

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Petition to adopt, amend, or repeal a regulation
pursuant to Pub. Util. Code § 1708.5

Rulemaking 15-03-010
(Filed March 26, 2015)

**CENTER FOR BIOLOGICAL DIVERSITY,
CENTER ON RACE, POVERTY & THE ENVIRONMENT,
CENTRAL CALIFORNIA ASTHMA COLLABORATIVE, AND
LEADERSHIP COUNSEL FOR JUSTICE & ACCOUNTABILITY**

**PETITION
TO IMPLEMENT REMAINING PROVISIONS OF
PUBLIC UTILITIES CODE § 783.5
(PHASE III OF THE SAN JOAQUIN VALLEY PROCEEDING)**

Pursuant to Public Utilities Code § 1708.5 and Rule 6.3 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, the Center for Biological Diversity, the Center on Race, Poverty & the Environment, the Central California Asthma Collaborative, and Leadership Counsel for Justice & Accountability,¹ petition the Commission to complete the requirements of Public Utilities Code § 783.5,² by reopening Rulemaking 15-03-010 (“San Joaquin Valley, “SJV” Proceeding”) and initiate Phase III.

In 2014, the California Legislature passed Assembly Bill (“AB”) 2672 to bring affordable energy to disadvantaged communities in the San Joaquin Valley. In 2015, the Commission opened the SJV Proceeding and subsequently outlined a three-phase approach to implement the statute.

¹ Center on Race, Poverty & the Environment, Central California Asthma Collaborative, and Leadership Counsel for Justice & Accountability are all members of the Building Energy, Equity, & Power (“BEEP”) Coalition along with Alliance of Californians for Community Empowerment, Central Valley Air Quality Coalition, Communities for a Better Environment, Emerald Cities Northern California, Local Clean Energy Alliance, Physicians for Social Responsibility - Los Angeles, and People Organizing to Demand Environmental and Economic Rights (“PODER”).

² All statutory references are to the Public Utilities Code unless otherwise specified.

The Commission initiated and completed Phase I and Phase II, only to close the proceeding before initiating Phase III, in contravention of both its statutory obligations under Section 783.5 and the Commission's prior decisions.

I. Background.

The San Joaquin Valley is one of the most socioeconomically disadvantaged and environmentally burdened areas in California and among the most impacted in the United States.³ Over 55% of its population reside in disadvantaged communities,⁴ the highest concentration of rural disadvantaged communities in California.⁵ As documented in the administrative record, historical patterns of racial segregation and exclusion have shaped unequal access to reliable electricity, safe drinking water, and affordable utility services. Adding to this burden, the Valley suffers from some of the worst air quality in the nation and has repeatedly failed to meet federal health standards for ozone and particulate pollution.⁶ These conditions contribute to elevated asthma rates, particularly among children,⁷ as well as other cardiovascular and respiratory impacts.⁸

³ Angel Santiago Fernandez-Bou et al., *San Joaquin Valley Region Report: California's Fourth Climate Change Assessment* (California Natural Resources Agency 2021) at 7, available at https://www.energy.ca.gov/sites/default/files/2022-01/CA4_CCA_SJ_Region_Eng_ada.pdf.

⁴ *Id.*

⁵ *Id.* at 17.

⁶ *Id.* at 71; see also Am. Lung Ass'n, *Most Polluted Cities*, <https://www.lung.org/research/sota/city-rankings/most-polluted-cities> [<https://perma.cc/MM4K-HVCS>] (last visited July 1, 2025). The three most polluted areas in the United States by year-round particulate pollution are in the San Joaquin Valley. Fernandez-Bou et al., *supra* note 3, at 72.

⁷ The Valley ranks at or above the 90th percentile for pediatric asthma emergency room visits statewide. Berkeley Air Monitoring Group, the Central California Asthma Collaborative & the Center for Race, Poverty, and the Environment, *Final Report: Characterizing Indoor Air Quality Improvements Associated with Electric Heating, Cooking, and Smart Filtration Appliances in Disadvantaged Communities in the San Joaquin Valley* 6 (n.d.); see also California Health and Human Services, *Asthma Emergency Department Visit Rates* (Aug. 28, 2024), <https://data.chhs.ca.gov/dataset/asthma-emergency-department-visit-rates> [<https://perma.cc/99YX-CSZE>] (last visited July 15, 2025).

⁸ Berkeley Air Monitoring Group et al., *supra* note 7, at 6.

In 2014, the California Legislature passed AB 2672, adding Section 783.5 to the Public Utilities Code.⁹ This legislation sought to increase access to affordable energy for disadvantaged communities in the San Joaquin Valley, addressing that “many low-income communities throughout California's San Joaquin Valley lack access to natural gas lines” and recognizing that “increasing access to affordable energy can improve the health, safety, and air quality of these communities.”¹⁰ The Bill recognized that the unique circumstances of the San Joaquin Valley necessitated a special law “to ensure more affordable and cleaner alternatives are available.”¹¹

Section 783.5 is composed of three subsections. First, Section 783.5(a) defined “disadvantaged communities” (“DACs”) in the San Joaquin Valley (“SJV DACs”) as communities meeting specific criteria: (1) at least 25% of residential households with electrical service are enrolled in the California Alternate Rates for Energy (“CARE”) program; (2) the community has a population greater than 100 persons; (3) the community has geographic boundaries no farther than seven miles from the nearest natural gas pipeline operated by a gas corporation; and (4) the community is located in one of eight specified counties: Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare.¹²

Second, Section 783.5(b) required the Commission to initiate a proceeding by March 31, 2015, to identify SJV DACs based on the specified criteria and analyze the economic feasibility of several options to increase affordable energy access.¹³

Lastly, Section 783.5(c) directs that the Commission “shall determine whether any of the options analyzed in the proceeding would increase access to affordable energy in a cost-effective

⁹ AB 2672 (Perea, 2014).

¹⁰ *Id.*

¹¹ *Id.*

¹² Pub. Util. Code § 783.5(a).

¹³ Pub. Util. Code § 783.5(b).

manner,” and for these options, the Commission “shall take appropriate action and determine appropriate funding sources.”¹⁴

In response to these three legislative mandates, on March 26, 2015, the Commission issued the Order Instituting Rulemaking to Identify Disadvantaged Communities in the San Joaquin Valley and Provide Economically Feasible Options for Affordable Energy, opening the SJV Proceeding.¹⁵ The Commission outlined a three-phase approach for implementing Section 783.5, with Phase I focused on identifying potential eligible communities and evaluating affordable energy solutions, and Phase II focused on implementing pilot projects in selected communities and gathering data for the final phase. Phase III, the operational stage of the implementation of Section 783.5, was intended to scale and modify pilot solutions based on their outcomes.

In Phase I of the SJV Proceeding, the Commission focused on identifying eligible DACs pursuant to Public Utilities Code Section 783.5 and establishing a framework for evaluating the economic feasibility of energy options in subsequent phases.¹⁶ To facilitate the identification process, the Commission established a Data Working Group consisting of representatives from Pacific Gas and Electric Company (“PG&E”), Southern California Edison Company (“SCE”), Southern California Gas Company (“SoCalGas”), the Office of Ratepayer Advocates (now, Cal Advocates), and Energy Division staff.¹⁷ The Data Working Group was tasked with compiling and analyzing available data on potential communities and creating a list that could be sorted based

¹⁴ Pub. Util. Code § 783.5(c).

¹⁵ R.15-03-010, Order Instituting Rulemaking to Identify Disadvantaged Communities in the San Joaquin Valley and Analyze Economically Feasible Options to Increase Access to Affordable Energy in those Disadvantaged Communities (March 26, 2015), *available at* <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M211/K923/211923892.pdf>.

¹⁶ D.17-05-014, Decision Adopting Methodology for Identification of Communities Eligible Under Section 783.5 and Providing Guidance on Economic Feasibility Study to Be Completed in Phase II (May 11, 2017) at 1-2, *available at* <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M187/K072/187072828.pdf>.

¹⁷ *Id.* at 5.

on criteria such as distance to the nearest gas pipeline, percentage of households not served by natural gas, and number of households in the community.¹⁸

On May 15, 2017, the Commission issued Decision 17-05-014, concluding Phase I of the proceeding. The decision adopted a methodology for identifying communities eligible under Section 783.5 and provided guidance on the future economic feasibility study.¹⁹ The Commission identified 178 DACs in the San Joaquin Valley that met the statutory definition of “disadvantaged.”²⁰ These communities represented approximately 890,000 households lacking adequate energy access.²¹

In Decision 17-05-014, the Commission also determined that the economic feasibility of each identified energy option would be evaluated based on three key factors: (1) direct financial and energy specific costs and benefits; (2) direct health, comfort, and safety impacts on participating households; and (3) indirect costs and benefits to society and the environment, including improved air quality, reduced greenhouse gases, and increased diversity in energy sources.²²

In December 2018, the Commission completed Phase II of the SJV Proceeding, which authorized affordable energy pilot projects in eleven communities—Allensworth, Alpaugh, Cantua Creek, Ducor, Fairmead, Lanare, Le Grand, La Vina, Seville, West Goshen, and California City—out of the identified 178.²³ The pilot projects were designed with a total budget of \$56

¹⁸ *Id.*

¹⁹ *Id.* at 39.

²⁰ D.18-12-015, Decision Approving San Joaquin Valley Disadvantaged Communities Pilot Projects (December 13, 2018) at 157, Conclusion of Law 2, *available at* <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M252/K522/252522682.pdf>.

²¹ D.17-05-014, *supra* note 16 at 10.

²² *Id.* at 35.

²³ D.18-12-015, *supra* note 20 at 162, Order 3. Pilot communities were able to select which energy solution worked best for them, with the vast majority (10 out of 11 communities) selecting electric service over natural gas. Common Spark Consulting, *San Joaquin Valley Affordable Energy Pilots — Community Findings Memo* (Apr. 2024) at 4. (Attached as Attachment A).

million and targeted approximately 1,891 households for appliance retrofits. The primary objective was to provide cleaner and more affordable energy options to communities lacking natural gas access, with a focus on replacing propane and wood-burning appliances.²⁴

The pilot projects incorporated several innovative components, including a bill savings mechanism, Community Energy Navigators (“CENs”), workforce development opportunities, and energy efficiency measures. The Commission’s broader goals included providing access to affordable energy options, reducing household energy costs, increasing health and safety, and assessing the scalability of different energy intervention approaches.²⁵ Critically, the pilots were designed to collect comprehensive data about energy usage, costs, and community benefits or impacts, with the ultimate aim of developing more effective strategies for extending affordable energy access to other DACs in the region, as required by Section 783.5.²⁶

However, following the pilots, the Commission never initiated Phase III. Instead, in August 2020, the CPUC closed the SJV Proceeding through Decision 20-08-025 without opening Phase III.²⁷ In formally closing the proceeding, the Commission effectively left unfulfilled the remaining implementation obligations under Section 783.5(c).

The Commission closed the proceeding despite findings of fact and conclusions of law made in Decision 18-12-015 to conduct the economic feasibility study required by Section 783.5

Although there is one natural gas pilot project in California City, since it is not relevant to this petition, remaining references to the Phase II pilots will only refer to the ten electric pilots. The Commission should not assess the economic feasibility of the natural gas pilot project in California City given the passage of and progress towards meeting SB 100, and moreover, SoCalGas’ prior determination that it was not cost-effective to extend a natural gas line to one SJV DAC, Allensworth. *See UC Berkeley Law, Candice Youngblood ’19: Lessons in zealous advocacy*, <https://www.law.berkeley.edu/center-article/candice-youngblood-a-hard-lesson-on-zealous-environmental-justice-advocacy/> (last accessed July 18, 2025).

²⁴ D.18-12-015, *supra* note 20 at 10.

²⁵ *Id.* at 157-158, Conclusion of Law 4.

²⁶ *Id.* at 13.

²⁷ D.20-08-025, Order Denying Rehearing of Decision 18-12-015 (August 7, 2020), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M344/K112/344112340.pdf>.

and determine whether to extend affordable energy solutions to the remaining identified SJV DACs in Phase III. This premature closure has prevented the full implementation of the statute and left many SJV DACs without access to the affordable energy options that the Legislature intended to provide through AB 2672. Because Phase III was never initiated, Petitioners request that the Commission reopen the SJV Proceeding and complete Phase III.

II. Justification for Requested Relief.

The Commission must promptly initiate and complete Phase III to fulfill its statutory obligations under Section 783.5. The Commission's failure to initiate and complete Phase III before closing the SJV Proceeding amounts to a failure to carry out a statutory mandate, is a significant departure from the proceeding scoping memos, and contravenes SB 100 and California's other climate and energy policy goals.

A. The Commission's failure to implement Phase III before closing the SJV Proceeding amounts to a failure to carry out a statutory mandate.

Section 783.5 imposes clear statutory obligations on the Commission. The plain language of the statute directs the Commission to go beyond merely identifying affordable energy options in disadvantaged communities of the San Joaquin Valley; it requires the Commission to "take appropriate action" to implement those solutions found to be cost-effective and "determine appropriate funding sources" for doing so.²⁸ Phases I and II of the SJV Proceeding satisfied Sections 783.5(b)(1) and (b)(2) by identifying qualifying communities and piloting affordable energy solutions. However, the remaining mandate of Section 783.5(c) requires implementation of proven cost-effective solutions. The Commission identified this mandate as being appropriately executed in Phase III.²⁹ To date, Phase III was never initiated and the SJV Proceeding has closed.

