

Comments to the Commission for Catastrophic Wildfire Cost and Recovery

Overview

Distributed energy resource deployment by local governments and public agencies should be a top priority for the state as it looks to accomplish short and long-term climate policy goals. It is paramount that we make immediate changes to build local energy resilience because climate change is not waiting for us. It is here and it is real. It is damaging, expensive, deadly, and its impacts are always local. We have experienced its disastrous effects firsthand now. We need to accept and understand the gravity of the situation. As a state, it requires us to take bold and unprecedented action.

Climate change requires the state to make changes in the energy sector to address climate change mitigation and grid modernization: decarbonization, diversification, digitization, safety, resiliency, and local community engagement. Implementing policies that promote these principles in the energy sector will be key to mitigating the effects of climate change, while allowing the state to modernize the grid in a manner that is safe, resilient and cost effective. The policies and regulations outlined below will continue providing a strong foundation for a robust and sustainable clean energy system for decades to come. They should be undertaken as sustainability investments by the state in all local communities and will have long-term sustainable benefits that stretch far beyond dollar savings that can be quantified today. This will ensure California remains a sustainable and prosperous state that provides quality life for all. As the fifth largest economy in the world, it is up to California to continue leading the way in climate policy and sustainability, and we are up for the challenge.

The Advanced Community Energy and Resilience Act

The state should enact and implement the “Advanced Community Energy and Resilience Act” as described in these comments. The Act would kickstart the Advanced Community Energy (ACE) program, a statewide program to develop local energy resources in all California cities, counties and public agencies to power decarbonization and resilience projects while supporting reliable and efficient use of the existing power grid. Under the ACE program the state would provide funding, technical guidance and other support for local jurisdictions to collaborate with electric service providers, distribution utilities, technology companies and diverse stakeholders to plan and implement energy systems that serve local energy needs, advance state policy goals, and support a safe, reliable and efficient power grid.

The policy framework for the ACE program could be authorized by legislation and implemented by the state this year, providing a path forward to address many urgent issues in the energy sector and beyond. This year California’s policymakers have introduced several important and creative legislative proposals that could work in concert with the Ace program to maximize our effectiveness and success in achieving those climate goals.

Key components of the ACE Program policy framework

The proposed Advanced Community Energy program has two main components that need to be established through state legislation.

- Statewide ACE planning structure. Legislation would designate a state agency such as the California Energy Commission (CEC) to establish a new statewide program that empowers local governments to design and implement ACE systems.

- An ACE system is a set of energy resources and programs — such as energy efficiency retrofits, aggregated demand response, community-scale solar+storage, electric vehicle charging stations, microgrids for critical facilities, etc. — designed as a whole system to meet a portion of local energy needs, support state goals and provide grid services.
- An ACE system for a community would begin with an ACE plan, created by the relevant local government entity in collaboration with the distribution utility, load-serving entity, third-party energy and technology companies, and local stakeholders, following state guidelines and empowered by state funding and technical support.
- The ACE plan would identify a set of local resources and program elements, describe how their coordinated performance achieves desired outcomes, and estimate factors such as cost and time to implement.
- State funding for ACE planning will ensure that no communities are left behind and will avoid any unfunded mandates. Financing to implement any specific plan element would fit the element; e.g., a community solar+storage facility could be financed through a bilateral power purchase agreement between the developer and the local load-serving entity.
- The CEC or designated state agency would develop standards and templates for ACE systems and guidelines for stakeholder engagement in ACE planning, all emphasizing decarbonization, resilience and social equity aligned with safe and efficient operation of the state and regional power grid.
- The designated agency would allocate state funding for ACE planning, provide technical expertise and perform ongoing oversight to ensure all communities align their ACE plans with state policy goals, support power system operation and receive the greatest benefits from the program.
- Investor-owned utility collaboration and changing regulatory framework
 - Legislation would direct the CPUC to develop and adopt, through a regulatory proceeding, provisions that define the role of the investor-owned electric distribution utilities in developing and implementing ACE systems
 - These provisions would direct the utilities to collaborate with local governments and other stakeholders to develop ACE plans in accordance with the criteria of the statewide ACE program. These would include various performance metrics and incentive mechanisms that align the utility's compensation with the policy goals of the state.
 - California can look to the states of Hawaii and Washington as a starting point and roadmap for embarking on these reforms, and the state can iterate as the process moves forward
 - Distribution utility collaboration in ACE planning is necessary to design and locate the plan resources so as to maximize power system benefits by offsetting needs for new grid infrastructure, meeting local capacity requirements, and providing real-time services to support reliable grid operation.

