



November 15, 2024

California Public Utility Commission

Project Title: Climate Adaptation Community Engagement and Equity Workshop

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**RE: Comments on the California Public Utility Commission's Climate Adaptation Community Engagement and Equity Workshops**

Dear CPUC Leadership and Staff,

I welcome the opportunity to provide comments in response to the California Public Utility Commission's (CPUC) Climate Adaptation Vulnerability Assessment (CAVA) Community Engagement and Equity Workshops on [September 19 and October 25, 2024](#). I appreciated the opportunity to share comments as a speaker in my roles supporting the [Tribal Energy and Climate Collaborative \(TECC\)](#), the [Tribal Climate Health Project](#), and the [California Climate and Energy Collaborative \(CCEC\)](#), all of which serve California communities working to combat the worst impacts of climate change. The local and tribal communities I work closely with continuously share mounting concerns about climate-induced utility infrastructure disruptions and energy reliability and resilience, and welcome the opportunity to help the CPUC shape its approach to obtaining meaningful community input to inform its adaptation planning processes and resulting investments.

**Clarify Scope and Intended Outcomes**

While it is still somewhat unclear, it appears that the scope and objective of the workshops - and the CAVA in general - are to ensure that the IOUs invest in appropriate utility asset improvements that can protect those Californians most vulnerable to utility disruptions induced by climate events such as wildfire, heat, and flooding. The benefit of this process is to match the right infrastructure improvements (e.g. substations, distribution lines, microgrids, etc), at the right scale and urgency, to the locations on the grid that are at the most risk due to climate change. If accurate, this is an important policy matter and one to clearly articulate upfront to community stakeholders that need to decide whether or not to engage. If the scope and objectives are not clear, we run the risk of engaging people under a false understanding of the potential outcome of their involvement. As someone who conducts adaptation planning, there are many issues community stakeholders would like to speak to the state about when it comes to climate vulnerability, but it is not a respectful use of their very limited and often uncompensated time to ask questions about issues that this proceeding has no authority to address.

For example, communities share with me regularly the hardships that follow power disruptions that range from difficulties with getting to work to losses to key economic drivers and threats to health and safety. Many of the solutions to these problems would not be within the purview of an IOU's capital plans for infrastructure improvements, and it is unclear whether funds may be dedicated for



non-asset related strategies that could range widely from cooling centers to communication and emergency response systems or even nature-based solutions. If investments of funding for community organizations to implement wrap-around strategies are within the scope of the CAVA and resulting rate cases, that is important to make clear up front, and would likely compel greater interest from many in engaging in the process.

### **Maximize Communities' Limited Time with Streamlined and Meaningful Engagement with the Key Stakeholders**

Having clarity on the range of authorized investments that will be informed by this process will help engagement administrators be targeted and concise with their engagement. During the workshops, CPUC raised questions about streamlining engagement, rightly noting that the protracted, years-long engagement processes can extract far more capacity from community stakeholders than is available or reasonable. I emphasize my comments in the workshops that communities are inundated with requests for input every day from many programs and proceedings within each of more than 10 energy and climate related state agencies, not to mention federal requests, all of which are deserving of public comment. There just simply isn't the bandwidth. While some community advocates demand more and more engagement, they aren't clear about what manageable engagement might look like; thus agencies regularly find themselves unable to gain meaningful or sustained engagement with the kind of wide reach that would reflect diverse and substantive perspectives. I recommend that the CPUC and IOUs get very clear on the critical questions that will need to be answered in order to make good adaptation decisions, and spend time cutting out questions that stray beyond CAVA's authority.

For example, in the workshops, I expected to hear that community engagement would include sharing draft maps and information on the intersection of climate exposures and utility infrastructure risks or weak spots and facilitating related feedback and lived experience to contextualize and prioritize those risks. I also expected that community representatives would be engaged in discussion around how to address those vulnerabilities through specific options for infrastructure improvements. From what I heard, community stakeholders were not given access to informing what are typically the most important decision points in conventional adaptation planning. It sounded like most of the discussion was spent defining equity and readiness.