²⁸ Pub. Util. Code § 783.5(c).

²⁹ D.18-12-015, *supra* note 20 at 161, Conclusion of Law 30 ("The Commission should initiate a Phase III to the proceeding to further implement Section 783.5"); R.15-03-010 Assigned Commissioner's Scoping

The Commission's failure to implement Phase III affects both pilot and non-pilot communities in the San Joaquin Valley alike. First, several pilot participants joined not only in hopes of near-term benefits, but also because they understood their participation as a contribution to a broader process in which any hurdles they faced could help identify and resolve barriers for other SJV DACs in future implementation of the statute. Declining to initiate Phase III and finalize the SJV Proceeding would disregard that understanding, reliance, and the good-faith efforts of pilot communities who took a risk in joining the program at its nascent stage. Second, Section 783.5 was not enacted merely for the benefit of pilot participants; the statute mandates affordable energy solutions for *all* SJV DACs. While the pilots provided affordable energy options for ten SJV DACs, the vast majority of eligible SJV DACs have not been reached.³⁰ Many qualifying communities declined to participate or were not selected in the pilot phase for various reasons, including structural limitations and pilot design constraints.³¹ Some may have reasonably assumed that further opportunities would arise through subsequent implementation phases. 93 percent of identified eligible SJV DACs still await the Commission's full implementation of Section 783.5.³²

To decline to reopen the SJV Proceeding and initiate Phase III would mean the Commission has not fulfilled the full mandate of Section 783.5 and would frustrate the broader legislative purpose that underpins the statute.

B. The Commission's failure to implement Phase III before closing the SJV Proceeding is a significant and improper departure from its scoping memos.

Memorandum and Ruling (December 6, 2017) at 3, *available at* <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M199/K979/199979978.pdf>.

³⁰ See *supra* note 23.

³¹ For instance, the community of Monterey Park Tract was "deferred for further consideration in Phase III of this proceeding." D.18-12-015, *supra* note 20 at 2.

³² While other Commission proceedings may offer these communities ancillary benefits, they are not designed to fulfill the specific statutory mandate of Section 783.5. As discussed in Section V, other proceedings are not targeted at the San Joaquin Valley DACs identified in this proceeding. The Commission is still required to comply with Section 783.5, which mandates action for these communities specifically.

Once an issue is included in a scoping memo, the Commission is required to follow through on that scope, and may not disregard or exceed it, without proper procedural steps.³³ In other words, a scoping memo constrains the Commission to the defined issues and does not permit silent expansion or constriction to reach other policy determinations.³⁴ Although a scoping memo need not “detail every possible outcome of a proceeding,” it must at the very least “describe the issues to be considered.”³⁵

“The PUC's Rules of Practice and Procedure define ‘scoping memo’ in pertinent part as ‘an order or ruling describing the issues to be considered in a proceeding and the timetable for resolving the proceeding.’”³⁶ Following issuance of a scoping memo, “[t]he assigned PUC commissioner then must make a ruling on the scoping memo that “*finally* determine[s] the . . . issues *to be addressed*” in the proceeding.³⁷

As scoped in the Assigned Commissioner’s Scoping Memorandum and Ruling for Phase II (“Scoping Memo”), Phase III of the SJV Proceeding must implement the remainder of Public Utilities Code § 783.5(c):

Phase III of this proceeding will be opened at a later date to a) evaluate progress with implementation of the authorized Pilot Projects; and b) review the data collected pursuant to an approved Data Gathering Plan created in Phase II. Phase III, will also utilize data collected in accordance with the approved Data Gathering Plan and evaluation of pilot projects to conduct the economic feasibility study required by AB 2672.³⁸

The Scoping Memo further included a Conclusion of Law determining that “[t]he Commission should initiate a Phase III to the proceeding to further implement Section 783.5 and

³³ See *Golden State Water Co. v. Public Util. Com.*, 16 Cal. 5th 380, 395-96 (Cal. 2024).

³⁴ See *Id.* at 394-96.

³⁵ *Id.* at 396 (quoting Pub. Util. Code, § 1701.1, subd. (c)).

³⁶ *Southern California Edison Co. v. Public Util. Com.*, 140 Cal.App. 4th 1085, 1104 (Cal. Ct. App. 2006) (citing Cal. Code Regs., tit. 20, § 5).

³⁷ *Id.* (emphasis added).

³⁸ R.15-03-010, *supra* note 29 at 3.

increase access to affordable energy in disadvantaged communities in the SJV.”³⁹ The Scoping Memo put parties on notice that, as part of Phase III, the Commission would conduct an economic feasibility study to determine whether to expand the pilots. The Commission also committed to issuing a separate scoping memo for Phase III,⁴⁰ to expand upon the essential components of Phase III already included in the Scoping Memo.

In *Golden State Water Company v. Public Utilities Commission*, the Commission’s initial and amended scoping memos made no mention of eliminating two mechanisms to decouple water sales from utility revenue.⁴¹ When the Commission eliminated them, the California Supreme Court held that the issue fell outside the scope of the proceeding, and that the Commission had failed to provide sufficient notice that elimination was at issue, thereby violating procedural requirements and depriving water companies of meaningful opportunity to present evidence or arguments relating to the elimination. “If the Commission cannot fairly be said to have complied with the statutory scoping memo requirement, it has failed to regularly pursue its authority.”⁴²

Here, as in *Golden State Water Company*, the Commission has “failed to regularly pursue its authority” by departing from the expectations it established in its Scoping Memo, frustrated stakeholder expectations and undermined the transparency and integrity of the SJV Proceeding.⁴³

³⁹ D.18-12-015, *supra* note 20 at 161, Conclusion of Law 30.

⁴⁰ *Id.* at 13.

⁴¹ *Golden State Water Company v. Public Utilities Commission*, 16 Cal. 5th 380 (Cal. 2024).

⁴² *Id.* at 394-95.

⁴³ *Id.* at 394; *see also Greyhound Lines, Inc. v. Public Utilities Com.*, 68 Cal.2d 406, 410-11, 414 (1968) (applying then-existing § 1757). Before 1998, judicial review of Commission decisions was limited to assessing whether the Commission “regularly pursued its authority” and whether any evidence supported its factual findings. With the 1998 revisions to the Public Utilities Code, the Legislature replaced that standard of review with a more stringent one; courts now must determine whether the Commission “proceeded in the manner required by law.” Pub. Util. Code, § 1757.1(a)(2). The updated language requires a more stringent obligation to comply with specific statutory procedures and legal mandates. On August 7, 2025, in *Center for Biological Diversity v. Public Utils. Comm’n*, No. S283614 (Cal. Aug. 7, 2025) the Supreme Court clarified that the applicable standard of review must conform to §§ 1757 and 1757.1. Accordingly, the Commission is obligated to proceed in the manner required by law.

In *Golden State*, the Commission exceeded its scope by acting on an issue that it had failed to include in its scoping memo. Similarly, in the present proceeding the Commission failed to act upon a clearly scoped issue, leaving a necessary component of Section 783.5 unresolved. More than six years after it issued the most recent scoping memo, the Commission has, in effect, denied parties the opportunity to evaluate the pilots in a timely manner and denied residents in the identified SJV DACs from further participation in the pilots. Parties were not fairly informed that the scope of the proceeding included the Commission electing to end the program without evaluation or party comment.

However, many of the determinations made in the Scoping Memo for Phase II were predicated on the eventual implementation of Phase III.⁴⁴ The failure to initiate Phase III represents a significant departure from the Commission's procedural framework to implement a statute, not the omission of a minor or discretionary element.

Finally, the Commission has failed to resolve all issues raised in the Scoping Memo within 18 months, or provide written determination that the deadline cannot be met.⁴⁵ Here, the Commission issued the last scoping memo on December 6, 2017 and gave itself until December 6, 2019 to resolve the rulemaking.⁴⁶ The Commission later extended the statutory deadline to December 31, 2021.⁴⁷ As discussed above, despite the commitment to issue a subsequent Phase III scoping memo, the latest scoping memo requires completion of the essential components of Phase III, which the Commission has failed to resolve by the deadline more than three years ago.

⁴⁴ D.18-12-015, *supra* note 20 at 4 (“The aim of these requirements is ensuring a continuous learning process from the pilots to assist us in Phase III.”); *Id.* at 74 (instructing Phase II survey information to inform appropriateness of income eligibility requirements in Phase III); *Id.* at 99 (delaying determination of amending household remediation cap until Phase III); *Id.* at 101-02 (delaying consideration of a local hire approach until Phase III).

⁴⁵ Public Utilities Code § 1701.5(a).

⁴⁶ D.19-12-026, Order Extending Statutory Deadline (December 12, 2019), Finding of Fact 4, *available at* <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M322/K128/322128100.pdf>.

⁴⁷ *Id.*, Finding of Fact 5.

Therefore, the Commission must open Phase III and must resolve the issues remaining in Phase III in a timely manner.

C. The Commission’s failure to implement Phase III before closing the SJV proceeding contravenes California’s climate commitments.

The full implementation of Section 783.5, including initiation of Phase III of the SJV Proceeding, also aligns with California’s broader climate commitments. Executive Order B-55-18 set a statewide greenhouse gas reduction goal to achieve carbon neutrality no later than 2045 and Senate Bill 100 mandates that all retail electricity sales come from 100 percent clean and renewable sources by that same year.⁴⁸ Furthermore, in light of California’s ongoing energy affordability crisis and the situation in the San Joaquin Valley, advancing cost-effective affordable energy access in SJV DACs is particularly important.⁴⁹ Advancing cost-effective affordable energy access in disadvantaged communities in the San Joaquin Valley directly supports these objectives. Abandoning Phase III would not only undermine statutory obligations and conflict with existing caselaw, but also depart from the policy direction set by California.

III. Requested Relief.

Pursuant to Section 783.5(c), Petitioners request that the Commission reopen the SJV Proceeding and initiate Phase III, and respectfully request a response to this petition within 30 days of its filing.

Determination of whether to extend affordable energy access to other SJV DACs requires a comparison between different clean and affordable energy options available to SJV DACs. This

⁴⁸ Exec. Order B-55-18 (2018), *available at* <https://archive.gov.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>; SB 100 (De Leon, 2018), *available at* <https://legiscan.com/CA/text/SB100/id/1816787>.

⁴⁹ See Eric McGhee, *A Closer Look at California’s Surging Electricity Rates*, Public Policy Institute of California (blog) (April 1, 2025), <https://www.ppic.org/blog/a-closer-look-at-californias-surging-electricity-rates/> (last visited July 7, 2025) (showing that rates in California have surged in last few years and are now 80% higher than national average); D.18-12-015, *supra* note 20 at 152, Finding of Fact 22.

should include an analysis of the cost-effectiveness (considering non-energy benefits and social costs, collectively non-energy impacts (“NEIs”) and accurate avoided costs) of utility-scale and distributed clean energy solutions, with a focus on the need for transmission line buildout, distribution upgrades, the feasibility of clean microgrids, and affordability.

Once the Commission reopens the SJV Proceeding and initiates Phase III, it must address certain core issues in order to fulfill the mandate of Section 783.5. Decision 18-12-015 details several components the Commission must address in Phase III. First, (A) the Commission must develop the economic feasibility analysis of the pilot program. Second, (B) the Commission must address whether to extend one or more aspects of the pilot program to the remaining SJV DACs. Lastly, (C) the Commission must address remaining Phase II implementation issues. Petitioners further stress the need for the Commission to consider this requested relief as soon as possible.

A. Phase III Must Develop the Economic Feasibility Analysis of the Pilot Program.

Section 783.5 directs the Commission to “analyze the economic feasibility” of various alternatives to increase affordable energy access in SJV DACs and determine whether one, or several, of these options “would increase access to affordable energy in a cost-effective manner.”⁵⁰ Following this mandate, the Commission determined it must “assess the economic feasibility of extending affordable clean energy options to all SJV DACs identified in Phase III.”⁵¹ The Commission’s Phase II Scoping Memo appropriately characterized the economic feasibility study as being “required by AB 2672.”⁵² Indeed, Decision 18-12-015 asserts that one of the “dual goals” of the Phase II pilots is to gather data to facilitate the economic feasibility study mandated by AB 2672.⁵³

⁵⁰ Pub. Util. Code § 783.5.

⁵¹ D.18-12-015, *supra* note 20 at 151, Finding of Fact 8.

⁵² R.15-03-010, *supra* note 29 at 4-5; *see* Pub. Util. Code § 783.5(c).

⁵³ D.18-12-015, *supra* note 20 at 151, Finding of Fact 8.

Pursuant to Decision 18-12-015, Southern California Edison issued a Request for Proposals to retain a consultant to assist the Energy Division in developing a “white paper/straw proposal” on the cost-effectiveness issue.⁵⁴ The Commission is still expected to release “a draft of its proposal . . . within four months after the contract with the consultant begins.”⁵⁵

Pursuant to Section 701.1, the white paper’s analysis “shall include, in addition to other ratepayer protection objectives, a value for *any* costs and benefits to the environment, including air quality.”⁵⁶ Pursuant to the Commission’s prior decisions, this analysis must consider indirect benefits, or NEIs.⁵⁷

The pilots authorized in Phase II were designed not only to reduce household energy costs but also to generate data on these broader community benefits.⁵⁸ Accordingly, Decision 17-05-014 concluded that “the economic feasibility of each energy option should consider indirect costs and benefits to society and the environment,” including, but not limited to, “improved air quality, reduced greenhouse gases, and increased economic activity for the community.”⁵⁹ The Decision further concluded that the economic feasibility of each option should be evaluated based on “[d]irect health, comfort, and safety impacts” and “increased diversity in energy resources.”⁶⁰

D.18-08-019, approving the Data Gathering Plan, expanded on this consideration, requiring the collection of pilot community data to evaluate these factors that include, but are not limited to: resiliency and quality of energy service, safety, health, comfort and quality of life

⁵⁴ *Id.* at 139.

