

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



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Consider Strategies and Guidance for
Climate Change Adaptation

Rulemaking 18-04-019
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**CENTER FOR ACCESSIBLE TECHNOLOGY'S OPENING COMMENTS ON STAFF
PROPOSAL AND CLIMATE LEXICON REPORT**

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I. INTRODUCTION

In accordance with the Assigned Commissioner's Ruling Entering Staff Proposal and Working Group Report into the Record and Requesting Comment (Assigned Commissioner's Ruling or ACR), issued July 10, 2026, and the Administrative Law Judge's Ruling Denying Motion for Extension Request and Modifying Comment Schedule, issued July 20, 2026, Center for Accessible Technology (CforAT) timely files these opening comments on the Staff Proposal and Climate Lexicon Report.

The Assigned Commissioner's Ruling enters Energy Division's Staff Proposal on Community Engagement and Adaptive Capacity (the Staff Proposal) into the record of the above-captioned proceeding and seeks party comment. In addition, the Ruling invites feedback on the Climate Lexicon Report filed by PG&E, SDG&E, SCE, and SoCalGas on August 7, 2025. CforAT appreciates the Staff Proposal's thoughtful efforts to facilitate meaningful community engagement and adaptive capacity metrics. We recommend that the Commission adopt the Staff Proposal, with additions recommended herein including mechanisms to facilitate ongoing stakeholder participation. CforAT also generally supports adoption of the recommendations of the Climate Lexicon with additional modifications, including a mechanism for the Commission, IOUs, and stakeholders to update the Lexicon as needed.

II. BACKGROUND

As a representative of the interests of utility customers with disabilities and medical needs, CforAT is highly invested in the Commission's efforts to improve community engagement throughout the IOUs' Climate Adaptation Vulnerability Assessment (CAVA) process, to ensure that this process meaningfully engages with communities, including vulnerable community members, and to further ensure that it evaluates and addresses

communities' adaptive capacity. On behalf of our constituency, we are also focused on efforts to establish a useful and accessible Climate Lexicon that supports community understanding of the process and outcomes.

Our constituency is highly vulnerable to climate change impacts and has critical health and safety needs that are specific and distinct from the general population, including the need for clean and reliable energy to power medical devices and other essential equipment. To ensure that the needs and perspective of this community are considered, outreach and engagement efforts must be fully accessible and understandable to a lay audience, and metrics must account for vulnerable populations that may not be visible in averages. "Accessible" outreach and engagement efforts include making information understandable and meaningful to people who do not regularly engage with issues related to climate change, as well as ensuring that information is accessible to people who have disabilities that impact their ability to use standard forms of communication and to those who do not use English as their primary language.

CforAT actively participated in efforts leading to the development of the Staff Proposal and Climate Lexicon Report, including attending and presenting at workshops and submitting comments.¹ We appreciate the Staff Proposal's incorporation of our feedback² and make additional recommendations below to ensure the accessibility of engagement practices and support ongoing participation by stakeholders. We also make recommendations for modifications to the Climate Lexicon and support adoption of a mechanism for updates as necessary.

¹ Staff Proposal at pp. 49, 51 (listing CforAT's participation at workshops). CforAT also submitted informal written comments following the September 19, 2024, October 25, 2024, November 20, 2024, and August 27, 2025 workshops.

² See Staff Proposal at p. 16 fn. 39, p. 29 fn. 122, p. 34 fn. 140 (citing CforAT's informal comments and workshop presentation).

III. STAFF PROPOSAL ON COMMUNITY ENGAGEMENT FRAMEWORK AND ADAPTIVE CAPACITY

A. Overarching Feedback on Staff Proposal

Based on the extensive stakeholder input contributed by CforAT and other interested parties throughout the public workshop series, the Staff Proposal recommends adoption of a Community Engagement Framework (CEF) that refines Commission-led guidance for the existing community engagement process associated with the IOUs' CAVA development, as well as criteria for Adaptive Capacity metrics. The Staff Proposal appropriately recognizes that information obtained through community engagement must be incorporated effectively into adaptive capacity efforts and then communicated back to communities in order to better connect these processes and enable a meaningful two-way exchange between the IOUs and DVCs. CforAT particularly appreciates the Staff Proposal's reflection of our input on promoting transparency in the consultation process, providing broadly accessible communications in plain language, and ensuring that communities receive follow-up and benefits from their participation.³ We agree with the Staff Proposal's acknowledgement of the values of transparency, consistency, and diversity, and generally support adoption of all the proposed modifications, subject to additional recommendations detailed below.

