

November 30, 2022

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



RE: California Climate and Energy Collaborative (CCEC) Comments on the Draft 2022 Integrated Energy Policy Report (IEPR) Update [Docket Number: 22-IEPR-01]

Dear Vice Chair Siva Gunda, CEC Leadership, and Staff,

The California Climate and Energy Collaborative (CCEC) welcomes the opportunity to provide comments in response to the California Energy Commission's (CEC) Draft 2022 Integrated Energy Policy Report (IEPR) Update.

[CCEC](#) is a program of CivicWell (formerly known as the Local Government Commission) that supports California local governments and their partners in their efforts to save energy, reduce greenhouse gas emissions, and accelerate climate action by building knowledge and networks amongst practitioners. We are increasingly developing ways to foster better two-way communication between State and local agencies to better reach mutual energy and climate goals, and welcome greater collaboration with the State.

With communities across the state facing record-breaking wildfires, heat waves, floods, drought, and repeated electricity outages, it has never been clearer that the time for an accelerated transition to a reliable, clean, affordable energy future is now. We recognize CEC as a global leader in proactive clean energy policy and applaud CEC's considerable efforts to develop the Draft 2022 IEPR Update. We also recognize the IEPR as a critical tool to meaningfully boost efforts to transform California's energy system while elevating priorities related to climate change, energy reliability, equity, and environmental justice for segments of California communities most in need.

In September, we hosted our [Annual Statewide Climate & Energy Forum](#) on the topic of *Accelerating Climate Action & Advancing Justice* for nearly 400 local climate and energy practitioners, as well as several State leaders, where communities across the state presented their innovative approaches to advancing local and regional climate and energy initiatives in an inclusive, conscientious way without leaving anyone behind. Our network shares CEC's desire to foster effective, on-the-ground implementation of equitable energy solutions in coordination with regions and communities throughout California. We are in agreement with most positions and priorities reflected in the IEPR, particularly the focus on embedding equity and environmental justice at CEC.

We are honored to have been invited to collaborate with CEC in the execution of regional workshops and community outreach efforts to ensure local voices and needs are reflected in the 2022 IEPR Update. We appreciate the opportunity to continue engaging with CEC, and respectfully offer our comments and recommendations to support the finalization of the 2022 IEPR. We wholeheartedly

agree that “the CEC should continue this regional approach for future IEPR proceedings and other major CEC proceedings” (IEPR, p.1).

Our comments and recommendations reflect the needs and priorities that our extensive network of thousands of California local government staff, officials, and supporting organizations have shared with us. We elevate the following key points for consideration to recognize the critical role of local and regional agencies.

- **The Need to Unlock Local Potential** by addressing access to assistance and energy data and closer State-local engagement.
- **Proposed Solutions for Unlocking Local Potential** under the following three categories:
 - Streamlining and sustaining ongoing engagement between the State and key local and regional agencies working across California.
 - Distributing funding and assistance so investments reach the places they are needed.
 - Operationalizing solutions through a statewide regional apparatus.

The Need to Unlock Local Potential

We believe that cities, counties, special districts, regional municipal organizations, and local energy-focused consortiums like [Regional Energy Networks](#) (RENs) and Community Choice Aggregation (CCA) programs - and their community partners - are in a key and irreplaceable position to continue pushing California towards a 100 percent clean energy and climate-stable future. In June 2022, CCEC submitted [comments](#) to CARB on its Draft Scoping Plan, in which we suggest that greater collaboration between the State and locals can unlock vast untapped potential to transform energy systems, increase energy resilience, and lower emissions at the local level. Below we further detail local needs to inform the IEPR as the State’s energy policy roadmap for the next several years.

Access to Assistance

California communities have been leading on energy and climate action for decades, including taking on additional responsibilities to provide California constituents with greater energy resilience and reliability as conditions become more uncertain and dangerous.¹ However, local agencies lack the necessary internal resources and capacity to match the enormity and urgency of the growing need for clean energy and climate resilience solutions, as well as to meet the targets and goals established by State or federal agencies.

