California Public Utilities Commission

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Guidance on Community Engagement and Adaptive Capacity

CLIMATE ADAPTATION PROCEEDING, PHASE 2

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Contents

Section 1. Community Engagement 3

Community Engagement Framework (CEF) ***3***

Public Touch Points 5

Advisory Groups 8

Tribal Engagement ***10***

Improvement to CAVA Coordination Activities ***14***

Local Governments 14

Other California State Agencies 16

CEF Evaluations ***17***

Additional Phase II Issues ***20***

DVC Definition 20

Section 2: Community Adaptive Capacity Metrics 22

1. Public Interest Criteria ***23***

1A. Public Interpretability 23

1B. Ground-Truthing through Community Engagement 24

1C. Investment Decision Interpretability 25

2. Transparency Criteria ***26***

2A. Auditability and Transparency in Data Sources and Methods 26

2B. Reliability of Data and Methods 27

3. Data Resolution Criteria ***28***

3A. Ability to Compare Across Time 28

3B. Ability to Compare Across Geography 28

3C. Sensitivity to Pockets of Vulnerability 29

Adoption Community Adaptive Capacity Criteria ***31***

Section 1. Community Engagement

This document directs improvements to the Climate Adaptation Community Engagement planning process and proposes a shift in paradigm to a full 4-year CAVA cycle approach using a Community Engagement Framework (CEF) that refines Commission-led guidance. An ongoing CEF process acknowledges that the CAVA is not the end point, but a continual cyclical process of two-way communication for community engagement, CAVA outcomes, and improvements to the process. The CEF is aligned with the Commission's intention that communities should have input into shaping the CAVA, community engagement plans, and IOU actions to address climate impacts.[1] Implementing these equity principles is foundational to addressing engagement fatigue. Engagement fatigue occurs when communities are approached multiple times by multiple groups on the same or similar issues and the outcomes of the engagement effort are unclear or not communicated back to communities once engagement is completed. Proactively addressing engagement fatigue is necessary to demonstrate to communities that their participation is meaningful, as well as building knowledge capacity on technical issues that impact their communities.

This full cycle CEF consists of the following components:

- **Public Touch Points:** At least three public meetings at key milestones across four years
- **Advisory Groups:** A transparent Advisory Group process
- **Tribal Engagement:** An improved and discrete Tribal engagement process
- **Coordination:** Demonstration of robust and efficient coordination across organizations, stakeholders, and proceedings related to climate adaptation
- **Evaluation:** An improved evaluation process that demonstrates how DVC feedback is collected and used to improve the engagement process (or otherwise explain why not incorporated) and how lessons-learned are incorporated

Community Engagement Framework (CEF)

In D.20-08-046, the Commission directed the IOUs to take the lead in establishing the community engagement process by developing a Community Engagement Plan (CEP) and submitting it to the CPUC as a compliance filing one year in advance of their respective CAVAs.[2] bookmark24 The Commission provided broad guidance for IOUs to "identify and prioritize utility climate adaptation investments in [DVCs]"[3] in their CEPs, including to: engage with the Disadvantaged Community Advisory Group (DACAG),[4] bookmark26 acknowledge and summarize all input received from DVCs and CBOs (Community Based Organizations),[5] bookmark27 and disseminate the draft CEP in advance to the service

[1] D.20-08-046, p.110.
[2] Ibid, OP 5.
[3] Ibid, OP 5.
[4] Ibid, OP 5.3.
[5] Ibid, OP 5.4.

list.[6] bookmark28 CAVA filings were required to include a copy of the IOU's most recent CEP and engagement undertaken "before, during, and after" the CAVA process.[7]

During the first CAVA cycle,[824] the IOUs identified engagement strategies to create and implement their CEPs, such as using advisory groups and taking a regional approach to outreach. However, the CEP structure itself served more as a point-in-time snapshot of the planned — not actual — engagement, with mixed success in providing a meaningful process to strategically engage with DVCs (including Tribes) and demonstrate incorporation of feedback.

Despite use of advisory groups and implementation of community surveys, all community feedback was filtered through the IOUs' lens. Direct community input (or its impact on the IOU filings) was not transparent to communities or the CPUC. Accordingly, Staff find that the Commission should make incremental improvements to the current CEP process by establishing an improved engagement process via the CEF by building off best practices established by the IOUs and making them more publicly transparent.