One of CforAT's overarching recommendations for better supporting these values is that the Commission should ensure that stakeholders have ongoing opportunities to provide feedback on the frameworks outlined in the Staff Proposal. Consistent with the Staff Proposal's recognition of the need for ongoing improvements and iterative processes,⁴ CforAT urges the

³ See CforAT Comments on September 19, 2024 Workshop at pp. 3-4, 6; CforAT Comments on October 25, 2024 Workshop at p. 2; CforAT Comments on November 20, 2024 Workshop at pp. 3-4; CforAT Comments on August 27, 2025 at pp. 3-6.

⁴ See Staff Proposal at p. 5 (stating recommendations are "for incremental improvements").

Commission to modify the proposed framework to better facilitate meaningful opportunities for stakeholder input on the implementation and effectiveness of the proposed guidance.

The Staff Proposal envisions a number of activities that will occur after a final Commission Decision adopting the proposed framework is issued, including the four-year CAVA community engagement process for each IOU, a staff report assessing the effectiveness of the updated CEF process and recommending any revisions, and a post-Decision workshop providing a stakeholder forum for discussion of metrics and clarifications on how they should be applied.⁵ CforAT generally supports these activities while recommending modifications to better ensure that these activities continue to incorporate stakeholder feedback for effective implementation of the CEF and Adaptive Capacity analysis. However, if these activities occur outside of an open docket and do not culminate in a further Commission decision or resolution, CforAT and other similarly situated intervening stakeholders will not be able to participate, due to the lack of opportunity to pursue intervenor compensation.

Just as the Staff Proposal acknowledges the importance of compensating community engagement participants for their contributions,⁶ it is important to recognize the value of stakeholder contributions to Commission matters by providing an avenue for intervening stakeholders to seek compensation. Consistent with the Commission's repeated findings of CforAT's significant hardship,⁷ we (and other similarly situated intervenors) do not have the resources to continue providing input on the CAVA process if the Commission does not provide any potential avenue for intervenor compensation. The lack of opportunity for intervenor

⁵ Staff Proposal at pp. 12-13, 14, 43.

⁶ Staff Proposal at p. 16.

⁷ See, e.g., Administrative Law Judges' Ruling Granting Center for Accessible Technology's Notice of Intent to Claim Intervenor Compensation, issued June 3, 2026 in R.25-04-010 at p. 3 (finding that CforAT has demonstrated significant financial hardship pursuant to Public Utilities Code §1802(h)).

compensation will also limit the ability of other representatives of utility customers and vulnerable communities to participate and provide valuable input on the implementation of the Staff Proposal. This is counterproductive to the goal of continually improving the community engagement process and overall CAVA process, as well as contrary to the goals of the Intervenor Compensation Program and the Commission’s ESJ Action Plan.⁸

CforAT respectfully requests that any post-Decision implementation activities incorporate mechanisms to ensure that any requests for participation by intervenors include a pathway for seeking compensation, just as IOU and Commission staff are compensated for their participation. This could be done by maintaining an open docket to review ongoing updates through the Decision process or by requiring Commission review the implementation work through the Resolution process at appropriate intervals.

B. Feedback on Proposed Community Engagement Framework (CEF)

1. CforAT Recommends a Mechanism to Raise Stakeholder Concerns to the Commission

The Staff Proposal presents a CEF that includes three public Touch Points, scheduled over the course of the IOUs’ four-year CAVA cycle, as a mechanism to more effectively involve communities throughout the entire process as well as in the development and use of metrics.⁹

CforAT appreciates this regular incorporation of stakeholder input, which emphasizes the importance of engaging communities throughout the CAVA process and sharing the results.