Communities in our network relay that without knowledgeable and stable in-house staff, it is virtually impossible to shepherd energy and climate initiatives through concept, data gathering and analysis, planning, design, inclusive public engagement, RFPs, hearings, and implementation. On top of that, local governments find it risky and challenging to hire staff using one-time or short term grant funds. It is difficult for local governments to carve out general fund dollars away from “essential services” (e.g. public health and public safety) to pay for recurring salaries and expenses associated with energy and climate initiatives, especially when budgets are strained by a pandemic, disasters, or economic downturn. Furthermore, key sources that communities depended on for

¹ Examples of local actions are highlighted in [CCEC’s CARB Scoping Plan comments](#).

energy and climate work - like the Local Government Partnership dollars through the Investor Owned Utilities' Energy Efficiency budgets - have greatly diminished. The local governments that are furthest ahead in energy and climate work are typically those that used to rely on annual allocations from Local Government Partnerships to help them staff the work needed to audit and retrofit buildings, develop reach codes, and adopt climate action plans.

Where assistance programs do exist, accessibility remains a major barrier. Communities share that funding and technical assistance typically are not regularly available or include sufficient, recurring or predictable dollar amounts to meet their specific needs. Assistance is currently made available through numerous programs administered by different agencies, which are often too difficult to track and navigate, let alone access. Obtaining assistance usually requires complicated, competitive applications or participation in highly complex regulatory proceedings with too many technical, financial, and legal constraints or requirements (disallowed costs, overly prescriptive eligible activities, match, waiver of sovereign immunity, difficult invoicing or reporting processes).

The IEPR highlights the groundbreaking investments being made at the State and federal levels that will allow CEC, among other State agencies, to “transition California to a clean energy system, address impacts from climate change, and invest in the state’s workforce and communities with an emphasis on equity and scale” (IEPR, p. 15). Our network is aware and excited that CEC is already working to allocate billions of dollars in ways that can effectively support both local and State energy goals through multiple forms of assistance. CCEC has been closely tracking new investments to identify where local governments and their partners may be able to access assistance for their most pressing needs. In fact, across the U.S., State and federal agencies need to deploy increasing levels of energy and climate investment in ways that lead to measurable, positive outcomes and help advance *all* communities to a clean energy, climate-stable future.² Like the IEPR, these initiatives are working on ways to ensure resources reach the communities that need them most yet often struggle the most to obtain them.

We appreciate that the IEPR recognizes that “long-term, sustained, system level funding is needed” (IEPR, p. 25). In addition to clean energy and distributed energy resources, CCEC encourages CEC to consider local governments and their partners as essential actors in delivering urgently needed energy resilience and reliability solutions for California constituents, and carve out significant assistance, when available, to support community level initiatives. To unlock California’s vast local potential to address place-based energy, emissions, and equity needs, communities need external funding, technical assistance (e.g. project design, data access/analysis, and grant writing assistance), and other capacity and knowledge building support (e.g. trainings, templates, best practices, and peer knowledge exchange opportunities) that would allow them to expand and accelerate actions that lead to measurable outcomes.

New assistance programs should be thoughtfully designed to meet the specific and varied needs of communities and the special authorities and roles of governments, CBOs, NGOs and other key

² Example: DOE seeking input at 9/13/22 CCEC LERN on the following topics: 1) Technical assistance needed to support local clean energy and climate goals; 2) Barriers and challenges to applying for and managing federal grants; 3) Strategies for increasing local capacity; 4) Ideas for model projects and programs to support local clean energy deployment; and 5) Priority technology/equipment to support local clean energy projects.

stakeholders. For example, local governments are uniquely capable of planning, regulating, empowering, operating, procuring, and engaging critical public and private activities within their communities across buildings, energy, transportation, land use, and climate planning. Despite existing resource constraints, local governments are carrying out these duties with stronger commitments to meaningfully engaging diverse stakeholders in policy decisions, centering their actions on equity, and serving those segments of their communities most burdened and vulnerable to pollution and climate effects in line with the goals of this IEPR update. We believe that equity must happen within communities, and local governments are an essential part of that process.