This new Framework will promote engagement qualities that DVCs have identified as important: early and often, transparent, and meaningful.[9] While the IOUs note concerns that this tenet alone does not ensure tangible CAVA findings for DVCs, as Staff explain in this section, engaging communities through a full CAVA cycle approach is multifaceted. The Commission intended for DVC communities to have the opportunity to inform and shape the CAVA, not just react to it.[10]

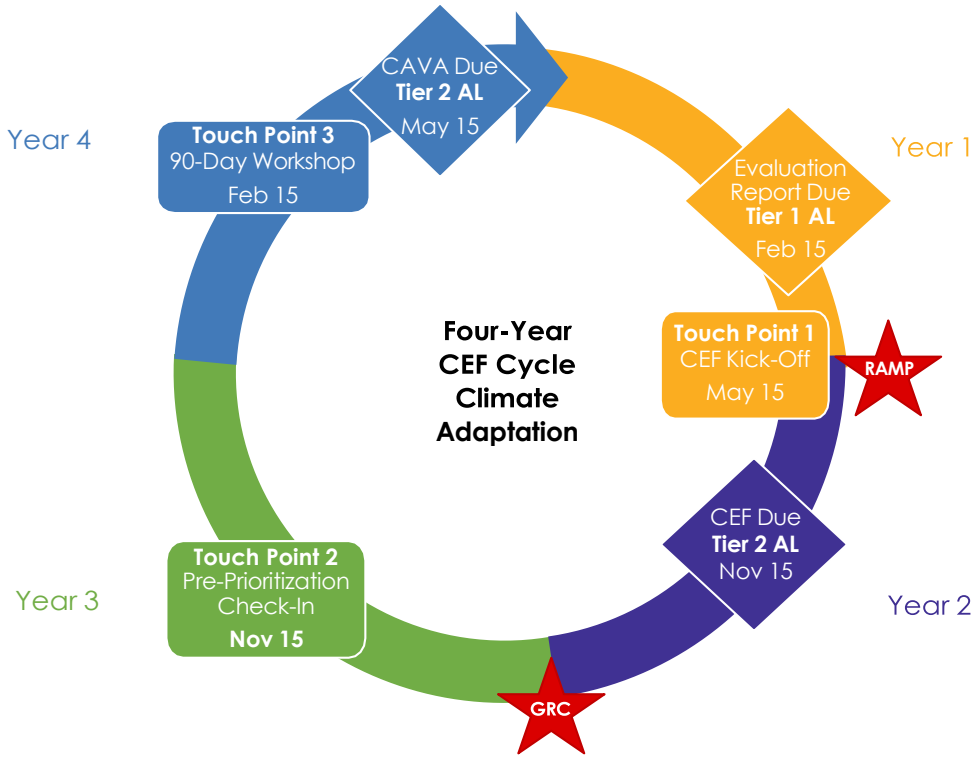
The Commission finds:

1. It is not mutually exclusive to allow early input as well as to have tangible analysis findings for the DVCs to react to;
2. A cycle approach provides efficient, pivotal Touch Points to explain to communities the basis for its investment proposals; and
3. Though climate data and vulnerability assessments are technical, the engagement process provides an opportunity for the IOUs to build knowledge capacity of these technical issues in DVCs that may have profound impacts on communities.

To illustrate this cycle-based CEF approach, Staff have distilled key community engagement milestones around three public Touch Points (see **Figure 1**) in consideration of CPUC compliance filings to 1) inform Scope, 2) guide Priorities, and 3) brief stakeholders 90 days before submitting the CAVA to the CPUC.

[6] Ibid, OP 6.2.
[7] Ibid, OP 9.7.
[8] All IOUs have now submitted one CAVA, with SCE recently submitting its second CAVA on May 15, 2026. See Appendix C for the CEP and CAVA schedule by IOU.
[9] D.20-08-046, pp.34-38.
[10] Ibid, OP 9.6.

Figure 1. Climate Adaptation Four-Year Engagement CEF Cycle



Public Touch Points

The three Touch Points are defined as follows:

1.) **Touch Point 1, Scoping** — end of the first year of cycle

- **Purpose:** CEF Kick-off where IOU presents its CEF evaluation report from previous cycle informing draft proposal of its next CEF Plan in response to Commission criteria. IOUs should also present their draft engagement Plan to gather DVC community feedback on both evaluation and plan to inform revisions to its Tier 2 advice letter Plan to be submitted to the CPUC 6 months later. This Touch Point replaces the previous Meet and Confer requirement.

2.) **Touch Point 2, Guiding** — middle of the third year of cycle

- **Purpose:** Pre-prioritization community check-in (engagement Plan now being implemented) serves as a forum for DVCs to inform IOU CAVA priorities by synthesizing community feedback as IOUs implement quantitative climate and vulnerability assessments. IOUs should provide a preview of community adaptive capacity metrics, in plain language, it may consider relative to the Commission's guidance. This is consistent with the Commission's original acknowledgement that community members know their community best.[11] bookmark34 This midcycle Touch Point is necessary to ensure DVCs have the opportunity to inform priorities. This Touch Point should be held after technical analysis is complete but before prioritization of identified climate adaptation options and

[11] *Ibid.*, Findings of Fact 21.

to confirm the community adaptive capacity conclusions through ground truthing. Touch Point 2 should include regional workshops or similar meeting venues throughout the service area. IOUs are required to justify how they meet the reasonable geographic representation requirements in the CEF Plans.

3.) **Touch Point 3, Refining** — end of the fourth year of cycle

» **Purpose:** 90-Day Workshop (established in D.24-08-005) in which the IOU presents its near-completed CAVA, which is intended to allow stakeholders the opportunity to provide feedback with sufficient time for the IOU to make final edits prior to submitting to the CPUC.