⁸ “The Intervenor Compensation Program is intended to ensure that individuals and entities that represent residential or small commercial electric utility customers have the financial resources to bring their concerns and interests to the CPUC during formal proceedings.” CPUC Intervenor Compensation Guide, revised April 2017, at p. 4. The Commission’s ESJ goals include “enhanc[ing] outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC’s decision-making process and benefit from CPUC programs” and “enhanc[ing] enforcement to ensure safety and consumer protection for all, especially for ESJ communities.” CPUC ESJ Action Plan Version 2.0 (ESJ Action Plan), published April 7, 2022, at pp. 24-25.

⁹ Staff Proposal at pp. 12-13.

CforAT believes that the proposed CEF accurately reflects input from the diverse stakeholders that participated in the workshop series, and we support its requirements to encourage more meaningful, two-way engagement. As noted in the Staff Proposal, regular feedback to communities from the utilities will help motivate ongoing participation, while breaking down the divide between utility planning and community sentiment.

While we strongly support increased two-way engagement between IOUs and communities, including representatives of vulnerable community members, we remain concerned about the ability of communities and community members to sustain engagement. As discussed in our overarching feedback, CforAT specifically questions the ability of stakeholders to provide regular ongoing feedback on the CEF and its implementation after this docket closes unless avenues are made available for intervenors to pursue compensation.

We appreciate the Staff Proposal's requirements for detailed descriptions of the community engagement process in the CAVA filings in order to provide transparent and robust discussion of the outcomes of this process. However, if these filings are submitted in a closed docket and do not culminate in a further Commission Decision or Resolution, then interested stakeholders do not have a meaningful avenue to respond and raise concerns. For the reasons discussed in our overarching feedback, we respectfully request that the Commission ensure there are mechanisms in place for intervening stakeholders to continue to provide input on the implementation of the CEF with the opportunity to seek compensation for their contributions.

2. CforAT Recommends Express Requirements for Disability Access

The Staff Proposal appropriately emphasizes the need for transparency in the community engagement process, including the use of plain language at public Touch Points so that the IOUs provide communities with updates and analysis that includes explanations that are useful and

understandable to lay audiences.¹⁰ Consistent with CforAT's recommendations,¹¹ the Staff Proposal also acknowledges the need for accessibility in community engagement efforts, referring to location accessibility and options for in-person and virtual participation.¹²

CforAT appreciates the Staff Proposal's recognition that community engagement efforts should be open to the public and broadly accessible. We recommend that the Commission add express requirements to ensure the accessibility of the proposed CEF processes and materials specifically for community members with disabilities, as discussed in our prior comments.¹³ This is necessary to ensure that community members with disabilities and medical needs may share their distinct and important perspectives.

Accessible process and communication efforts require provision of all written and digital materials in accessible, alternative, and in-language formats, including large print, Braille, audio, and in-language, as well as hosting events in locations that are physically accessible (compliant with the Americans with Disabilities Act Accessibility Guidelines) and in locations served by accessible public transportation, and by offering hybrid options for virtual participation. Notices of community engagement events should affirmatively state that ASL interpretation is available or can be requested (along with clear statements of the availability of translation into languages other than English), and they should include contact information for a coordinator that individuals may reach to ensure that any accommodations are provided. Community engagement efforts should also consider that the disability community is impacted by the digital divide and provide outreach and means of seeking input through a variety of channels other than internet postings, including physical formats.

¹⁰ Staff Proposal at p. 12.

¹¹ CforAT Comments on September 19, 2024 Workshop at p. 3.

¹² Staff Proposal at pp. 14,

¹³ CforAT Comments on September 19, 2024 Workshop at p. 3.

3. CforAT Recommends Express Requirements for Engagement of Additional Vulnerable Communities

While the Staff Proposal does not recommend modifying the existing definition of DVCs, it appropriately acknowledges that the IOUs should consider climate impacts on additional vulnerable communities not captured in this definition, specifically including rural communities and communities of people with disabilities and medical needs.¹⁴ Accordingly, the Staff Proposal recommends requirements for the IOUs to consider these vulnerable groups in their adaptive capacity analysis.¹⁵ However, the Staff Proposal does not suggest any analogous requirement for the CEF.

