

Rulemaking: A. 18-06-015
Exhibit No.: _____
Witness: Joel Espino

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

Application of Southern California Edison
Company (U338E) for Approval of its
Charge Ready 2 Infrastructure and Market
Education Programs.

Application 18-06-015
(Filed June 26, 2018)

**OPENING TESTIMONY OF JOEL ESPINO, SPONSORED BY THE GREENLINING
INSTITUTE ON APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY
(U338-E) FOR APPROVAL OF ITS CHARGE READY 2 INFRASTRUCTURE AND
MARKET EDUCATION PROGRAMS**

November 30, 2018

JOEL ESPINO
The Greenlining Institute
360 14th Street, 2nd Floor
Oakland, CA 94612

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	THE COMMISSION MUST ENSURE SCE’S CHARGE READY 2 PROGRAM PROMOTES THE PUBLIC INTERST AND ADVANCES RACIAL JUSTICE	1
III.	MULTIPLE CALIFORNIA LAWS, PROGRAMS, AND ACTIONS AIM TO INCREASE CLEAN TRANSPORTATION OPTIONS IN DISADVANTAGED AND LOW-INCOME COMMUNITIES.....	7
A.	California’s climate and clean energy policies and actions create a social equity goal and value the Commission must help advance	7
IV.	INCORPORATING AN EQUITY FRAMEWORK WILL ENSURE CHARGE READY 2 MAXIMIZES SOCIETAL GOOD	11
A.	Promote community engagement and power.....	12
1.	<i>Enable Community-Driven Mobility Equity Projects and Proactively Engage Environmental Justice/Community-Based Organizations:</i>	12
2.	<i>Increase electric mobility awareness for low-income communities:</i>	13
B.	Prioritize investment in disadvantaged communities and low-income households.....	15
C.	Ensure, direct, assured, targeted benefits for low-income people and disadvantaged communities	16
1.	<i>Increase access to electric mobility for all:</i>	16
D.	Maximize societal good by promoting economic equity	16
1.	<i>Maximize workforce opportunities for those most in need by aligning with the Transformative Climate Communities Program and Recommendations from CARB’s SB 350 Barriers report:</i>	16
V.	CHARGE READY 2 MUST PROMOTE SUSTAINABLE LAND-USE PATTERNS TO ADVANCE EQUITY AND ENSURE CALIFORNIA MEETS ITS CLIMATE GOALS	19
VI.	CONCLUSION	22

LIST OF FIGURES

Figure 1: Area description for an East Oakland neighborhood	2
Figure 2: Redlining Map of Los Angeles, CA	3
Figure 3: Air pollution index by race/ethnicity: Los Angeles-Long Beach-Santa Ana Metro Area, 2015	4
Figure 4: Percent of working poor by race/ethnicity: Los Angeles-Long Beach-Santa Ana Metro Area, 1980-2015	5
Figure 5: Family wealth by race in the United States	6
Figure 6: Mobility Equity Framework Steps	13
Figure 7: CO2 and VMT Per Capita Trend in California	19
Figure 8: Example of What Transportation Modes to Prioritize in Urban Areas	21

1 **I. INTRODUCTION**

2 In accordance with Rule 13.11 of the California Public Utilities Commission
3 (“Commission”) Rules of Practice and Procedure (“Rules”), the October 29, 2018 “Assigned
4 Commissioner’s Scoping Memo and Ruling,” and the email ruling of Administrative Law Judge
5 Sasha Goldberg issued November 2, 2018, The Greenlining Institute (“Greenlining”) submits the
6 opening testimony of Joel Espino on Southern California Edison’s (“SCE”) application in A.18-
7 06-015. Mr. Espino is legal counsel for Greenlining’s Environmental Equity program; his
8 experience and qualifications are set forth in Attachment A.

9 **II. THE COMMISSION MUST ENSURE SCE’S CHARGE READY 2 PROGRAM**
10 **PROMOTES THE PUBLIC INTEREST AND ADVANCES RACIAL JUSTICE**

11 Since the founding of the United States of America, all levels of government have played
12 a role in creating and maintaining social inequities within our economic, political, social, and
13 cultural systems.¹ Government carried out multiple acts of oppression, and passed and
14 implemented a wide range of laws and policies, “including everything from who could vote, who
15 could be a citizen, who could own property, who was property, where one could live, whose land
16 was whose and more.”²

17 An example of a government-backed racially discriminatory policy that created inequities
18 still felt today is a 1930s home loan program coming out of the New Deal. The program was
19 intended to stem the rise in foreclosures and the Home Owner’s Loan Corporation (“HOLC”)
20 was the federal agency charged with backing mortgages to help postwar families build wealth.³
21 To help carry out this program, “government surveyors interviewed local officials and bankers to
22 document what local lenders considered credit risks in different neighborhoods.”⁴ The surveyors
23 looked a number of factors like access to transportation and quality of housing, but the “primary
24 driver of the grading system was the racial and ethnic makeup of the neighborhood’s residents.”⁵
25 As a result, surveyors created maps and graded neighborhoods using a color-code: green areas

¹ See, Government Alliance on Race and Equity, “[Racial Equity Toolkit: An Opportunity to Operationalize Equity](#)”

² *Id.*; See also, [The Atlantic Slave Trade; Colonization of Native Americans](#).

³ See, Misra, T., “[A Digital Window in the Roots of Redlining](#)”;

⁴ See, [How 1930s discrimination shaped inequality in today's cities](#)

⁵ *Id.*

for “best,” blue for “still desirable,” yellow for “definitely declining” and red for “hazardous.”⁶ The “redlined” areas were deemed credit risks because of the influx or presence of racial and ethnic minorities. It was common to see things like “infiltration of Negroes and Orientals” listed as “detrimental influences” in descriptions of redlined areas.⁷

Figure 1: Area description for an East Oakland neighborhood

NS FORM-8
8-28-37

AREA DESCRIPTION

1. NAME OF CITY	OAKLAND, CALIFORNIA	SECURITY GRADE	RED	AREA NO.	D-18
2. DESCRIPTION OF TERRAIN.	Level				
3. FAVORABLE INFLUENCES.	Convenience to schools, local shopping districts, local and San Francisco transportation; proximity to industry increases demand for class of residences in this area.				
4. DETRIMENTAL INFLUENCES.	Infiltration of Negroes and Orientals (see below). Many cheap type cottages and old homes detract from otherwise generally fair appearance of area. Distance from Metropolitan center				

Since these maps were created, the term “redlining” is used to describe discrimination in housing, lending, and access to services and opportunity. Below is an example of a redlining map in Los Angeles, California:⁸