This cadence of Touch Points is responsive to suggestions raised by workshop participants that communities should be involved throughout the entire CAVA process, including in determining metrics (see Section 3).

These IOU-hosted public Touch Point meetings are intended to promote transparency of 1) the DVC advisory process (both for communities and the CPUC); 2) how IOUs demonstrate effective 2-way communication with DVCs; 3) measurable effectiveness of improving impacts on DVCs through metrics and ultimately investments in GRCs, which the CAVAs are intended to inform.

IOUs do not need to create new or additional meetings to fulfill the Touch Point requirements. Rather, they should seek efficiencies such as existing meeting opportunities, including those that cross similar multiple topics/proceedings of interest to the public.

These three Touch Points shall be developed and implemented addressing the following:

- The CEF Plan shall be submitted as a Tier 2 advice letter explaining how the IOU will comply with the CEF process in response to Commission guidance. The CEF Plan replaces the previous CEP filing requirement.
- Each of the three Touch Point meetings must be held in the respective IOU's organizing regions. This ensures that feedback is appropriately representative given that regions can be significantly geographically diverse. IOUs should leverage public coordination techniques to mitigate DVC consultation fatigue, promote cost-effectiveness, and reduce duplicative efforts. (See Coordination section below.)
- Existing stakeholder venues are suitable for Touch Point 1 and 2 meetings. IOUs are still required to conduct engagement efforts with DVCs in all regions of their service territory to ensure broad outreach and diverse community feedback.
- The IOU is responsible for assembling a diverse panel of DVC participants to ensure representative feedback, which can be fulfilled by its advisory group. Local jurisdictions and CBOs often have unique insight into DVC needs.[12]
- Touch Point meetings shall embrace two-way conversation in which IOUs share updates and

[12] D.20-08-046; *Comments of Southern California Edison on the September 25, 2025 Climate Adaptation Equity Metrics Workshop*, SCE, p.5.

provide educational context; likewise, communities share their priorities and preferences so that IOUs can consider community input in CAVA planning, providing a feedback loop to community input.

- All three Touch Points must be open to the public and recorded with a virtual option for participation. All content shared during Touch Points and recordings of the meetings must be publicly posted on the IOUs' CAVA webpages with a comment portal and shared with attendees and the proceeding service list.
- IOUs shall seek ED Staff's early input on Touch Point format, agenda, diversity of DVC community consultation, outreach, presentations, and location accessibility to promote continued alignment with the Commission's intentions.
- At the conclusion of each Touch Point, the IOU shall seek out and collect post-meeting feedback in close proximity to the public event that will feed into continued Touch Point improvements as well as the IOU's evaluation survey.
- This Community Engagement should be described in detail across three key Commission filings:
    - **CEF Plan:** Submit a Tier 2 Advice Letter in response to CPUC guidance, including explanation of how bilateral community engagement is integrated into all climate adaptation steps;
    - **CAVA:** Include a robust section in each CAVA dedicated to how IOUs' Engagement process impacted DVCs or why feedback was not incorporated; and
    - **GRC Chapter:** Include a substantive GRC CAVA chapter explaining how the DVC engagement and community adaptive capacity informed GRC investment proposals, including a roadmap to proposed investments in the broader GRC.
- The joint IOUs shall collaborate to develop a consistent Advice Letter template describing how they will address Commission engagement guidance, in consultation with ED Staff. IOUs shall confer with ED Staff in advance of each CEF cycle on whether template updates are needed to reflect lessons learned from the previous cycle.
- This CEF process shall commence in 2027 with a schedule published in the proposed decision.
- At the end of a full cycle of each IOU implementing this CEF process including submission of evaluation reports, ED Staff may draft a Staff report assessing the effectiveness of this updated CEF process and recommending any revisions. The Staff report may serve as a basis for a staff resolution to seek Commission approval of modifications to this document.

Modification

The requirements of D.20-08-046, Ordering Paragraph (OP) 5 to submit a Community Engagement Plan are modified.[13] The Commission adopts the new CEF process described above and requires the IOUs to submit a Tier 2 Advice Letter in consultation with ED Staff that provides a schedule for the CEF process. Updates to planning and implementation of the CEF shall be updated in CAVAs as described above. The

[13] D.20-08-046, OP 5.

Community Engagement Plan is no longer required as the CEF Plan fulfills the same purpose.

Advisory Groups

The Commission required IOUs to meet with CBOs, DVCs, and the proceeding's parties to create and implement a CEP.[14] While utilizing advisory groups was not a requirement, all four of the IOUs facilitated advisory groups to fulfill the Commission's requirement. All IOUs independently selected, collaborated with, and compensated advisory groups to conduct DVC engagement, including co-creating engagement materials and surveys. Staff utilized existing IOU engagement efforts as an initial roadmap to inform this proposal for continued refinement to the community engagement process.

