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SCE Comments on IEPR Workshop on Advancing Energy Equity

Additional submitted attachment is included below.



Catherine Hackney
Director, Regulatory Affairs

August 13, 2019

California Energy Commission
Docket Office, MS-4
Re: Docket No. 19-IEPR-05
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission
Docket No. 19-IEPR-05: IEPR Workshop on Advancing Energy Equity

Dear Commissioners:

On July 30, 2019, the California Energy Commission (CEC), the California Public Utilities Commission (CPUC) and the California Air Resources Board (ARB) jointly conducted the *IEPR Joint Agency Workshop on Advancing Energy Equity* (Workshop) as part of the CEC's 2019 Integrated Energy Policy Report (IEPR) Proceeding. State agency representatives reported on the implementation status of recommendations in the Low-Income Barriers Studies, followed by panel discussions of additional actions and strategies that state agencies could pursue to advance energy equity.

Southern California Edison (SCE) appreciates the Commission holding a dedicated workshop on advancing energy equity. This reflects its importance for California energy policy – a fact that was also evidenced by the active participation of several state agency leaders at the Workshop.

SCE consistently pursues equitable distribution of benefits from its operations among its customers. SCE is committed to increasing benefits in underserved areas by proactively expanding access to clean energy and resiliency resources and services in environmental and social justice (ESJ) communities. Our efforts are well-aligned with the CPUC's recently published Environmental and Social Justice Action Plan.¹

SCE appreciates the opportunity to submit comments on the Workshop, which are summarized here and expanded on further, below:

- Energy equity plays a crucial role in meeting California's decarbonization targets.
- Effective community engagement, outreach, and technical assistance are essential.
- Additional resources are available to inform policymaking to advance energy equity.

¹ For more information, please visit <https://www.cpuc.ca.gov/CPUCNewsDetail.aspx?id=6442461331>.

I. Energy equity plays a crucial role in meeting California's decarbonization targets

Addressing barriers to clean energy and transportation for ESJ communities is an important policy goal not only to ensure that all communities share the benefits of a transformed energy sector but also to help California reach its decarbonization targets. As discussed in SCE's Clean Power and Electrification Pathway paper,² significant levels of transportation electrification and building electrification are needed if we are to achieve the state's decarbonization targets set forth in Senate Bill 32 and Executive Order S-3-05. Low-income residents and customers living in disadvantaged communities have some of the greatest opportunities for gains from transportation electrification and building electrification. However, these same residents and communities also have some of the greatest barriers. Therefore, efforts to ensure the affordability of and access to electric vehicles, efficient electric space and water heaters, and other technologies are essential to meeting California's decarbonization targets.

II. Effective community engagement, outreach, and technical assistance are essential

At the Workshop, several community-based organizations stressed the importance of effective community engagement, outreach, and technical assistance for lowering barriers to access for low-income residents and customers living in disadvantaged communities. Such efforts can help customers navigate the landscape of disparate programs and find integrated solutions that increase program efficacy and, ultimately, better serve their needs. In addition, these efforts can help address consumer protection issues, a goal shared by CPUC in its Environmental and Social Justice Action Plan.

SCE strives to incorporate community engagement, outreach, and technical assistance into all its customer programs, which is another goal shared by CPUC in its Environmental and Social Justice Action Plan. For example, the San Joaquin Valley Disadvantaged Communities Pilot Projects will utilize a Community Energy Navigator to provide comprehensive community education and outreach, including technical assistance to residents with the application process, supporting each stage of the pilot. This program can provide lessons learned and potentially a model going forward for effective community engagement, outreach, and technical assistance.

In addition, SCE has partnered with The Greenlining Institute, environmental and community groups, and faith-based organizations to launch the Clean Energy Access Working Group (CEAWG).³ This partnership works to develop community-based solutions that advance energy equity by hosting listening sessions and commissioning studies, among other activities. For example, CEAWG recommended that community renewables programs use an RFI process to give the community an opportunity to take an active role in project development. SCE's Community Solar Green Tariff Program will utilize such a process to help developers tailor their projects to the community's needs and identify unique community assets.

Effective community engagement and outreach can also help unlock some of the non-energy benefits of clean energy projects for low-income residents and customers in disadvantaged communities. For example, enabling these communities to take advantage of

² For more information, please visit <https://www.edison.com/home/our-perspective/clean-power-and-electrification-pathway.html>.

³ For more information, please visit <http://www.edison.com/ceawg>.

workforce development and training opportunities provided by clean energy projects is an increasing area of emphasis in the efforts to advance energy equity. Convening a forum to discuss lessons learned from previous efforts would help as utilities, community-based organizations, and state agencies continue to pursue best practices in this area.

III. Additional resources are available to inform policymaking to advance energy equity

The Low-Income Barriers Studies by CEC and ARB are important resources that have successfully galvanized significant effort across the state to advance energy equity. SCE urges the CEC and other state agencies to also take advantage of other resources when considering policies to advance energy equity. For example, pursuant to Assembly Bill 327, the CPUC and the investor-owned utilities produce a Low-Income Needs Assessment every three years.⁴ These studies, while each developed with slightly different objectives,⁵ provide ongoing sources of new primary data associated with the needs of low-income residents in California. These reports also suggest improvements that can be incorporated into the programs being implemented across the state.

In addition, the results of various other ratepayer-funded pilot projects and studies such as the San Joaquin Valley Disadvantaged Communities Pilot Projects and the CEC's forthcoming Residential Appliance Saturation Survey are expected to provide useful data that may also inform policymaking to advance energy equity.

IV. Conclusion

SCE thanks the CEC for consideration of the above comments and looks forward to its continued partnership with stakeholders in the development of the 2019 IEPR. 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,

/s/

Catherine Hackney

⁴ For more information, please visit <https://www.cpuc.ca.gov/iqap/>.

⁵ The 2013 Low-Income Needs Assessment focused on drivers of participation and nonparticipation in the California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) Programs. The 2016 Low-Income Needs Assessment examined energy burden of California's low-income residents and how burden differed across sub-segments of the market. The forthcoming 2019 Low-Income Needs Assessment is examining some of the enrollment and retention processes associated with the CARE Program and how the ESA Program may better address needs beyond bill savings, including different health, comfort, and safety needs.