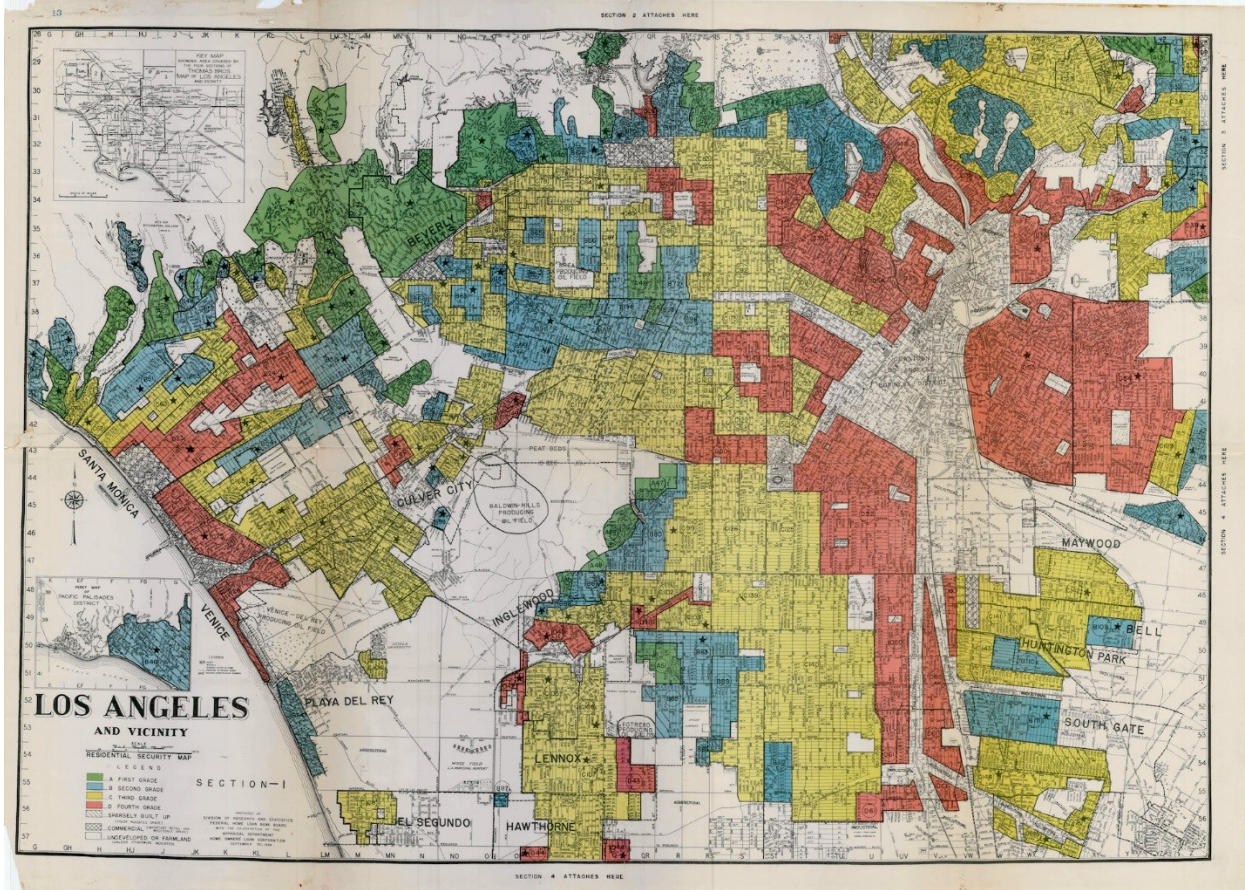
⁶ [Redlining was banned 50 years ago. It's still hurting minorities today](#)

⁷ See, [T-RACES](#)

⁸ See, [T-RACES](#) for examples of “redline” descriptions.

1

Figure 2: Redlining Map of Los Angeles, CA⁹



2

3 A four-university research project aimed at archiving these redlining maps summarizes their
4 impact:¹⁰

5 *Over the last thirty years especially, scholars have characterized HOLC's*
6 *property assessment and risk management practices, as well as those of the*
7 *Federal Housing Administration, Veterans Administration, and US. Housing*
8 *Authority, as some of the most important factors in preserving racial segregation,*
9 *intergenerational poverty, and the continued wealth gap between white*
10 *Americans and most other groups in the U.S. Many of these agencies operated*
11 *under the influence of powerful real estate lobbies or wrote their policies steeped*
12 *in what were, at the time, widespread assumptions about the profitability of racial*

⁹ Reft, R., "[Segregation in the City of Angels: A 1939 Map of Housing Inequality in L.A.](#)," KCET

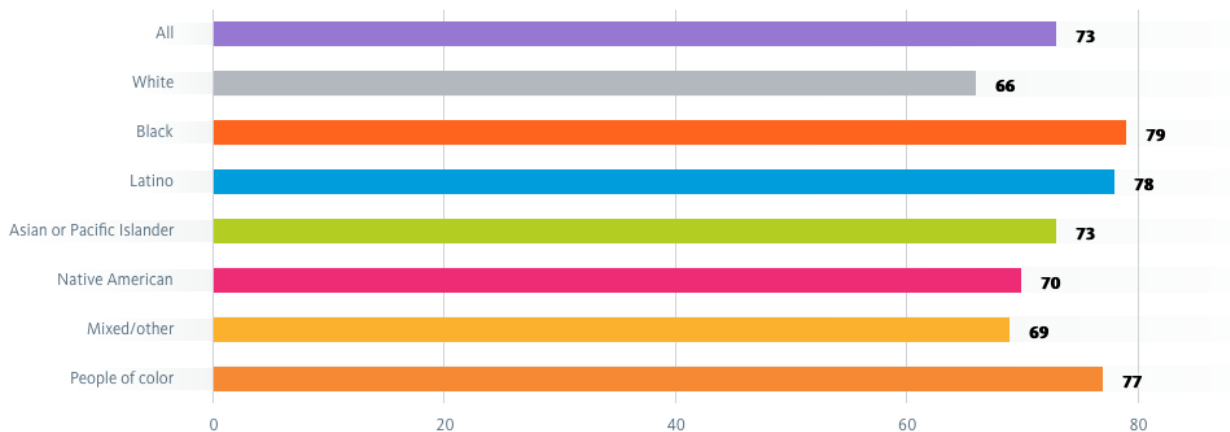
¹⁰ Nelson, R.K., et al., "[Mapping Inequality](#)," American Panorama, accessed November 25, 2018

1 *segregation and the residential incompatibility of certain racial and ethnic*
2 *groups. Through HOLC, in particular, real estate appraisers used the apparent*
3 *racial and cultural value of a community to determine its economic value.*

