

**DOCKETED**

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*Comment Received From: Leslie Martinez*  
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**Comments on Proposed Evaluation Criteria - EPIC Grant Funding**

*Additional submitted attachment is included below.*

February 19, 2019

California Energy Commission  
Docket Office  
1516 Ninth Street  
Sacramento, California 95814

Re: 19-ERDD-01 EPIC GFO Criteria Additions to the EPIC Solicitation Manual

Dear Commission:

Leadership Counsel for Justice and Accountability (LCJA) respectfully submit the following comments for the proposed Evaluation Criteria for Benefits and Impacts to Low-Income and Disadvantaged Communities in Electric Program Investment Change Grant Funding Opportunities. While we understand that we are submitting comments after the official comment deadline, we hope that you will take our feedback into account given our extensive engagement in partnership with disadvantaged communities and our involvement in developing the disadvantaged community set-aside pursuant to AB 523.

Based in the San Joaquin and Eastern Coachella Valleys, we work alongside the most impacted communities to advocate for sound policy and eradicate injustice to secure equal access to opportunity regardless of wealth, race, income, and place. As our mission relates to energy-related investments and EPIC, in particular, we focus on ensuring that lower income communities receive the benefits of state-wide investments and innovations and protecting the same communities from bearing the negative health and environmental impacts of energy production and distribution.

We appreciate that the EPIC Solicitation Manual will include new categories and criteria related to benefiting disadvantaged communities and preventing net negative impacts but ask that the CEC strengthens the scoring metrics and includes enforceable performance measures to ensure conformity with the goals of the program and these new scoring criteria and categories. Accordingly, we suggest the following edits:

In the category: Benefits to Low-Income/Disadvantaged Communities

Edit, (b) and (c) to ensure that the project will have a significant and direct impact in the disadvantaged/low-income community/communities:

b) Identifies how the project will have a significant and direct benefit to the disadvantaged or low income community by increasing access to clean energy or sustainability technologies for the local community.

c) Identifies how the proposed project will have a significant and direct benefit to the disadvantaged or low income community by improving opportunities for economic impact including customer bill savings, job creation, partnering and contracting with micro-, local, and small businesses, economic development, and expanding community investment.

Add the following three criteria:

d) Identifies how the impacted community will be engaged in project implementation

e) Demonstrates that the project's primary beneficiaries are residents of the identified disadvantaged/low-income community(ies)

f) Includes evaluation and performance measures that the CEC can use to ensure delivery of proposed benefits over time.

#### In the Category: Localized Health Impacts

Edit (a) to ensure that health benefits and impacts are verifiable and that the identified benefits and impacts account for the foreseeable build-out and operations of a project, including any relevant increases in trucking of materials in and out of a community, increased waste in a community, or other foreseeable impacts:

(a) Summarizes the net potential localized health benefits and impacts of the proposed project and provides verifiable analysis and assumptions. The analysis must consider foreseeable build-out and operations of a project, including any relevant increases in trucking of materials in and out of a community, increased waste in a community, or other foreseeable impacts.

Add the following criteria:

d) Includes evaluation and performance measures that the CEC can use to ensure short and long term delivery of identified health and environmental benefits and prevention of negative environmental and health outcomes.

Furthermore, we recommend that the CEC prioritize funding of EPIC projects that provide significant and direct benefits to disadvantaged communities that demonstrate the highest energy disparities have faced historic neglect in the areas of environmental protection, clean energy investments, and equitable, economic development.

Leadership Counsel for Justice and Accountability looks forward to working with CEC on EPIC and other projects to ensure equitable access for all communities in the state. Please call me at 559-369-2790 or email me at [lmartinez@leadershipcounsel.org](mailto:lmartinez@leadershipcounsel.org) if you have any questions or would like to discuss our comments.

Respectfully,

Leslie Martinez