IOU advisory group roles have included two-way information exchange, co-designing strategic input on CEP design, and providing substantive feedback on IOU plans, CAVAs and community surveys. In the first round of CEPs, IOUs involved advisory groups members early, and at multiple points throughout CEP development and implementation. This is consistent with feedback provided by workshop participants that "early and often" engagement is critical for conducting meaningful engagement efforts.[15] bookmark39

Given their large, climate-diverse service territories, PG&E and SoCalGas opted to create multiple regional advisory groups:

- **PG&E:** Established the Resilient Together Advisory Groups (RTAG). Each of PGE's five RTAGs is composed of 7-13 CBOs to guide and engage with that region's DVCs.[16]
    - **SoCalGas:** Established the Regional Advisory Boards (RABs). SoCalGas' four RABs included 6-7 members representing a CBO that serves DVCs in the community.[17]
- SCE, on the other hand, created a single advisory group:
- **SCE:** Established a six-month paid partnership with its Climate Resilience Leadership Group (CRLG) comprised of CBO leaders, representing a diverse cohort of DVCs from across their entire service territory.[18] The CRLG had 11 members for SCE's 2022 CAVA and nine for its 2026 CAVA.[19]

SDG&E created a single advisory group, but also leveraged existing regional entities:

- **SDG&E:** Given its smaller service territory, SDG&E formed an Equity-First Community Climate Coalition (EC3) with 11 member organizations[20] and collaborated with the San Diego Association of Governments (SANDAG) and the San Diego Regional Climate Change Collaborative (SDRCC) for

[14] Ibid, OP 6.1.
[15] Sacramento Environmental Justice Coalition, RAND Corporation, PSE Healthy Energy, Climate Resolve; Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento.
[16] Community Engagement Plan of Pacific Gas & Electric Company (U 39M) pursuant to Decision 20-08-046, PG&E, filed May 15, 2026, p.14.
[17] "Climate Adaptation Equity Workshop," SoCalGas, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles, pp.63-64.
[18] "CPUC Climate Adaptation Workshop," SCE, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles, p.32.
[19] *Climate Adaptation Vulnerability Assessment*, SCE, filed May 15, 2026, p.218.
[20] Climate Action Campaign of Orange County (CAP OC), Inland Southern California Climate Collaborative (ISC3), Strategic Growth Council; Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles.

their DVC engagement.[21]

This advisory group approach to inform CAVAs and community engagement was supported by many workshop participants who emphasized the importance of engaging with trusted CBOs as community messengers to facilitate authentic feedback from their communities.[22] bookmark46 Stakeholders also emphasized the importance of compensating CBOs for conducting outreach.[23] Staff appreciate that all IOUs compensated advisory group members and that many also compensated DVC survey participants for providing feedback. CBOs are often only able to engage in funded activities and are, therefore, more receptive to longer-term partnership opportunities, as opposed to one-off event payments.[24]

Advisory groups did not meet publicly, and the CPUC did not receive independent work products from the advisory groups. The format of these closed advisory groups did not involve consistent bilateral communication with DVCs themselves. The interactions with DVCs mostly consisted of surveys conducted by the IOUs, appearing to be largely "one-time, one-way" transactions that stakeholders have advised against.[25] bookmark49 By design, these advisory groups relied on CBO leadership to bring community input into the process and disperse IOU planning information, rather than IOUs directly engaging with DVC members.[26] This is contrary to Commission intent that the IOUs must be directly involved in DVC engagement efforts before, during, and after vulnerability assessment work.[27]

In addition, advisory group members pointed to a need for more structure and consistency with their meetings: "The Advisory Group should have more meetings to continue the conversations regarding the work each group is doing in their areas and how to improve engagement with the residents."[28] bookmark52 A PG&E RTAG member at the September 19, 2024 workshop spoke about how the CAVA process was challenging because of the stop-and-go interactions with PG&E across the CAVA cycle.[29] bookmark53 This feedback points to a benefit in consistent and increased bilateral communication that ensures communities are involved through all stages of the CAVA cycle.

The IOUs shall continue to utilize advisory groups using the following criteria:

- Advisory groups may meet in private or in public. Advisory group meetings, if held in private shall

[21] SDG&E, Climate Adaptation Community Engagement and Equity Workshop, October 25, 2024, Irvine.
[22] Climate Action Campaign of Orange County (CAP OC), Inland Southern California Climate Collaborative (ISC3), Strategic Growth Council; Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles.
[23] Center for Accessible Technology's Comments on September 19, 2024 Community Engagement and Equity Workshop, C4AT, October 11, 2024, p.3; PG&E, CA Climate and Energy Collaborative (CCEC), Sacramento Environmental Justice Coalition, Strategic Growth Council; Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento; SCE, SDG&E, SoCalGas, Orange County (OC) Goes Solar, Climate Action Campaign of Orange County, Climate Adaptation Community Engagement and Equity Workshop, October 25, 2024, Irvine; ISC3, CAP OC; Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles.
[24] San Diego Regional Climate Collaborative, Climate Adaptation Community Engagement and Equity Workshop, October 25, 2024, Irvine.
[25] Comments on the California Public Utility Commission's Climate Adaptation Community Engagement and Equity Workshops, CCEC, November 15, 2024, p.2.
[26] *Community Engagement Plan of Pacific Gas and Electric Company (U 39 M) pursuant to Decision 20-08-046*, PG&E, filed May 15, 2026, p.13.
[27] D.20-08-046, p.35.
[28] Community Engagement Plan of Pacific Gas and Electric Company (U 39 M) pursuant to Decision 20-08-046, PG&E, filed May 15, 2026, p.A6.
[29] Stone Soup Fresno, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento.

be separate from the three public Touch Points. If the advisory group meetings are held in public, they may be held in conjunction with the three public touch points.

