 2024 include 32 SCP-sponsored events within, or representing, Empower Communities, and over 54% of the total dollars spent in SCP's community support program going to efforts that directly aid Empower Communities.

F. Next Steps

Empower has set the stage for SCP to measure the impacts of its services, engagement, and customer offerings, beyond cost-effectiveness or projects deployed. As we continue to develop and deploy new services and offerings, we can incorporate the NEI-like metrics identified through Empower to evaluate impacts of primary concern to the communities we serve.

² Sonoma Clean Power, "Residential & Commercial Community Needs Assessment." 2024. [Online]. Available: <https://sonomacleanpower.org/uploads/documents/2024-SCP-Final-CNA-Report-7.16.2024.pdf>

³ Sonoma Clean Power, "Transportation Needs Assessment - A Qualitative and Quantitative Summary." Apr. 2024. [Online]. Available: <https://sonomacleanpower.org/uploads/documents/EVNoire-Transportation-Needs-Final-Report-web-5-2-24.pdf>

⁴ Sonoma Clean Power, "Agricultural Community Needs Assessment." Dec. 2023. [Online]. Available: <https://sonomacleanpower.org/uploads/documents/Agricultural-Needs-Assessment-Final-Report.pdf>

II. The CEC should work to develop methods that allow for the layering and integration of both quantitative and qualitative metrics.

A clearly defined methodology – or a set of methodologies – for incorporating NEIs into planning and decision-making processes will provide essential guidance for program design, operational approaches, and infrastructure development. Such methodologies should align with the State’s overarching climate, equity, and resilience goals.

Wherever feasible, SCP encourages the Commission to prioritize the use of accessible, publicly available, and shareable tools. These resources help ensure transparency, support replicability across agencies and communities, and promote a common language for validation and communication of results.

It is important to recognize that any selected methods will need to remain flexible and adaptable depending on data availability, the scale of analysis, and the category of outcome under consideration. For instance, assessments related to building-level decarbonization may require different tools and assumptions than those focusing on neighborhood-scale planning. In this regard, SCP recommends borrowing methodological concepts (e.g. functional unit) from life cycle assessment (LCA) practices, including the use of standardized definitions, units, and system boundaries. Establishing effective “functional units” of analysis will be critical in ensuring consistent, “apples-to-apples” comparisons across impact categories.

Additionally, early-stage methodologies should focus on establishing directional relationships between indicators/metrics, rather than attempting to quantify precise values. Acknowledging uncertainty while providing meaningful insights into whether an impact is likely to be beneficial or harmful will strengthen both the analytical rigor and the practical utility of these methods.

III. Maintain a broad and inclusive definition of “resilience” to capture critical interdependencies across energy systems and communities.

SCP encourages the CEC to adopt a comprehensive lens when considering resilience. This is critical to ensuring that multifaceted, intersectional issues encompassing interconnected systems – such as water, wildfire mitigation, air quality, workforce development, and local economic stability – are weighted as key considerations of communities. These factors are integral to understanding how communities experience energy-related disruptions and recover from them. The ultimate aim of resilience planning should be to minimize harm and maximize the speed and equity of recovery. SCP sees the role of agencies and energy providers as two-fold: (1) to help communities move swiftly from harm to healing, and (2) to build systems that minimize harm in the first place.

IV. Include affordability metrics that move beyond “cost-effectiveness” frameworks.

Affordability must remain a central tenet of any resilience or NEI-focused assessment. Energy-related costs have disproportionate impacts on a household’s ability to thrive. As key actors in the energy sector, public entities should pay particular attention to how changes to energy systems directly impact affordability. ***But affordability should not be inherently linked with the “cost-effectiveness” paradigms frequently used when designing equity programs.***

Too often, cost-effectiveness is framed in ways that can inadvertently work against equity or slow investment in underserved communities. Historic patterns of underinvestment in many communities have created significant barriers to resource distribution that continue to operate today. Programs or services that pair success with the lowest possible cost of implementation risk ignoring these barriers and placing the burden of ineligibility on the individual, rather than the implementer.

Cost-effectiveness frequently favors shorter-term “per dollar” returns in lieu of the long-term transformative changes that frequently require higher upfront investment in regions that may not be as accessible, trusting, ready to engage or participate, or face economic barriers to offset the costs of participation with their own resources. Meaningful systemic change - including widespread electrification and improved energy efficiency for all - requires transformative investments that reduce socioeconomic barriers to participation.

SCP urges the CEC to scope-in thoughtful alternatives to frameworks that prioritize cost-effectiveness at the expense of equitable access and investment. SCP encourages consideration of metrics focused on cost burden, accessibility, and just distribution, which may better reflect the long-term, community-wide value of programs and infrastructure.