

DOCKETED

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**Comments of Rising Sun Energy Center on the California Public Utilities
Commission/California Energy Commission Joint Staff Draft Proposal Senate Bill
350 Disadvantaged Communities Advisory Group Structure and Framework**

Additional submitted attachment is included below.



RISING SUN ENERGY CENTER

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California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Via e-Comment

Re: Docket No. 16-01R-06-Comments of Rising Sun Energy Center on the California Public Utilities Commission/California Energy Commission Joint Staff Draft Proposal Senate Bill 350 Disadvantaged Communities Advisory Group Structure and Framework

Rising Sun Energy Center respectfully submits these comments in response to the California Public Utilities Commission (CPUC)/California Energy Commission (CEC) Joint Staff Draft Proposal Senate Bill (SB) 350 Disadvantaged Communities Advisory Group Structure and Framework. Rising Sun is a nonprofit workforce development organization that provides green job training and employment opportunities to youth and low-income adults.

Rising Sun Energy Center would like to address the questions for comment provided in the draft proposal.

- 1. In what ways should the Straw Proposal be modified to better align with the mandates of SB 350, including PU Code 400, PU Code 454.52(a)(1), PU Code 740.8, and PU Code 740.12(a)(1) and other mandates related to disadvantaged communities?**

Rising Sun Energy Center recommends expanding “benefits” under the first guiding principle listed in *Disadvantaged Communities Advisory Group Guiding Principles* to include “societal, economic, and environmental benefits” to ensure that the Advisory Group is creating holistic solutions.

Rising Sun Energy Center echoes Greenlining Institute’s written comment on SB 350 Disadvantaged Communities Advisory Group Draft Proposal that members of the Advisory Group should not be precluded from providing advice on programs in which they have a financial interest, instead a disclosure of the financial interest should be provided publicly. This recommendation would ensure that the invaluable insights of

program implementers can be leveraged to enhance the effectiveness of the Advisory Group.

Rising Sun Energy Center supports Natural Resources Defense Council's suggestion *G) Ensure compensation for participation* presented in the organization's comments on SB 350 Disadvantaged Communities Advisory Group Draft Proposal. Compensation for Advisory Group members ensures that all interested individuals or organizations can participate.

- 2. Are there other ways in which the Disadvantaged Communities Advisory Group can provide advice to CPUC and CEC (e.g., informal written comments to the CPUC and CEC, providing reports to the CPUC and CEC, etc.)?**

Rising Sun Energy Center recommends that CPUC and CEC maximize effective communication with the Advisory Group. Agency management and staff should be allowed to seek guidance and policy recommendations from the Advisory Group in a manner that is deemed most time-effective by the Advisory Group members. Alternatively, the Advisory Group should be allowed to provide policy recommendations to CPUC and CEC in a manner that is deemed most time-effective by agency executive management.

- 3. Are there specific programs and policy areas related to SB 350 which the Disadvantaged Communities Advisory Group should focus on? If so, please name.**

Rising Sun Energy Center recommends that one of the foci for the Advisory Group be access to quality, career-ladder, green jobs at family-sustaining wages with benefits for low-income and under-employed adults. The Advisory Group should provide recommendations to increase the quantity of quality green jobs available for, and accessible to, low-income and disadvantaged communities and to incentivize green industries to employ local and targeted hiring practices.

- 4. In light of Disadvantaged Communities Advisory Group's responsibility to review SB 350 programs, are there additional areas of knowledge or expertise that should be sought in candidates beyond those described on page three?**

Rising Sun Energy Center recommends that there should be at least one member of the Advisory Group that has expertise in clean energy workforce development for disadvantaged communities in California. This recommendation supports the implementation of Principal Recommendation 3 detailed in CEC's *Low-Income Barriers*

5. **The Advisory Group may review technical information regarding proceedings and programs related to integrated resource planning, transportation electrification, and other clean energy technologies. Should prospective members be recruited who have an interest or background/experience in one or more of the following subject areas? Explain your response.**
- a. **Clean energy technologies, such as distributed generation, energy efficiency, renewables, etc.**
 - b. **Transportation electrification;**
 - c. **Electric or Natural Gas resource planning;**
 - d. **Local economics (including job and training potential) with respect to clean energy development;**
 - e. **Air quality and related health impacts; or**
 - f. **Greenhouse gas and/or air pollutant controls from a technical or policy perspective.**

Please refer to suggestion provided for Question 4.

6. **Are there any other subject area backgrounds that the Commissions should seek out in prospective applicants?**

Please refer to suggestion provided for Question 4.

7. **Should the Advisory Group charter assign specific roles to the eleven member positions based on policy, issue or geographic areas, such as “air quality/health impacts designee” or “transportation electrification designee”?**

Rising Sun Energy Center recommends that the Advisory Group is composed of a membership with diverse expertise and community representation, which is not wholly dependent on the specification of roles.

8. **Should any leadership positions be designated in the Group’s charter, other than Chair, and Secretary? Should the officers’ roles be assigned to particular specialties or represented particular communities, rather than be open to any interested members? Are there additional responsibilities desired for each position?**

No comment.

9. **If the CPUC and CEC cannot find willing candidates with the desired qualifications, how should they proceed to establish the Advisory Group?**

No comment.

10. How can the work of the Disadvantaged Communities Advisory Group and the Low Income Oversight Board (LIOB) be best coordinated?

No comment.

11. How can the work of the Disadvantaged Communities Advisory Group and the Air Resources Board's Environmental Justice Advisory Committee be best coordinated?

No comment.

Rising Sun Energy Center appreciates the CPUC and CEC for its commitment to this topic and for the opportunity to comment and engage in this process.

Sincerely,

Jodi Pincus
Executive Director
Rising Sun Energy Center

About Rising Sun Energy Center

Rising Sun is a nonprofit workforce development organization operating since 1994 that provides green job training and employment opportunities to youth and low-income adults, and that offers free residential energy efficiency and water conservation assessments, installations, and education to renters and homeowners in six Bay Area and Central Valley counties. Rising Sun runs two primary programs: California Youth Energy Services (CYES), which employs local youth to provide Green House Calls in their communities, and Green Energy Training Services (GETS), a pre-apprenticeship training, case management, and job placement program that prepares low-income adults who experience barriers to employment for careers in construction, energy efficiency, solar, and the building trades.