⁵⁵ *Id.* at 140.

⁵⁶ *Id.* at 159, Conclusion of Law 14 (emphasis added); *see also* Pub. Util. Code § 701.1(c).

⁵⁷ *Id.* at 139-40; *see also* D.17-05-014, *supra* note 16 at 45, Conclusion of Law 16; Skumatz Economic Research Associates, *Non-Energy Benefits: Status, Findings, Next Steps, and Implications for Low Income Program Analyses in California* (May 12, 2010) at 1 (showing NEIs are also known as “indirect costs”), *available at* <https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2020/12/Non-Energy-Benefits-Study-SERA-Inc-2010.pdf>.

⁵⁸ D.18-12-015, *supra* note 20 at 12.

⁵⁹ D.17-05-014, *supra* note 16 at 45, Conclusion of Law 16.

⁶⁰ *Id.* at 35.

benefits, workforce development and career enhancement, reduction of criteria air pollutants and GHGs, and public health factors, both inside the residence and in the community.

Phase III is the intended and necessary forum to evaluate NEIs, among which indoor air quality improvements are particularly significant. For communities reliant on wood or propane, electrification measures can reduce exposure to harmful pollutants like carbon monoxide and nitrous oxides. Available evidence indicates that indoor air quality improvements were a clear and substantial success of the pilot program.

In 2024, a coalition of technical experts, public health advocates, and environmental justice organizations published an independent study evaluating the impact of transitioning to electric heating, cooking, and smart filtration appliances on indoor air quality in the low income, rural pilot communities in San Joaquin Valley.⁶¹ The study found that homes with electric stoves had “significantly lower” indoor concentrations of NO₂, NO, and NO_x, compared to those using gas stoves.⁶² This is precisely the kind of NEI the Commission identified as being an appropriate component of Phase III’s economic feasibility analysis.

Improvements in indoor air quality and other NEIs, including local economic development, are consistent with the Commission’s mandates for determining cost-effectiveness. Pursuant to Section 701.1, and prior Commission decisions in this proceeding, the Commission should therefore integrate NEIs into Phase III’s economic feasibility analysis alongside traditional cost metrics. The Commission must reopen the SJV Proceeding and initiate Phase III to analyze the economic feasibility of each component of the affordable energy pilot projects, as detailed in the next section, and if cost-effective considering NEIs, determine funding sources to replicate those components in other SJV DACs as soon as possible.

⁶¹ Berkeley Air Monitoring Group et al., *supra* note 7.

⁶² *Id.* at 13.

B. Phase III Must Address Whether to Extend One or More Aspects of the Pilot Program.

Title 11 of Decision 18-12-015 details several components of the pilot projects the Commission authorized pursuant to Section 783.5(b)(2), including bill savings and affordability, the Community Energy Navigator (“CEN”) program, partial and full electrification, solar and storage, energy efficiency measures, a safety plan, a household remediation budget cap, and workforce training and development. As Section 783.5(c) directs, following Phase III’s economic feasibility analysis, the Commission “shall take appropriate action and determine appropriate funding sources” for those options that “would increase access to affordable energy in a cost-effective manner.”⁶³ Accordingly, Phase III must first determine whether to expand one or more options analyzed in the proceeding to the remaining SJV DACs, and, second, whether to continue elements of the pilots for the initial pilot communities.

The following sections elaborate on each element the Commission must evaluate for possible extension to remaining SJV DACs and the initial pilot communities themselves.

1. Bill Savings and Affordability

Achieving energy cost savings for participating households was a central objective of the pilots.⁶⁴ Accordingly, Decision 18-12-015, and subsequently Resolution E-5034 (“Bill Savings Resolution”), established a bill savings mechanism, also referred to as a bill protection mechanism, for pilot community participants.⁶⁵ The bill savings mechanism was a critical component designed to ensure affordability, particularly for low-income residents transitioning from propane or wood-burning appliances to electric options. The mechanism provided a 20% discount, supplemented

⁶³ Pub. Util. Code § 783.5(c).

⁶⁴ D.18-12-015, *supra* note 20 at 75 (“Ensuring that participating households experience energy cost savings is a central objective of the pilot.”); *see Id.* at 156, Finding of Fact 56 (“It is important that all PAs work to ensure energy cost savings for all households receiving electric appliance retrofits as part of the pilots.”).

⁶⁵ *Id.* at 75-80.

by the CARE discount for low-income households, to help ensure that participants experienced actual energy cost savings.⁶⁶ This 20% discount applied to all electrification pilot participants on their monthly electricity bills for a five-year period after the first electric appliance was installed in their home. Following a finding in December 2024 that some participants experienced energy cost increases, the discount was extended for an additional five years.⁶⁷ Given that implementation began several years ago, the expiration of this necessary and protective bill savings mechanism now appears imminent, raising urgent questions about continued energy affordability for participating SJV DAC residents.⁶⁸

Evergreen Economics subsequently evaluated the savings mechanism by analyzing pilot participant energy bills to determine whether households experienced cost savings switching from propane or wood-powered appliances to electric.⁶⁹ Evergreen concluded that the mechanism had “a large influence on both the likelihood and magnitude of bill reductions for participants.”⁷⁰ The study found that the mechanism successfully guarded pilot participants against rising electricity rates. Without the bill savings discount, pilot participants would have seen a \$565 rise in their total energy costs post-installation.⁷¹ Non-participants living in similar homes in the pilot communities saw a \$657 increase in their energy costs, despite slightly reducing their energy

⁶⁶ Resolution E-5034, Resolution Authorizing Bill Protection Mechanisms for San Joaquin Valley Pilot Participants Pursuant to Decision 18-12-015 (December 19, 2019), at 46-50, *available at* <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M322/K776/322776695.pdf>.

⁶⁷ *Id.* at 48, Order 3; Pacific Gas & Electric Company, Advice Letter Pursuant to Ordering Paragraph 5 of Resolution E-5034 Authorizing Bill Protection Approaches for Pacific Gas and Electric Company, Southern California Edison Company, and Southern California Gas Company San Joaquin (December 10, 2024), *available at* https://www.pge.com/tariffs/assets/pdf/adviceletter/GAS_5010-G.pdf.

⁶⁸ The bill savings mechanism is currently set to expire in 2029.

⁶⁹ Evergreen Economics, PG&E and RHA San Joaquin Valley Pilot Impact Evaluation (Dec. 9, 2024) at 26, *available at* <https://pda.energydataweb.com/api/view/4084/PG%26E%20RHA%20SJV%20DAC%20Impact%20Evaluation%20Report%20FINAL.pdf>.

⁷⁰ *Id.* at 67.

⁷¹ *Id.* at 2-3 (“[T]he program intervention saved participants \$539 per year in energy costs (net impacts), by avoiding the full natural increase in energy costs (\$657-\$117 = \$539).”).

consumption by 43 kWh, during the same study period.⁷² Indeed, all households in the region, both pilot and non-pilot participants, saw major increases in bills due to factors outside the pilot program's control.⁷³ The success of the bill protection mechanism serves as proof that policy levers, particularly those used in the pilots, can enable affordability through electrification, even under volatile market conditions. Given the affordability crisis facing all California ratepayers, in particular those in SJV DACs, Phase III should assess whether to replicate this mechanism in the remaining SJV DACs.

The bill protection mechanism was not intended to be eliminated outright absent a showing that all pilot participants were experiencing cost savings.⁷⁴ Protecting pilot residents from rising costs through the bill protection mechanism and evaluating whether the mechanism can successfully achieve pilot goals was a central purpose of the pilot program, as articulated in the Commission's prior decisions. This dual purpose was designed to inform whether and how such a mechanism could be expanded more broadly to fulfil the goals of Section 783.5. Accordingly, eliminating bill protection, particularly without evidence that all participants are realizing energy cost savings, would directly contradict the Commission's findings and undermine the pilot's core objectives. Given that affordable energy access is at the core of Section 783.5, and bill savings are critical to achieving that objective, the Commission should prioritize replicating the bill savings mechanism.

⁷² *Id.* at 2.

⁷³ *Id.* at 2-3; see also Eric McGhee, *A Closer Look at California's Surging Electricity Rates*, Public Policy Institute of California (blog) (April 1, 2025), <https://www.ppic.org/blog/a-closer-look-at-californias-surging-electricity-rates/> (last visited July 7, 2025) (showing that rates in California have surged in last few years and are now 80% higher than national average).

⁷⁴ Resolution E-5034, *supra* note 66 at 47, Finding 30 ("It is reasonable to step down a percentage bill protection discount over time, assuming that all participants are experiencing cost savings.").

Phase III must assess whether to extend the bill savings mechanism to other SJV DACs, as well as whether to extend coverage beyond 10 years for pilot participants currently benefiting from the mechanism.

2. Community Energy Navigator

Phase III must also assess the CEN program for extension to other SJV DACs. The Commission recognized that CENs would be “a key to the success of the pilot” and thus directed all pilot administrators to offer this service.⁷⁵

CENs are individuals affiliated with local community-based organizations or who serve as trusted community leaders to inform, engage, and assist participating residents. They conducted outreach to educate San Joaquin Valley residents, assisted households in achieving energy cost savings, and provided guidance to those navigating pilot participation. Their responsibilities included community outreach, technical assistance, implementing the split incentives program, supporting the remediation process, identifying funding sources, and facilitating pilot communications and reporting.⁷⁶

The complexity of available energy options, including the varying implications of fully electrifying or selecting partial measures, can make it difficult for residents to understand the potential impacts on their energy bills, how to access additional information, or who to contact for issues such as damage or faulty equipment. In light of these challenges, as the Commission has itself acknowledged, CENs are critical “to assist pilot community residents with understanding

⁷⁵ D.18-12-015, *supra* note 20 at 81 (“We recognize that the CEN component will be key to the success of the pilot and we direct all pilot administrators and the third-party PA/PI to offer this service in all pilot communities.”).

⁷⁶ Self-Help Enterprises, SJV DAC Pilot Projects Community Energy Navigator Program Manager: *Community Outreach & Engagement Plan* (PowerPoint) (n.d.), <https://liob.cpuc.ca.gov/wp-content/uploads/sites/14/2020/12/Item-06.-Self-Help-Enterprises-Presentation-on-San-Joaquin-Valley-Proceeding-LIOB121019.pptx>.

and adhering to program requirements.”⁷⁷ In Oakland, the success of a recent block-scale electrification effort depended on trusted, face-to-face outreach, demonstrating that direct community engagement is essential to overcoming participation barriers.⁷⁸ Given that the Commission has tasked itself with ensuring “expanded engagement, education and outreach to all households located in host SJV DAC communities,” evaluating whether to extend the CEN program is critical to fulfilling that commitment.⁷⁹ An initial pilot evaluation found that CENs were effective in sharing information and building community trust. To enable CENs to fulfill their role more effectively, the evaluation recommends, *inter alia*, expanding and strengthening the program.⁸⁰

The Commission has identified the many benefits of the CEN program, in particular how tailored and in-person outreach in partnership with community-based organizations was responsible for the vast majority (enrolling 731 customers, as compared to the only 13 enrolled under more traditional IOU outreach efforts) of pilot project participation.⁸¹ Beyond assisting SJV DACs in navigating the complex field of energy options, the CENs were implemented to allow for “more diverse pilot learnings and data” that was planned to be utilized “in Phase III of the proceeding.”⁸²

Phase III must also determine whether to extend the CEN role to support SJV DACs.

⁷⁷ D.18-12-015, *supra* note 20 at 156, Finding of Fact 48.

⁷⁸ Laura Klivens, *This Oakland Block Tried to Quit Fossil Fuels. Here’s What They Learned*, KQED (June 12, 2025), <https://www.kqed.org/science/1997283/this-oakland-block-tried-to-quit-fossil-fuels-heres-what-they-learned>. See also Commission Environmental and Social Justice Action Plan.

⁷⁹ D.18-12-015, *supra* note 20 at 158, Conclusion of Law 10 (“The Commission should ensure expanded engagement, education and outreach to all households located in host SJV DAC communities, particularly in all-electric pilot host communities.”).

⁸⁰ Common Spark Consulting, *supra* note 23 at 8.

⁸¹ Evergreen Economics, *supra* note 69 at 49; see also Common Spark Consulting, *supra* note 23 at 8.

⁸² D.18-12-015, *supra* note 20 at 156, Finding of Fact 49.

3. Appliances: “Partial vs. Full Electrification”

The Phase II pilots were designed to test both full and partial electrification as alternatives to propane and wood-burning appliances. Full electrification replaces all major gas appliances with electric ones, while partial electrification involves converting only select end uses. The Commission directed that both approaches be evaluated, with Phase III tasked with assessing their respective economic feasibility to inform broader implementation of measures providing affordable energy across SJV DACs.