- Be comprised of diverse representation reflecting the community of the service territory or region.[30] bookmark54
- Utilize advisory group members as lead panelists at public Touch Points, to the extent possible. When advisory member participation is not possible, given the broad cadence of the Touch Points, the IOUs should create ad hoc, diverse panels at the public Touch Points to ensure diverse community representation and feedback.[31] bookmark55
- Consider staggered advisory group member terms that overlap so that intuitional knowledge in the group is not lost as members depart, and members are not subject to burnout from multi-year commitments.
- IOUs can contract out engagement to CBO and advisory group partners, provided that they co-create engagement materials and provide engagement support
- Provide Tribal representatives with an opportunity to participate in broader advisory groups, but IOUs should be required to create a Tribal-specific advisory process (see Tribal Engagement section, below).

While advisory groups can be instrumental in guiding the IOUs in developing their community engagement plans, and involved in conducting engagement efforts, the IOUs should not solely rely on advisory group members to execute their DVC outreach, as IOUs are most familiar with their own assets and infrastructure, and any changes required to meet known and foreseen climate risks.[3248]

Modification

The requirements of D-20-08-046, OP 6 are modified to require a specific, diverse, and publicly transparent CAVA advisory process, as described above.

Tribal Engagement

The Commission's foundational CAVA guidance decision determined that the broad DVC definition would include Tribal communities,[33] bookmark58 however, the Commission at that time provided no specific guidance on how the IOUs should interact with Tribal communities to inform their CAVAs. The Commission acknowledged that Tribal lands should be specifically called out in the DVC definition, explaining that Tribal communities "may be equally in need of climate adaptation regarding the utility infrastructure, operations and services."[34] bookmark59 California Tribal lands have since been added to

[30] This is consistent with SDG&E's stated 2024 CEP goals of increasing the value of EC3's perspective by improving the diversity of their Advisory Board's members, p.21

[31] SCE utilized microgrants for advisory members as a bridge between cycles. Southern California Edison Company's (U 338-E) Submission of Community Engagement Plan pursuant to Decision 20-08-046, SCE, filed May 15, 2025, p.18.

[32] D.20-08-046, p.48.

[33] Ibid, OP 1.

[34] Ibid, p.20.

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As part of their previous CEPs, the IOUs described how they proposed to undertake engagement with Tribal communities:

- **PG&E**: A new core part of PG&E's 2026 CEP is its Tribal Engagement Advisory Group (TEAG), composed of up to five Tribal representatives to advise on engagement with the 100+ Tribes in PG&E territory.[35] _bookmark60 With the guidance of the TEAG, the IOU collaborates with Tribal governments through direct, compensated interviews. Stated goals of the TEAG include engaging with Tribal Nations "beyond the scope and timeline of the CEP"[36] requirements and deepening existing relationships[37] by engaging through the entirety of the CAVA creation. In the TEAG's review of the CEP, members suggested "explaining how Tribal feedback will be used in the CAVA and beyond,"[38] _bookmark63 suggesting more actionable goals are needed. While PG&E's 2023 CEP included mention of reaching out to Tribal governments to discuss climate hazards and community resilience strategies to integrate into its CAVA, in its 2024 CAVA, PG&E states that after consultation with its Principal Tribal Affairs Representative, it chose to engage with Tribal governments once the CAVA was already completed "in parity with how PG&E intend[ed] to engage other governmental jurisdictions."[39] _bookmark64 Some RTAG members represented Tribal communities.
- **SCE**: In SCE's 2025 CEP, one of its stated lessons-learned from its previous CAVA cycle CRLG advisory group is that "Tribal engagement requires a customized approach."[40] SCE's CEP mentions strategies for "municipal *or* Tribal entities,"[41] _bookmark66 suggesting SCE did not have a distinct process for Tribal engagement. In the 2026 CAVA, SCE does state it collected Tribal feedback on a "[T]ribe-by-[T]ribe basis" per Tribal request, meaning a Tribal representative filled out a CAVA survey on behalf of the entire Tribe).[42] _bookmark67 One CRLG member was responsible for all Tribal outreach for SCE's 2026 CAVA.[43]
- **SoCalGas:** Describes that it has coordinated three talking circles with 10 Tribal governments since 2023. Discussion includes not only climate adaptation and engagement, but also education.[44] _bookmark69 SoCalGas's RAB advisory groups also include representation from Tribal communities.[45] _bookmark70
- **SDG&E:** Explains that it engages the Southern California Tribal Chairman's Association (SCTCA)[46] _bookmark71 on an ongoing basis for Tribal engagement. Before submitting its 2024

