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SCE Comments on Joint Staff Draft Proposal

Additional submitted attachment is included below.

August 15, 2017

California Energy Commission
Docket Office, MS-4
Re: Docket No. 16-OIR-06
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I. Introduction

On August 1st, 2017, the California Energy Commission (“CEC”) and California Public Utilities Commission (“CPUC”) released the California Public Utilities Commission/California Energy Commission Joint Staff Draft Proposal: Senate Bill 350 Disadvantaged Communities Advisory Group Structure and Framework (“Joint Staff Draft Proposal”).

SCE commends the CEC and CPUC for advancing the discussion of the Disadvantaged Communities Advisory Group (“DACAG”). SCE believes that direct engagement with disadvantaged communities and their representatives is an important stage in developing useful and effective programs and policies in disadvantaged communities. In that spirit, SCE has partnered with The Greenlining Institute to begin collaborative conversations around clean energy access, air quality and climate change issues in Southern California.

The DACAG will provide an important and valuable forum for discussion of the programs and policies proposed under SB 350. SCE looks forward to the opportunity to engaging with the CEC and CPUC as they develop a charter for the DACAG, and with the DACAG itself after it is up and running.

Finally, SCE acknowledges and appreciates the continued cross-agency collaboration on disadvantaged community related-efforts. Coordination during the formation of the DACAG, as well as forums like the Joint Agency Workshops on SB 350 Barriers Study Implementation, help ensure consistency between the various activities that impact disadvantaged communities and also provide opportunities for coordination and information-sharing.

Southern California Edison (“SCE”) appreciates the opportunity to provide comments to the draft. SCE’s comments are organized in accordance with the eleven “Questions for Comment” identified in the Joint Staff Draft Proposal.

II. Responses to Questions for Comment from Joint Staff 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?

These questions will be explored during the development of the charter for the DACAG. Furthermore, once the DACAG is up and running, this topic should be revisited, as the group may determine that there are additional and/or more efficient ways to share its feedback.

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.)?

SCE agrees that the DACAG should produce written reports that summarize its meetings and recommendations. However, under the Joint Staff Draft proposal, the DACAG is required to produce one annual report. The DACAG should consider producing reports after each meeting, especially as those meetings provide time-sensitive recommendations.

For the same reasons listed above, the group may wish to revisit this question once the DACAG is up and running.

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.

SCE expects that the focus of the DACAG will shift over time. For example, factors that may influence the DACAG's focus include the priorities of the DACAG members and the communities they represent, or the policy topics under consideration by the CPUC and CEC.

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?

We support the CEC and CPUC's efforts to recruit candidates with strong knowledge of their community's energy-related issues.

For the same reasons listed above, the group may wish to revisit this question once the DACAG is up and running.

- 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.**

Candidates should be interested in the areas listed above (clean energy technology, transportation electrification, resource planning, local jobs, air quality, and greenhouse gas policy), as they represent core elements of the policies and programs that will be developed pursuant to Senate Bill 350. For that reason, prior expertise or experience in those fields may be valuable.

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

The background and interests listed in Question 5 should be sufficient. However, the CEC, CPUC, and DACAG may wish to revisit this question during the development of the DACAG charter, or once the DACAG has met several times.

- 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”?**

For the same reasons outlined in Question 6, we do not suggest assigning specific roles at this time, but note that the group may want to revisit the topic at a later date.

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?

The CEC and CPUC should consider providing a member of their staff as facilitator and coordinator for the DACAG. The facilitator would support the group through meeting facilitation, as well as serving as a liaison between the DACAG and agency staff.

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

SCE anticipates that the CPUC and CEC will be able to find candidates with the desired qualifications. At this time, SCE does not have any comments on contingency plans.

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

Questions 10 and 11 and answered jointly below.

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

The LIOB, EJAC, and the Advisory Group should coordinate to avoid overlap and create consistency where appropriate. For example, the DAC Advisory Group could include one or more members of the LIOB and EJAC to better understand and define areas of responsibility and promote consistency. The LIOB, EJAC and the Advisory Group can identify where resources and activities can be shared or co-sponsored.

III. Conclusion

SCE appreciates the CEC's and CPUC's consideration of these comments. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

Catherine Hackney