4 This long historical record of explicit and implicit policies and practices created structural
5 inequities in our society along race and ethnicity lines. These inequities manifest in well-
6 documented racial and ethnic disparities in common quality of life indicators like education,
7 economic stability, distribution of transportation burdens and benefits, and others.¹¹

8 For example, greater exposure to transportation pollution in communities of color is tied
9 to decades of segregation and structural racism in land-use decisions and government policy,
10 which has resulted in low-income communities of color living near busy roads, freeways, ports,
11 and other freight corridors at higher rates than wealthier communities and whites. The figure
12 below shows the greater exposure to air pollution by people of color—black people in
13 particular—in the Los Angeles Metro area located within SCE’s service territory:

14 **Figure 3: Air pollution index by race/ethnicity: Los Angeles-Long Beach-Santa Ana Metro Area, 2015¹²**



15
16 Approximately 90 percent of people living in the poorest, most polluted “Disadvantaged
17 Communities,” as defined by the California Environmental Protection Agency, are people of

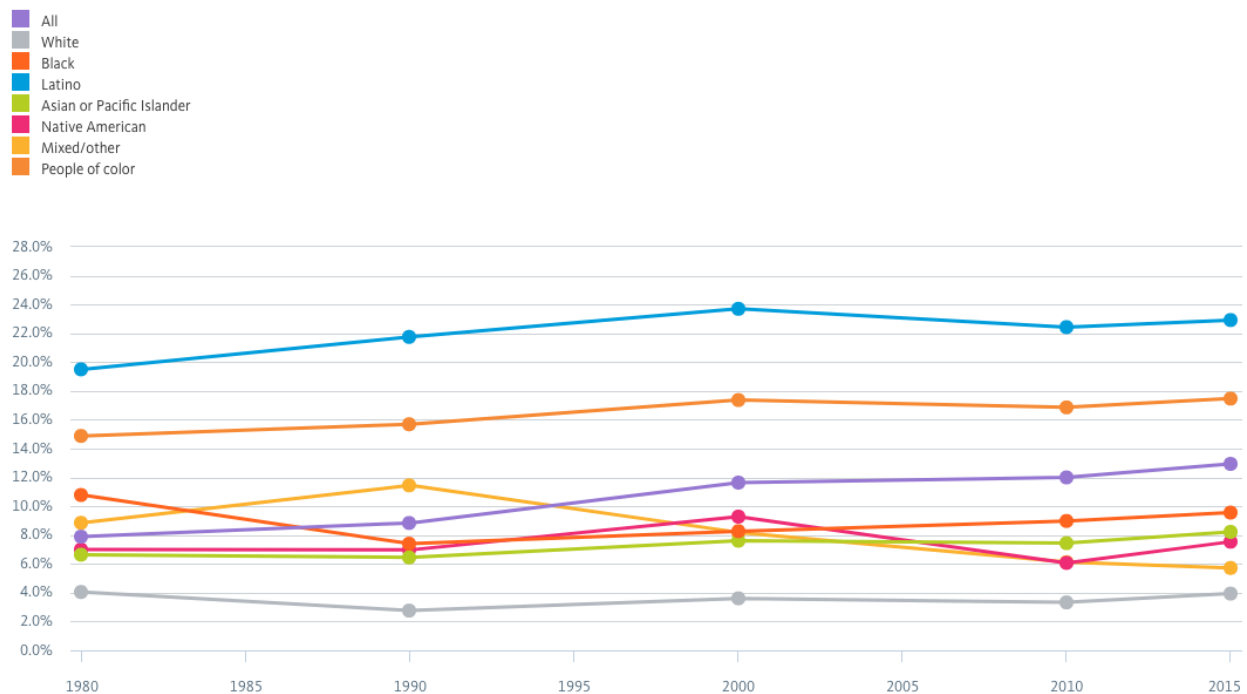
¹¹ See, [National Equity Atlas; Systemic Inequality: How America’s Structural Racism Helped Create the Black-White Wealth Gap](#); [Race Counts: Advancing Opportunities for All Californians](#).

¹² PolicyLink, National Equity Atlas, [Air pollution exposure index, by race/ethnicity: Los Angeles-Long Beach-Santa Ana, CA Metro Area, Cancer and non-cancer, 2015](#)

color.¹³ This disproportionate exposure leads to higher rates of asthma, cancer, and other pollution-related illnesses, increased health costs and more missed school and work days for people of color.¹⁴

Moreover, people of color have traditionally lacked the financial well-being that would enable them to afford to live in less polluted neighborhoods or enable them to pay for healthcare to manage the negative health impacts of prolonged exposure to pollution. For instance, between 1980 and 2014, the share of working poor white in the Los Angeles Metro area remained steady just below 4 percent.¹⁵ During that same period, the share of working poor among people of color grew from 14.9 percent to 17.5 percent.¹⁶

Figure 4: Percent of working poor by race/ethnicity: Los Angeles-Long Beach-Santa Ana Metro Area, 1980-2015¹⁷



As stated by PolicyLink, “[a]s the low-wage sector has grown, the share of adults who are working full-time job but still cannot make ends meet has increased, particularly among Latinos

¹³ See, Chandler, S., Espino, J., O’Dea, J., “[Delivering Opportunity: How Electric Buses and Trucks Can Create Jobs and Improve Public Health in California](#),” the Union of Concerned Scientists and The Greenlining Institute.

¹⁴ *Id.*

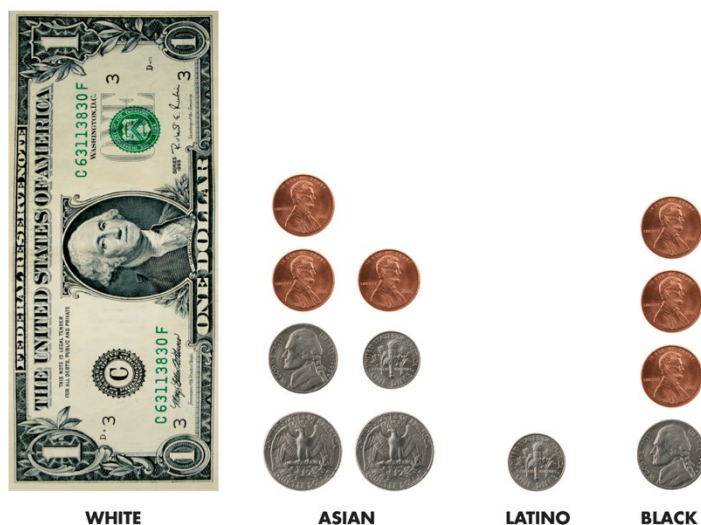
¹⁵ See, PolicyLink, [National Equity Atlas: Indicators – Working Poor California](#)

¹⁶ *Id.*

¹⁷ PolicyLink, National Equity Atlas, [Percent of working poor by race/ethnicity: Los Angeles-Long Beach-Santa Ana Metro Area, 1980-2015](#)

and other workers of color,” and thus, the “failure of even full-time work to pay family supporting wages dampens the potential of millions of workers and our nation as a whole.”¹⁸ Additionally, people of color, and—black people in particular—lack access to wealth and assets that can serve as a lifeline in cases of emergencies or as credit when looking to rent or purchase a home in less polluted areas.

