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LCJA Comments on Proposed Scope of 2022 IEPR Update

Attached.

Additional submitted attachment is included below.



March 22, 2022

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 22-IEPR-01
715 P Street
Sacramento, California 95814-5512

Re: Comments of the Leadership Counsel for Justice and Accountability on the Draft Scoping Order for the 2022 Integrated Energy Policy Report Update [Docket No. 22-IEPR-01]

Dear Vice Chair Gunda and Commission Staff,

Leadership Counsel for Justice and Accountability (LCJA) appreciates the opportunity to comment on the proposed scope of the 2022 IEPR update. LCJA fundamentally shifts the dynamics that have created the stark inequality that impacts California's low income, rural regions. 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.

1. Establishing a Framework to Center Equity and Environmental Justice Throughout CEC Efforts

LCJA strongly supports the Commission's commitment to center equity and environmental justice in the 2022 IEPR Update. LCJA works alongside communities that face energy burden, historic disinvestment, structural barriers to participate in agency programs, and disproportionate harm from climate change. We look forward to working with the Commission and stakeholders to develop this framework and to ensure this framework is implemented in all CEC efforts. LCJA generally supports the scope of work in this topic. Our specific comments on this topic's scope are as follows:

The guidance on prioritizing equity and environmental justice should include requirements for proceedings and programs to include goals and metrics to ensure they are responding to the guidance. Experience has taught us that optional equity metrics are frequently set aside.

The Commission should coordinate definitions across state agencies so that the agency staff and stakeholders can have clear and transparent coordination. These agencies should include the Air Resources Board, the Public Utilities Commission, and the Department of Housing and Community Development.



The outreach and engagement approach should include requirements for future CEC activities and should include technical support funding to ensure residents are able to participate in this IEPR as well as future Commission activities. The Commission and all stakeholders would benefit from hearing directly from the residents themselves about how they can participate and the expertise they bring.

2. Creating a California Planning Library

LCJA looks forward to engaging with stakeholders on this issue, but has no comment on the scope of this topic.

3. Addressing Emerging Topics

LCJA supports the Commission engaging in a public process on the future of hydrogen in California's clean energy future. At the outset, we have several concerns that we look forward to discussing further in this process. First, we are especially concerned about the use of factory farm derived biomethane used in steam reformation to create hydrogen and that some stakeholders consider this "green hydrogen." Second, we are concerned about investments in hydrogen competing with investments in wind and solar. Finally, we caution that use of hydrogen must not create air quality impacts in pollution-burdened communities or communities of color.

Therefore, LCJA urges the scope of this topic to be revised to exclude hydrogen derived from polluting fuels, including fossil fuels and biomethane. The scope should explicitly consider local impacts on air and water quality in addition to a complete lifecycle analysis of GHG emissions.

4. Conclusion

LCJA looks forward to engaging with the Commission and stakeholders on these important topics.

Respectfully submitted,

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