While the State's growing commitment to providing local assistance is *greatly* appreciated, many assistance programs remain inaccessible to capacity-constrained entities that could benefit the most from State support. Many local communities have limited capacity to conduct day-to-day activities, let alone to meet the need for additional climate-related public safety measures to address disasters and power outages escalate. Although State and federal investments are on the rise and greatly needed, most grant programs are not designed for low-capacity agencies and can even create further capacity constraints. The highly competitive nature, burdensome application process, and tight application timelines of grant programs prevent many agencies from applying. For those that do decide to apply, it is often at the cost of their ongoing work to implement equitable energy initiatives. In short, building capacity takes capacity and once core staffing levels are established, local leaders can be very effective in obtaining external dollars to expand their team and their impact.

We also recognize that State and federal agencies have finite budgets for their programs, limitations and deadlines built into enacting statutes, and an obligation to be accountable taxpayer investment, which means they need certain processes and controls in place to report outcomes and ensure proper spending. We recognize that simply providing large amounts of formula funding to communities for any initiative without accountability is neither reasonable nor feasible. Increasing the accessibility of assistance and funding will take thoughtful work, and we respectfully provide suggestions below under "Proposed Solutions" on how to make needed headway in this area.

Access to Energy Data

Beyond funding and technical assistance a major barrier in completing critical energy and climate planning and furthering local energy initiatives is related to energy data access. To guide decision-makers on how to best target public clean energy, energy resilience, and climate investments, projects, policies, and programs, a local government must gain an understanding of where and how energy is being used within its jurisdiction. Given data confidentiality concerns, California municipalities typically encounter a long, arduous, and risky process to individually access and use data from their Investor Owned Utility for energy planning and climate action planning. In fact, CivicWell (formerly the Local Government Commission), CCEC's program administrator, gathered 117 signatures on a [letter](#) highlighting the cumbersome process of conducting GHG inventories, in large part due to the complexities with obtaining and using energy data, with a request for State support to streamline the inventorying process.

Additionally, through CivicWell's Local Government Sustainable Energy Coalition (LGSEC), local governments have [advocated to the CPUC](#) for comprehensive and transparent data access to make critically-needed information available to suitable stakeholders. We are aware that the CEC has been coordinating with the CPUC on potential actions to streamline this process statewide. Through tools like the Market Informed Demand Automation Server (MIDAS) and the exploration of other data access concerns through several CPUC proceedings like [R.22-11-013](#) and [R.22-07-005](#), multiple opportunities for community engagement have arisen in the past year. However, the complex regulatory space and the sheer amount of engagement opportunities require local and Tribal agencies to direct ample resources to participate. That is if they have enough capacity to monitor the regulatory space, all of which makes engagement inconsistent and, at times, impossible.

The CCEC network appreciates the emphasis CEC has placed on making its data and analytics “more readily available to communities and tribes” (IEPR, p. 2) and the noble goals identified in the California Energy Planning Library section of the IEPR. CCEC agrees that if the CEC can serve as the State’s energy data repository, providing access and analysis to policy makers and stakeholders around the state for planning, operations and policy needs, it would ease a tremendous burden off communities so they can help enable an equitable energy transition. We recommend CEC collaborate with CPUC and CARB to ensure this data can be easily converted to emission data and also be made available and readily usable to local governments. We also recommend that all datasets be made available by jurisdiction without a lengthy data request process. Because local governments and their partners will be a key customer of these energy data services, with deep knowledge of the needs and pitfalls of such data, CCEC would encourage CEC to collaborate with our network as it develops the California Energy Planning Library, as well as its California Energy Demand Forecast.

State-Local Engagement

While communities have strong feelings about their experiences with assistance and data accessibility and wish for programs to be improved, they most certainly lack the time needed to meaningfully participate in the various State and federal program design input processes. In the section on “Addressing Barriers through Technical Assistance and Engagement,” the IEPR highlights themes related to community engagement. CCEC applauds the CEC for taking note of important concerns during its workshops and puts forth additional detail below regarding challenges communities face with participating in engagement opportunities.

The fortuitous recent rise in investments in energy and climate assistance programs, and increased diligence on inclusion and equity, has meant that communities are inundated with requests for input (e.g. workshop, listening sessions, public comment). There may be a dozen relevant input opportunities at any given time. These requests are increasingly well-intentioned (not just a box check), but they are often a one-off, one way transaction where the State or federal agency expects individual communities to prepare to comment on specific details within complex program guidelines. Once one input opportunity is done, there is little effort to accumulate or archive this understanding for future and related State needs or build a lasting ongoing relationship with key stakeholders. Among disadvantaged and underrepresented communities, there is a sense that government agencies have not historically acted upon the input provided.