Figure 5: Family wealth by race in the United States



The figure above shows the scale of the racial wealth gap in the United States. In 2013, for every dollar a white family had, the median black family had 8 cents and the median Latino family had 10 cents.¹⁹

Policies, programs, and investments are too often developed and implemented without thoughtful consideration of racial equity. When equity is not explicitly brought into operations and decision-making, racial inequities are likely to be reinforced and, in some instances, exacerbated. In fact, CARB acknowledges this “the way we grow also imposes and often reinforces long standing racial and economic injustices by placing a disproportionate burden on low-income residents, who end up paying the highest proportion of their wages for housing and commuting.”²⁰ To close racial divides and create a fairer and more just California, California

¹⁸ See, PolicyLink, [National Equity Atlas: Indicators – Working Poor California](#)

¹⁹ The Greenlining Institute, [Economic Equity Program](#)

²⁰ CARB, [2018 Progress Report: California’s Sustainable Communities and Climate Protection Act](#)

1 must prioritize and practice social equity in every sector of our economy, including SCE’s
2 Charge Ready 2 program. Additionally, the California government—and the CPUC as a state
3 agency—has the duty and responsibility as part of its “police powers” under the 10th Amendment
4 of the United States Constitution to “promote the public health, morals, or safety, and the general
5 well-being of the community.”²¹

6 **III. MULTIPLE CALIFORNIA LAWS, PROGRAMS, AND ACTIONS AIM TO** 7 **INCREASE CLEAN TRANSPORTATION OPTIONS IN DISADVANTAGED** 8 **AND LOW-INCOME COMMUNITIES**

9 **A. California’s climate and clean energy policies and actions create a social equity** 10 **goal and value the Commission must help advance**

11 Over the years, various California policies, programs, and actions have set objectives and
12 commitments targeting benefits to disadvantaged and low-income communities relating to clean
13 transportation and climate and energy policy, overall. Below is a *non-exhaustive list*:

- 14 1. SB 1275.²² Known as the Charge Ahead California Initiative, this bill states that
15 California must “increase access for disadvantaged, low-income, and moderate-income
16 communities and consumers to zero-emission and near-zero-emission vehicles, and to
17 increase the placement of those vehicles in those communities and with those consumers
18 to enhance the air quality, lower greenhouse gases, and promote overall benefits for those
19 communities and consumers.” As directed by this bill, the California Air Resources
20 Board has created EV equity programs and has invested \$280 million to date.²³ Currently,
21 there are 16 equity projects at various stages of implementation from awards pending to
22 projects up and running.²⁴ Projects range from scrap and replace programs that give low-
23 income individuals vouchers of up to \$9,500 for new or used EVs to electric carsharing
24 projects in disadvantaged communities to clean agriculture worker vanpools in the central
25 valley.²⁵

²¹ Galva, J.E., et al., “[Public Health Strategy and the Police Powers of the State](#),” Public Health Reports

²² Senate Bill 1275 (De León), Part 5 of Division of the Health and Safety Code, Chapter 8.5, Section 44258.4
(4)(B), at https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB1275

²³ See, [CARB FY 18-19 Low Carbon Transportation Funding Plan](#).

²⁴ *Id.*

²⁵ *Id.*

- 1 2. SB 350 Transportation Electrification Equity Provisions:²⁶ Finds and declares that
2 “[w]idespread transportation electrification requires increased access for disadvantaged
3 communities, low- and moderate-income communities, and other consumers of zero-
4 emission and near-zero-emission vehicles, and increased use of those vehicles in those
5 communities and by other consumers to enhance air quality, lower greenhouse gases
6 emissions, and promote overall benefits to those communities and other consumers. SB
7 350 also requires that the CPUC direct the utilities under its jurisdiction to file
8 applications “to accelerate widespread transportation electrification to reduce dependence
9 on petroleum, meet air quality standards, achieve the goals set forth in the *Charge Ahead*
10 *California Initiative* . . . , and reduce emissions of greenhouse gases to 40 percent below
11 1990 levels by 2030 and to 80 percent below 1990 levels by 2050” (emphasis added).²⁷
- 12 3. SB 350 Transportation Electrification Priority Review Projects:²⁸ The CPUC approved 15
13 proposals to expand electric vehicle access and charging infrastructure submitted last
14 year by Pacific Gas and Electric, Southern California Edison, and San Diego Gas and
15 Electric under SB 350. The projects were revised to increase EV access in disadvantaged
16 communities: 14 of the 15 projects will directly benefit DACs in some form.²⁹
- 17 4. SB 350 Transportation Electrification Standard Review Projects:³⁰ The CPUC approved
18 four projects with budgets totaling \$738 million to expand electric vehicle access and
19 charging infrastructure submitted last year by Pacific Gas and Electric, Southern
20 California Edison, and San Diego Gas and Electric under SB 350. The projects were
21 revised to ensure disadvantaged communities benefitted: SCE’s Medium-Duty/Heavy-
22 Duty (MD/HD) EV Infrastructure Program– CPUC approved \$343M for this program
23 with a minimum of 40% committed to DACs (\$137.2M); PG&E’s MD/HD EV
24 Infrastructure Program– CPUC approved \$236M for this program with a minimum of
25 25% committed to DACs (\$59M); PG&E’s Fast Charging Infrastructure Program – the

²⁶ Senate Bill 350 (De León), Clean Energy and Pollution Reduction Act of 2015, at https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350

²⁷ *Id.*

²⁸ Decision 18-01-024

²⁹ The Greenlining Institute, [*California Okays New Electric Vehicle Charging Projects to Boost Access in Low-Income Communities*](#), Press Release

³⁰ Decision 18-05-040; see also, <http://www.cpuc.ca.gov/sb350te/>

1 proposed decision approved \$22.4M for this program with a minimum of 25% committed
2 to DACs (\$5.6M); SDG&E's Residential Charging Program – the proposed decision
3 approved \$137M for this program with a minimum of 25% committed to DACs
4 (\$34.25M).