For the investor-owned utilities to play this role the state must revise their profit incentives to support implementation of cost-effective distributed energy systems rather than seeking to maximize the value of rate-based assets.

The Need for the ACE Program

- Planning Coordination

- Practical strategies for decarbonization and resilience fall naturally in the scope of urban and county planning. They will also drive new energy demand profiles and innovative supply options. Yet there is no state-level structure to coordinate energy system planning with urban and county planning.
- Statewide Access and Equity
 - Local government planning and implementation capabilities vary greatly across the state. Without a statewide program of funding and other practical support, the drive for decarbonization and resilience could leave some communities behind and worsen economic, health and other societal inequities.
- Focus on Communities:
 - Programs to advance low-carbon technologies such as rooftop solar and electric vehicles focus almost entirely on individual customer adoption decisions, leading to operational concerns for the grid and benefit-cost equity challenges. Focusing on the level of local government and community can address local needs more equitably while managing grid impacts to ensure more cost-effective investment in new grid infrastructure.
 - Resiliency is inherently a local issue and communities are the tip of the spear. We need to better equip our local governments and their constituents with the resources needed so they can become more sustainable and resilient.
- Utility Collaboration
 - The current operational and incentive structures of the investor-owned electric distribution utilities were designed for a centralized power system that serves large service areas. The ACE program would be complemented by regulatory reforms that direct and reward investor-owned utilities for local collaboration to bring decarbonization, resilience and economic benefits to all California cities and counties.
- California's Policy Goals
 - Effective decarbonization requires local strategies to change housing patterns and day-to-day movement of people and goods that currently drive fossil fuel use, as well as electrifying transportation, businesses and buildings. Locally-developed ACE systems can support these changes without adding massive new demand onto the regional grid, so that California can access distant renewables without massive bulk power system investment.
 - Distributed energy resources can reduce fire risks by allowing utilities to de-energize lines in dangerous conditions, and when serious disruptions occur, these systems can provide resilient power supply to critical local services and first responders.

Benefits

The benefits of the proposed ACE program derive from the alignment of local urban and county planning with energy planning, through collaboration of local governments with distribution utilities, load-serving entities, third-party energy and technology companies and local stakeholders. As we recognize the role of local initiatives in achieving urgent climate and resilience goals, and energy technologies become more powerful, cost effective and scalable, we must update the existing planning and regulatory structures that were created for the 20th century centralized, one-way-flow electric power system or they will be barriers to change.

The proposed ACE program builds on activities traditionally within the scope of city and county planning, including policies on zoning and land use, housing densification and affordable housing, building codes, mobility strategies and essential municipal services, all of which affect greenhouse gas emissions and require energy. Local policy decisions in these areas reflect the priorities and needs of the residents and businesses within a local government's geographic boundaries.

The ACE program would align these local activities with major state policy goals and power system planning, so that ACE systems deliver the following benefits:

- Energy resilience and security
 - A local ACE system will provide continuous power to critical and priority locations in communities, to withstand and rapidly recover from natural disasters or cybersecurity events.
- Reduced emissions
 - ACE system design uses renewable energy to replace fossil fuels in support of state greenhouse gas reduction goals; an ACE system will provide cost-effective and secure energy for electrification of transportation, homes and buildings in coordination with local climate action adaptation plans.
- Lower costs
 - A local ACE system will shape load and production profiles to lower peaks and support grid operation, reducing grid impacts and related costs of centralized energy infrastructure. ACE system design targets optimal locations and sizes for local resources to reduce costs of interconnection and operation.
- Local economic investment and high-quality jobs
 - A local ACE system will stimulate investment in cities and communities, growing quality jobs in clean energy and smart grid solutions and rewarding participating property **owners.**

Legislation and regulation

The Advanced Community Energy and Resiliency Act aligns with and can serve as an umbrella for several current legislative initiatives, creating a bill package that is authored by a diverse set of legislators. This package will allow the state to address the components of the ACE program in its own vehicle, as part of a comprehensive set of policies that maintain the structure and objectives of the other related bills. The ACE system model is replicable and scalable, applicable to any size city or county, and can be designed to optimize human and energy resources at the community or neighborhood level. With the proposed state-level program, each ACE implementation is able to learn from all the others, and system-wide scale economies are achieved by widely replicating the best ideas and practices. The ACE system integrates many other public policy goals of state legislators and regulators, unlocking more value from the ACE program.