Although the Commission acknowledged that full electrification would better achieve household energy cost reductions, a conclusion supported by the Evergreen study, exploring partial electrification also allowed pilot administrators to forgo installing heat pump space heaters in homes where installation was deemed inappropriate.⁸³ The Commission concluded that “[p]roviding participants only one appliance does not provide sufficient assurances that energy costs savings will occur in participating households,” but acknowledged that a single appliance “may be appropriate in households that are not appropriate to receive heat pump space heaters.”⁸⁴

One key benefit of allowing the pilots to range between partial and full electrification is that it expanded available data on measures that could inform Phase III implementation across SJV DACs. For instance, it provided insights into how customer bill savings were affected by the scope of the home retrofit and how participants responded to different electrification incentives.⁸⁵ More than half of pilot participants who converted an appliance from propane or wood to electricity experienced a reduction in their annual energy costs, with the greatest savings among those who installed heat pumps and heat pump water heaters.⁸⁶ By contrast, participants who only upgraded

⁸³ *Id.* at 88-89; Evergreen Economics, *supra* note 69 at 67-70.

⁸⁴ D.18-12-015, *supra* note 20 at 155, Finding of Fact 46.

⁸⁵ *Id.* at Appendix A, p. 3.

⁸⁶ *Id.*

existing electric appliances, without electrifying or installing heat pumps, experienced the least benefit.⁸⁷

The Bill Savings Resolution concluded that it was “not the appropriate venue to seek a modification of the SJV Decision regarding partial or full electrification.”⁸⁸ Phase III is the appropriate forum to do so. Phase III must address the differential benefits associated with full versus partial electrification and evaluate whether to extend one or both approaches to other SJV DACs.

4. Solar and Storage

Decision 18-12-015 determined that “it is reasonable to allow community solar projects in the SJV DAC communities where all-electric pilots are approved.”⁸⁹ Under a separate proceeding pursuant to AB 327, the Commission had already created three programs to increase access to solar for residents of disadvantaged communities.⁹⁰ As a result, Decision 18-12-015 authorized use of those solar projects in the approved pilot communities.⁹¹ The Commission evaluated two solar options, the Community Solar Green Tariff (“CSGT”) and the-Disadvantaged Community Green Tariff (“DAC-GT”), ultimately selecting the DAC-GT for implementation in the pilots.

The Community Solar Green Tariff (“CSGT”) program requires customers to live in a DAC that is 5 miles or less from the solar project to which they subscribe.⁹² For SJV pilot communities, the Commission found it reasonable to permit a locational exemption from this geographic

⁸⁷ Evergreen Economics, *supra* note 69 at 69.

⁸⁸ *Id.*

⁸⁹ D.18-12-015, *supra* note 20 at 158, Conclusion of Law 11.

⁹⁰ D. 18-06-027, Alternate Decision Adopting Alternatives to Promote Solar Distributed Generation in Disadvantaged Communities (June 22, 2018).

⁹¹ D.18-12-015, *supra* note 20 at 67-68, Table 26: Summary of Approved Pilots.

⁹² *Id.* at 107.

requirement “to allow a CGST project to serve multiple pilots,” and expanded the locational requirement from 5 to 40 miles.⁹³

Decision 18-06-027 asserted that SJV DAC pilot communities would be eligible for CGST,⁹⁴ and made it clear that the Commission “intended the program to specifically target projects *in* these communities.”⁹⁵ The Decision also directed SCE and PG&E to solicit CSGT projects to serve the pilot communities.⁹⁶ However, in the Commission’s recent community solar decision, the Commission acknowledged that “no projects have come online.”⁹⁷

Community solar projects located within or near the communities they serve offer substantial reliability and resilience benefits, including reducing outage duration and maintaining power during emergencies.⁹⁸ Locating these projects close to customers also enhances environmental and public health outcomes, supports local job creation, and increases participation by building trust and accessibility.⁹⁹ Solar-powered microgrids can be one of the most cost-effective ways to electrify remote areas.¹⁰⁰ Moreover, since revenue from these projects stays

⁹³ *Id.* at 107-09.

⁹⁴ D.18-06-027, *supra* note 90 at 68, fn. 41.

⁹⁵ D.18-12-015, *supra* note 20 at 108 (quoting D.18-06-027 at 82) (emphasis added).

⁹⁶ *Id.* at 110.

⁹⁷ D. 24-05-065, Decision Modifying Green Access Program Tariffs and Adopting a Community Renewable Energy Program (May 30, 2024) at 57.

⁹⁸ See Center for Biological Diversity, *Rooftop-Solar Justice: Why Net Metering Is Good for People and the Planet and Why* (March 2023) at 4; Sherry Stout, et al., *Distributed Energy Planning For Climate Resilience*, National Renewable Energy Laboratory (2018), *available at* <https://www.nrel.gov/docs/fy18osti/71310.pdf>; Nat’l Renewable Energy Lab. & U.S. Agency for Int’l Dev., *Cybersecurity and Distributed Energy Resources 1* (April 2020), *available at* <https://www.nrel.gov/docs/fy20osti/76307.pdf>; Nat’l Acad. of Science, Eng’g & Med., *Enhancing the Resilience of the Nation’s Electricity System*, Washington, DC: The National Academies Press 108 (2017), *available at* <https://nap.nationalacademies.org/catalog/24836/enhancing-the-resilience-of-the-nations-electricitysystem>.

⁹⁹ To ensure these benefits are realized, the Commission must implement these programs with meaningful and adequate community participation. Land use priorities differ across communities and effective implementation requires that local voices shape decisions from the outset.

¹⁰⁰ Global Footprint Network, *Rural Solar Power and Microgrids*, <https://overshoot.footprintnetwork.org/portfolio/rural-solar-power-and-microgrids/> [<https://perma.cc/K86E-T55G>] (last visited July 7, 2025).

local, local jobs are created, spurring local economic growth.¹⁰¹ Given the cost-effectiveness of microgrids and their potential to advance the goals of the Section 783.5 while delivering local benefits, the Commission should evaluate this alternative as part of Phase III.¹⁰²

Ultimately, for the pilots, utilities pursued another solar option, the DAC-GT program, a subscription model to solar anywhere in the utility service territory, typically a lot further away from the community. In their study evaluating pilot implementation, Evergreen Economics found that 65% of respondents were unaware of the CS-GT program and 74% were unaware of the DAC-GT program.¹⁰³ These low awareness rates, and the fact that no CS-GT projects have come online, suggest that the solar and storage programs have not yet been given a fair opportunity to succeed.

Phase III must evaluate whether, with improved outreach, these offerings can be effectively replicated and scaled to achieve affordable energy for SJV DACs.

5. Energy Efficiency

Another pilot component that must be evaluated in Phase III is energy efficiency measures, a recognized strategy for reducing household energy burdens.¹⁰⁴ Where electrification pilots

¹⁰¹ Miguel Yañez-Barnuevo, *Microgrids and Energy Improvements in Rural Areas*, Environmental and Energy Study Institute, <https://www.eesi.org/articles/view/microgrids-and-energy-improvements-in-rural-areas> [<https://perma.cc/F2FG-XJUX>] (last visited July 7, 2025).

¹⁰² See Pub. Util. Code § 783.5(b)(2)(C) (directing the Commission to analyze the economic feasibility of “[t]he alternatives that would increase access to affordable energy in those disadvantaged communities that the commission deems appropriate.”). In regions like the San Joaquin Valley, the alternative to distributed energy resources is transmission buildout, which has been linked to increased wildfire risk and other hazards. Microgrids offer a safer, more cost-effective, and locally beneficial solution. See e.g. M.Cubed, *Microgrids could cost 10% of undergrounding PG&E’s wires* (blog) (December 17, 2019), <https://mcubedecon.com/2019/12/17/microgrids-could-cost-10-of-undergrounding-pges-wires/> (last visited July 15, 2025); M.Cubed, *A cheaper wildfire mitigation solution: using microgrids instead of undergrounding* (blog) (March 15, 2022), <https://mcubedecon.com/2022/03/15/a-cheaper-wildfire-mitigation-solution-using-microgrids-instead-of-undergrounding/> (last visited July 18, 2025).

¹⁰³ Evergreen Economics, PG&E and RHA San Joaquin Valley Pilot Impact Evaluation (Dec. 9, 2024) at 53, Figure 17.

¹⁰⁴ See Merrian Borgeson, *CA Must Protect Its Energy Efficiency Programs Amidst the Rates Crisis* (blog), NRDC (August 4, 2024), <https://www.nrdc.org/bio/merrian-borgeson/ca-must-protect-its-energy-efficiency-programs-amidst-rates-crisis> (last visited July 18, 2025); U.S. Department of Energy, *Low-Income Household Energy Burden Varies Among States — Efficiency Can Help In All of Them* (December 2018); Diana Hernández, Understanding ‘energy insecurity’ and why it matters to health, Social Science

involved measures already covered by existing energy efficiency programs, such as the Energy Savings Assistance (“ESA”) Program, the California Solar Initiative Solar Thermal Program (“CSI-Thermal”), or others, the Commission determined the cost of those measures should be funded through the relevant program at its established rates.¹⁰⁵ However, the Commission allowed administrators to still count the associated energy savings, provided they avoid double-counting.¹⁰⁶

Achieving energy efficiency alongside electrification is essential to ensuring affordability for SJV DACs, particularly in light of California’s ongoing affordability crisis.¹⁰⁷ As the Commission recognized, one quantifiable benefit of potential energy programs is “achieved energy efficiency.”¹⁰⁸ Without taking advantage of energy efficiency measures, electrification alone has the potential to increase household energy costs and undermine the purposes of Section 783.5. In addition to reducing household energy burdens, energy efficiency measures also align with California’s long-term environmental goals.¹⁰⁹

Phase III must assess whether continuing or expanding access to these energy efficiency programs for SJV DAC residents would further reduce household energy burdens and improve program effectiveness.

& Medicine 167, 1-10; CPUC Press Release, CPUC Approves Energy Efficiency Plans and Leverages Local Governments to Ensure Consumer Benefits (November 8, 2012) *available at* <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M033/K963/33963319.pdf>.

¹⁰⁵ D.18-12-015, *supra* note 20 at 90-91.

¹⁰⁶ *Id.* at 91.

¹⁰⁷ See *supra* Section II.C.1; Eric McGhee, *A Closer Look at California’s Surging Electricity Rates*, Public Policy Institute of California (blog) (April 1, 2025), <https://www.ppic.org/blog/a-closer-look-at-californias-surging-electricity-rates/> (last visited July 7, 2025) (showing that rates in California have surged in last few years and are now 80% higher than national average).

¹⁰⁸ D.18-12-015, *supra* note 20 at 154, Finding of Fact 35.

¹⁰⁹ See e.g. CPUC Press Release, CPUC Approves Energy Efficiency Plans and Leverages Local Governments to Ensure Consumer Benefits (November 8, 2012) *available at* <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M033/K963/33963319.PDF> (low-income energy efficiency programs collectively contribute to “4,000 gigawatt-hours and 750 megawatts of electricity savings over the next two years, reducing the need for at least two large power plants”); see also D.17-05-014, *supra* note 16 at 41, Finding of Fact 20.

6. *Safety Plan*

Decision 18-12-015 also directed pilot administrators to take reasonable steps to ensure the safety and health of pilot community residents, describing such an effort as a “top priority.”¹¹⁰ In addition to adhering to all applicable state, federal, and local laws and permitting requirements, “reasonable steps” also include disclosing pre-existing housing conditions that may affect the health and safety of residents, obtaining any final inspections, and filing a safety report following completion of the pilot documenting adherence to the Safety Plan and describing all health and safety issues encountered.¹¹¹ The Commission ordered PG&E, SCE, and SoCalGas to file a Tier 1 Advice Letter within 90 days of completing pilot implementation describing the Safety Plan, detailing any health or safety issues encountered, and providing any additional relevant information.¹¹² According to information and belief, the Commission has yet to take any affirmative action to address safety issues encountered.

Consistent with the observations of the IOUs,¹¹³ Section III.C below details how faulty appliances and home damage have been reported by pilot participants. Improperly installed electrical systems can create dangerous conditions that may result in sparks or short circuits, posing significant risk to property and personal safety. Given that health and safety was described as a “top priority,” in Phase III, the Commission should also direct IOUs to adequately address remaining Phase II implementation issues that create any safety or health risk for pilot community residents.

¹¹⁰ D.18-12-015, Decision Approving Pilot Projects (December 13, 2018) at 156, Finding of Fact 54.

¹¹¹ *Id.* at 92-93.

¹¹² *Id.* at 164-165, Order 12.

¹¹³ Pacific Gas & Electric Company, Pacific Gas and Electric Company Adherence to the Approved San Joaquin Valley Disadvantaged Communities Safety Plan (September 11, 2023), *available at* https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_7021-E.pdf.

7. Household Remediation Budget Allowance

Decision 18-12-015 approved funding for household remediation to address substandard housing conditions and ensure that all necessary pilot work could be completed safely and in compliance with local building codes.¹¹⁴ This component was especially important for the lowest income and most vulnerable pilot participants, who were more likely to live in substandard housing and less able to afford necessary remediation costs. The Decision also established a \$5,000 per household allowance on remediation costs. A subsequent Petition to Modify the Decision expressed concern that the \$5,000 household remediation cap was too rigid, would disadvantage the most vulnerable households, and would decrease pilot participation, and thus requested reconsideration of the cap.¹¹⁵ The Commission denied the request, citing to their previous Decision reasoning that “[a]n important learning of the pilot will be if our reasonable, adopted household cap on remediation costs of \$5,000 results in exclusion from the pilot of a significant number of homes.”¹¹⁶ If it did create such a result, the Commission would need to reconsider the remediation cap and “take a fuller account of additional options to fulfill the mandate of AB 7672 in Phase III.”¹¹⁷

Available evidence indicates the household remediation allowance likely resulted in the exclusion from the pilot program of a significant number of homes. Evergreen’s Pilot Impact Evaluation found that one of the largest barriers to program participation was remediation costs, with 41 percent of respondents indicating that it was a large barrier.¹¹⁸ Customers in mobile homes

¹¹⁴ D.18-12-015, *supra* note 20 at 95-96.

