

## DOCKETED

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**APEN and Greenlining Comments\_2016 IEPR**

*Additional submitted attachment is included below.*

**Comments of the Asian Pacific Environmental Network and Greenlining Institute  
on the California Energy Commission  
2016 Integrated Energy Policy Report Update**

**General Comments**

The Greenlining Institute (Greenlining) and the Asian Pacific Environmental Network (APEN) welcome the opportunity to provide comment on the California Energy Commission 2016 Integrated Energy Policy Report Update (2016 IEPR). We commend Energy Commission staff for the time, effort, and expertise that went into such a robust and detailed policy document.

Generally, we see the 2016 IEPR process as an opportunity for the state to flesh out detailed and specific equity and environmental justice weaknesses and opportunities, and use recommendations developed through the 350 Barriers Study process and other policy discussions to address these issues. In fact, SB 350 requires the IEPR to look into how we can maximize clean energy benefits within disadvantaged communities.

**Research Plan and Portfolio**

We would like to highlight the specific recommendation that the state to develop, in consultation with key stakeholders, an environmental equity and environmental justice research plan and portfolio that scopes out research, development, and deployment projects and priorities that focus on equity and environmental justice considerations and bringing climate and sustainability benefits to low-income and disadvantaged communities. Ultimately, APEN and Greenlining want to promote advanced energy solutions that create economic and health benefits for disadvantaged communities. The following are some of the guiding principles for the Energy Commission to consider when developing an environmental equity and justice research plan and portfolio.

**1. No Increase in Harm and Targeted Pollution Reduction**

RD&D shall not increase harm in disadvantaged communities (in terms of pollution, health, affordability of goods and services). Furthermore, RD&D should aim to target pollution reduction benefits to disadvantaged communities. RD&D teams should consider how a climate or clean energy solution may adversely impact disadvantaged and low-income communities and should proactively plan for unintended consequences through adaptive management and mitigation strategies.

**2. Advanced Energy Solutions that are Useful, Accessible and Beneficial to Disadvantaged Communities.**

A key equity priority is to increase access to green technologies and resilient infrastructure within low-income and disadvantaged communities. RD&D should promote and enable clean energy innovations and strategies that can be made useful, accessible and beneficial to disadvantaged communities, ideally providing both health benefits and economic opportunities in those communities. Examples of “economic opportunities” include: (1) lower energy costs, (2) job opportunities, particularly for underrepresented groups and workers with barriers to entry, (3) targeted access to technology, (4) contracts with small and diverse-owned businesses, and (5) anti-displacement strategies.

### **3. Respond to Community Needs**

There should be a body of clean energy and climate RD&D that is specifically designed to resolve critical issues present in low-income or disadvantaged communities. Examples of high-demand issues that need to be addressed in underserved communities include: (1) providing access to clean energy technology in multi-family dwellings, (2) modifying rebate and incentive programs so they better serve vulnerable communities, (3) increasing low-cost energy efficiency programs in low-income communities, (4) addressing how to prepare households for extreme weather events (e.g. heat exposure and flooding), (5) reducing GHG emissions from facilities located in disadvantaged communities, and (6) enabling community-owned and operated clean energy projects.

Identifying the clean energy sector demands in underserved communities can result in a better understanding of the potential for economic opportunities in this industry. For example, the development of free or low-cost financing programs for energy efficient or renewable energy products for underserved communities is an advanced energy solution in high demand. Such programs can result in lower energy costs, a market demand for green products and services, and more jobs in the clean energy sector.

The Energy Commission and California Air Resources Board SB 350 Barriers and Opportunities Studies will have a more complete analysis of critical issues in low-income and disadvantaged communities.

### **4. Social Inclusion**

Meaningful community engagement is critical to ensuring that RD&D will effectively benefit disadvantaged communities. Residents living in disadvantaged and underrepresented communities should feel valued and included in the RD&D of technologies and strategies that will impact them. The experiences and needs of residents should be at the center of an equity research agenda, both to define the problems that need solving and to develop actionable solutions that work for the residents and their day to day lives.

### **SB 350 Comments**

These comments also incorporate by reference comments previously submitted as part of the SB 350 Barriers study into this IEPR proceeding. Although a different mandate, those comments outline equity and environmental justice priorities that apply in the context of the 2016 IEPR. Please find references below.

“APEN and CEJA’s Comments,” October 28, 2016,  
[http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN214241\\_20161028T160402\\_APEN\\_and\\_CEJA's\\_comments\\_Comments\\_APEN\\_and\\_CEJA's\\_Comments.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN214241_20161028T160402_APEN_and_CEJA's_comments_Comments_APEN_and_CEJA's_Comments.pdf)

“APEN and CEJA Comment Letter on SB 350 Draft,” September 29, 2016,  
[http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN213837\\_20160929T135018\\_Amee\\_Raval\\_Comments\\_APEN\\_and\\_CEJA\\_Comment\\_Letter\\_on\\_SB\\_350\\_Draft.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN213837_20160929T135018_Amee_Raval_Comments_APEN_and_CEJA_Comment_Letter_on_SB_350_Draft.pdf)

“Comments of the Green EEFA Coalition,” October 28, 2016,  
[http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN214254\\_20161028T165338\\_Stephanie\\_Wang\\_Comments\\_Comments\\_of\\_the\\_GREENEEFA\\_Coalition.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN214254_20161028T165338_Stephanie_Wang_Comments_Comments_of_the_GREENEEFA_Coalition.pdf)

“Comments of the GREEN-Energy Efficiency for All Coalition, including NRDC, CHPC, AEA, Greenlining Institute, and Build It Green,” [http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN213843\\_20160929T152126\\_Maria\\_Stamas\\_Comments\\_Comments\\_of\\_the\\_GREENEnergy\\_Efficiency\\_fo.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN213843_20160929T152126_Maria_Stamas_Comments_Comments_of_the_GREENEnergy_Efficiency_fo.pdf)

“Greenlining Institute Comments on CEC SB 350 Barriers Study Recommendations,” October 28, 2016,  
[http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN214246\\_20161028T162254\\_Stephanie\\_Chen\\_Comments\\_Greenlining\\_Institute\\_Comments\\_on\\_CEC\\_S.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN214246_20161028T162254_Stephanie_Chen_Comments_Greenlining_Institute_Comments_on_CEC_S.pdf)

“Greenlining Institute Comments - SB 350 Barriers Study,” September 29, 2016,  
[http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN213839\\_20160929T143312\\_Sekita\\_Grant\\_Comments\\_Greenlining\\_Institute\\_Comments\\_SB\\_350\\_Ba.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN213839_20160929T143312_Sekita_Grant_Comments_Greenlining_Institute_Comments_SB_350_Ba.pdf)

“Stephanie Wang Comments: Report on June 20, 2016 Stakeholder Solutions Meeting,” July 18, 2016,  
[http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN212329\\_20160718T093015\\_Stephanie\\_Wang\\_Comments\\_Report\\_on\\_June\\_20\\_2016\\_Stakeholder\\_Solu.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN212329_20160718T093015_Stephanie_Wang_Comments_Report_on_June_20_2016_Stakeholder_Solu.pdf)

APEN and Greenlining appreciate this opportunity to comment and look forward to engaging further on this IEPR process.

Respectfully submitted,

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