

## **Follow-up from Local Energy Equity Coalition to R.21-06-017 May 23 Meeting of Stakeholder Organizations and Commission Energy Division Staff**

### **May 23 Meeting Follow-up**

The following organizations are collaborating in R.21-06-017 as the Local Energy Equity Coalition (the “Coalition”): California Alliance for Community Energy, Center for Biological Diversity, Center for Community Energy, Clean Coalition, The Climate Center, GRID Alternatives, Local Clean Energy Alliance, Reimagine Power, Synergistic Solutions, Vote Solar, and Wild Tree Foundation.

The Coalition sees meaningful community stakeholder engagement as an essential requirement in the process of making and evaluating proposals for specifying the roles and function of a distribution system operator (“DSO”) for a High-DER Future. Jointly and separately, Coalition members have recommended to the Commission, since the outset of R.21-06-017, that development and implementation of a Community Stakeholder Engagement Plan is a critical prerequisite to successful community engagement in this proceeding. Coalition efforts so far, including this letter, have focused on Track 2 but we must emphasize that given the intrinsically local nature of distributed energy resources, all elements of the entire proceeding should include meaningful community engagement, following a concrete plan for how such engagement will be conducted and how community perspectives will be used to inform the decision-making in this proceeding. Please see the Coalition’s recommendations, below, regarding a Community Stakeholder Engagement Plan.

### **Clarification of Roles and Decision Making**

We appreciate the efforts of Energy Division staff to collaborate with stakeholder organizations regarding Track 2 community engagement efforts. However, we remain unclear on how decisions will be made throughout the proceeding on community engagement and what roles the various institutional staff and consultants are playing.

Initially, consultant Gridworks issued a White Paper that was intended to address Track 2 community engagement, organized a workshop where stakeholder proposals were invited, and accepted pre and post workshop comments. There was no discussion during the subsequent May 23 meeting of Energy Division responses to proposals made by stakeholders at the May 3 Workshop.

Instead, representatives of the CEC and an additional consultant, Verdant, were at the May 23 meeting. We were not made aware of the role of this consultant regarding Track 2, yet following the May 23 meeting, Verdant communicated with a number of stakeholders asking for follow-up information. The May 23 meeting and follow-up email are the only communications that have

taken place between Verdant and any of our organizations, in contrast to the continuous and thorough outreach that had been conducted by Gridworks.

## **Focus Groups**

During the May 23 meeting, there was mention of focus groups. This is not something that to our knowledge has been mentioned at any point in this proceeding prior to the May 23 meeting, including in the OIR, Scoping Memo, White Paper, or any of the workshops or discussions regarding community engagement. Stakeholders were requested during the meeting to provide the Commission a draft list of invitees for focus groups and targeted questions the Commission should pose. While we note that focus groups may have a constructive role to play in developing a community engagement plan, we are not able to provide such information without knowing the contemplated role or function of these focus groups. The lack of clarity on this issue leads us to infer that these focus groups may be intended as a replacement for the Community Stakeholder Engagement Plan we have called for and deemed necessary for the achievement of the goals underlying this proceeding. We sincerely hope that this is not the case, but we have not been informed at this point of what role these focus groups are intended to play or to what end.

## **Community Stakeholder Engagement Plan**

It is not clear what steps the Commission is planning to take regarding a Community Stakeholder Engagement Plan for this proceeding generally, and in particular for Track 2. We would like to hear how the Energy Division views the role of such a Plan in this proceeding and the current thinking as to the timing and process for developing the Plan.

During the May 23 meeting, we were informed by Commissioner Houck's staff that documentation of the Gridworks process would be made a part of the record and posted on the docket. This is a step in the right direction, and we very much appreciate the engagement the Commissioner has demonstrated in this proceeding thus far. It does not appear that this action has been implemented but we are hopeful that will occur very soon.