¹¹⁵ The Center on Race, Poverty & the Environment, Self-Help Enterprises and Leadership Counsel for Justice and Accountability, *Petition to Modify Decision 18-12-015 Approving San Joaquin Valley Disadvantaged Communities Pilot Projects* (December 13, 2019), at 8.

¹¹⁶ D.18-12-015, *supra* note 20 at 99.

¹¹⁷ *Id.*

¹¹⁸ Evergreen Economics, PG&E and RHA San Joaquin Valley Pilot Impact Evaluation (Dec. 9, 2024) at 47 (“Remediation was cited most often by survey respondents as a large barrier to program participation, with 41 percent of survey respondents who did not participate reporting that it was a large barrier, 24

were more likely to face challenges with excessive remediation costs and were also less likely to participate in the pilot after completing an application.¹¹⁹ The aim of such a restrictive requirement, as articulated by the Commission, was to ensure “a continuous learning process from the pilots to assist us in Phase III.”¹²⁰

Phase III must evaluate whether to modify the \$5,000 household remediation allowance, by either raising the amount and/or shifting to a community remediation cap.

8. *Workforce Training, Education and Development*

Decision 18-12-015 explicitly acknowledged that it is “reasonable and consistent with Section 783.5 to promote workforce development, training, education and outreach associated with appliances and home improvements.”¹²¹ As such, the Decision directed PG&E, SCE, SoCalGas, and the third-party pilot administrator to “[o]ffer the workforce development and workforce education and training elements outlined in this decision.”¹²²

As several parties commented, workforce training is necessary to maintain and service new technologies and combat the shortage of skilled technicians in areas like the San Joaquin Valley.¹²³ The Commission directed program administrators to include training on installation and servicing “should there be a need.”¹²⁴ The lack of skilled technicians in areas like the San Joaquin Valley, coupled with reports of faulty equipment and barriers to repair access, confirms a clear and

percent reporting that it was a small barrier, and 35 percent reporting that it was not a barrier.”); *Id.* at 89 (“The main barriers to participation recalled by opt-outs and non-participants in the survey were remediation costs”).

¹¹⁹ Evergreen Economics, PG&E and RHA San Joaquin Valley Pilot Impact Evaluation (Dec. 9, 2024) at 89 (“Customers in mobile homes were more likely to face challenges with program policies including excessive remediation (>\$5,000) and timing (e.g., waiting for PG&E infrastructure upgrades). This could explain why mobile homes were less likely to participate after completing an application (37% of opt-outs live in mobile homes vs. 16% of participants).”).

¹²⁰ D.18-12-015, *supra* note 20 at 4.

¹²¹ *Id.* at 160, Conclusion of Law 24.

¹²² *Id.* at 164-165, Order 12(f).

¹²³ *Id.* at 100-101.

¹²⁴ *Id.* at 101.

pressing need for workforce training. Organizations supporting pilot communities have encountered pilot participants in need of additional support, underscoring the importance of developing a local clean energy workforce.¹²⁵

With respect to workforce development, the Decision directed that such efforts should “focus on a sustainable pipeline of workers and jobs, rather than provide training [. . .] for jobs that may not persist beyond the tenure of the pilots.”¹²⁶ The Commission claimed the information from such an approach in the pilots would help the Commission “consider a local hire approach in Phase III.”¹²⁷ In doing so, the Commission postponed full consideration of workforce development to later in the SJV Proceeding.

Phase III must determine whether to extend workforce training, education, development, and other elements that could provide direct benefits to the local communities and other SJV DACs.

* * *

Section 783.5(c) directs the Commission to “take appropriate action” and “determine appropriate funding sources” for options that “would increase access to affordable energy in a cost-effective manner.”¹²⁸ As detailed above, those options include bill savings and affordability, CEN program, partial and full electrification, solar and storage, energy efficiency measures, a safety plan, a household remediation budget cap, and workforce training and development. The Commission must implement Phase III to determine whether to expand one or more options

¹²⁵ See *infra* Part C. Workforce development efforts should also consider the broader regional context, including the need to support displaced workers from declining oil and gas extraction and agriculture sectors.

¹²⁶ *Id.* at 102.

¹²⁷ *Id.*

¹²⁸ Pub. Util. Code § 783.5(c).

analyzed in the proceeding to the remaining SJV DACs, and whether to continue elements of the pilots for the initial pilot communities.

C. Phase III Must Address Remaining Phase II Implementation Issues.

Overall, Phase III must “further implement Section 783.5 and increase access to affordable energy in disadvantaged communities in the SJV.”¹²⁹ In order to address this directive, as detailed above, the Commission must develop the economic feasibility analysis of the pilot program and determine whether and how to extend one or more of its aspects. Additionally, the Commission must remedy remaining Phase II pilot implementation issues, in particular with regard to safety.

These concerns also include varying levels of the quality of installation work, including nonreceipt of eligible appliances, participants that received broken appliances, and damage to homes during the course of installation; lack of consistent and transparent communication and decision-making; unclear bill savings; overextended and underfunded CEN responsibilities; and barriers to eligibility and implementation, including mobile home eligibility and funding gaps for home remediation needs.¹³⁰ Failure to resolve these concerns suggests the Commission has not fulfilled the intended objectives of the SJV Proceeding and, in some instances, has left pilot participants in a worse position, facing property damage, nonfunctioning appliances, or faulty equipment that increases rather than reduces their energy costs.

In a recent Community Findings Memo, pilot communities raised two central concerns: the receipt of faulty appliances and damage to homes during the pilot process.¹³¹ The Commission explicitly ordered PG&E, SCE, and SoCalGas to “provide warranties on and servicing of all home appliance technologies installed during the pilot project.”¹³² Despite being responsible for ongoing

¹²⁹ D.18-12-015, *supra* note 20 at 161, Conclusion of Law 30.

¹³⁰ Common Spark Consulting, *supra* note 23.

¹³¹ *Id.*

¹³² D.18-12-015, *supra* note 20 at 165, Order 12(g).

servicing of appliances, however, pilot administrators have largely abandoned their duty to fix and replace faulty appliances. The Commission has not taken adequate action to ensure pilot communities received appropriate appliance repairs or replacements.

In December 2023, PG&E filed its final Annual Progress Report claiming it had “completed the engagement and implementation of the SJV DAC Pilots in its three assigned territories”; available data contradicts this claim.¹³³ Three pilot communities have reported that their appliances were faulty or stopped working within weeks of receipt.¹³⁴ Notably, a number of households have had to forego cooling in cases where their air conditioning unit was not working, a critical concern as the San Joaquin Valley is predisposed to dangerous heat waves.¹³⁵ Although CENs were not scoped or funded to assist with implementation work, they have reportedly taken on the role of helping households navigate issues with faulty appliances.¹³⁶

Moreover, some pilot participants reported that the quality of installation work lacked clear or consistent standards. Some reported that contractors burnt out or disconnected certain circuits in their homes and did not repair them. Others reported that piping was constructed outside the walls of their home, creating an eyesore and potentially affecting the value of their home.¹³⁷ Lastly, some residents also reported they never received promised appliances, despite being eligible, and never received an explanation as to why their promised appliances were never delivered.¹³⁸

¹³³ Pacific Gas & Electric Company, San Joaquin Valley Disadvantaged Community Electrification Pilot 2023 Annual Progress Report (December 19, 2023), at 3; Common Spark Consulting, *supra* note 23.

¹³⁴ Common Spark Consulting, *supra* note 23 at 9.

¹³⁵ *Id.* at 9 (“In June 2022, CRPE wrote a letter to the CPUC detailing this concern as many households endured the summer heat waves in SJV while waiting for replacements or repairs on their AC units.”).

¹³⁶ *Id.* at 10.

¹³⁷ *Id.*

¹³⁸ *Id.*

In Phase III, the Commission must resolve remaining Phase II implementation issues, not merely to ensure that future SJV DACs receive improved and reliable program offerings, but also to meet its obligations to current pilot communities. These residents were promised functioning appliances, quality installations, and adequate support, commitments the Commission is responsible for ensuring are fulfilled. Phase III presents the final opportunity to remedy these deficiencies and deliver on those obligations.

D. The Commission Should Act on this Petition Expeditiously.

Finally, although Section 1708.5(b)(1) allows the Commission to respond to this petition within six months, we emphasize the urgency to grant this petition. This urgency is underscored by public health and environmental harm, uncertainty for affected communities, as well as public policy and legal considerations.

First, delays in resolving the petition prolong communities' exposure to harmful environmental conditions and deny them the public health benefits associated with clean and affordable energy access and improved air quality, as required by Section 783.5. In the San Joaquin Valley, where the air quality is among the worst in the country, the need for urgent action is particularly acute.

Second, 167 disadvantaged communities in the San Joaquin Valley that qualify under Section 783.5, but were excluded from the pilot, remain in limbo, with no clarity as to whether, when, or how they will receive the benefits contemplated by law. Similarly, households and communities that participated in the pilots lack assurance that key benefits, such as affordable energy access, will continue. For example, the bill savings mechanism is currently set to expire in 2029, leaving participating households vulnerable to increased energy burdens.

Section 783.5 requires more than temporarily providing affordable energy access for a subset of disadvantaged communities in the San Joaquin Valley. It directs the Commission to

“take appropriate action” and to “determine appropriate funding sources” for those options determined to increase access to affordable energy in a cost-effective manner. Appropriate action necessarily includes extending, amending, or supplementing the tools tested during the pilot phase, not closing the proceeding without completing an economic feasibility analysis or issuing determinations under Section 783.5(c).

Finally, the Commission must remain mindful of its obligations to proceed in the manner required by law and avoid unreasonable delay. The Commission’s actions to date do not fulfill the requirements of Section 783.5. Timely action is necessary to fulfill the Commission’s statutory obligations in a manner that reflects urgency and accountability.

IV. The Issues Raised in the Petition Have Never Been Litigated Before the Commission.

The Commission has not addressed the issues required to be addressed in Phase III. Moreover, the Commission has no other active proceeding, including Rulemaking 19-01-011 (“Building Decarb Proceeding”) that can adequately address the myriad of outstanding issues detailed above.

For example, the Commission’s Building Decarb Proceeding is not the appropriate place to address these issues. The Building Decarb Proceeding is, first, a statewide-focused effort that, second, targets “both actions to reduce the emissions and impacts from natural gas use in buildings, as well as to electrify certain building end uses.”¹³⁹ Neither of these lenses is suitable to adequately address affordable clean energy solutions in SJV DACs.

First, the Legislature specifically passed AB 2672 as a special law on account of “the *unique* circumstance that the San Joaquin Valley is home to many communities that *lack access to natural gas service* and it is *necessary to ensure more affordable and cleaner alternatives* are

¹³⁹ R.19-01-011, Order Instituting Rulemaking (February 8, 2019) at 3-4, *available at* <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M264/K629/264629773.pdf>.

available.”¹⁴⁰ For instance, “in the Central Valley, where temperatures can reach extremes, it may be difficult for low-income families to afford the high usage of electricity to adequately heat or cool their homes and provide hot water.”¹⁴¹

Second, the SJV DACs lack access to natural gas: “[g]as lines simply do not extend into their communities and they must choose among more costly, less convenient and more potentially hazardous fuels to heat their homes, their water, and their food. Other fuels such as propane, wood and electricity are more costly and less environmentally friendly and leave residents more prone to health and safety issues. Communities that wish to transition to a more affordable energy source often times don’t have the resources to pay for projects without financing the project over time.”¹⁴²

The Building Decarb Proceeding is not suited to the “unique circumstances” in the San Joaquin Valley, and has a more specific focus on natural gas fuel substitution. Focusing solely on end use appliances will similarly ignore the multiple (and also unique when compared to the rest of the state) infrastructure and financing barriers to clean energy solutions specific to SJV DACs, and which the SJV Proceeding record itself has already begun identifying.

Furthermore, the Building Decarb Proceeding is intended to align with building decarbonization efforts detailed in the California Air Resources Board’s (“CARB”) Scoping Plan.¹⁴³ CARB’s most recent 2022 Scoping Plan, however, does not address propane use or wood

¹⁴⁰ AB 2672 (Perea, 2014), Sec. 3 (emphasis added).

¹⁴¹ AB 2672, Assembly Committee on Utilities And Commerce Analysis (April 7, 2014) at 4, *available at* https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=201320140AB2672#.

¹⁴² AB 2672, Senate Energy Utilities and Communications Committee Analysis (June 23, 2014) at 2-3, *available at* https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=201320140AB2672#.

¹⁴³ R.19-01-011, *supra* note 139 at 3 (The “Commission currently oversees a wide range of programs and activities to decarbonize California’s electricity and natural gas systems *in a manner consistent with the Scoping Plan.*” (emphasis added).)

burning.¹⁴⁴ In fact, the Building Decarbonization Appendix to CARB’s 2022 Scoping Plan even identifies the need for “special consideration” of SJV DAC circumstances, referencing the Commission’s responsibility to determine that special consideration in the SJV Proceeding itself.¹⁴⁵

Finally, while the Building Decarb Proceeding efforts may be complementary to the goals of the SJV Proceeding, D.18-12-015 determined that two programs, BUILD and TECH “may contribute to the *feasibility* of providing affordable clean energy options to the remaining SJV DAC listed communities in Phase III of the proceeding.”¹⁴⁶ That inquiry rests on the cost-effectiveness determination, but does not address the other outstanding issues presented by Section 783.5(c), detailed throughout this Petition, that the Commission has yet to address.