[35] Community Engagement Plan of Pacific Gas And Electric Company (U 39 M) pursuant to Decision 20-08-046, PG&E, filed May 15, 2026, p.28.
[36] Ibid, p.2.
[37] Ibid, p.7.
[38] Ibid, p.31.
[39] PG&E Climate Adaptation and Vulnerability Assessment, PG&E, filed May 15, 2024, Introduction pp.1-6.
[40] Southern California Edison Company's (U 338-E) Submission of Community Engagement Plan pursuant to Decision 20-08-046, SCE, filed May 15, 2025, p.16.
[41] Ibid, p.18.
[42] Climate Adaptation Vulnerability Assessment, SCE, filed May 15, 2026, p.222.
[43] Ibid, p.227.
[44] "Climate Adaptation Equity Workshop," SoCalGas, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles p.59.
[45] Southern California Gas Company (U 904 G) Community Engagement Plan, SoCalGas, filed May 15, 2024, p.31.
[46] The SCTCA is a Southern California non-profit with representation from 25 Tribes.

CEP, SDG&E presented to the Climate Science Alliance's Tribal Working Group,[47] _bookmark72 but did not share the feedback or results of this presentation. SDG&E gathers additional feedback by conducting year-round Tribal Community Surveys to center Tribal priorities and relationship-building.[48] _bookmark73 This engagement is focused on Tribal priorities for "sovereignty, equity and affordability," including IOU programming and infrastructure investments, but SDG&E does not mention discussing climate adaptation metrics or criteria with Tribes.[49] _bookmark74

Tribes face unique climate adaptation barriers as DVCs,[50] and Tribal lands are often located in remote rural areas with high wildfire risk.[51] _bookmark76 Tribal households face 6.5x more electrical outages than the national average.[52] Further, workshop participants noted distinct histories of underinvestment by IOUs and natural resource exploitation.[53]

California's Fifth Climate Assessment is currently in development and has indicated a shift in Tribal approach to be more rooted in indigenous ecological knowledge of California and increased collaboration between Tribes and the State, including by utilizing Tribal Advisory Groups.[54] _bookmark79 As stewards of their ancestral territories, Tribes already understand climate risks and potential adaptation options from which IOUs can learn.[55] Tribes may be interested in, or are already completing, their own climate change analyses, which IOUs could support through technical assistance[56] to inform their CAVAs.[57] _bookmark82 Workshop participants noted that IOUs should consider opportunities for Tribal infrastructure ownership given historical underinvestment in infrastructure on Tribal lands,[58] as some Tribes are still struggling to get electricity to their territories.[59] _bookmark84.

.Workshop participants conveyed significant feedback that in order to make the CAVA engagement process more accessible to Tribes, IOUs need to engage with Tribes sooner in the decision-making process so Tribes can provide meaningful input. Further, IOUs should make it clear to Tribes how their feedback was incorporated into the CAVA and relevant GRC chapters.[60] IOUs should collaborate with Tribes when proposing climate adaptation projects sited on Tribal lands to avoid replicating harmful cycles of resource extraction.[61]

Engagement fatigue is likely exacerbated if Tribes feel they are contributing to CAVA analysis without affecting its outcomes, including investments via the GRC. Tribal governments are typically quite small and often under-resourced, thus, many Tribes are overwhelmed with the number of consultation and engagement requests from local, state, and federal governments.[62] Inviting Tribes to collaborate on IOU

[47] San Diego Gas & Electric Company (U 902 E) Community Engagement Plan, SDG&E, filed May 15, 2024, p.20.
[48] "CPUC Climate Adaptation Workshop," SDG&E, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles, p.46.
[49] Ibid, p.52.
[50] See more about Tribal clean energy and resilience priorities, need, and barriers in the California Tribal Gap Analysis, prepared by Prosper Sustainably, commissioned by the CA Strategic Growth Council and the CA Energy Commission, released February 2026.
[51] "CPUC Climate Adaptation Workshop," SDG&E, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles, p.52.
[52] Tribal Electricity Access and Reliability Report to Congress, Department of Energy, August 2023, p.54.
[53] Yurok Tribe, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento.
[54] Tribal Advisory Group Fact Sheet, California's Fifth Climate Change Assessment, Tribal Research Program. Accessed 2026.
[55] Blue Lake Rancheria, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco.
[56] Programs such as by the CA Strategic Growth Council can support increasing Tribal adaptive capacity.
[57] Yurok Tribe, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento.
[58] Yurok Tribe, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento.
[59] Morongo Band of Mission Indians, Climate Adaptation Community Engagement and Equity Workshop, October 25, 2024, Irvine
[60] Blue Lake Rancheria, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco.
[61] Yurok Tribe, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento.
[62] CCEC, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento; Morongo Band of Mission

projects that benefit the Tribe, would likely mitigate engagement fatigue.[63] IOUs should engage with and collaborate with Tribes when considering siting climate adaptation projects on Tribal lands to avoid replicating harmful cycles of resource extraction.[64] bookmark89 IOUs should further be aware that Tribal stewardship is not always limited to mapped lands; as culturally affiliated areas are still part of Tribal ancestral territories.[65]

Staff find that a CAVA Tribal engagement process will benefit from the Commission providing clearer guidance on how IOUs should engage with Tribes. There are some IOU Tribal engagement strategies that can inform best practice standards to ensure meaningful, respectful Tribal engagement moving forward.