5 5. SB 535:³¹ Directed a portion of the revenue generated by AB 32 into disadvantaged
6 communities to invest in the communities most impacted by the cumulative impacts of
7 poverty and pollution.

8 6. AB 1550:³² Updated SB 535 and requires at least 25% of cap-and-trade investments to be
9 spent in disadvantaged communities with an additional 10% benefiting low-income
10 communities and households, for a total of 35% going to disadvantaged and low-income
11 communities.

12 7. AB 197:³³ Requires CARB to protect the state's most impacted and disadvantaged
13 communities and to consider the social costs of the emissions of greenhouse gases when
14 developing climate change programs.

15 8. AB 523:³⁴ Requires the California Energy Commission to spend at least 25% of the
16 Electric Program Investment Charge fund for technology demonstration and deployment
17 at sites located in, and benefiting, disadvantaged communities, and additional 10% to
18 fund projects located in and benefiting low-income communities, for a total of 35% going
19 to disadvantaged and low-income communities.

20 9. SB 92:³⁵ Requires that the Air Resources Board strive to ensure at least 35% of funds
21 from Volkswagen's ("VW") ZEV Investment plan benefits low-income and
22 disadvantaged communities.

³¹ Senate Bill 535 (De León) at https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120SB535

³² Assembly Bill 1550 (Gomez) at https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB1550

³³ At https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB197

³⁴ Assembly Bill 523 (Reyes), at https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB523

³⁵ Senate Bill 92 at https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB92

- 1 10. VW ZEV Investment Plan Cycle 1 and Cycle 2: For Cycle 1, Electrify America
2 anticipates that 35% of their investment will be in low-income and disadvantaged
3 communities across all its investment categories. For Cycle 2, Electrify America’s plan
4 commits to exceed the 35% minimum investment in low-income and disadvantaged
5 communities.
- 6 11. VW Environmental Mitigation Trust:³⁶ CARB’s Mitigation Trust Plan designates 57.5%
7 (172.5M) of the \$300 million allocated for ZEV infrastructure to low-income and
8 disadvantaged communities.
- 9 12. SB 350 Low-Income Barriers Study, Overcoming Barriers to Clean Transportation
10 Access for Low-Income Residents:³⁷ SB 350 also declared that there is insufficient
11 understanding of the barriers for low-income customers to clean transportation. The bill
12 therefore required CARB to complete and publish a study on those barriers. CARB just
13 finalized the study’s guidance document, which outlines various barriers and actions to
14 ensure clean transportation investments are benefitting low-income and disadvantaged
15 communities.
- 16 13. SB 350 Low-Income Barriers Study, Overcoming Barriers to Energy Efficiency and
17 Renewables for Low-Income Customers and Small Business Contracting Opportunities
18 in Disadvantaged Communities:³⁸ SB 350 required that the CEC also complete and
19 publish a study on low-income barriers.
- 20 14. SB 350 Multi-Agency Task Force:³⁹ The Governor’s Office convened a task force to
21 facilitate multi-agency coordination to ensure the implementation of both CARB and
22 CEC barriers reports recommendations. The task force includes the following agencies,
23 among others: California Public Utilities Commission, California Transportation
24 Commission, California Department of Transportation, California State Transportation
25 Agency, the California Department of Public Health, California Environmental

³⁶ CARB, [Volkswagen Environmental Mitigation Trust for California](#)

³⁷ CARB, [Low-Income Barriers Study Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents](#) (SB 350 Barriers Study)

³⁸ CARB, [Low-Income Barriers Study Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents](#)

³⁹ *Id.*

Protection Agency, Governor’s Office of Planning and Research, California Strategic Growth Council, and the Governor’s Office of Business and Economic Development.⁴⁰

15. Disadvantaged Communities Advisory Group:⁴¹ Consists of representatives of disadvantaged communities who will provide advice to the CEC and CPUC on programs proposed to achieve clean energy and pollution reduction. SB 350 required the creation of this advisory group.

16. California Public Utilities Commission Energy Storage Equity Program:⁴² Directs 25% of funds for distributed energy storage to low-income households and environmentally burdened communities throughout the state.

For SCE to help eliminate social inequities in its service territory, the Charge Ready 2 program must incorporate a strong equity framework into its implementation (see below).

IV. INCORPORATING AN EQUITY FRAMEWORK WILL ENSURE CHARGE READY 2 MAXIMIZES SOCIETAL GOOD

SCE must build off its social equity efforts in the Charge Ready pilot and work to further advance social equity outcomes, especially considering the proposed budget amount for Charge Ready 2. In order to do this, we recommend SCE’s Charge Ready program be modified to incorporate the following framework:

- Promote community engagement and power
- Prioritize investment in disadvantaged communities and low-income households
- Ensure, direct, assured, targeted benefits for low-income people and disadvantaged communities
- Maximize societal good by promoting economic equity

Below are some recommended modifications that will ensure Charge Ready 2 maximizes equity.

⁴⁰ See, <https://www.arb.ca.gov/msprog/transoptions/050817roundtable/presentation.pdf>.

⁴¹ CPUC, [Disadvantaged Communities Advisory Group](#)

⁴² CPUC, “[CPUC Directs Investment for Energy Storage Projects to Customers Located in Disadvantaged and Low-Income Communities](#),” Press Release

1 **A. Promote community engagement and power**

2 1. *Enable Community-Driven Mobility Equity Projects and Proactively Engage*
3 *Environmental Justice/Community-Based Organizations:*

4 Charge Ready 2 should improve off the Charge Ready pilot’s efforts and incorporate
5 equity best practices in engaging community-based organizations, determining community
6 needs, and implementing community-driven approaches. Specifically, we recommend SCE
7 commit to using cutting-edge strategies like the ones listed in Greenlining’s *Electric Vehicles for*
8 *All: An Equity Toolkit* and University of Kansas, Center for Community Health and
9 Development’s robust and comprehensive “*Community Toolbox*.”⁴³

10 Specifically, Greenlining recommends that Charge Ready 2 be modified to make funds
11 available for a “Mobility Equity” project that will be implemented following the process
12 established in The Greenlining Institute’s *Mobility Equity Framework*, which outlines a three-
13 step process for elevating principles of community, equity, and sustainability: (1) determine the
14 community’s mobility needs, (2) conduct a mobility equity analysis that evaluates factors such as
15 affordability, accessibility and impacts of air pollution, and (3) place neediest communities at the
16 center of final decision-making.⁴⁴ The framework urges use of a Participatory Budgeting process,
17 a democratic form of decision-making that has gained support at the Metropolitan Transportation
18 Commission in the Bay Area and at Caltrans.⁴⁵

⁴³ Espino, J., [*Electric Vehicles for All: An Equity Toolkit*](#), The Greenlining Institute; *see also*, University of Kansas, Center for Community Health and Development, [*Community Toolbox, Using Outreach to Increase Access*](#).

