

DOCKETED

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GRID Alternatives Support and Recommended Changes to EPIC Scoring Criteria

Additional submitted attachment is included below.

February 15, 2019

California Energy Commission
Docket Office
1516 Ninth St.
Sacramento, CA 95814

VIA DOCKET
Energy Commission Docket 19-ERDD-01

Re: 19-ERDD-01 EPIC GFO Criteria Additions

Dear Commissioners:

GRID Alternatives (GRID) submits the following comments regarding the Proposed Evaluation Criteria for Benefits and Impacts to Low Income and Disadvantaged Communities in Electric Program Investment Charge (EPIC) Grant Funding.

GRID strongly supports the addition of “Benefits to Low-Income/ Disadvantaged Communities and Localized Health Impacts” (Criteria 8) into the standard scoring criteria of the EPIC program. Assembly Bill (AB) 523 provides historically underserved communities equitable access to EPIC funding, and the CEC’s proposed Criteria 8 will ensure that these communities will receive direct, meaningful benefits from EPIC grant projects. GRID is encouraged to see the new criteria focus on creating positive economic and health impacts to low-income and disadvantaged communities. GRID has also incorporated additional recommended text. Please see the redline text in the evaluation criteria section (page 4 & 5) which indicates the additions contributed by GRID.

GRID is the nation’s largest non-profit solar installer and works to bring the benefits of clean energy technologies and job training opportunities to low-income customers and disadvantaged communities. GRID serves as the statewide program administrator for the California Solar Initiative’s Single-family Affordable Solar Homes (SASH) program, since 2008, and the Department of Community Services and Development’s Low-income Weatherization Program (LIWP), since 2014. GRID also serves on a team of mission-driven nonprofit organizations selected as the statewide program administrator for the Solar on Multifamily Affordable Housing (SOMAH) program, which will commence in 2019.

GRID Recommends using the Disadvantaged Communities Advisory Group Definition to Define Disadvantaged Communities

The Clean Energy and Pollution Reduction Act of 2015 - Senate Bill (SB) 350 (De León, 2015) directed the CEC to study the barriers that exist for low-income and disadvantaged

communities from participating and benefitting from California’s transition to a low-carbon economy. SB 350 also directed the California Public Utilities Commission (CPUC) and the CEC to jointly develop a Disadvantaged Communities Advisory Group (DACAG) to provide guidance on emerging programs designed to benefit and serve disadvantaged communities. GRID recommends the CEC adopt the following definition for disadvantaged communities, sourced from the DACAG Equity Framework:¹

- CalEnviroScreen, as defined by Cal EPA,
- Tribal Lands,
- Census tracts with area median household income/state median income, less than 80%, and
- Households with median household income less than 80% of Area Median Income (AMI)

In addition, GRID encourages the CEC to apply the CalEnviroScreen designation of disadvantaged communities to the top 25% of CalEnviroScreen census tracts either statewide or within each utility’s territory, whichever is broader. This designation of disadvantaged communities, adopted in two Public Utility Commission Electric Vehicle Proceedings,² will encourage participation from geographically diverse communities statewide.

The definition of low-income customers for the purposes of EPIC grant funding should be the last two bullet points above, aligning with leading low-income clean energy programs statewide. Furthermore, GRID has incorporated elements of the DACAG’s Equity Framework into the suggested new criteria, section 8.1 - “Benefits to Low-income/Disadvantaged Communities and Localized Health Impacts.”

Health and Safety Lens

Health and Safety is the DACAG’s first Equity Framework element; the section outlines how “[e]nergy policies and programs should be observed through the lens of public health to identify impacts and utilize findings to optimize the health and well-being of California’s most vulnerable communities.”³ The public health lens is paramount when scoring EPIC Grant Funding Opportunity (GFO) project applications because low-income and disadvantaged communities will be more severely impacted by climate change than non-low-income and under-resourced communities.⁴

In addition to the important and constructive language additions currently outlined in Criteria 8, GRID recommends the addition of distinct sub-sections. For example, GRID is specifically requesting the addition of Section 8.2(d) under Section 8.2 - the “Localized Health Impacts” section, to ensure that potential projects are designed to build community resilience,

¹ Disadvantaged Communities Advisory Group Equity Framework, [http://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/DAC%20AG%20Equity%20Framework%20\(Revised\).pdf](http://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/DAC%20AG%20Equity%20Framework%20(Revised).pdf)

² D.16-01-045, January 28, 2016, p.138; D.16-01-023, January 14, 2016, p.40

³ Disadvantaged Communities Advisory Group Equity Framework, [http://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/DAC%20AG%20Equity%20Framework%20\(Revised\).pdf](http://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/DAC%20AG%20Equity%20Framework%20(Revised).pdf)

⁴ Morello-Frosch, Rachel, Manuel Pastor, Jim Sadd, and Seth B. Shonkoff. May 2009. The Climate Gap: Inequalities in How Climate Change Hurts Americans and How to Close the Gap. Program for Environmental and Regional Equity (PERE) Publications. University of Southern California. <https://dornsife.usc.edu/perc/climategap/>

mitigate climate related illnesses, injury and deaths, and reduce climate related health care costs. The public health lens provides immediate and holistic benefits to low-income and disadvantaged communities by helping to reduce the needed output from local fossil fuel generation and thus reducing harmful criteria air pollutants which has a causal effect on increased asthma and other health related hospital visits.⁵ A reduction in hospital visits translates to a reduction in healthcare costs and a reduction in missed work days. Low-income and disadvantaged community members also benefit from increased safety and comfort when local clean energy projects contribute to a reduction in criteria air pollutants. This chain of events, starting with incorporating a public health perspective into the scoring criteria for clean energy project proposals, directly impacts personal financial stability and local economic prosperity and should be acknowledged in the structural design of GFO scoring criterion for EPIC grants.

