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Comments of Environmental Defense Fund

Additional submitted attachment is included below.

Comments of Environmental Defense Fund on IEPR Commissioner Workshop on Centering Equity and Environmental Justice

Environmental Defense Fund (EDF) is pleased to offer these comments on the June 29, 2022 IEPR workshop on centering equity and environmental justice. EDF appreciates the long history that the Energy Commission has taken on this topic recently, including the Senate Bill 350 barriers study work and the subsequent creation of California Energy Equity Objectives and Indicators (the Indicators). EDF understands the goal of the current process is to build an equity and environmental justice framework (the Framework) and potentially update the Indicators.

The Energy Commission is off to a good start, based on the IEPR Commissioner Workshop on Centering Equity and Environmental Justice held on June 29th. That workshop was particularly unique, in that it brought in speakers from the heart of local communities. The work that they have done – for example, Silvia Paz from Alianza Coachella Valley, and her partner on developing metrics, Dr. Chris Benner from the Institute for Social Transformation - spoke considerably towards bringing in local thoughts and voices in the creation of metrics. Maria Lemus from Vision y Compromiso and the Promotoras Comunitarias, also discussed in depth the best practices that for reaching out to communities that they have developed.

EDF agrees with these speakers that the Energy Commission would benefit from dialogue with communities throughout the state to develop the Framework and update the Indicators. While such direct community engagement may be outside of the Energy Commission's normal practice, EDF suggests that this is an important step to achieve the objectives. If the Energy Commission is looking for a best practice from other states, EDF suggests one resource could include the International Association for Public Participation (IAP2)¹, which offers both classes and can help the Commission find local practitioners.

EDF suggests that the Energy Commission consider enabling (through financial and logistical support) local leaders to take these classes or classes like these. These local leaders could report their findings from their communities back to the Energy Commission on a regular basis. This dedicated effort could complement the community organizations that are already active before the Energy Commission doing this engagement work.

As the Energy Commission is considering what should be included in the Framework and the Indicators, the most obvious answer would be that it depends on what the local communities want. The Energy Commission should engage in authentic listening and not “guess” what the

¹ <https://www.iap2.org/mpage/Home>

community may want. This engagement should occur prior to finalization of updates to the Framework or the Indicators.

The earlier indicators (access, investment, resilience) are important. They are simple and able to cover many benefits and costs of a complicated energy system.

There are certain implications of the energy system which are likely to disproportionately impact Environmental Justice and equity communities. We support considering:

- Pollution from fossil-fuel energy sources;
- Cost of energy to consumers and through consumer products;
- Access to affordable, clean and safe/reliable energy;
- Access to affordable, clean and safe/reliable transportation and microgrids (with special emphasis on critical infrastructure);
- Access to high-road jobs and business opportunities;
- Where clean resources are located;
- Energy efficiency of housing (with regards to heating and cooling);
- Equitable application of California policies, considering the different needs of communities.

This list is not comprehensive, and it should be augmented after engagement with community groups.

Another community derived list came from Silvia Paz: Equity, Inclusion, Growth / Stability (for example, diversify economy), Social-ecological health, Transportation / access to development. EDF suggests that the Energy Commission continue to combine and refine these efforts.

EDF supports the Energy Commission in its goal to create a more equitable energy system. EDF does not want the Energy Commission to underestimate this task. EDF strongly encourages continued and sustained community engagement as it works to center equity and environmental justice into its operations.

Respectfully submitted on July 21, 2022,



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