⁴⁴ *See*, Creger, H., Espino, J., Sanchez, A., “[*Mobility Equity Framework: How to Make Transportation Work for People*](#),” The Greenlining Institute; [*A Blueprint for More Equitable Transportation Planning: How to Decide, Fairly, Which Transportation Investments Are the Best Ones*](#); [*Transportation Planning: people first, not cars*](#)

⁴⁵ [*Participatory Budgeting Fans Say State DOT’s Embrace Is “Revolutionary”*](#)

Figure 6: Mobility Equity Framework Steps

Mobility Equity Framework

- Step One: Identify the mobility needs of a specific low-income community of color.
- Step Two: Conduct the mobility equity analysis to prioritize transportation modes that best meet those needs while maximizing benefits and minimizing burdens.
- Step Three: Place decision-making power in the hands of the local community.



Following this process will ensure communities buy-in and have decision-making power to craft and pick what electric mobility investments make sense for them. Piloting this type of process will help stakeholders and communities test, learn, and refine a revolutionary transportation planning and decision-making process that can promote the many equity goals listed above, and serve as a national model. Specifically, piloting this model will help advance many of the recommendations listed in CARB’s SB 350 Low-Income Barriers to Clean Transportation Options study, and ensure the Commission is doing its part to advance those recommendations given its membership in the multi-agency task force that is working to implement recommendations of this report.⁴⁶ SB 350 Barriers Study recommendations this would advance:⁴⁷

- “Transformative Clean Transportation and Mobility Projects – “Fund programs that create or expand transformative clean transportation car sharing, ride sharing, bike sharing, vanpooling, micro-transit, and other mobility options.”
- “Expand Assessments of Low-Income Resident Transportation and Mobility Needs to Ensure Feedback is Incorporated in Transportation Planning”

2. Increase electric mobility awareness for low-income communities:

An equity best practices is to anchor community engagement and awareness in direct connections with community members and enhance with paid multi-ethnic media, where

⁴⁶ CARB, [Low-Income Barriers Study Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents](https://www.arb.ca.gov/msprog/transoptions/050817roundtable/presentation.pdf), see also, <https://www.arb.ca.gov/msprog/transoptions/050817roundtable/presentation.pdf>.

⁴⁷ CARB, [Low-Income Barriers Study Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents](https://www.arb.ca.gov/msprog/transoptions/050817roundtable/presentation.pdf)

appropriate. Paid media should not be the sole, primary strategy. Moreover, here is a *non-exhaustive* list of best practices that should be implemented and scaled up Charge Ready 2:

- Partner with local, community-based/faith-based groups/leaders to organize events and conduct outreach/marketing (funding for them to assist and build their capacity is necessary)
- Partner with local and state electeds to sponsor/host events and other key community influencers
- Commit to a “one-stop shop” mentality - bring in EV equity project administrators (like Valley CAN and others) where applicable, and bring in other community/low-income specific services e.g. health clinic services, immigration, low-income weatherization/solar, jobs application/resume help, etc.
- Target marketing, education, and outreach to car-dependent low-income communities
- Develop culturally appropriate awareness campaigns (in a language other than English where appropriate) using trusted mediums/messengers (e.g. Spanish language radio, community newspapers, ethnic media, etc.) which could incorporate the activities recommended by CARB’s SB 350 Low-Income barriers report⁴⁸

We recommend SCE commit to using other cutting-edge community engagement strategies like the ones listed in The Greenlining Institute’s “*Electric Vehicles for All: An Equity Toolkit*,” and University of Kansas, Center for Community Health and Development’s robust and comprehensive “*Community Toolbox*.”⁴⁹

Incorporating this framework will ensure Charge Ready 2 will maximize social equity outcomes and align with growing efforts listed above to maximize benefits and minimize burdens for low-income individuals and disadvantaged communities.

⁴⁸ CARB, [Low-Income Barriers Study Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents](#)

⁴⁹ Espino, J., [Electric Vehicles for All: An Equity Toolkit](#), The Greenlining Institute; *see also*, University of Kansas, Center for Community Health and Development, [Community Toolbox, Using Outreach to Increase Access](#).

B. Prioritize investment in disadvantaged communities and low-income households

Greenlining recommends the Charge Ready 2 program be modified to ensure at least 50% of its charging stations be deployed in disadvantaged communities as defined by CalEPA pursuant to SB 535 (i.e. statewide definition). Specifically, SCE should use findings from its study in the Charge Ready pilot and develop other assessments and evaluations to ensure the neediest and hardest to reach DAC census tracts in its service territory receive charging infrastructure.⁵⁰ In carrying out those assessments, SCE should focus its DAC deployment efforts in census tracts that are car-dependent and lack high quality public transit. Some key tools that would help SCE and stakeholders are:

- An inventory/map of how many EVs have gone to low- and moderate-income people to date through CARB's SB 1275 EV equity projects and a projection of how many EVs are anticipated to reach low- and moderate-income people given that CARB has not awarded all of the funds for these EV equity programs and given that administrators have not yet spent all of the money allocated to them. In other words, a tally how much money is unused across all programs (e.g. financing assistance, Clean Cars 4 All, etc.) and calculate how many low- and moderate-income people are anticipated to have access to an EV through these unused dollars.
- An inventory/map and projection analysis for EV charging stations in disadvantaged communities. There are many programs that have invested in charging stations in low-income areas with more investments anticipated in low-income areas; E.g. VW Settlement, IOU TE projects, CEC, Air Districts, POUs, CARB projects.
- Surveys, focus groups, and mobility needs assessments

⁵⁰ [Decision 16-01-023](#): "SCE to commission a study of consumer demand growth in disadvantaged communities that will inform a significant scale up of deployment in disadvantaged communities in Phase 2" at 39.