Attempts to coordinate or streamline these input opportunities across agencies, or even across departments or units within the same agency, have been insufficient to-date. Communities have attempted to organize themselves to build joint capacity to participate meaningfully in regulatory and administrative proceedings, but lack access to resources to fund these initiatives, which are often considered disallowed costs in grants (e.g. membership dues to networks that provide this type of coordination).

There is clearly a need to find better ways to engage the diverse perspectives and expertise within communities to help design and deploy effective programs as new investments and policies are enacted by the State. CCEC stands ready to work with CEC and State partners to help address the above-mentioned barriers to engagement and create lasting structures for effective collaboration.

Proposed Solutions to Unlock Local Potential

In aggregate, the time spent pursuing grants, accessing and analyzing data needed for planning, and participating in fragmented State input opportunities taxes limited local capacity. These activities are a direct impediment to greater action at the local level, and can be alleviated through State-led solutions. CCEC respectfully shares three key recommendations on how the State can more strategically leverage the vast potential of communities throughout California to advance IEPR priorities, detailed below.

1. Streamlining and sustaining ongoing engagement between the State and key local and regional agencies working across California

We greatly appreciate CEC's efforts to meaningfully engage stakeholders throughout the 2022 IEPR Update development process. With consideration to ongoing capacity constraints and the plethora of State policies and programs under development, we recommend CEC consider the following actions to streamline and sustain ongoing engagement with key local and regional entities.

- State agencies coordinate communications and services to communities on the back end to make it easier to build awareness of and navigate existing programs and participate in input opportunities on various programs, data products, and other State offerings.
- Develop a community engagement protocol inclusive of local governments and other community-based organizations.
- Regional liaisons engage regularly with key community-serving organizations to build relationships and capacity.
- Convene quarterly meetings with key representatives of relevant State and local agencies to identify and address key barriers to local energy action and engagement (CCEC would be interested in helping to facilitate these conversations).
- Comprehensively assess needs via a gap analysis for community energy and climate needs building upon [CA Tribal Gap Analysis](#) and [Climate Crossroad report](#).
- Compensate engagement, especially in underrepresented communities.

2. Distributing funding and assistance so investments reach the places they are needed

We wholeheartedly agree with the IEPR's recommendation to "provide funding to support partnerships with local governments focused on removing barriers to participation and ensuring clean energy benefits reach more tribes and disadvantaged communities." (IEPR, p. 102). We recommend considering the following actions to advance this priority.

- Empower the existing community leadership and organizational expertise already in place, including those representing underrepresented voices:
 - Target investments to local governments, Tribes, regional energy organizations or other regional consortiums, NGOs, CBOs.
 - Include core staffing and administrative costs as allowable costs.
 - Direct dollars towards regional technical assistance providers where possible, which already have the proximity, technical expertise, local knowledge, and relationships to best serve local needs. For example, the four active Regional Energy Networks serve a population of over 27.5 million, including under-resourced and disadvantaged communities that do not have the capacity to administer complex energy programs alone. A fifth REN is being developed to serve several Rural areas across the State.
- Reduce barriers within program guidelines that keep communities from being able to access available resources, including overly complex grant processes:
 - Convene a cross-agency working group to identify barriers and determine best practices in assistance program design to increase accessibility, equity, and outcomes (e.g. eligibility, cost share, set asides, program periods, recurring funding cycles, standardized application processes, etc.).
 - Provide grant writing assistance and guidance before and during open solicitations. Consider drafting eligible project templates.
 - Consider alternatives to statewide competitive grants, such as allocations to regional contracting entities, where State contracts are selected by regional representatives for certain types of assistance.
- Provide statewide energy data access and analysis to ease the burden on communities of conducting energy and climate planning (e.g. GHG inventories and calculated emission reduction strategies).