Throughout the workshop series, CforAT advocated for the explicit recognition of the vulnerability of communities with access and functional needs (AFN) including those with medical needs, and recommended that the Commission modify the DVC definition to include communities with disabilities and medical needs.¹⁶ While the definition of DVCs is geographically based, CforAT explained that the population of individuals with disabilities and medical needs is not geographically clustered; people with disabilities and medical needs reside in every community in California, and many of them will not be located in DVCs as currently defined, despite their vulnerability to climate impacts.¹⁷

As CforAT has previously explained, recognizing the vulnerability of communities with AFN and medical needs is consistent with the CPUC's ESJ Action Plan 2.0.¹⁸ The definition of ESJ communities, initially established in ESJ Action Plan 1.0, is similar to the existing definition

¹⁴ Staff Proposal at p. 29.

¹⁵ Staff Proposal at p. 29.

¹⁶ CforAT Comments on September 19, 2024 Workshop at pp. 4-5; CforAT Comments on October 25, 2024 Workshop at pp. 1-2; CforAT Comments on November 20, 2024 Workshop at p. 1; CforAT Comments on August 27, 2025 at pp. 2-3.

¹⁷ CforAT Comments on September 19, 2024 Workshop at pp. 4-5.

¹⁸ CforAT Comments on September 19, 2024 Workshop at p. 5.

of DVCs as it includes: (1) disadvantaged communities identified via CalEnviroScreen score for the census tract; (2) all Tribal lands; (3) low-income households; and (4) low-income census tracts.¹⁹ In its subsequent revision, the ESJ Action Plan 2.0 acknowledges that there is no “one-size-fits-all” approach to identifying potential ESJ communities and does not propose a new definition.²⁰ Instead, it recognizes that “additional priority communities” are not specifically captured in the current definition, including “communities with AFN and those with other medical vulnerabilities,” and states that CPUC initiatives should “critically consider all the various kinds of populations that warrant prioritization in policies and programs.”²¹

CforAT appreciates the Staff Proposal’s recognition that the DVC definition does not include all vulnerable communities that should be considered, as well as its emphasis on the importance of diverse DVC community consultation.²² CforAT understands the statement that the “IOUs should seek ED Staff’s early input on . . . diversity of DVC community consultation”²³ to imply that ED Staff will evaluate whether IOUs’ identified communities for engagement include those within the DVC definition as well as additional vulnerable communities represented within the IOUs’ territories and make any necessary recommendations for additional outreach.

While it appears to be implied, it would be more appropriate for the requirement that IOUs consider additional vulnerable communities in their community engagement efforts to be explicit. Consistent with the ESJ Action Plan, CforAT recommends a requirement in the CEF for the IOUs to “critically consider all the various kinds of populations that warrant

¹⁹ ESJ Action Plan at pp. 2, 21-22.

²⁰ ESJ Action Plan at p. 22.

²¹ ESJ Action Plan at pp. 21-22.

²² Staff Proposal at pp. 14, 29.

²³ Staff Proposal at p. 14.

prioritization”²⁴ in community engagement, including the additional vulnerable populations not captured in the DVC definition. CforAT also recommends that the Staff Proposal expressly state that ED Staff will evaluate the diversity of IOUs’ DVC community consultation, including the inclusion of additional vulnerable populations, and direct the IOUs to conduct additional outreach as needed.

C. Feedback on Community Adaptive Capacity Metrics

1. CforAT Recommends a Mechanism to Raise Stakeholder Concerns to the Commission

To guide the IOUs’ use of metrics and adaptive capacity analysis in the CAVA process, the Staff Proposal presents eight criteria organized into the three areas of (1) Public Interest, (2) Transparency, and (3) Data Resolution.²⁵ The IOUs would be required to explain their use of the criteria in CAVA filings and to provide plain language presentations at public Touch Point meetings.²⁶

CforAT appreciates the Staff Proposal’s guidance, which incorporates our recommendations for fostering community input on quantitative analyses and addressing numerous important considerations in the use of metrics.²⁷ However, as discussed in our overarching feedback and recommendations on the CEF, we are concerned about the ability of stakeholders to provide ongoing feedback on adaptive capacity analyses in the CAVA process without any available avenue for intervenors to seek intervenor compensation. For example, the Staff Proposal suggests a post-Decision workshop “for the purpose of providing a stakeholder

²⁴ ESJ Action Plan at pp. 21-22.