The good news is that there is ample opportunity to streamline engagement processes. In the workshops, Karen Woodard from Morongo aptly introduced TECC, which could be a means to more efficiently connect with the 25 member tribes of the Southern California Tribal Chairman's Association. I shared examples of how I'm working to streamline engagement and coordination processes with state agencies to make it easier for local and tribal communities to help shape programs, policies and projects of interest. As I detail in a recently published report called [Better Funding](#), communities relay that they wish for engagement to be coordinated between agencies so they are not duplicative or siloed where questions are repeated and input is often not stored or shared. They would like engagement to be less transactional and one-way, and more relational and sustained. One solution I shared is the [State and Local Energy and Climate Coordination](#) meetings CCEC has conducted over the last year and a half with participation across over 250 local



governments and nine state agencies. We are now bringing this communication and ideation vehicle into regions, with our first [REACH event on December 5th at Morongo](#), in collaboration with several state agencies and region-based organizations. We will maximize local, tribal, CBO, NGO, and higher education attendees' time by offering multiple state input opportunities, exchanging local successes, knowledge, and concerns, and providing direct access to assistance providers. By giving the audience more value and easier access, we hope to engage voices that would not typically have the ability to provide input, thereby improving agencies' "reach." These convenings are intended to be held in regions across the state on an ongoing basis. For each region, co-facilitators CCEC and Strategic Growth Council will document a cumulative understanding and landscape analysis of key stakeholders, assistance providers, priorities and unmet needs, which can be used to guide effective state and regional efforts, lowering the need for redundant engagement. The social infrastructure, relationships, and communication systems developed by REACH can be activated when necessary for ongoing engagement needs by agencies, without having to reinvent a very expensive, time consuming, and extractive engagement wheel.

### **Target Engagement and Investments with Appropriate Metrics and Informed Stakeholders**

In the two workshops already conducted, and in future workshops, the CPUC wishes to identify metrics that can help them best target CAVA engagement and investments to ensure they benefit those most vulnerable. While the CalEnviroScreen tool is great for identifying economically and environmentally disadvantaged places, it wasn't meant to be a one-size fits all way to identify community needs or vulnerabilities for all topics. In general, I'm concerned that the CAVA will overly restrict its attention to DACs only as defined by CalEnviroScreen, and thereby leave out people and places that may be most at risk of climate-induced disruptions to utility infrastructure. The CPUC should ensure that the CAVA overlays communities and populations particularly vulnerable to climate-induced utility infrastructure disruptions on its community engagement target mapping, in addition to considering equity indicators, to ensure we not only talk with the important stakeholders but make future investments that serve their needs. For example, CalEnviroScreen measures indicators like income and asthma rates, but does not take into account relative proximity to utility weak spots, like towns at the end of a line, wires not yet undergrounded, or transformers near flood zones. It does not speak to climate exposure risks at all, but many other climate vulnerability indicators do. I have shared the Tribal Climate Health Project's most recent version of the Exposures, Impacts, and Strategies Inventory which identifies many vulnerability indicators as well population sensitivity and adaptive capacity indicators (community characteristics that modify vulnerability risk).

Other questions were raised in the workshops related to what kind of community stakeholders should be engaged. I agree with other speakers that raised the importance of engaging those already responsible and informed about energy reliability, grid resilience and climate vulnerability in communities, including tribal governments and local governments, which are democratic bodies that represent and serve constituents within their jurisdictions. Many of these governments have already analyzed climate impacts and managed related emergencies, and understand the needs of their communities when the power is disrupted. All information already produced by these agencies should be gathered, analyzed and used to develop engagement materials in advance of starting



community engagement to avoid repeating questions to communities. This is not to suggest that governments are to have exclusive access to informing the CAVA, but that they should be prioritized and also utilized as one of several trusted conduits to broad networks of community perspectives.

Thank you for the opportunity to relay comments from my statewide networks. I remain committed to coordinating with state and the extensive network of California local and tribal governments and their partners, and look forward to ongoing collaboration. Please do not hesitate to reach out to Angie Hacker at [ahacker@prospersustainably.com](mailto:ahacker@prospersustainably.com) if you have any questions. We hope your agency will continue to participate in our SLECC meetings or reach out if CCEC or TECC can be helpful in distributing information or coordinating engagement with our networks.

*Respectfully submitted by Angie Hacker, CEO of Prosper Sustainably, on behalf of the California Climate and Energy Collaborative (CCEC). With sign on from Shasta Gaughen on behalf of the Tribal Energy and Climate Collaborative.*