1 **C. Ensure, direct, assured, targeted benefits for low-income people and**
2 **disadvantaged communities**

3 *1. Increase access to electric mobility for all:*

4 SCE must work to “increase access for disadvantaged, low-income, and moderate-income
5 communities and consumers to zero-emission and near-zero-emission vehicles, and to increase
6 the placement of those vehicles in those communities and with those consumers” as mandated in
7 SB 1275 and SB 350.⁵¹

8 Greenlining recommends that SCE partner with EV equity administrators and find ways
9 to complement and enhance CARB’s programs under the Charge Ahead California Initiative
10 authorized in SB 1275 (De León).⁵²

11 Specifically, SCE should partner with the statewide administrator of the low-income EV
12 financing assistance (Beneficial State Foundation), One-Stop Shop administrator (GRID
13 Alternatives), Replace Your Ride (aka Clean Cars 4 all), and other electric mobility equity
14 administrators.⁵³ SCE should also engage with awardees of Transformative Climate
15 Communities grants to determine if Charge Ready 2 can be leveraged to help deliver projects.⁵⁴

16 **D. Maximize societal good by promoting economic equity**

17 *1. Maximize workforce opportunities for those most in need by aligning with the*
18 *Transformative Climate Communities Program and Recommendations from*
19 *CARB’s SB 350 Barriers report:*

20 Greenlining recommends that SCE prioritize projects that demonstrate how they will
21 leverage, support, and/or create training programs (e.g. EVITP, IBEW, etc.) to recruit, train, and
22 hire workers from disadvantaged communities and low-income households. One way to do this

⁵¹ Senate Bill 1275 (De León, 2014).

⁵² *Id.*

⁵³ CARB, Low Carbon Transportation Program, [Transportation Equity Projects](#)

⁵⁴ Strategic Growth Council, [Transformative Climate Communities Awards](#)

1 is to assign preference points to bidders/contractors that demonstrate workforce equity efforts
2 (including but not limited to):⁵⁵

- 3 • Hiring of low-income workers and other individuals with barriers to employment
4 (through targeted or local hiring policies, or others);
- 5 • Diverse workforce demographics;
- 6 • Partnerships with skills development programs (or its own training programs)
7 targeted at low-income workers and people with barriers to employment, such as job
8 training and pre-apprenticeship programs; especially those that provide support
9 services to participants (e.g. child care, transportation assistance, financial stability,
10 etc.); and/or
- 11 • Paying of prevailing wages; providing benefits for hires, partners, and dependents
12 (medical and dental coverage, paid vacation and sick leave, retirement savings,
13 transportation reimbursement, childcare assistance, paid training opportunities);
14 predictable scheduling; and opportunities for advancement for entry-level workers

15 Incorporating this recommendation will also ensure Charge Ready 2 aligns with the following
16 provision of SB 350, which amended Pub. Util. Code § 740.8 to clarify the standard of review
17 for utility transportation electrification proposals under Pub. Util. Code § 740.3:

18 *740.8. As used in Section 740.3 or 740.12, “interests” of ratepayers, short- or*
19 *long-term, mean direct benefits that are specific to ratepayers, consistent with*
20 *both of the following:*

21 *(a) Safer, more reliable, or less costly gas or electrical service, consistent with*
22 *Section 451, including electrical service that is safer, more reliable, or less costly*
23 *due to either improved use of the electric system or improved integration of*
24 *renewable energy generation;*

25 *(b) Any one of the following:*

⁵⁵ See, [Public Sector Jobs: Opportunities for Advancing Racial Equity](#)

1 . . .

2 (5) Creating high-quality jobs or other economic benefits, including in
3 disadvantaged communities identified pursuant to Section 39711 of the Health
4 and Safety Code (emphasis added).

5 As part of the “ratepayer interest” determination, this section requires the Commission to
6 evaluate and consider the job and economic benefit produced by utility transportation
7 electrification proposals in disadvantaged communities.

8 Moreover, ensuring equitable job outcomes from this large infrastructure project will
9 ensure the Commission is helping advance the following SB 350 Barriers Study
10 recommendation:

11 *Maximize Economic Opportunities and Benefits for Low-Income Residents from*
12 *Investments in Clean Transportation and Mobility Options by Expanding*
13 *Workforce Training and Development*⁵⁶

14 Additionally, this modification will ensure Charge Ready 2 aligns with efforts like the Strategic
15 Growth Council’s Transformative Climate Communities program, which has become the gold
16 standard for how to most equitably invest in and implement projects.

17 2. *Maximize business opportunities for those most in need:*

18 Greenlining recommends Charge Ready 2 improve on the 40% Diverse Business
19 Enterprise (“DBE”) spending goal in the Charge Ready pilot. Specifically, we recommend SCE
20 incorporate new strategies to ensure potential new minority-owned and women-owned are aware
21 of RFP opportunities resulting from Charge Ready 2 and assist applicants in understanding how
22 to participate in the RFP process.

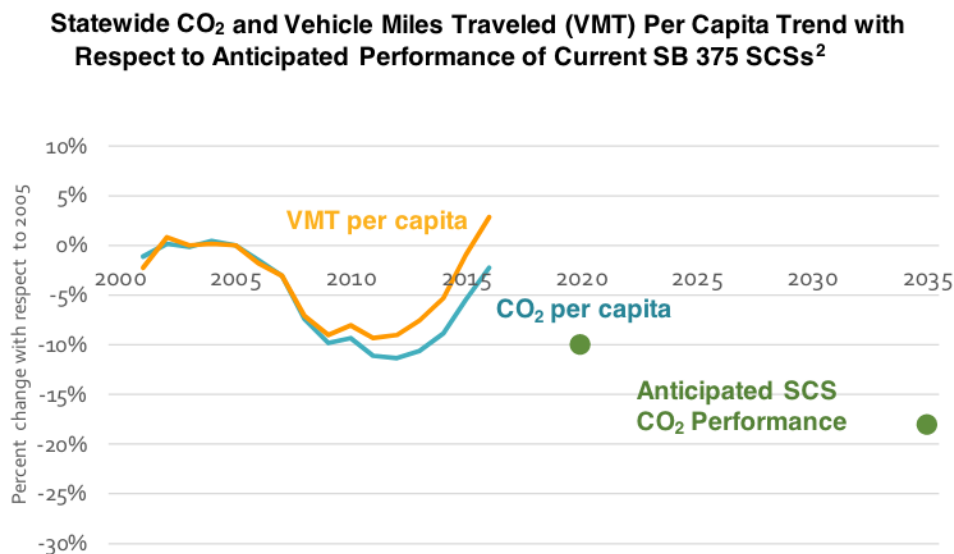
⁵⁶ CARB, [Low-Income Barriers Study Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents](#)

Greenlining also recommends increasing participation from minority- and women-owned businesses by giving preference points to bids/contracts that demonstrate agreements with contractors and subcontractors certified as minority- or women-owned businesses.⁵⁷

V. CHARGE READY 2 MUST PROMOTE SUSTAINABLE LAND-USE PATTERNS TO ADVANCE EQUITY AND ENSURE CALIFORNIA MEETS ITS CLIMATE GOALS