²⁵ Staff Proposal at pp. 32-43.

²⁶ Staff Proposal at p. 43.

²⁷ CforAT’s “Considerations for Equity Metrics in CAVA Process,” presented at August 27, 2025 workshop.

forum for and discuss[ion] of metrics and clarifications for how they should be applied.”²⁸

CforAT believes that such a workshop would be helpful, but we and other similarly situated stakeholders would not have the resources to participate without any pathway for seeking compensation. Likewise, while we believe that the requirements for plain language explanations of adaptive capacity analyses generally support the ability of communities and stakeholders to track IOUs’ efforts documented in filings and raise any concerns, we (and similarly situated intervenors) do not have the resources to follow up on the IOUs’ analyses and metrics in their CAVAs and provide any necessary responses once the docket is closed and there is no identified pathway to pursue compensation for our efforts.

As discussed above, we respectfully request that the Commission consider the importance of stakeholder input on post-Decision implementation activities and ensure that intervenors may participate with opportunity for compensation.

2. CforAT Appreciates the Public Interest Criteria and Recommends Express Requirements for Disability Access

The Staff Proposal presents Public Interest Criteria to inform the IOUs’ development of community adaptive capacity and metrics, including (1A) Public Interpretability, (1B) Ground-Truthing through Community Engagement, and (1C) Investment Decision Interpretability.²⁹ These criteria correctly recognize the importance of meaningful linkages between community engagement and adaptive capacity analysis in order to enable meaningful stakeholder involvement, verify models with community feedback, and inform investment decision-making processes.³⁰ CforAT appreciates the Staff Proposal’s adoption of our recommendations,

²⁸ Staff Proposal at p. 43.

²⁹ Staff Proposal at pp. 32, 34-37.

³⁰ Staff Proposal at pp. 34-37.

including ensuring procedural equity through public interpretability of processes and results,³¹ validating and ground-truthing quantitative metrics with community input,³² and demonstrating how adaptive capacity metrics inform investment decisions.³³

CforAT appreciates the Staff Proposal’s requirements for “plain-language public explanations” of metrics, “public materials designed for accessibility, including multi-lingual summaries where appropriate, reduced use of jargon, and durable feedback channels,” and “assumptions and limitations . . . presented in a form that a nontechnical stakeholder can reasonably understand.”³⁴ As explained with regard to the CEF, it is important to ensure that information is not only broadly accessible to the public and communities, but also that it is made available in accessible and alternative formats for people with disabilities and people who do not use English as their primary language. Accordingly, CforAT recommends that the Commission add express requirements for disability and language access to ensure that information and materials regarding the IOUs’ adaptive capacity analyses and metrics is available to people with disabilities and those who do not use English as their primary language.

As discussed above, this should include provision of all written and digital materials in accessible, alternative, and in-language formats, including large print, Braille, audio, and in-language, and provision of physical formats for communities impacted by the digital divide. Such requirements are critical to providing access to people with specific communication needs

³¹ Staff Proposal at p. 34 fn 140, citing CforAT’s presentation on considerations for equity metrics at August 27, 2025 workshop.

³² See Staff Proposal at pp. 35-36; CforAT’s “Considerations for Equity Metrics in CAVA Process,” presented at August 27, 2025 workshop (recommending that IOUs should validate/ground-truth their metrics with feedback from communities).

³³ See Staff Proposal at pp. 36-37; CforAT’s “Considerations for Equity Metrics in CAVA Process,” presented at August 27, 2025 workshop (recommending transparent and clear explanations of how metrics and analyses will inform prioritization and investment decision-making).

³⁴ Staff Proposal at pp. 34-35.

and ensuring that these communities may meaningfully participate in validating and informing the IOUs' analyses.