3. Operationalizing solutions through a statewide regional apparatus

To operationalize the two solutions proposed above, CCEC would like to work with CEC to consider a structured, flexible, and accountable administrative apparatus deployed at the regional level. Such an apparatus could operationalize the important recommendations stated in the IEPR to:

- "Provide more customized support to tribes and communities," including "funding to support a technical assistance program that creates regional hubs throughout the state that can provide immediate support, current information, and technical assistance to tribes and disadvantaged communities;"
- "Continue a regional approach" including "partnering closely with local leaders to codesign outreach, engagement, and other efforts;"

- “Provide funding to support a needs assessment of community-based organizations in all regions of California to help determine most effective models to engage (for example, promoters) and how agencies can best engage and partner with them on efforts to achieve a clean energy future;” and
- “Provide funding to support partnerships with local governments focused on removing barriers to participation and ensuring clean energy benefits reach more tribes and disadvantaged communities.”

We are aware that the CEC is considering allocating resources to the development of a Regional Energy Hub, which if designed thoughtfully can help address the needs raised in our comments. While CEC is considering a centralized no-cost technical assistance program, and most communities would welcome neutral “boots on the ground” from a knowledgeable State representative, we suggest that a more decentralized approach may better drive energy and climate action by empowering the unique capabilities and knowledge of communities and building place-based collaboration and technical capacity. CCEC has begun to design a concept for a California Regional Energy and Climate Hub (REACH), which would help State assistance and communication more easily “REACH” the places they are needed, so that communities can more easily “REACH” for ambitious and equitable energy and climate goals. Key aspects of CCEC’s nascent concept are further described below. CCEC welcomes opportunities to work with the State and other stakeholders to further develop this concept.

- REACH would be administered by the State, which would operate statewide services and provide bi-directional throughput to community stakeholders via regional sub-hubs (e.g. REACH LA, REACH North Coast), which could conform to the IEPR Workshop and Regional Engagement Map (Figure 2 in Draft 2022 IEPR Update, p. 21) as a starting point.
- Each REACH sub-hub would be staffed by a knowledgeable State staff member and would serve as a regular engagement body with the region’s ecosystem of local governments, local energy organizations (e.g. RENs, CCAs), Tribal governments, CBOs, environmental justice representatives, NGOs, and other service providers that are already positioned to understand, serve, and communicate the needs of the community. With appropriate proximity, training, and role, this staff member would build relationships, streamline engagement needs, and accumulate understanding of the region and its priorities which can be shared across State agencies as input and funding opportunities arise. The staff member would ensure that organizations within regions are kept abreast of new applicable assistance opportunities, especially those representing under-resourced communities or DACs without the means to track or pursue them.
- The networks cultivated in each REACH sub-hub could be invited to convene quarterly to discuss matters of statewide significance with State leadership. REACH would also serve as a contracting and fiscal entity to more easily infuse available State dollars for regional investments, such as to local technical assistance service providers or for compensating for community input. Each REACH sub-hub could invite a diverse group of stakeholders to help collaboratively choose administrators of regionally selected projects, policies, programs, and services in ways that complement rather than compete with existing local experts.

- While REACH could begin with the CEC, ideally it would be a multi-agency effort with several State agencies responsible for energy and climate priorities, to help streamline otherwise fragmented, confusing, and overwhelming engagement and opportunities with communities and help agencies avoid reinventing the engagement wheel over and over again. Having a singular State-led apparatus to engage and invest at the regional level could truly help unlock local energy and climate action.

In conclusion, local governments and other community-serving organizations can serve as the State's best partners in achieving the clean energy and equity goals outlined in the IEPR. As federal funding opportunities become available quickly and more frequently, a closer relationship can mean that the State is guided by community expertise as it designs and proposes future programs and projects. With closer collaboration and strategic investments and operations decisions, the State can alleviate burdens and barriers impeding greater progress at the local level.

Thank you for the opportunity to review the Draft 2022 IEPR Update and relay comments from our statewide network. We greatly appreciate your time in considering our comments and recommendations and welcome further discussion. We remain committed to supporting and distributing tools, libraries, and other resources resulting from the 2022 IEPR Update to our extensive network of local governments and their partners, and look forward to working in partnership with CEC leadership and staff to support the advancement of IEPR priorities. Please do not hesitate to reach out to Angie Hacker at ahacker@civicwell.org if you have any questions.

Respectfully submitted by Angie Hacker, CCEC's Statewide Best Practices Coordinator, on behalf of the California Climate and Energy Collaborative (CCEC).