ACE for Local Governments

- AB 1347 (Boerner Horvath) – Local government clean energy
 - AB 1347 provides a vehicle to create the statewide ACE program. It establishes guidelines for local governments to develop and deploy community level resources.
 - Local governments receive funds to deploy advanced energy systems that are less risky (physically and financially) for their constituents, the ratepayers and tax payers. They develop these projects with guidelines that support public policy goals. This stimulates

economic development and provides many other benefits to the community as outlined above.

- This would be done through the California Energy Commission, in concert with other state agencies like the Governor's office, Treasurer, and others that may assist with funding outlined later in this document.
- These guidelines could also be incorporated into local general planning or climate action and adaptation planning. CCAs, nonprofits, and companies they partner with will be able to play a greater role in providing technical and administrative guidance to local governments.

Resiliency

Resiliency — the ability to maintain essential quality of life services when severe disruptions occur — is a key element within the ACE program and the state should be incentivizing and assisting local governments and public agencies to invest in resiliency to the greatest extent possible. These policies can provide new incentives and direct existing ones to quickly develop resiliency projects in the areas that are at highest risk of de-energization and high fire threat areas

- AB 1144 (Friedman) – SGIP funding for critical facilities and wildfire threat areas
 - AB 1144 can direct some Self Generation Incentive Program funding that has been newly authorized per SB 700 towards high fire threat regions for the installation of energy storage projects at public and critical facilities.
 - It could also create a diesel generator replacement program within SGIP to incentivize homeowners and businesses to install battery storage for backup power instead of using diesel generators that produce GHG emissions and are not as safe as batteries.
- SB 774 (Stern) – Microgrids and community resiliency
 - SB 774 will direct the CPUC to develop, not just consider, a microgrid services tariff as part of SB 1339 (which was original intent of bill).
 - It can provide further direction to the CPUC to make the price signal for microgrids very generous since this incentive is absolutely something the state should be providing a "subsidy" for.
 - Step down incentive levels or other program mechanism to encourage timely deployment in highest risk areas.
 - It could be limited to public and critical facilities to ensure that no "cost-shifting" occurs because we want to motivate and incentivize public investments that will benefit all ratepayers in the form of more resilient communities.
- AB 1503 (Burke) – Microgrids and disadvantaged workers
 - AB 1503 is a complimentary vehicle that could direct local governments to enlist disadvantaged workers or other workforce development groups for some of these projects.
 - This bill could be further amended to address other issues related to microgrid project development and construction if necessary
- Regulation:
 - Integrated Distributed Energy Resources (R. 14-08-013)
 - The CPUC should approve new locational and resiliency tariff proposals that have been suggested in the open IDER proceeding to incentivize DER projects in high value locations on the grid and in areas that are most at risk of de-energization.
 - Distribution Resource Planning

- The utility could share more information about its highest risk transmission and distribution (T&D) infrastructure within the Distribution Resource Plans (DRP) and Intergrated Distributed Resource (IDER) proceedings with relevant stakeholders and implement a more transparent T&D planning process so that developers and customers in high risk areas can be prioritized and solutions can be developed and targeted to reduce that risk.
 - PV RAM and ICA maps improvement can be done as part of these proceedings

Realization and valuation of non-energy benefits

The cost savings from installing local clean energy projects can be reinvested into the public agencies' general funds to be used for other public services that benefit constituents in their local communities. This could come in many forms: Retain teaching jobs, fix more roads, beautify a public park, expand a city sports league, increase hours at a food bank, or any other public service that the local community decides. This allows the communities to better serve their constituents and address local needs.

The energy systems themselves being sited in local communities have additional non-energy benefits that can be realized. Public agencies can organize community energy events, partner with local schools and non-profits on energy and STEM education, provide education and job training by turning the projects into living labs. These projects can serve as a source of pride for the community. Local economic development and community enrichment are impossible to fully quantify, but their value is significant and should be more fully considered.

- AB 961 (Reyes) – non-energy benefits
 - Distributed energy resources projects to date have been undervalued when assessed by the CPUC. The state should place a larger emphasis on DER deployment that captures other values that provide public benefits.
 - AB 961 could direct the CPUC to prioritize the Societal Cost Test and avoided T&D costs as priority variables when evaluating the effectiveness and success of distributed energy programs, as well as reaching disadvantaged and vulnerable communities.
 - This is an actionable step that can be taken to implement the provisions of the bill and address some of the flaws with the current regulatory evaluation processes.