3. CforAT Appreciates the Transparency Criteria

The Staff Proposal's Transparency Criteria include (2A) Auditability and Transparency in Data Sources and Methods and (2B) Reliability of Data and Methods. CforAT appreciates the Staff Proposal's adoption of our recommendations, including requiring transparent and clear explanations of methodologies and metrics and ensuring that explanations are provided in plain language that is accessible and meaningful to lay audiences.³⁵ As described in the Staff Proposal, requirements promoting transparency will also support public understanding of the IOUs' analyses and foster more meaningful community engagement.³⁶

4. CforAT Appreciates the Data Resolution Criteria

The Staff Proposal's Data Resolution Criteria include (3A) Ability to Compare Across Time, (3B) Ability to Compare Across Geography, (3C) Sensitivity to Pockets of Vulnerability.³⁷ CforAT appreciates the Staff Proposal's adoption of our recommendations, including ensuring that metrics and analyses can demonstrate change over time,³⁸ consider various community characteristics,³⁹ and account for vulnerable populations such as

³⁵ See Staff Proposal at pp. 37-39; CforAT's "Considerations for Equity Metrics in CAVA Process," presented at August 27, 2025 workshop (highlighting the need for transparency, accessibility, and ongoing engagement and recommending that IOUs clearly explain their analyses in a manner accessible to laypeople). See also CforAT Comments on November 20, 2024 Workshop at pp. 3-4; CforAT Comments on August 27, 2025 Workshop at pp. 3-4.

³⁶ Staff Proposal at pp. 37-39.

³⁷ Staff Proposal at pp. 40-43.

³⁸ Staff Proposal at p. 40 fn 168, citing CforAT's presentation on equity metrics at August 27, 2025 workshop.

³⁹ See Staff Proposal at p. 41; CforAT's "Considerations for Equity Metrics in CAVA Process," presented at August 27, 2025 workshop (recommending that metrics should "[c]onsider community characteristics, such as built environment, resources of local government and ability to provide services, emergency preparedness, exposure to climate hazards").

communities with AFN that may not be visible in census tract scale analysis.⁴⁰

In particular, we appreciate the attention to pockets of vulnerability to ensure that small but severely vulnerable populations are not overlooked in the IOUs' adaptive capacity analysis. Consistent with CforAT's recommendations⁴¹ and the ESJ Action Plan,⁴² the Staff Proposal appropriately requires IOUs to consider vulnerable populations that are not captured in the DVC definition, including Medical Baseline and rural communities, and directs IOUs to avoid binary vulnerability designations that would fail to reflect "the gradient of need that exists across communities."⁴³ CforAT appreciates and supports these requirements.

IV. CLIMATE LEXICON REPORT

A. Feedback on the Climate Lexicon Report

The Assigned Commissioner's Ruling requests feedback on the Climate Lexicon Report, which summarizes the Working Group's process in developing various recommended definitions.

CforAT participated in the July 10, 2025 Public Workshop on the Climate Lexicon and provided comments,⁴⁴ including recommendations to acknowledge additional priority communities not captured in the DVC definition and to include examples within definitions to

⁴⁰ Staff Proposal at p. 42, citing CforAT's comments on September 19, 2024 workshop. *See also* CforAT's "Considerations for Equity Metrics in CAVA Process" (recommending that metrics should consider vulnerable demographics and "be granular enough for visibility of at-risk populations and understanding of community-level inequities").

⁴¹ CforAT Comments on September 19, 2024 Workshop at pp. 4-5; CforAT Comments on October 25, 2024 Workshop at pp. 1-2; CforAT Comments on November 20, 2024 Workshop at p. 1; CforAT Comments on August 27, 2025 at pp. 2-3.

⁴² ESJ Action Plan at pp. 21-22.

⁴³ Staff Proposal at pp. 42-43.