## **Questions for Staff**

To facilitate our ability to provide meaningful information to the Commission, we would appreciate a response regarding questions we have posed herein:

- How and by whom will decisions be made regarding community engagement in this proceeding?
- What roles are the various staff and consultants playing in Track 2 community engagement?
- Whom should we be communicating with regarding Track 2 community engagement, if different from Rob Peterson?

- What are the community engagement next steps for the Commission?
- Is the Track 2 community engagement to remain separate from the Track 1 Community Engagement Needs Assessment?
- Will a Community Stakeholder Engagement Plan be drafted for the entire proceeding, and specifically Track 2, and if so, by whom and when?
- Does the Commission plan to develop a draft Community Stakeholder Engagement Plan in advance of the Track 1 fall community engagement workshop, so that workshop attendees can have adequate time to react and comment on the plan?
- What is the genesis and purpose of the focus group idea, and is it intended to function as a replacement for a Community Stakeholder Engagement Plan?
- What is the Commission’s current thinking about the timing and content of the substantive Track 2 workshops, as described in the Gridworks white paper and considering the input provided by stakeholders at the May 3 workshop?

### **Recommendations: Toward a Track 2 Community Stakeholder Engagement Plan**

Please find below a summary of the Coalition’s recommendations for developing a Community Stakeholder Engagement plan. For more details, please see the attached joint parties October 7, 2021 filing on meaningful community engagement in R.21-06-017 and its specific recommendations.

#### *Purpose*

To remove the present barriers to effective community engagement and secure meaningful participation by environmental and social justice (ESJ) communities in this proceeding—often referred to as disadvantaged communities.

#### *Elements of a Community Stakeholder Engagement Plan for Track 2*

- Identifies the target communities and their institutions.
- Describes how the Commission’s Environmental and Social Justice Action Plan Goals will be incorporated in the Track 2 process.
- Provides accessible background information on the issues involved, including the community’s stake in Track 2—the potential of a high DER future in terms of local needs and community benefits—and why community engagement is important in the process.
- Identifies organizations or individuals representing ESJ communities that are authentic and trusted within their community. This should include organizations beyond those experienced in engaging on energy issues.
- Outlines who will be responsible for reaching out to and engaging community stakeholders at each stage of the Track 2 process.
- Describes how community stakeholders’ input will be incorporated into the Track 2 process. What format—workshops, proposals, focus groups, testimonies, etc.—will be used to collect this input.
- Specifies how ESJ input will be incorporated into the official record.

- Identifies how organizations or individuals representing ESJ communities will be resourced to participate in the Track 2 process (intervenor compensation is not a viable option for community-based organizations due to their very limited and overextended resources and the long delay in intervenor claim payment).
- Encourages community stakeholders to participate in the refinement and implementation of the Community Stakeholder Engagement Plan.
- *Developing a Community Stakeholder Engagement Plan for Track 2*
- Create a list of community groups and institutions in ESJ communities for outreach on Commission proceedings and programs.
- Prepare materials describing the issues involved and the communities' stake in Track 2.
- Consult the Disadvantaged Communities Advisory Group in developing a Community Stakeholder Engagement Plan for Track 2.
- Reach out to the target communities and their institutions, drawing from related existing recommendations in other Commission proceedings on how to conduct effective community outreach.
- Hold a widely publicized workshop or series of workshops inviting all interested EJ advocates, CBOs, and others to present their recommendations for how the Commission can get meaningful engagement in the Track 2 process. (For example, the Commission should consider offering multiple workshops across the state, including the Central Valley, Inland Southern California, the East Bay, South Central Los Angeles, the San Gabriel Valley, etc. to foster participation by a wide range of communities.)
- Commission staff could also provide a draft outline of a Community Stakeholder Engagement Plan for comments during the above workshop(s). The workshops should focus on listening, with Commission staff further refining the draft Plan based on workshop findings.
- The Commission should approve a Community Stakeholder Engagement Plan and resource it.
- The Commission should designate specific staff to implement the plan and serve as points of contact with community stakeholder representatives.