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**PG&E Comments on Workshop on Centering Equity and Environmental Justice throughout CEC Efforts**

*Additional submitted attachment is included below.*



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July 20, 2022

California Energy Commission  
Vice Chair Siva Gunda  
Docket Number 22-IEPR-04  
715 P Street  
Sacramento, CA 95814

**Re: Pacific Gas and Electric Company Comments on the Commissioner Workshop on Centering Equity and Environmental Justice Throughout CEC Efforts (Docket Number 22-IEPR-04)**

Dear Vice Chair Gunda,

Pacific Gas and Electric Company (PG&E) appreciates the California Energy Commission's (CEC) efforts to develop its framework to center equity and environmental justice in its 2022 Integrated Energy Policy Report (IEPR). The workshop was well organized, and the presentations provided an insightful understanding of how the CEC is approaching the Energy Equity Indicators tool being developed to identify areas where to invest resources, and to explore approaches to ensure meaningful community engagement to achieve a clean energy future for all.

At PG&E, we recognize our responsibility to understand and respect the needs of our neighbors, including low-income communities and Black, Indigenous, and people and communities of color. Our efforts are guided by our Environmental and Social Justice (ESJ) Policy.

We are working to further incorporate ESJ principles into our organization and aspire to better serve ESJ communities by expanding our engagement, collaboration, and partnerships. Based on this experience, PG&E aims to collaborate with the CEC on this topic and offers the following comments:

1. **Definitions:** During the workshop, the CEC acknowledged the ongoing dialogue around definitions to represent these communities. PG&E supports the ongoing effort to appropriately define or characterize these communities and suggests the use of the term "communities of opportunity" to encompass ESJ, vulnerable communities and disadvantaged communities. It is important that we utilize terminology that simultaneously acknowledges the needs of these communities, while highlighting the significant assets within ESJ communities.
2. **Equity Proceeding at the CEC:** Similarly, PG&E supports the proposal that the CEC open a proceeding focused on equity. According to the CEC, this two-year-long proceeding would further allow the Commission to analyze equity tools, metrics, and engagement opportunities with these communities. As PG&E further develops our framework on equity, we welcome the opportunity to collaborate with the CEC and the communities we serve to ensure the success of this proceeding.

3. **Equity Indicators and Metrics:** During the workshop, the CEC presented various equity indicators based on Senate Bill 350 and shared that the CEC is developing an equity tool. PG&E recommends that the tool be made widely available and easy to use by stakeholders, especially by representatives or people from “communities of opportunity.” This should include making the tool easy to use on both mobile devices and desktop computers.

On the indicators and respective metrics that the CEC proposed, PG&E requests clarity on the “reliability” indicator that refers to Public Safety Power Shutoff (PSPS) events as a metric. It would be helpful to understand whether PSPS will be used as a short- or long-term indicator, and how the CEC expects to evolve this indicator in the coming years as the PSPS program and associated events evolve.

4. **Engaging communities and building trust:** PG&E recommends that, among many other stakeholders, the CEC coordinates with how investor-owned utilities (IOUs) are engaging with communities to address equity as we deploy programs, plans and investments to better enable the transition to clean energy in these communities. PG&E offers to collaborate with the CEC on engaging communities and lend our experience from various projects and initiatives.

For reference, PG&E offers the following examples where it has proactively engaged with communities of opportunity to build trust in different ways:

- a. **Our Focus on Supporting ESJ Communities:** As part of our long-standing commitment, PG&E has maintained a dedicated ESJ Manager to coordinate our ESJ efforts from an operational and policy perspective, including engaging with external stakeholders and assisting with internal capacity building as part of a broader companywide effort to better address the needs of disadvantaged and vulnerable communities (DVC).

We also maintain a Tribal Liaison and Deputy Tribal Liaison to lead PG&E’s engagement with Native American tribal governments, communities, and organizations, including activities related to PSPS events, wildfire safety and the development of sustainable, resilient communities.