The following requirements for IOUs in guiding Tribal engagement for climate adaptation are added:

- Submit a Tribal Engagement Plan as a discrete and robust section within the IOUs' CEF Plan. The CEF Plan is submitted to the Commission as a Tier 2 Advice Letters. The Tirbal Engagement Plan shall detail an initial outreach attempt to all Tribes in their service territory. Each IOU's approach to Tribal engagement be clearly described in the IOU's CEF Plan.
- Invite Tribal government representatives from *all* Tribes within the IOU's service territory to participate in IOU Tribal Advisory Groups and offer Tribal government representatives the opportunity to also participate in the DVC Advisory Groups and Touch Points. Tribes are not required to form Tribal Advisory Groups, but Tribes should be provided with the option to join Climate Adaptation Advisory Groups, or form their own Tribal Climate Advisory Groups, or not participate in an advisory role, should they so choose. IOUs should not presume what tribes may be interested in and should submit a clear plan to the Commission a clear plan / strategy to work with tribes – though how tribes engage with IOU offer will be left to their discretion. IOUs are still required to offer these advisory group options.
- Tribal Advisory Group meetings may be held privately or publicly, to be determined by the participants of the Tribal Advisory Group with advisement of the IOU.
- Respect Tribes as sovereign nations as well as their unique needs and preferences that will vary from Tribe to Tribe, including consultation preferences.[66]
- Consider meeting efficiencies, guided by Tribe needs, such as IOUs leveraging existing forums with Tribes and State agencies, including assistance opportunities that avoid duplication regarding climate change adaptation and resilience efforts.

Indians, Climate Adaptation Community Engagement and Equity Workshop, October 25, 2024, Irvine.

[63] Yurok Tribe, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento; American Indian Chamber of Commerce of California, Climate Adaptation Community Engagement and Equity Workshop, October 25, 2024, Irvine.

[64] Yurok Tribe, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento.

[65] Blue Lake Rancheria, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco.

[66] Yurok Tribe, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento; Morongo band of Mission Indians, Climate Adaptation Community Engagement and Equity Workshop, October 25, 2024, Irvine; Blue Lake Rancheria, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco.

- Prioritize conducting engagement with Tribes in-person on Tribal lands.[67]
- Consider Tribal stewardship of ancestral territories, Tribal laws, and Tribal jurisdiction over utility matters.
- Implement additional relevant principles that may result from the Commission's Tribal Rulemaking.[68]
- Outcomes of Tribal Engagement shall be detailed in individual CAVAs.

Modification

The requirements of D.20-08-046, OP 1 are modified to distinguish Tribes from other DVCs defined within this proceeding and provide specific direction to IOUs for required engagement with Tribal governments, modifying the requirements of OP 6 beyond the original guidance, to prioritize coordination with other state Tribal engagement efforts and in-person engagement on Tribal lands.

Improvement to CAVA Coordination Activities

In its Scoping Memo, the Commission sought stakeholder input on whether the Commission should provide additional guidance on consultation and collaboration of local governments as part of the CAVA process. As explained below, given the commonalities of goals and activities for climate adaptation across numerous forums, broader coordination would be beneficial to informing CAVAs as well as to create efficiencies and minimize engagement fatigue.

During workshops, several presenters representing other CPUC proceedings and from other California agencies, noted that broader climate adaptation coordination is necessary for promoting efficiencies, consistency of implementing the State's climate adaptation policies, avoiding duplication, information-sharing, and mitigating community engagement fatigue.

Accordingly, this section focuses on the need for coordination in the following areas:

- Local Governments
- California State Agencies considering Climate Adaptation

Local Governments

The Scoping Memo posed whether improvements should be made to coordination with local governments. The Commission does not require the IOUs to include government entities as part of their engagement plans, but directs them to describe in their CEPs outreach efforts to local non-governmental entities if local

[67] American Indian Chamber of Commerce of California, Morongo Band of Mission Indians; Climate Adaptation Community Engagement and Equity Workshop, October 25, 2024, Irvine.
[68] See R.22-02-002, Order Instituting Rulemaking to Implement Resolution E-5076 and Review of Tribal Practices.

governments aren't "sufficiently engaged with [their] disadvantaged residents."[69] The Scoping Memo notes that there are engagement requirements for local jurisdictions (defined as local governments and Tribes) adopted in Rulemaking (R.) 19-09-009 concerning Microgrids in D.20-06-017,[70] bookmark97 and that refinement in guidance regarding IOU collaboration with local governments "should build on and not duplicate requirements adopted in other proceedings."[71] This Proposal seeks to bolster efficiencies and transparency of that type of existing forum coordination.