Interconnection of DERs and Utility Performance

The utilities incorrectly claim that only their systems are safe and that non-utility owned energy resources are higher risk to the public, so therefore they need the most scrutinizing requirements and approval processes in place to interconnect in the name of safety and reliability. Distributed energy resources actually have a lower risk profile than large capital-intensive infrastructure. The utilities make the regulatory approval process and interconnection for distributed systems so difficult when it doesn't have to be. If the utilities redirected much of their focus and resources on quick and safe interconnection of these systems, we would meet our climate goals more quickly and affordably.

The utilities should be evaluated on how quickly they start and finish the interconnection process. Perhaps there should be an incentive for how quickly they can interconnect public projects. They can respond to developer data requests, review designs quicker, and schedule more frequent site work (labor), which improves the construction timeline of these projects, which all adds up to lower project development costs. That means those public agency projects constructed with prevailing wage labor cost less overall, which translates into saving public agencies money.

The utilities should direct substantially more internal financial and human resources towards interconnection. Nadim Virani's interconnection and IT group should have their budget tripled. Invest in more IT upgrades so interconnection can be done faster with less work. Give workers within PG&E raises and get some new blood into PG&E by recruiting (internal and external) a world-class interconnection team for the utility. PG&E is a well-known company and should be embarking on a large talent recruiting initiative for its interconnection division. These measures will also help restore PG&E's public image.

- SB 288 (Wiener) – Solar bill of rights/self-generation and storage
 - This bill provides a vehicle for interconnection improvement, redirecting utility financial and human resources towards interconnection, and establishing guiding principles for distributed systems to be able to participate more fully in the state's energy markets and realize the full technical capabilities of DERs, which can provide grid services and other benefits.
- SB 766 (Stern) – Clean energy grid solutions
 - SB 766 provides a vehicle to make some regulatory reforms to the CPUC and modify utility incentives to more closely align with the state's policy goals.
 - Safety, resiliency, de-energization risk mitigation, decarbonization, interconnection speed, should all be priority performance areas for the utilities
 - The bill should establish Performance Incentive Mechanisms (PIMs), and look to add new performance regulation schemes into the regulatory process as it undergoes reform.
 - Look to the states of Hawaii and Washington as a starting point and guide. California is losing its leadership position amongst other states.

Safety in Construction, Operations & Maintenance

The utilities have to sign off on the safety of every system already. There is more than adequate due diligence on the part of the utility, developer, customer and local government to ensure public safety with regards to the electric grid and distributed systems. All public agencies and local governments procure their energy projects through a solicitation through a public procurement process to select a developer. This has several levels of oversight, from the public at city council and board meetings, and the decision makers at these agencies are public servants who pledged to serve the best interest of their constituents and the public. Developers must put a lot of work into their bids and must go through extensive review and approval processes to be selected for the work. The local governments must sign off on their decision to contract with a qualified developer.

To install and interconnect a DER project, the customer and developer(s) come up with a scope of work, engineer the design, receive customer approval of the design, and then submit an application to the utility. The utility reviews and approves the application and the customer and developer sign an Interconnection Agreement that the customer will operate the system in the way that was reviewed and approved by the utility. The customer and the developer must then get the Notice to Proceed from the local permitting authority to construct the project. After construction the local inspection agency must approve the system, then the utility does a final inspection and issues a Permission to Operate notice. Public agencies nearly always include post-construction services or O&M contracts to ensure the systems are operating and maintained appropriately, or have their own public works/facility operations employees manage O&M.

Local control

This project development and safety review process is very comprehensive and requires due diligence from multiple stakeholders which further reduces risk. The local governments already require permits for DG projects to be installed so they have the final safety and legal review of the project. That, along with the utility approval process, is sufficient oversight to ensure these things are deployed in the safest and quickest manner, while local governments retain local control. This also allows the local governments to make decisions that are in the best interests of their specific community and leverage local resources for sustained economic growth.

Workforce development and education

It is critical that we provide resources to workforce programs that we can enable more disadvantaged and younger workers to become a part of this clean energy economy. The state should offer a state-subsidized program for vegetation management and electrical line workers. Recruit from every state community college district and workforce development program. Put young adults, new high school and community college graduates to work. Give contractors and subcontractors who hire directly from the state community college workforce program a tax deduction for putting these people to work. They will then recruit more workers from the places the state and other non-profits have focused their resources on. Infuse more funding into those nonprofits and workforce groups that are training workers on electrical work, vegetation management and other relevant operations.