- b. **PG&E’s Environmental Remediation Program** has established a series of best practices to meaningfully involve and empower vulnerable communities in the decision-making and cleanup process for our projects. PG&E continues to use and expand these guidelines when engaging with other environmental justice (EJ) communities throughout our service area.

For example, PG&E’s environmental remediation stakeholder engagement team uses the California Office of Environmental Health Hazard Assessment’s (OEHHA) screening technology to identify impacted communities by taking into consideration pollution exposure and its effects, as well as health and socioeconomic status, at the census-tract level.

Outreach efforts have included holding briefings, site tours and community meetings at major project milestones to ensure all stakeholders—such as local businesses and residents, community and environmental groups, and unsheltered individuals—are informed in advance and have an opportunity to provide input on specific remediation projects. Other

outreach activities include PG&E bilingual fact sheets and work notices near the remediation sites and/or along truck routes; door-to-door outreach to site neighbors; and installing English and Spanish site signage with a toll-free number to call with questions. When appropriate, PG&E has also implemented a local-hire program to provide unsheltered individuals the opportunity for on-the-job training.

For example, in the City of Salinas, our outreach program allowed PG&E to meaningfully connect with the local area, where 90% of the surrounding population was composed of unsheltered people – many of whom struggled with mental and physical health issues and economic constraints. Early and active engagement with many local stakeholders enabled PG&E to develop a collaborative outreach program that allowed for the sensitive relocation of over 20 encampments along the project fence line. Working with the Downtown Streets team, PG&E hired and trained ten unsheltered residents to work as community liaisons throughout the project.

- c. **The Community Microgrid Enablement Program (CMEP):** PG&E introduced CMEP during the Community Microgrid Order Instituting Rulemaking (OIR) at the California Public Utilities Commission (CPUC) as part of PG&E’s proposal to address PSPS mitigation and support energy resilience for our customers and communities. CMEP’s approach is to empower communities directly through a combination of technical and financial assistance, as well as through development of the tariffs and agreements necessary to facilitate multi-customer microgrids<sup>1</sup>.

The Redwood Coast Airport Microgrid<sup>2</sup>, which recently became operational, is an example of our first CMEP project, and PG&E has been pleased to engage with over three dozen other communities under this new program.

- d. **Hydropower licensing and watershed land conveyances:** PG&E continues to work extensively with Native American tribes through the Federal Energy Regulatory Commission (FERC) relicensing, license implementation, and land management associated with the operation of its hydroelectric generation facilities. Additionally, PG&E has actively engaged with tribes over the past 15 years through its collaboration with the Pacific Forest and Watershed Lands Stewardship Council (Stewardship Council)<sup>3</sup>.

The Stewardship Council was established in 2004 as a private non-profit foundation to oversee implementation of PG&E Land Conservation Commitment, which will ensure the permanent protection of beneficial public values, including historic and cultural values, on over 140,000 acres of PG&E’s watershed lands<sup>4</sup>. Tribes and tribal-led organizations will receive ownership interest in more than 9,600 acres of PG&E’s watershed lands through implementation of the Land Conservation Commitment. PG&E is a board member on the Council along with tribal and rural organizations, forest and farm industry groups,

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<sup>1</sup> program website [www.pge.com/cmep](http://www.pge.com/cmep)

<sup>2</sup> [Collaborating for a Clean Energy Future: California’s First 100% Renewable Multi-Customer Microgrid Is Now Operational - PG&E Currents](#) [PG&E Currents \(pgecurrents.com\)](http://pgecurrents.com)

<sup>3</sup> [Home | stewardship \(stewardshipcouncil.online\)](#)

<sup>4</sup> [Land Conservation Program](#)

conservation organizations, the California Public Utilities Commission, and other stakeholders.

PG&E commends the CEC's progress on the development of a framework to center equity and environmental justice through its efforts on the 2022 IEPR and future IEPRs. Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/

Licha Lopez