⁴⁴ While CforAT's comments at the workshop are reflected within the report, CforAT understands that our written comments emailed as directed on July 18, 2025 were not received, ostensibly due to a technical malfunction. These written comments mainly expanded on the oral comments we provided during the workshop and included the recommendation reiterated here that some definitions may benefit from information on how they are measured or expressed.

aid in understanding.⁴⁵ While the IOUs incorporated CforAT’s recommendation to include examples within specific definitions, the Report states that the IOUs do not have the ability to adjust the definition of DVCs because it is a CPUC-defined term. The Report acknowledges that “it is a common best practice for IOUs to include at-risk populations, including AFN customers, medical baseline customers, low-income customers, and others in outreach efforts and programs aimed at DVCs.”⁴⁶

As in our discussion of the Staff Proposal above, CforAT appreciates the IOUs’ recognition that additional communities not captured in the DVC definition should be considered at-risk and included in outreach and program efforts. However, while the IOUs explained that they are not authorized to adjust the CPUC-defined DVC term, they did not address the feasibility of adding another term to the Lexicon that acknowledges additional priority communities that are not captured in the DVC definition or including a footnote to the DVC definition with the same acknowledgement. This would be consistent with the CPUC’s ESJ Action Plan 2.0, which acknowledged that “additional priority communities are not specifically named [in the ESJ community definition],” including “communities with AFN and other medical vulnerabilities.”⁴⁷ An additional definition or a footnote acknowledging that there is not a one-size-fits-all definition of DVCs would also accord with the Staff Proposal’s requirement for the IOUs to consider other vulnerable groups in their adaptive capacity metrics.⁴⁸

B. Recommendations to Modify and Adopt Definitions

The Assigned Commissioner’s Ruling asks if the Commission should adopt the recommended definitions, either in total or in part. CforAT generally supports adoption of the

⁴⁵ Climate Lexicon Report at pp. 2-4, C-6, C-11, C-13.

⁴⁶ Climate Lexicon Report at p. 3.

⁴⁷ ESJ Action Plan 2.0 at pp.

⁴⁸ Staff Proposal at p. 29.

recommended definitions with modest modifications.

First, as discussed above, the Climate Lexicon should acknowledge additional priority communities, either by adding a footnote to the current DVC definition or adding another term to address other climate-vulnerable communities.

CforAT also recommends a minor modification to improve the accessibility and comprehensibility of the Climate Lexicon, consistent with D.24-08-005's intent to make it understandable for lay audiences.⁴⁹ CforAT notes that the Climate Risk definition states that climate risk "may be expressed in terms of various potential adverse outcomes and their likelihoods."⁵⁰ Other definitions may also benefit from including information on how they are measured and/or expressed. This would aid in understanding, similar to the use of examples in definitions. CforAT recommends that the Commission consider adding this information for the following terms: Climate Resilience and Resilience.

C. Mechanism for Updating the Climate Lexicon

The Assigned Commissioner's Ruling asks whether the Commission should create a mechanism to update the Climate Lexicon, such as a staff-initiated resolution or Tier 3 advice letter process. CforAT supports the development of such a mechanism. While the Climate Lexicon sets out the major terms used in the Climate Change Adaptation proceeding, it is likely that additional terms will become relevant as climate change adaptations and mitigations develop and enhanced community engagement practices shed light on other important concepts. Moreover, coordination with other related Commission proceedings may identify gaps or variations in usage of terms and necessitate revisions of terms or definitions to support consistency and understanding.

⁴⁹ D.24-08-005 at p. 71.

⁵⁰ Climate Lexicon Report at A-5.

CforAT supports a mechanism that allows staff, IOUs, and stakeholders to initiate a request to update the Climate Lexicon. As detailed in section III.A., CforAT emphasizes that meaningful stakeholder participation requires an avenue to seek intervenor compensation. This would be satisfied by use of a process that results in a Commission Resolution, whether initiated by staff or through an advice letter process. Any such process should also include a pathway for stakeholders other than the IOUs to request an update to the Climate Lexicon.

V. CONCLUSION

CforAT appreciates the opportunity to provide feedback on the Staff Proposal and Climate Lexicon Report and respectfully requests that the Commission adopt our recommendations herein. We look forward to reviewing other parties' input and to continuing to support the Commission's efforts to refine the CAVA process.

Respectfully submitted,
August 6, 2026

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