- AB 48 (O'Donnell) – State school facilities bond act
 - Authorizes new bond ballot measure for 2020 and 2022 for schools to complete facilities modernization projects, including clean energy projects
- AB 1028 (Gonzales) – Clean energy jobs creation fund
 - Authorize more funding for school energy projects through the extension of the Prop 39 program. Also has provision that those projects with an energy education or workforce development component be prioritized.
 - This fund should be nearly \$1 billion and appropriated with the highest funding amounts going to those schools that need it most. We authorize billions for our UC/CSU system, we should be authorizing much more than that for the K-14 school districts that don't charge tuition and are responsible for the proper growth and education of our youth before they get to college.
 - Developers of these projects will create or expand on those efforts to create a more inclusive and diverse workforce because they want to win the jobs.
- AB 1208 (Ting) – Utility Users Tax exemption
 - Extend the utility-users tax exemption via AB 1208 to further incentivize local development. This is an efficient way to deploy a diverse workforce, that actually reaches the local communities that need economic development, and achieve clean energy goals.

Physical infrastructure and risk mitigation

The physical infrastructure maintained by the utility is large, sited in various terrains and climates that are often considered dangerous, and serves a large number of customers from centralized locations. Large infrastructure is inherently more vulnerable than smaller scale projects. In our current climate, large centralized infrastructure has a significantly higher risk profile as it is subject to increasingly severe environmental conditions. Utility infrastructure has an extremely high environmental, security, safety and insurance risk. If equipment suffers an operational failure, the size and severity of this failure directly correlates to the amount of damages that are suffered as a result of this failure.

A diversified portfolio of smaller resources that are sited in a more decentralized fashion mitigates more of the environmental risks associated with electrical infrastructure. Smaller equates to safer and more secure. Insurance premiums for both the utility's infrastructure and all the surrounding infrastructure (property owners) has skyrocketed. If property owners can't afford insurance, they will be forced to leave or significantly reduce their quality of life. This means declining enrollment in schools, less business and economic development for the region, and displacement of people and families. There is no way to fully measure the impacts that these increasing costs have and will continue to have on our communities.

Smaller, distributed systems require less transmission and distribution infrastructure, which is expensive, capital intensive, and has a very high physical, security and environmental risk as we have seen with the recent wildfires. Utility liability aside, this infrastructure is a massive public risk due to climate change, and further damages to it (whether it was properly maintained or not) will have more catastrophic effects. We should be mitigating these risks by downsizing and diversifying energy systems.

Capital markets and risk management

The private sector can be mobilized in a much faster and greater manner if we create and enhance market mechanisms that encourage private capital investment in a distributed fashion to reach all local public entities. Private capital investment reduces the need for costly utility capital investment because it does not require lengthy regulatory processes, it does not have the very high utility interest rates (due to their credit rating), or the utility's guaranteed rate of return. Currently, private capital investment has a much lower risk profile and capital cost than utility investment. The state needs to greatly diversify its portfolio of resources and investments by minimizing risk and capital-intensive utility spending.

The state should be looking to unlock new opportunities for the private sector to take on as much of the risk as possible when making investments in the grid. The state should develop more price signals for the third-party market to get the most value out of these investments. The state will pay far less in interest financing climate change mitigation and resiliency investments over the next decade if it is financed with lower interest rates from many entities that have decent credit, versus with higher interest rates with one entity that has bad credit.

- AB 296 (Cooley, E. Garcia, co-author Stern) – Climate Innovation voluntary tax incentive
 - Approve the Climate Innovation tax incentive that allows individuals to get a tax deduction for making contributions towards the climate innovation fund.
 - The Climate Innovation fund tax deduction should be either required or extended to corporations. Corporations just this year got a very generous 15% federal corporate tax credit so there is no reason why the private sector businesses can't contribute something to this fund.
 - Call on Venture Capital firms and other private equity firms to invest in more startup companies that are innovating climate-related solutions.
- AB 383 (Mayes and Friedman) – Clean Energy Financing Clearinghouse
 - The Clean Energy Financing Clearinghouse will be housed in the office of the treasurer and will coordinate all government programs that invest private capital in clean energy technologies and programs as outlined in the bill.
 - Funding from the Climate Innovation voluntary tax could flow into the Clean Energy Financing Clearinghouse so that it can be managed and distributed appropriately

- The state can provide more support to Cleantech think tank organizations and incubators. This will provide the state with sufficient oversight, while energizing the private sector to innovate and boost economic development in the state.