Community Engagement

To help ensure a proposed project is best suited for a specific low-income and/or disadvantaged community, ongoing community input is critically important. GRID suggests adding text to section 8.3, requiring the applicant to identify how education and outreach materials will be disseminated in a culturally sensitive and language appropriate manner. Moreover, GRID suggests the applicant clearly identify how community input was solicited, in addition to only being considered, in the design of the project, and will be solicited throughout the life of the project.

Equity Applicants Section Suggested for Addition to Evaluation Criteria

GRID also recommends that both the CPUC and CEC encourage diversity of the entities funded by EPIC GFO solicitations. Mission-driven Community Based Organizations (CBOs) with direct on-the-ground experience working with low-income and disadvantaged communities are well suited to provide beneficial clean energy projects that the communities request and need. Considering this, GRID recommends adding a new criterion, section 8.5, to help level the playing field for organizations that have previously faced barriers to EPIC solicitations to meaningfully participate: Equity Applicants. Removing these barriers will likely yield projects that maximize benefits to low-income and disadvantaged communities, as local non-profits and CBOs that live and work in these communities tend to be well informed about how to design clean energy projects that will bring the most benefit to their local communities. Enabling pathways for Equity Applicants to lead and win EPIC GFO funding will increase the diversity of projects funded and will naturally result in more community engagement with projects and community trust of project developers. The CEC should adopt evaluation criteria 8.5 and allow for Equity Applicants to earn additional points in the overall grant evaluation.

Please do not hesitate to contact us should you require any additional information or have any questions regarding these comments. We look forward to continue working with the Commission to ensure the adequate and equitable implementation of EPIC grants in low-income and disadvantaged communities.

⁵ California Air Resources Board, Asthma and Air Pollution, <https://ww2.arb.ca.gov/index.php/resources/asthma-and-air-pollution>

Sincerely,

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Proposed Evaluation Criteria for Benefits and Impacts to Low Income and Disadvantaged Communities in EPIC Grant Funding

Red text indicates the proposed scoring criteria additions from GRID Alternatives

8. Benefits to Low-income/Disadvantaged Communities and Localized Health Impacts

8.1 Benefit to Low-Income/Disadvantaged Communities

- a. Identifies the energy and economic needs of the community based on project location, what steps the applicant has taken to identify those needs, and how the community input was **solicited and** considered in the design of the project
- b. Identifies how the project will increase access to clean energy or sustainability technologies for the local community.
- c. Identifies how the proposed project will improve opportunities for economic impact including customer bill savings, **customer energy burden reduction**, job creation, partnering and contracting with micro-, local, **women-owned and/or minority-owned**, and small-businesses, economic development, and expanding community investment.

8.2 Localized Health Impacts

- a. Summarizes the net potential localized health, **safety, and comfort** benefits and impacts of the proposed project and provides reasonable analysis and assumptions.
- b. Identifies how the proposed project will reduce or not otherwise impact the community's exposure to pollutants and the adverse environmental conditions caused by pollution. If projects have no impacts in this criterion, provide justification for why impacts are neutral.

c. Identifies health-related Energy Equity indicators and/or health-related factors in CalEnviroScreen that most impact the community and describes how the project will reduce or not otherwise impact the indicators or factors. If projects have no impacts in this criterion, provide justification for why impacts are neutral.

d. Identifies how the proposed project builds resiliency, mitigates climate related illnesses, injury and deaths, and reduces climate related healthcare costs.

8.3 Identifies how the project, if successful, will lead to increased deployment of the technology or strategy in other disadvantaged or low-income communities.

a. Identifies how the applicant will disseminate appropriate language- and culturally-appropriate education materials and career information.

b. Identifies how the applicant will solicit community feedback and engagement throughout the life of the project.

8.4 Includes letters of support from technology partners, community-based organizations, environmental justice organizations, or other partners that demonstrate equity, feasibility, and commercial viability in low-income and disadvantaged communities

8.5 Equity Applicants, meeting all the below criteria, will earn up to 10 additional points:

a. Have less than 1000 permanent full-time staff members.

b. Have official mission and vision statements that expressly identifies serving disadvantaged and/or low-income communities.

c. Currently employs a full-time staff member(s) who specializes in and is dedicated to - diversity, or equity, or inclusion, or is a 501(c)3 non-profit.

d. Has deployed projects and/or outreach efforts within the bounds of the disadvantaged or low-income community considered in this EPIC application.