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Southern California Public Power Authority Comments on August 1 SB 350 Barriers Report Implementation Workshop

Additional submitted attachment is included below.



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California Energy Commission
Dockets Office, MS-4
Re: Docket No. 17-IEPR-08
1516 Ninth Street
Sacramento, CA 95814-5512

Re: SCPPA Comments on the August 1 Low-Income Barriers Study Implementation Workshop

Thank you for the opportunity to provide comments on the August 1 Low-Income Barriers Study Implementation Workshop. The Southern California Public Power Authority (SCPPA) and its Members have actively followed this proceeding and are very interested in continuing to learn about the range of efforts around the state to support low-income customers and disadvantaged communities.

SCPPA is a joint powers agency whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Our Members collectively serve nearly five million people throughout Southern California. Each Member owns and operates a publicly-owned electric utility governed by a board of local officials who are directly accountable to their constituents. Furthermore, each SCPPA Member has a duty to provide reliable power to their customers - many of whom reside in disadvantaged communities - at affordable rates, while also complying with all applicable local, regional, state, and federal environmental and energy regulations.

As the Commission and stakeholders move forward with implementation of the SB 350 Low-Income Barriers Report, SCPPA looks forward to monitoring the process and working with our Members to highlight the variety of program offerings and solutions they implement to support low-income customers or those in disadvantaged communities. Our Members have cited the information-sharing aspect of SCPPA membership as a key benefit. Via SCPPA, Members exchange information about their successful experiences or challenges with designing and implementing different programs. The utilities can learn from one another, ultimately improving their ability to offer effective programs to their customers while also keeping costs down. SCPPA Members are continually evaluating whether to implement new programs for their customers and seeking public input on the potential for such activity. Many of our Members will also be submitting integrated resource plans (“IRPs”) to the Commission that will discuss their utilities’ efforts to support disadvantaged communities. The IRP development process includes several opportunities for public engagement from the local community; IRPs are designed to reflect the unique nature of a POU’s customer-owners.

We urge the Commission to keep in mind that POU’s need flexibility to design programs and policies that best serve their communities’ needs, which differ across the board.

SCPPA and other POU representatives have consistently asserted that a “one-size-fits-all” approach to policymaking does not necessarily support successful implementation. It is imperative to recognize the significant differences between the investor owned utilities (“IOUs”) and the POU’s, as well as the substantial diversity among the POU’s. Most of California’s POU’s have loads and customer bases that are significantly smaller than those of the three large electric IOUs. This means

that POU's can more easily tailor their programs to the specific needs of their customers. It also means that a program that may be effective in an IOU's service area might not be viable in an individual POU's service area.

Similarly, a program that effectively meets the needs of one POU's customers may be ill-suited to a different POU. This could be due to climate, customer preference, economics, or a host of other factors. Maintaining local flexibility and discretion over the development of such programs improves the POU's ability to adapt to changes in technologies and/or the market. Conversely, broad statewide policy mandates may lack the flexibility that allows POU's to prioritize the types of programs best suited to their customers. As such, providing funding to support statewide programs may actually reduce the amount of funding that could be used for more efficient and valued programs.

Furthermore, discussions related to utility programs for disadvantaged communities often rely upon the Office of Environmental Health Hazard Assessment's CalEnviroScreen 3.0 tool as a screening factor to determine target audiences. While this tool is appropriate for some purposes, the Commission should not limit its SB 350 implementation efforts to only those communities qualifying as "disadvantaged" under CalEnviroScreen.

Many of SCPPA's Members serve disadvantaged communities – only some of which actually fall under what is defined as disadvantaged through the data in the CalEnviroScreen tool and the weighting of that data. POU's should be granted flexibility to define disadvantaged communities in a way that reflects their specific customer bases. Regardless of whether a given community qualifies as disadvantaged under CalEnviroScreen 3.0, our Member utilities continually strive to improve their programs and reduce emissions for the benefit of all of their customers. This may be achieved via other programs, particularly those for low-income customers. **We specifically recommend that any report or effort to track progress in implementing recommendations from the SB 350 Barriers Report should consider activities that support low-income customers or customers in disadvantaged communities, as individual utilities define each of those customer segments within their service areas.** The Commission should not limit its evaluation to only those activities occurring in support of CalEnviroScreen-identified disadvantaged communities.

Thank you for your consideration of these comments. SCPPA and our Members look forward to continued discussions with Commission staff to continue advancing our state's energy and climate goals in an affordable manner for California ratepayers. SCPPA and its Members welcome future discussions with Commission staff on progress in developing and implementing solutions that support our Members' low-income customers and disadvantaged communities.

Respectfully submitted,



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