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California Energy Commission
Docket Unit, MS-4
VIA EMAIL
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RE: 21-IEPR-O1- 2021 Scoping Order

To the California Energy Commission,

The Disadvantaged Communities Advisory Group (DACAG) submits the following comment on the Draft Scoping Order for the 2021 Integrated Energy Policy Report (2021 IEPR). We are pleased that the Draft Scoping Order includes equity in the proposed scope of the IEPR.¹ The DACAG respectfully requests that staff confirm that equity is a guiding principle of the 2021 IEPR, and detail the necessary coordination with other state agencies to determine non-energy benefits and social costs of energy resources. These costs and benefits to DACs include air and water quality, resiliency, affordability, and other factors critical to public health that the Energy Commission must consider within the framework of the 2021 IEPR.²

The 2021 IEPR builds upon other efforts to further California's climate policy, including SB 350, the Clean Energy and Pollution Reduction Act. Our Advisory Group was formed pursuant to SB 350. The Act specifically requires the Energy Commission to address the costs and benefits of energy resources to DACs. The DACAG was established to eliminate barriers to renewable resources in DACs. The failure to consider non-energy benefits and social costs of energy resources has proven a significant barrier that the 2021 IEPR now has an opportunity to address. Importantly, "[n]on-energy benefits are often not considered in cost-effectiveness tests, which devalues some of the most important factors that motivate investment in clean energy upgrades, such as family health and safety, comfort, and tenant retention."³ Consideration of non-energy benefits and social costs of energy resources is critical so that California does not adopt false solutions, and instead considers all aspects to equitably further its climate policy.

The DACAG has previously commented on the Energy Commission's January 2021 Joint Agency Report implementing SB 100. The Joint Agency Report includes the commitment to consider equity in energy resource planning, specifically non-energy benefits and social costs of energy resources in cost-effectiveness evaluations. We understand that the Energy Commission will not continue specific SB 100 analyses in the foreseeable future, leaving the

¹ Notice of Request for Public Comments on the Draft Scoping Order for the 2021 Integrated Energy Policy Report at 4. ("The 2021 IEPR will continue and expand on previous efforts to decarbonize California's energy system while ensuring that the benefits are equitably spread.")

² See Pub. Res. Code sec. 25301(a).

³ Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-income customers and Small Business Contracting Opportunities in Disadvantaged Communities at 3.

urgent need to continue the Commission’s work on critical, yet unaddressed costs and benefits that affect residents of DACs and low income communities. Moreover, the Draft Scoping Order details that the Lead Commissioner proposes a “comprehensive approach toward decarbonizing buildings in a *cost-effective and equitable* manner.”⁴ The DACAG agrees with this proposal and requests that the scope of the 2021 IEPR specifically include significant discussion of how the State will consider non-energy benefits and social costs of energy resources in its energy policy recommendations.

The DACAG looks forward to continuing discussions with Energy Commission staff to determine the costs and benefits of energy resources that affect the public health of DAC and low-income communities, and that the 2021 IEPR must consider.

Sincerely,

The Disadvantaged Communities Advisory Group

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⁴ *Id.* at 2 (emphasis added).