V. Conclusion.

For the foregoing reasons, Petitioners respectfully request the Commission to grant this petition, reopen the SJV Proceeding, and initiate Phase III pursuant to Section 783.5(c) and D.18-12-015 as soon as possible.

Dated: August 20, 2025

¹⁴⁴ See CARB 2022 Scoping Plan (November 2022) at 60, *available at* (“The black carbon inventory [that includes residential wood burning] is not part of California’s GHG Inventory that tracks progress toward the state’s climate targets under AB 32 or SB 32.” The 2022 Scoping Plan does not mention propane.)

¹⁴⁵ CARB 2022 Scoping Plan, Appendix F, Building Decarbonization (November 2022) at 15, *available at* <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-f-building-decarbonization.pdf>.

¹⁴⁶ D.18-12-015, *supra* note 20 at 130 (emphasis added).

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ATTACHMENT A

Common Spark Consulting

San Joaquin Valley Affordable Energy Pilots: Community Findings Memo (April 2024)

San Joaquin Valley Affordable Energy Pilots - Community Findings Memo

Prepared by Common Spark Consulting for the Center on Race, Poverty, & the Environment
April 2024

Table of Contents

Purpose of this Memo	2
Background	4
Methods	5
Literature Review	5
Pilot Community Engagement	5
Guidance from the Pilot Team	6
Participant Concerns	6
Barriers to eligibility and implementation	7
Mistrust of state agencies and utilities	8
Nonreceipt of eligible appliances or repairs of broken appliances	8
Overextended and underfunded CEN responsibilities	9
Varying levels of quality of installation work	10
Lack of consistent and transparent communication and decision-making	11
Unclear bill savings	12
Recommendations	12
Appendix: Summarized Community Meeting Notes	15

Purpose of this Memo

To provide a strong platform for organizing and policy advocacy, the Center on Race, Poverty, and the Environment (CRPE), with the advice and leadership of Self-Help Enterprises (SHE) and Leadership Counsel for Justice and Accountability (LCJA), seeks to consolidate findings, observations, learnings, challenges, questions, and perspectives on the implementation of the San Joaquin Valley (SJV) Affordable Energy Pilots. These findings from the community are necessary to document so that:

1. Community-based organizations can seek the immediate-term needs for **successful completion of the SJV Pilots**.
2. Community-based organizations can work from a narrative that is grounded in and elevates **community experience and perspectives** from the pilot.
3. Policymakers that seek to leverage best practices and learnings from the SJV Pilots can reference an **authentic record of what has gone well and what could have gone better, and approach new projects with updated program designs**.
4. Community-based organizations can pursue **future regulatory or other advocacy and organizing** with a comprehensive and organized set of findings and perspectives from the SJV Community and Pilot partners.

The California Public Utilities Commission (CPUC), through the SJV Pilots, the California Energy Commission (CEC), through the Equitable Building Decarbonization Program, and other state agencies in similar efforts should leverage this memo to:

1. **Complete the work already planned in the existing 11 SJV pilot communities.** The top priority should be remedying households that received faulty appliances or experienced damage during installation, households that have not received repairs or replacements, and households that are eligible but have not been serviced.
 - a. Relatedly, the CPUC should immediately investigate the discrepancy between PG&E's 2023 Annual Pilot Progress Report, which claims that it completed installations in June 2023, with Allensworth community members' statements in a November 2023 community meeting that at least 10 households were still waiting for appliances they had been promised.
2. **Meet regularly with the CBOs supporting program implementation to understand community perspectives and experiences and make appropriate course corrections.** The CPUC and CEC cannot treat communities as short-term "treatment groups" and only engage with them until the pilot begins. The community's long-term trajectory must be centered on building the climate and community resilience that state agencies seek.
 - a. Consistent and regular community forums should also be held for state agencies to hear from residents themselves about their evolving pilot experiences.

- b. CENs must be engaged in and funded for program implementation. There is high demand for these appliances and program participation, but community residents need to trust the programs, administrators, and implementers.
- 3. Establish quality installation standards and hold contractors accountable for meeting these standards.** Clear accountability measures are critical to maintaining trust and a long-term relationship with the community. Program administrators and implementers must not view communities as transactions to "get the job done" and then move on to the next without any accountability to how well the job has been done from the perspective of the community. Community residents are not stepping stones to "economies of scale."
 - a. For each of the 11 pilot communities, conduct an independent evaluation of the implementers' quality of construction and installation work and appliance quality to inform the development of quality installation standards.
 - b. When state agencies release Requests for Proposals (RFPs) for program implementers and administrators of direct install programs, they should include requirements for a community engagement plan (specifying details on how the program administrator or implementer intends to engage with and reliably maintain engagement with community members and/or CBOs) and evidence of community competency (proof of competency in working with communities who may be rural, people of color, non-English-speaking, and/or agricultural, etc.). This sub-recommendation will support greater partnership between the program administrator or implementer with the CBOs and community members and greater opportunities to hold the administrator or implementer accountable for enforcing quality installation standards across all projects.
- 4. Sufficiently fund and support community-based organizations that will continue to be active and engaged with communities to provide ongoing technical assistance and community support.** If any pilot expansion or new program is launched, fund community-based organizations to serve as advisors and/or contractors for program outreach, design, implementation, and evaluation. CBOs/CENs are best suited to serve as coordinators and advisors and will be most effective if they are adequately funded to hire new permanent staff and build organizational capacity.
 - a. In addition, fund an independent, third-party technical partner or third-party liaison to serve as additional support to CBOs to alleviate and be the point person for any community concerns that may arise that require technical knowledge outside a CBO's scope of expertise from pre- to post-installation, including but not limited to appliance usage and maintenance and billing support. This role is also envisioned to support CBOs and community members in holding the program administrator or implementer responsible for addressing any appliance or upgrade issues.
- 5. Provide funding for holistic home upgrades, including remediation and paneling costs.** In continued efforts, ensure that holistic home upgrades are eligible expenses and that there is adequate funding for remediation costs and panel upgrades, especially for mobile homes. The SJV Pilots frequently did not have adequate funding to address remediation and paneling expenses leaving some of the most vulnerable households behind. Mobile

homes faced unique challenges, including the fact that the replacement of a unit was often costly but still the most cost-effective way of addressing remediation concerns. The CPUC should seek to expand the pilots to include households that couldn't qualify under pilots because of too-high remediation costs or other upgrade needs.

- a. Expand the pilot to include more AC units per household, as cooling is a basic necessity in the SJV. Residents have asked for more AC units to cover more areas in their homes to ensure indoor temperatures are safe during summer heat days.
- b. Increase coordination with other programs that provide no-cost energy-efficient appliances such as refrigerators.

6. Recruit community residents for electrification jobs. Leverage the new Rural REN funding/workforce program and design specifically to engage and train local communities to support recruitment and ongoing technical assistance for electrification pilots and programs. Specifically, state agencies should work together with community-based organizations to create local jobs for:

- a. Community organizing
- b. Community advocacy
- c. Contractor and general construction
- d. Equipment maintenance and repair

Background

The SJV Affordable Energy Pilots were established via [Assembly Bill 2672, Perea, 2014](#) to provide affordable energy access to communities that were not served, or only partially served, by natural gas infrastructure. In the first phase of the Pilot development process, the CPUC identified 170 communities that met the statute criteria for being considered "disadvantaged" - including lack of access or only partial access to natural gas infrastructure - and, therefore, eligible for pilot participation. Ultimately, the CPUC selected only 11 communities for pilot participation. The Pilot communities then selected which energy solution worked best for them (i.e., gas or electric), rather than being prescribed a solution. The vast majority (10 out of 11 communities) chose electric service over natural gas.

This memo highlights the experiences in the pilot communities of Ducor, Alpaugh, and Allensworth. Each community has a different program administrator and/or pilot implementer (Table 1).

Table 1. Pilot Administrators and Implementers in SJV Communities

Community	Pilot Administrator	Pilot Implementer
Ducor	Southern California Edison (SCE)	Synergy
Alpaugh	Richard Heath and Associates (RHA) (under contract with PG&E)	Synergy
Allensworth	Pacific Gas & Electric (PG&E)	Synergy

Pilot participation has been life-changing for many residents who now have appliances that contribute to a clean, healthy, and comfortable home. That said, should the CPUC consider whether to expand the Affordable Energy Pilots and as the CEC embarks on the implementation of the Equitable Building Decarbonization Program, there are important community-focused lessons learned that must be integrated into future efforts.

Methods

Three components fed into the development of this memo: a literature review; community meetings in pilot communities (Ducor, Alpaugh, and Allensworth), and guidance from members of the Pilot Team, including CRPE, LCJA, and SHE.

Literature Review

Common Spark Consulting conducted a review of published evaluations, reports from community listening sessions, and comments from CRPE and LCJA to the CPUC. The following documents were reviewed and annotated to identify any direct community feedback or Pilot Team feedback about their experiences concerning the Pilot.

- Notes from the San Joaquin Valley Listening Sessions on Equitable Building Decarbonization held by the Building Energy, Equity, & Power (BEEP) Coalition in January 2022
- LCJA, CRPE, and PODER Public Comments in CPUC Docket I.22-09-011 (Santa Nella Mobile Home Electrification)
- SJV DAC Pilot Projects Process Evaluation Report by Evergreen Economics
- LCJA's comments to Evergreen Economics in response to the Process Evaluation Report
- CRPE's log of pilot participant feedback in Allensworth and Ducor
- CRPE's letter to the CPUC regarding pilot participant concerns in June 2022

Pilot Community Engagement

To gather direct feedback from pilot participants, CRPE organized three in-person meetings in pilot communities:

- Ducor community meeting (~ 5 participants) held October 2, 2023,
- Alpaugh community meeting (~ 15 participants) held October 4, 2023, and
- Allensworth community meeting (~ 20 participants) held November 8, 2023.

Common Spark Consulting worked with CRPE to develop the agenda, slides, and discussion questions ([meeting notes are included in Appendix 1](#)). In the case of the Allensworth community meeting, CRPE coordinated with the Allensworth Progressive Association to plan and conduct outreach for the meeting. CRPE also coordinated with local elementary schools to host the meetings and conducted door-to-door and phone outreach to invite pilot participants to the meetings.

In each community meeting, over two hours, CRPE and Common Spark Consulting welcomed and provided food to the participants. Each meeting began with an overview of the Pilot program and context around the effort to develop a community findings memo. The overview was followed by a group discussion with prepared and improvised questions about the participants' overall experience with the Pilot, the quality of the installation work and appliances, and general recommendations to the CPUC. With the support of a translator, the meetings were conducted in English and Spanish simultaneously.

Guidance from the Pilot Team

The Pilot Team, including CRPE, SHE, and LCJA, provided leadership and guidance to develop this memo. Common Spark Consulting had several meetings with CRPE to initiate the development of the memo, plan the community meetings, and debrief and check in about the findings. In addition, meetings with the Pilot Team were held at the onset of the memo development to guide the memo's outline, intentions, and direction; midway to share progress updates and gather additional resources and insights; and after the community meetings to share insights from the meetings and to review the memo. Common Spark Consulting also gathered feedback from the Pilot Team over email and Google Docs.

Participant Concerns

Each SJV pilot community has had a unique experience with implementation that is valuable to understand. This memo bases its findings on community meetings held in Ducor, Alpaugh, and Allensworth. LCJA, in its comments on the SJV Process Evaluation, highlighted the need for feedback from residents of Lanare, Cantua Creek, La Vina, and Fairmead.¹ **The CPUC and program administrators must conduct additional community outreach and visit and speak with pilot communities to better understand each community's experience and recommendations.**

¹ [Comments on SJV DAC Pilot Projects Process Evaluation](#), October 12, 2022, submitted by Leadership Counsel for Justice and Accountability, accessed January 19, 2024 at: <https://pda.energydataweb.com/#/documents/2716/comments/list?q=sjv%20pilot%20evaluation&searchOn=title>.

This memo focuses primarily on residents' experiences with the installation process, the appliance quality and maintenance, and the program's perceived benefits. There were a number of households who had no critical feedback to give and instead expressed their satisfaction and gratitude for the program. This section highlights the concerns raised by participants so that the program can properly address them and achieve total satisfaction with all of the Pilot communities and households. Each section is accompanied by a Community Voices call-out box highlighting statements shared at the Ducor, Alpaugh, and Allensworth community meetings.

Barriers to eligibility and implementation

Participants recounted facing barriers to determining eligibility for the program and receiving the appliances when deemed eligible. Barriers that have hindered project implementation include eligibility requirements and funding gaps for home remediation needs, homeownership documentation rules, mobile home permits, and ongoing technical assistance. A number of mobile home residents, in particular, noted they never received the appliances despite being deemed eligible and never received any communication about why they could not receive the appliances.

If remediation needs (noting that homes, especially mobile homes, have varying remediation needs) surpass a cost cap or are out of scope, then the cost cap and/or scope must be adjusted to ensure mobile homes are not left out of this, and future programs as mobile homes represent a significant portion of the SJV building stock.