Public-private partnerships and accountability

The state should be encouraging public-private partnerships and minimizing utility capital spending to the greatest extent possible because it the most cost-efficient. Instead of focusing on the least cost option today, we should look at what the total cost in the long run could be (financial, physical and social). The private sector partnering with local governments will allow us to deploy the appropriate climate solutions at scale across the entire state with sufficient oversight and accountability to the public.

The utilities keep stating they need to be the one to make these massive grid investments in the name of safety and reliability, but they don't want anyone else to be able to because they have a guaranteed profit. Other entities are capable and should be incentivized to make lower capital cost investments instead of the state continuing to give the utility a guaranteed rate of return. The utilities have not served the best interest of the public or their customers. A regular private company would declare bankruptcy and essentially cease to exist. The privileges they have held with their monopoly status need to be greatly reduced to really hold them accountable for the damages they have caused. Local governments and private companies will be held accountable through their constituents and competition. The state's punishment for utility negligence should be releasing their monopoly status for any function that could be better served by the private sector and local government while maintaining the best interests of the public and safety.

Leveling the clean energy resources playing field

- AB 1733 (Salas) – Renewable Portfolio Standard and Clean Energy Credits
 - The state could further align incentives for local projects and private investment by approving AB 1733 which will authorize the Clean Energy Credits described in the bill to count towards the RPS so that both utility-scale and customer-sited resources are properly valued for the clean electrons they generate for the grid.
 - More local projects will be built (with local labor) if the clean electrons local projects generate are valued on a level playing field with large centralized projects.
 - California needs a diverse portfolio of resources, both small scale and large.

Public-private partnerships, innovation and ventures

California is the leader in innovation, technology and entrepreneurship. We have more venture capital and private equity flowing through Silicon Valley than any other place in the world. California boasts more cleantech and sustainability companies than any other state. We need to harness this innovation so it can help achieve California's climate goals.

In order to do that, we have to improve our energy markets design and regulation to accommodate for the speed at which technology is accelerating and the diversity of participants in the market if we want our economy to be sustainable and grow. The state should adjust market policies and regulations to encourage public-private partnerships between public agencies, local governments, companies and customers. These communities should all benefit from the latest technology and innovation and economic development that comes with it. Price signals and tariffs will encourage the market to behave in a manner that is consistent with state goals. Incentivizing smaller systems with shorter term investments allows these businesses and customers to iterate and improve technologies over time,

which leads to reduced costs and larger scale adoption of these resources, which is what will help the state achieve its climate goals.

Conclusion

The decarbonization, digitization, distribution, and diversification of our energy system in California is paramount to mitigating risk, ensuring safety, and increasing climate resiliency for our local communities and constituents. Time is of the essence and we as a state can no longer stand and argue while the impacts of climate change ravage our communities. We need to make some tough decisions and get moving now.

All stakeholders must participate in the energy sector to a greater extent than in years past. The utilities and state regulators have proven they cannot manage it all in the top down, centralized, control framework that has existed for decades. Local governments and public agencies need resources and direction from the state so they can step up. They are willing and able to step up to the climate challenges, but need the state to support them in these efforts. They need a Advance Community Energy framework to become a driver in meeting state climate and clean energy goals while providing new benefits for local citizens. Public-private partnerships that are fostered and supported by the state through the ACE process will ensure that we diversify our energy portfolio and increase the resilience of our local communities in a manner that is coordinated and serves the best interest of the public.

Public-private partnerships will help the state achieve its climate goals in the most rapid and cost-efficient manner. These goals can be achieved with less risk and greater innovation in technology and community engagement, leading to additional societal benefits and improving the quality of life for all Californians. True sustainability recognizes the interconnectedness of our environment, economy, and society, and acknowledges the delicate balance of these systems. The state should strive to focus both on resiliency to prepare for near-term climate impacts and sustainability to shift our economy and society to energy practices that restore and protect our environment.

Change is needed, and it is needed now. In the name of safety, cost, efficiency, speed and the well-being of the next generations of Californians, we ask that you to use your influence to collaborate on passing the climate resiliency and sustainability policies as set forth in these comments.