On November 26, 2018, CARB released a progress report on the landmark land-use, transportation, and housing bill—SB 375—which passed in 2008.⁵⁸ The bill required metropolitan planning organizations to include “Sustainable Communities Strategies” to their regional plans, in order to reduce greenhouse gas emissions by reducing driving and promoting more climate-friendly mobility.⁵⁹ The main finding of the report is that California is not track to meet its greenhouse gas reductions expected under SB 375:

Figure 7: CO₂ and VMT Per Capita Trend in California



Source: CDTFA, U.S.EIA, U.S.EPA, CARB

⁵⁷ See, [Contracting for Equity: Best Local Government Practices that Advance Racial Equity in Government Contracting and Procurement](#)

⁵⁸ CARB, [2018 Progress Report: California's Sustainable Communities and Climate Protection Act](#)

⁵⁹ Senate Bill 375 (Steinberg) at https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375

1 The figure above shows that the trend is going in the wrong direction — statewide, driving is
2 increasing, and emissions with it. Another key point from the report, relevant to the Charge
3 Ready 2 program, is that California cannot meet its climate goals without curbing single-
4 occupancy driving, according to CARB’s 2017 Climate Change Scoping Plan Update.⁶⁰
5 Moreover, the report goes on to say that “even if the share of new car sales that are ZEV grows
6 nearly 10-fold from today, California would still need to reduce VMT per capita 25 percent to
7 achieve the necessary reductions for 2030.”⁶¹ To put it differently, California cannot meet its
8 climate goals by simply electrifying all our cars. We have to change the current makeup of our
9 transportation system to promote more sustainable forms of transportation like walking, biking,
10 and mass transit. CARB’s report highlights why California is better off when we focus on
11 reducing driving and promoting sustainable alternatives:

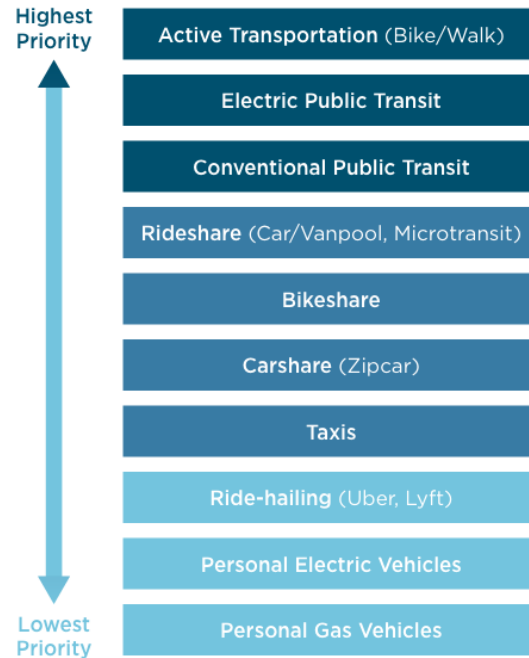
12 *[S]trategies to curb VMT growth help address other problems that focusing*
13 *exclusively on future vehicle and fuels technologies do not. For example,*
14 *spending less time behind the steering wheel and more time walking or cycling*
15 *home, with the family, or out with friends can improve public health by reducing*
16 *chronic disease burdens and preventing early death through transport-related*
17 *physical activity. Improving access to affordable homes in high opportunity areas*
18 *that are walkable, bikable, and have public transit will ensure that more*
19 *Californians are able to benefit from these improved health outcomes. Finally,*
20 *reducing vehicle travel will be crucial to keep congestion from both bringing*
21 *traffic to a standstill and continuing to put pressure on the state’s roadway*
22 *infrastructure as population grows. Efforts to reduce vehicle travel are a key*
23 *component of California’s efforts to preserve our climate and build healthier,*
24 *more sustainable, equitable and more prosperous regions for future generations.*

25 Greenlining agrees. Our *Mobility Equity Framework* shows illustrative examples of what modes
26 to prioritize that will result in the most equitable and sustainable outcomes:

⁶⁰ CARB, [*2018 Progress Report: California’s Sustainable Communities and Climate Protection Act*](#)

⁶¹ *Id.*

Figure 8: Example of What Transportation Modes to Prioritize in Urban Areas



*Illustrative example when all 12 equity indicators are weighted equally

*Assuming that all transportation modes are available in urban areas

The example above illustrates the order that should be given to various transportation modes in urban areas based on their ability to increase access to high quality mobility options, health, and economic outcomes for low-income people of color. These examples are not intended to serve as one-size-fits-all solutions to every community but can provide a starting point for discussions of what mobility options are the most equitable.

Given this CARB report and Greenlining's *Mobility Equity Framework*, Greenlining recommends that the Commission ensure Charge Ready 2 helps advance sustainable mobility options, especially in dense urban and suburban areas and areas with high-quality transit. Charge Ready 2 should be modified to ensure charging infrastructure deployment does not perpetuate car-centric streets and land-use patterns and promotes alternative, sustainable modes-especially in low-income areas.

1 **VI. CONCLUSION**

2 The Greenlining Institute respectfully urges the Commissions to consider the
3 recommendations in this testimony. Incorporating these recommended modifications will ensure
4 SCE's Charge Ready 2 program maximizes equity outcomes and helps advance many of the
5 goals and requirements set in California's growing climate and energy equity efforts.

6 Dated: November 30, 2018

Respectfully,

/s/ Joel Espino

Joel Espino

The Greenlining Institute

360 14th Street, 2nd Floor

Oakland, CA 94612

joele@greenlining.org

Testimony of the Greenlining Institute
Attachment A: Statement of Qualifications for Joel Espino

Joel Espino is Legal Counsel for the Greenlining Institute's *Environmental Equity Program*, based in Oakland, California. Since joining Greenlining in 2014, his focus has been reducing poverty and pollution in communities of color through advocacy for accessible, affordable and clean transportation choices and a diverse clean energy economy. Mr. Espino leads Greenlining's transportation equity work advocating to increase racial equity in transportation planning and investments; implementing the *Charge Ahead California Initiative* (De León, 2014) (SB 1275)—a law that works to make electric vehicles (EV) accessible to low- and moderate-income Californians; and advocating for equitable EV charging infrastructure investments before the California Public Utilities Commission, the California Energy Commission, and within the Volkswagen Diesel Settlement. Mr. Espino has participated, in a bilingual capacity (English and Spanish), in a number of EV ride and drive events in Oakland, Stockton, Los Angeles, and Riverside, aimed at educating low- and moderate-income individuals about EV benefits and EV incentives. Mr. Espino has presented on equity in electric mobility and authored multiple reports, blogs, and op-eds. He holds a bachelor's degree from Arizona State University and a Juris Doctor from the University of California, Hastings, College of the Law.