Community Voices

- *No one came after I enrolled.*
- *They told me that they were gonna install appliances in all four of my properties, but they only gave me a water heater for one property. They promised other appliances, but we never got them.*
- *When an application wasn't in the name of the person who called, it was hard to get information.*
- *They came to my daughter's house and drew lines on the walls for the electrical wire installations, but they never installed anything.*
- *Synergy installed an AC and Water Heater unit without a power line box. Synergy had affirmed that to get an AC, you need to accept a stove, but no stove was installed, and they broke that line without returning to fix it.*
- *I would appreciate clarification on what my household qualified for as we were told we qualified for a washer/dryer and refrigerator but never received them.*
- *I qualified for all eligible appliances under the Pilot Program; however, when an agent came to my home, they disqualified me without explanation, and I have not received any appliances.*

Mistrust of state agencies and utilities

There is a general lack of understanding and trust in state energy agencies and utilities implementing the Pilot, particularly for households whose calls have been unanswered and whose concerns go unaddressed. This lack of trust created a significant barrier to participant recruitment, which was largely remedied by engaging Community Energy Navigators (CENs), community-based organizations with existing relationships within the community. CENs conducted the household-level outreach and coordination between the program administrator, program implementer, and community members. Across the three community meetings, most, if not all, residents responded that the CENs were effective in sharing information about the Pilot and were trusted by residents.

Though post-installation support was out of their scope, CENs continue to support residents by helping them when they face any issues with their appliances (such as setting the temperature on the HVAC system). However, CENs have had limited success in engaging and communicating with the CPUC, program administrators, and installers to ensure that administrators and installers are accountable for the commitments they made. CENs reported feeling powerless in implementation and oversight because they were not trained, equipped, or funded to support residents with faulty appliances. In addition, the lack of clear accountability measures made many residents feel unsure about who to contact when CENs could not address their needs and contributed to a growing mistrust in implementers and administrators for not addressing the issues.

Community Voices

- *We heard a lot of stories about bad experiences with appliances in the Pilot, we're navigating the possibility to see what we can do in the future.*
- *They [Synergy and CPUC] should have responsibility about not promising what they can't deliver. It's a problem from the top. They played with us and that's what hurts. We can buy appliances if we need to but they played with us.*
- *All of my appliances are fine but after hearing all these issues, I'm not sure I'd recommend the Pilot to my friends and family.*
- *Synergy, PG&E, and CPUC need to come and fix it and listen to us.*
- *The CPUC needs to know they gave money to Synergy and the community didn't receive quality work. None of us asked for this type of service. CPUC needs to know what Synergy did not do the service the community deserves.*

Nonreceipt of eligible appliances or repairs of broken appliances

Particularly in Allensworth, many residents shared that they were promised appliances they never received and/or experienced poor-quality installation work by Synergy. About half of the residents who attended the community meeting did not receive any of the appliances they were promised,

while a number of residents only received one or a few of the appliances. Some heard that if they did not accept the stove, then no appliances would be delivered. One resident recalled hearing from Synergy that the program ran out of funds. Most of the residents recalled never receiving any communication as to why their promised appliances were not delivered.

Among households that did receive all of their promised appliances, a number of residents across the three pilot communities reported that their appliances were faulty or completely stopped working within weeks of receipt. A few of those residents were able to contact the implementers to repair or replace the appliances, but a greater number of residents have been unsuccessful in replacing or repairing the appliances. This is a critical concern as households have been foregoing heated water or cooling in cases where their AC unit or water heater is not working. In June 2022, CRPE wrote a letter to the CPUC detailing this concern as many households endured the summer heat waves in SJV while waiting for replacements or repairs on their AC units.² However, the CPUC has taken no action to ensure the pilot communities receive the appliances promised, and repairs or replacements are made. Furthermore, this finding is particularly concerning as PG&E, the Program Administrator in Allensworth, recently filed its final Annual Progress Report, claiming that it has "completed the engagement and implementation of the SJV DAC Pilots in its three assigned territories."³ The data in this memo shows that the Report is simply not accurate.

Community Voices

- *They told me I was qualified for all eligible appliances under the pilot program, but only received the clothes dryer.*
- *My stove and water heater were replaced as part of this program but they are both no longer working and failing to do what they're intended for.*
- *I received a new water heater from the program but it is not working. I also qualified for a stove but I never received it.*
- *I called about fixing the clothes dryer but they never came. It's been about 3 to 4 months and they never came.*
- *My daughter never received the appliances but got a letter saying that she did.*

Overextended and underfunded CEN responsibilities

CENs have put significant time and resources into recruitment beyond what was initially scoped and expected for the Pilot. Communities targeted by the Pilot have had negative experiences with clean energy installers in the past (e.g., [solar scams](#)), and CENs have put in extra time and effort

² June 30, 2022 Letter from CRPE to Leuwam Tesfai, Deputy Director for Energy and Climate Policy; Alice Busching Reynolds, President; Darcie Houck, Genevieve Shiroma, Clifford Rechtschaffen, John Reynolds, COMmissioners; Anand Durvasula, Sean Simon, Pounesh Ghaffarian, Suzanne Casazza, Chiefs of Staff; Re: San Joaquin Valley Disadvantaged Communities Pilot Project - Ducor.

³ PG&E, December 19, 2023, [San Joaquin Valley Disadvantaged Community Electrification Pilot 2023 Annual Progress Report](#), page 3.

to remediate that damage and build trust with the SJV pilot communities. In addition to the initial outreach and recruitment work, CENs have been increasingly supporting households with managing issues with their appliances – even though they are not scoped or funded to do implementation work. Residents lacked ongoing technical assistance to support them to use their new appliances correctly, help them with warranties, and understand their bills. CENs have been filling this gap but, along with the Pilot Team, reported feeling that the implementers are more accountable to who contracted them (i.e., program administrators) than the participating households. Due to this perceived dynamic, this program appears more inclined towards completing projects to boost the number of completed households rather than prioritizing the best quality installation and care for residents. Thus, it has been challenging for CENs to communicate with the program administrators and program implementers/contractors and to hold them accountable for addressing appliance issues and installation damages.

Community Voices

- *There was not clear information about the appliance warranties or how long they are valid – after the warranty ends, you have to call someone else.*
- *The AC is basic, but we don't know how to operate the water heater.*
- *The burners go off when you're cooking and we don't know how to address these issues.*
- *My stove and water heater were replaced as part of this program. Both of these appliances are no longer working and failing to do what they're intended. I need assistance or replacements.*

Varying levels of quality of installation work

Across the community meetings and research, residents have expressed dissatisfaction with the installation work and frustration with the lack of accountability to remedy the damages to their homes. For instance, some residents identified that contractors burnt out or disconnected certain circuits in their homes and did not repair them. Additionally, Ducor residents identified that the piping to connect to water heaters was constructed outside of the walls. Although it technically was functional, it was and continues to be an eyesore in the home. As one resident in Allensworth put it, “they came in and didn't do the work well. You don't deal with customers by promising them things and not delivering them. Just because we are a DAC [disadvantaged community] doesn't mean we should be treated like trash.” These sentiments differed from some households in Ducor and Alpaugh who reported mostly positive experiences with the installation work done. They noted they were satisfied with receiving the appliances, even if some were installed haphazardly.

Overall, there did not seem to be any formal standard or process around quality control. For some households, the standard for satisfaction was determined by whether they received appliances versus the quality of installation work done. It is important to note that poor-quality installation work is unacceptable, disrespectful, and particularly harmful to households that the energy system has historically neglected. This is contrary to the spirit of the rulemaking, which was to

undo and remedy harms caused by the energy industry by providing better access to affordable energy in the first place. Moving forward, quality installation work must be required and enforced across all projects to ensure that households are not further harmed through their participation in the program.

Community Voices

- *Some people have had holes in their wall or ceiling when the electric connection was done, but the holes were left there.*
- *Someone cut off a circuit in my back patio. They said they would fix it but they never came back.*
- *I have had to ask other people to come to fix the problems with the appliances – it cost a lot of money.*
- *When they first brought the appliances, the electricity wasn't working in half of my house. I called the worker directly to fix it.*
- *They burned our TV and dish cable when installing the wiring. They replaced the TV but not the cable box.*
- *When they put in the water heater, there were lots of leaks so we have to bathe with cold water.*
- *They came to install the AC inside the house and put a hole in the wall, so I had to call to fix it. It took a month or so and I had to fight them to come.*

Lack of consistent and transparent communication and decision-making

Residents reported poor communication and lack of accountability from program administrators and contractors to residents in all phases of the Pilot (pre-installation, installation, post-installation). In the pre-installation process, households and the Pilot Team were unaware of how eligibility decisions were made. There was confusion amongst residents about the eligibility requirements, which caused tension among neighbors who were deemed ineligible but were active advocates of the Pilot and/or did not have major remediation needs (compared to other households deemed eligible). The lack of communication on eligibility as well as a lack of transparency on how these decisions (such as via the home treatment plans) were made, created confusion and tensions.

When asked if residents knew who to contact for any questions or issues with their appliances, only a handful of residents at each community meeting had a Synergy number to call – the rest would call the CENs, who would face the frustration and anger of residents who were unhappy with their broken or missing appliances. Multiple residents noted that their calls to Synergy often went unanswered or if answered, they never received any follow-up. In addition, the wait time between the initial household evaluation and appliance installation ranged between 15 days to up to a year for those who have received appliances. Some residents noted satisfaction with how installers contacted them about when and how they will receive their appliances while others

were displeased with the lack of or unclear communication about when they will receive their appliances.

Community Voices

- *Members of the Pilot Team have been points of contact for the community if there were problems – they were calling someone at Synergy but after a while, their calls were not answered so they had someone else call.*
- *My boiler has a problem. Who do I call? I called but they never showed up.*
- *It took forever – they came to my house and surveyed it and months passed before the appliances were installed and it has not gone well.*
- *I called about fixing a dryer and they never came. It's been about 3 to 4 months, but they never came.*

Unclear bill savings

Many households reported that their utility costs have remained relatively the same as the increase in electricity bills was balanced by no longer paying for propane gas. However, a number of households reported increased utility costs – even with the CARE discount and program bill protection - due to the skyrocketing costs of electricity and their increased usage due to the new appliances. In addition, residents reported that the 20% Green Saver isn't seen on the bill and is not having the impact it was intended to have to offset cost increases. CENs have also seen cases where the increased bill impacts can be attributed to faulty appliances (e.g., one resident experienced a 3x bill increase).

Community Voices

- *Our electricity bill increased a lot after installing the appliances – We were paying \$180 in the summer months and now with new appliances, it's \$320-\$350 per month (even with CARE).*
- *I used to pay between \$3500-4000 for propane in the winter (4 - 5 months). I'm happy I don't have to buy propane anymore. When cooking with propane, there's lots of contamination and people can die.*

Recommendations

The following recommendations are based on the findings of the community meetings and conversations with community-based organizations that worked directly on Pilot implementation. Overall, there is a mix of residents who are satisfied with the Pilot and residents who are dissatisfied but holding onto hope that the CPUC will address their concerns so that they can also benefit from the Pilot. Residents also hope their experiences will positively influence similar state

initiatives in DACs across the state. The pilot communities hold firm belief in the intended benefits of the program – efficient appliances, reduced indoor air pollution, reliable heating and cooling, positive health impacts, and lowered energy costs – and thus gathered to share recommendations informed by their experiences to the CPUC to address their concerns and improve the Pilot. By addressing the recommendations below, the CPUC and pilot communities can share the success of the state’s first-of-its-kind affordable clean energy access program.

- 1. Complete the work already planned in the existing 11 SJV pilot communities.** The top priority should be remediating households that received faulty appliances or experienced damage during installation, households that have not received repairs or replacements, and households that are eligible but have not been serviced.
 - a. Relatedly, the CPUC should immediately investigate the discrepancy between PG&E’s 2023 Annual Pilot Progress Report, which claims that it completed installations in June 2023, with Allensworth community members’ statements in a November 2023 community meeting that at least 10 households were still waiting for appliances they had been promised.
- 2. Meet regularly with the CBOs supporting program implementation to understand community perspectives and experiences and make appropriate course corrections.** The CPUC and CEC cannot treat communities as short-term “treatment groups” and only engage with them until the pilot begins. The community’s long-term trajectory must be centered on building the climate and community resilience that state agencies seek.
 - a. Consistent and regular community forums should also be held for state agencies to hear from residents themselves about their evolving pilot experiences.
 - b. CENs must be engaged in and funded for program implementation. There is high demand for these appliances and program participation, but community residents need to trust the programs, administrators, and implementers.
- 3. Establish quality installation standards and hold contractors accountable for meeting these standards.** Clear accountability measures are critical to maintaining trust and a long-term relationship with the community. Program administrators and implementers must not view communities as transactions to “get the job done” and then move on to the next without any accountability to how well the job has been done from the perspective of the community. Community residents are not stepping stones to “economies of scale.”
 - a. For each of the 11 pilot communities, conduct an independent evaluation of the implementers’ quality of construction and installation work and appliance quality to inform the development of quality installation standards.
 - b. When state agencies release Requests for Proposals (RFPs) for program implementers and administrators of direct install programs, they should include requirements for a community engagement plan (specifying details on how the program administrator or implementer intends to engage with and reliably maintain engagement with community members and/or CBOs) and evidence of community competency (proof of competency in working with communities who may be rural, people of color, non-English-speaking, and/or agricultural, etc.). This

sub-recommendation will support greater partnership between the program administrator or implementer with the CBOs and community members and greater opportunities to hold the administrator or implementer accountable for enforcing quality installation standards across all projects.

