



**PUBLIC COMMENT for Peninsula Clean Energy
Board of Directors**

Sierra Club Letter to CC Power Board

Bill Nack

Feb 24, 2021, 6:33 PM

to me, Jan, David, Steve

Jan, Ann,

Please forward to the PCE Board, the attached letter from the Sierra Club to the CC Power Board. The positions that the Sierra Club expressed in this letter concerning policies for CC Power is very similar to those taken by PCE and IBEW 617.

Thank you for your consideration of this request.

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[Bill Nack](#)



February 22, 2021

Interim General Manager and Board of Directors
California Community Power

RE: Formation of California Community Power and Development of Policies

Dear Interim General Manager and Board of Directors:

The Sierra Club writes to express its support for California Community Power's (CCP) purpose to combine the buying power of multiple Community Choice agencies to procure new clean energy resources that will help meet the local and state climate mandates. Unfortunately, we are also disappointed to find out that the formation of CCP was done without much transparency, and that the Sierra Club and its members, many of whom played a key role in supporting the growth of Community Choice, were not given an opportunity to provide feedback on the process and what an agency like this could look like.

However, Sierra Club and its members and supporters are still Community Choice customers, and we wish to continue working with CCP to ensure its success. To that end, we recommend the Board and the Interim General Manager work with environmental, labor, and community stakeholders to draft a proposal for Board consideration, rather than having the process be worked through CCP's internal discussions. This will go a long way in building trust between CCP and impacted stakeholders and communities, and create community buy-in for a CCP that reflects our values.

Echoing many of the points other stakeholders have made in which policies should be considered, the Sierra Club also suggests the following:

I. Environmental

- CCP must prioritize projects that demonstrate multiple benefits, such as public health, economic, or environmental benefits beyond the climate and greenhouse gas reduction benefits.
- CCP must prioritize projects located in areas designed as renewable energy zones, and have received required land use entitlement permits.
- CCP must avoid projects located in high conflict areas, projects that have not gone through review under the California Environmental Quality Act, and/or do not have their relevant land use permits approved.
- CCP must exclude unbundled renewable energy credits from any type of procurement.
- CCP must prohibit any procurement relating to fossil fuel resources, including backup resources.

II. Workforce Development

- CCP must procure, or at minimum prioritize, energy projects that use multi-trade project labor agreements, require prevailing wage, support and utilize state-certified apprenticeship programs, including the utilization of local apprentices and graduates of pre-apprenticeship programs, and targeted-hired.
- CCP must require all battery storage projects, whether they are paired by solar or another renewable resource or not, to utilize C-10 licensees as defined by the California Standards Licensing Board.

III. Environmental Justice

- CCP must prioritize projects that are located within environmental justice communities and can demonstrate public health, climate, workforce and other community benefits to environmental justice communities.

IV. Geographical Preference

- CCP shall first give a preference to projects that are located in a county or city that receives electric service from one or more of the CCP JPA member CCAs, then to projects that are located in Northern California, and then to projects that are located within California.

V. Transparency and Public Engagement

- CCP must establish a meaningful, advisory committee that is composed of stakeholders and community members to ensure transparency and public engagement in CCP's operations and procurement practices.

These policies must be in place before CCP goes out and begins procuring power, and the relevant policies must be used as a way to evaluate the many different projects bids CCP would receive. The principles of many of the founding members, including the values of the community, are not something to be used as negotiating chips.

The Sierra Club appreciates the opportunity to comment. We urge you to move quickly in preparing a set of draft policies that reflect the above, and that the process between preparing a draft for Board consideration and Board approval is inclusive of impacted stakeholders.

Sincerely,

Luis Amezcua
Senior Campaign Representative

cc: Central Coast Community Energy, East Bay Community Energy, MCE, Peninsula Clean Energy, Redwood Coast Energy Authority, San Jose Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, CleanPowerSF