4. Sufficiently fund and support community-based organizations that will continue to be active and engaged with communities to provide ongoing technical assistance and community support.

If any pilot expansion or new program is launched, fund community-based organizations to serve as advisors and/or contractors for program outreach, design, implementation, and evaluation. CBOs/CENs are best suited to serve as coordinators and advisors and will be most effective if they are adequately funded to hire new permanent staff and build organizational capacity.

- a. In addition, fund a technical partner or third-party liaison (independent from the implementer and program administrator) to serve as additional support to CBOs to alleviate and be the point person for any community concerns that may arise that require technical knowledge outside a CBO's scope of expertise from pre- to post-installation. This role is also envisioned to support CBOs and community members in holding the program administrator or implementer responsible for addressing any appliance or upgrade issues.

5. Provide funding for holistic home upgrades, including remediation and paneling costs.

In continued efforts, ensure that holistic home upgrades are eligible expenses and that there is adequate funding for remediation costs and panel upgrades, especially for mobile homes. The SJV Pilots frequently did not have adequate funding to address remediation and paneling expenses leaving some of the most vulnerable households behind. Mobile homes faced unique challenges, including the fact that the replacement of a unit was often costly but still the most cost-effective way of addressing remediation concerns. The CPUC should seek to expand the pilots to include households that couldn't qualify under pilots because of too-high remediation costs or other upgrade needs.

- a. Expand the pilot to include more AC units per household, as cooling is a basic necessity in the SJV. Residents have asked for more AC units to cover more areas in their homes to ensure indoor temperatures are safe during summer heat days.
- b. Increase coordination with other programs that provide no-cost energy-efficient appliances such as refrigerators.

6. Recruit community residents for electrification jobs. Leverage the new Rural REN funding/workforce program and design specifically to engage and train local communities to support recruitment and ongoing technical assistance for electrification pilots and programs. Specifically, state agencies should work together with community-based organizations to create local jobs for:

- a. Community organizing
- b. Community advocacy
- c. Contractor and general construction
- d. Equipment maintenance and repair

Appendix: Summarized Community Meeting Notes

Note: The notes from the Ducor, Alpaugh, and Allensworth community meetings have been summarized and anonymized. The discussion questions vary between the meetings as the facilitators intended for community members to lead the discussion as much as possible.

Summary of Ducor Community Meeting Notes from October 2, 2023

What was your motivation to come today?

- I have no problems really but it took a while for the appliances to get installed; lots of people came in and said there were problems with my house but it worked out.
- A CEN heard a lot of stories about bad experiences with appliances in the pilot, navigating the possibility to see what we can do in the future.
- I have no problems with my appliances; but I have heard from neighbors that they have had problems with the stove. At the beginning, the dryer plug did not fit so it took half a year to fix it, had to change the cable (wasn't a normal three prong) – took the installer 6 months to fix this problem; boiler pipes installed outside the wall.
- The stove wasn't working but it only took a week to fix (they brought another stove); boiler installation – put the pipes on the outside of the wall; AC stopped functioning two weeks ago, called Synergy (Esmeralda) and after about three days they came to repair it (put on a temporary solution and will come back for a more permanent solution).
- CENs have been points of contact for the community if they have problems – they were calling [redacted] at Synergy but after a while their calls were not answered so they had someone else call.
- One neighbor called a CEN when they had a problem, the CEN called [redacted] at Synergy but nobody answered; many other community members did not get a call back from Synergy.
- A lot of people who have had complaints did not get a response.
- I also had a problem with the stove. It would start on its own and took about a year to replace the stove.
- Another neighbor had a problem with the stove (would start on its own) – had to change the stove, but it only took a week, but the stove (light) continues to turn on on its own – now unplug the stove whenever they go out everyday.
- With the other stove, sometimes the oven and the cooktop turn on on its own and it gets hot.
- Many community members who aren't here have had similar problems – air conditioning hasn't worked right, hot water hasn't worked right (either hot or cold water wouldn't work)
- [redacted] at Synergy has said that someone would come to fix it but nobody arrived.
- Some people have had holes in their wall or ceiling when the electric connection was done, but the holes were left there.

- One person had a problem with the plug but it was fixed after a few days.
- I have had to ask other people to come to fix problems with the appliances – it cost a lot of money.
- Many people have had problems but they didn't come today; they have complained to one another in many cases because Synergy doesn't answer the phone.
- When they first brought the appliances, the electricity wasn't working in half the house; I called the worker directly to fix it.
- When an application wasn't in the name of the person who called, it was hard to get information.

Did people receive warranty for their appliances?

- There was no clear information about appliance warranties or how long they are valid – after the warranty ends, you have to call someone else.
- There was inconsistent information given to participants about warranties.

Any impacts to your bills?

- Electricity bill increased a lot after installing the appliances – we were paying \$180 in the summer months and now with new appliances, it is \$320-\$350 per month (even with CARE).
- One household is the same because propane was expensive.
- Some have had increased usage with new appliances.

Any impacts to your comfort and health?

- Now one household is more comfortable, able to bathe everyday, air conditioning makes the house more comfortable.

If your family member or friend told you that they plan to sign up for the Pilot, what would you say to them? If the pilots will continue or expand, what would you recommend to the pilot implementation team to improve the program?

- I would recommend to friends and family to participate in the pilot.
- Some people wanted to participate but it was too late when they signed up.
- Small problems could be improved – need faster responses when there are problems, more professional installation (i.e., not outside the wall), and also include the refrigerator if there is another program.
- Water heater installation was not correct in some houses – the drain to the water heater was at the front door, rather than being diverted to somewhere outside of the house.
- Community members don't want to complain about "small things" because they didn't have certain appliances before.
- Someone cut off a circuit in to her patio and said they would fix it but they never came back.

Summary of Alpaugh Community Meeting Notes from October 4, 2023

What was your motivation to come today?

- To say thank you in general for the appliances.
- We're happy and content.
- Happy they gave us the appliances.
- I'm not happy because they said I qualified for AC, dryer, stove, and boiler. They said they were gonna put a plug for the dryer – they put the cables but didn't put the wiring for the dryer. One of the workers also had a problem with my husband. The worker would come in and out and said he was leaving for the day. But when my husband was eating, the worker had come back and was in his living room. My husband felt threatened so there was a bit of confrontation. My husband called to report this but they ended up canceling the rest of the installation. They said they never had this problem with others and would speak to higher-ups on the condition that my husband will not be home. However, my husband is sick and can't leave the house. Someone from the county came to see if the AC was installed properly to close the account and said I needed to sign a permit. I never signed anything and I never heard back from the county. They canceled everything.
 - This happened because they permitted crewmembers to make those decisions. The state gives money but gives it mostly to organizations and not to residents.

Did people receive a warranty for their appliances?

- (Mostly yes, some no's.)
- When you register the appliances, you get the warranty.
- They said if anything was wrong with the appliances, then they should call a number.

For non-enrollees, why didn't you enroll?

- I applied but didn't want to get rid of propane.
- I heard about it but had no time to come to the meetings.

What was the installation process for you? Timing, communication, etc.?

- They gave us AC, water heater, electric stove, and dryer. They changed our electric panel and we're very happy. They usually give us nothing but finally gave us something. We would like a tortilla griddle.
- My AC is not working.
- They burned our TV and dish cable when installing wiring. They replaced the TV but not the cable box.
- They did a good job. They came for 5-6 days and told us when they'll come and leave.
- No problems.

Did they give you training and information on how to use the appliances?

- My electricity bill went up.
- I used to pay between \$3500-4000 for propane in the winter (4 - 5 months). I'm happy I don't have to buy propane anymore. When cooking with propane, there's lots of contamination and people can die.
- My boiler has a problem. Who do I call? I called but they never showed up.

Any impacts on your bills?

- Bills went up.
- It's okay because we saved on propane.

Are you satisfied with the communication? Is it clear and reliable?

- I called and they came.
- I haven't heard back about the permit.

Any impacts to your comfort and health?

- (Positive nods and yes)

Has there ever been a time when you didn't use your appliance because of cost or uncertainty?

- (No's)

Would non-enrollees want to sign up after hearing what people discussed?

- People didn't come because they were fearful that they would have to pay for the appliances.
- Wish there more resources so others can receive appliances too.
- (Yes all around)

Recommendations you'd share with the CPUC?

- I'd like for refrigerators to be eligible appliances.
- More ACs to cover the home so all rooms are cooled off.
- I would like to open up the program for others who are not on propane.
- People wouldn't come to community meetings because they have more natural gas than propane.
- People also didn't sign up because they didn't want to pay a higher electricity bill.
- I would like to be notified if there are any new changes or updates to the program.
- They didn't change the meter for our home because they ran out of money at that point.

Summary of Allensworth Community Meeting Notes from November 8, 2023

What motivated you to be here today?

- I came to see why the program didn't do what they said they'd do and to see if they would finish the project.
- A CEN called, so we came because we had concerns. No information was given on how to address the problems.
- Our dryer only worked for 3 months. It doesn't blow hot air.
- Our water heater is not working – sometimes it works, sometimes it doesn't. When they put the water heater in, there were lots of leaks that we have to bathe with cold water.
- No one came after I enrolled.
- They told me that they were gonna install appliances in all four of my properties but they only gave me a water heater for one property. They promised other appliances but we never got them.
- All of my appliances are working perfectly. I needed a dryer but never got it.
- I didn't have a chance to apply for the appliances.

What was your experience with learning about and signing up for the pilot? Did you know who you could call if you had questions about the pilot?

- It took forever – they came to my house and surveyed it and months passed before the appliances were installed and it has not gone well.
- They promised appliances and played with us because they didn't do what they said they would do.
- I received a phone call and someone came to evaluate my home.
- I found out through a community meeting – which was easy and accessible.

What was your experience while equipment was being installed in your home? What kind of information or training did you get after your new appliances were installed? What was your experience after installing the appliances? (bill, landlord, health & comfort)

- It was professional. The evaluation was professional too. They told us the date and did the work.
- They installed 1 water heater for 2 bathrooms – it works in one bathroom but not the other.
- They came to install AC inside the house, put a hole in the wall, and I had to call to fix it. It took a month or so and I had to fight them to come.
- I had problems with my appliances and called a number but no one answered.
- They gave me a number (Synergy) and picked up every time I called.
- After the appliances concluded, no one answered. They said they'd change the gas stove but I'm glad they didn't because of what I'm hearing.
- I called about fixing a dryer and they never came. It's been about 3-4 months, they never came.
- They never finished installing the appliances so there was no training or information given.
- AC is basic, but we don't know how to operate the water heater.
- AC is good.

- Bills are about the same, because we're not using propane anymore.
- We can sleep comfortably now because we can regulate the temperature.
- Burners go off when you're cooking and we don't know how to address these issues.
- I can't use any pans with the stove. We were supposed to receive pans but I never got them. I can't find induction pots and pans.
- I received pans but very few. Not enough for my family.
- Everything went well. We had an old dryer and they gave me a new one and it still works well.
- I heard from folks that they heard that if they didn't take the stove then they couldn't receive other appliances. They are telling people different things.
- (By show of hands) 10 people never received appliances.

Length of time from evaluation to installation?

- 15 days
- 1 month
- 1 year
- 3 months
- 8 months
- I know someone who said that they promised to install appliances, then they told her she didn't qualify and they got into a fight about it.
- I know someone who said they only brought half of the promised appliances.
- My daughter never received the appliances but got a letter saying that she did.

Hear any reasons as to why you didn't get your appliances?

- They told me they ran out of funds.

If your family member or friend told you that they plan to sign up for the Pilot, what would you say to them? If the pilots will continue or expand, what would you recommend to the pilot implementation team to improve the program?

- I'd tell them to sign up but don't take the stove because there's no pots or pans.
- Just lies.
- They came to my daughter's house and drew lines on the walls for the electrical wire installations but they never installed anything.
- When they come with a number, be prepared to know the number in case you need to call.
- They should have responsibility about not promising what they can't deliver. It's a problem from the top. They played with us and that's what hurts. We can buy appliances if we need to but they played with us (just like they did to the old man's daughter).
- They should make the old appliances work.
- All of my appliances are fine but hearing all these issues, I'm not sure I'd recommend the pilot to my friends and family.

- It's a pilot so it's never been done before. In my mind, they didn't intend to give us the best service, they didn't address concerns, and it's unfair to everyone who signed up for it. The community didn't ask for it. They came in and didn't do the work well. You don't deal with customers by promising them things and not delivering them. Just because we're a disadvantaged community doesn't mean they can treat us like trash. There's a lot of money in the program and all of that went to Synergy, not the community.
- They need to be responsible. If they do something wrong, they need to be punished.
- I think the program was good, but we need to improve it with more follow-up and better service.
- The responsible party should come back and address the problems and install the appliances. If this is a pilot, how are you going to take it further with all these problems?
- Synergy, PG&E, and the CPUC need to come and fix it and listen to us.
- They need to do personalized service for the households.
- We're asking for justice.
- I recommend a supervisor for each household to ensure quality service.
- The PUC needs to know they gave money to Synergy and the community didn't receive quality work. None of us asked for this type of service. The PUC needs to know what Synergy did not do the service the community deserves.
- It's an experiment, I get it, and I know it'll be better.
- I hope when they hear what's happening, they should send a letter to the community.
- The program is designed to fail. If Synergy comes, a lot of people will come to voice their concerns.