Workshop participants noted that climate adaptation and resilience are a shared responsibility that IOUs and local governments are both asked to address but neither can solve individually.[72] Many local governments already undertake climate adaptation analysis with an equity perspective under the State's Climate Adaptation Strategy, first introduced in 2015 by Assembly Bill 1482 and last updated in 2024.[73] Local governments are additionally required by SB 379 (Jackson, 2015) to include a safety element in their general plans that includes climate adaptation and resiliency strategies,[74] bookmark101 as well as sea level rise plans by 2034 for coastal communities under SB 272 (Laird, 2023).[75] bookmark102 IOU infrastructure and services are often dependent on local climate adaptation efforts, such as city- or county-managed roads vulnerable to flooding or erosion that provide access to IOU assets. IOU climate planning cannot address broader infrastructure vulnerabilities outside of IOUs' jurisdiction,[76] bookmark103 making the capacity of local governments to plan and respond to climate change important context for developing their own plans.

Likewise, community resilience and local government services and planning are often dependent on IOU assets and services,[77] such as maintaining adequate energy service to provide emergency, health, and safety services to residents and implementing planning and building requirements.

Local government and community representatives expressed that local governments may have data and information relevant to climate change planning within their jurisdiction that may be helpful for IOU CAVA analysis in some cases.[78] Additionally, local governments have expertise in their communities and regularly engage with constituents on a variety of issues, including climate vulnerability and adaptation issues.[79] Workshop participants suggested that regional organizations, such as councils of governments,[80]

[69] D.20-08-046, OP 5.8.
[70] R.19-09-009 is the Commission's Rulemaking Regarding Microgrids Pursuant to Senate Bill 1330 and Resiliency Strategies. Learn more here: Resiliency and Microgrids.
[71] Assigned Commissioner's Phase 2 Scoping Memo and Ruling, R.18-04-019, filed June 2, 2023, p.9.
[72] PG&E, Community Engagement and Equity Workshop, September 19, 2024, Sacramento; SCE, SDG&E, SoCalGas; Community Engagement and Equity Workshop, October 25, 2024, Irvine; SCE, SDG&E, SoCalGas; Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles.
[73] The CA Climate Adaptation Strategy (Strategy) is the State's overarching framework for building community, economic, and environmental resilience to climate change impacts, reflecting six key pillars of sector or threat-specific efforts. The Strategy is meant to be updated every three years and was last updated in 2024. Learn more here: 2024 California Climate Adaptation Strategy: Priorities, Goals, and Actions.
[74] SB 379 (Jackson, 2015); Cal. Gov't Code § 65302(g)(4).
[75] SB 272 (Laird, 2023); Cal. Pub. Res. Code § 30985, et seq. Local governments within the jurisdiction of the San Francisco Bay Conservation and Development Commission (BCDC) are also required to develop sea level rise plans that are part of a subregional San Francisco Bay shoreline resiliency plan (Cal. Pub. Res. Code § 30985(a)).
[76] "CPUC Climate Adaptation Workshop," SCE, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles, p.29.
[77] Farallon Strategies, CCEC; Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento. County of Los Angeles, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles.
[78] PSE Healthy Energy, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco.
[79] City of Irvine, Climate Adaptation Community Engagement and Equity Workshop, October 25, 2024, Irvine.
[80] Western Riverside Council of Governments (WRCOG), Climate Adaptation Community Engagement and Equity Workshop, October 25, 2024, Irvine.

renewable energy networks,[81] and regional climate collaboratives[82] can also play a role in providing technical assistance and a single point of contact to local governments to increase their community adaptive capacity.

IOUs and local governments essentially have overlapping constituencies with common objectives around climate adaptation, thus, it makes sense for CAVAs to reflect coordination with local governments. Such coordination with local governments can promote efficiencies and aid in reducing engagement fatigue while promoting effectiveness for community adaptive capacity solutions. Given all this, IOUs should not wait to engage with local government representatives until the CAVA analysis is complete and should engage local governments earlier in the CAVA process, as well as seek local government feedback once the CAVA cycle process is complete.

The IOUs in their CEF Plans and CAVAs shall describe:

- How they coordinate with local governments to identify climate risks and priorities to inform their CAVAs and outcomes of that coordination.
- How they do or can leverage existing forums to engage with overlapping communities on similar multiple topics to implement efficiencies and thereby minimize community fatigue.
- How they will identify local regions that may have low readiness factors that may intersect with high climate risk CAVA ratings in order to highlight that such communities may require increased support that can be used as a resource across government agencies more broadly.[83]

Modification

The requirements of D.20-08-046, OP 6 are modified to provide direction to IOUs for describing engagement with local governments in creating their Tier 2 CEF ALs to coordinate adaptation efforts, as Staff describe above.

Other California State Agencies

The State considers climate adaptation for impacts on California communities in various other forums such as the California Climate Adaptation Strategy.[84] The Governor's Office of Land Use and Climate Innovation (LCI) leads several climate adaptation efforts, including the State's regular Climate Assessment,[85][101] its Vulnerability Community Platform (VCP),[86][102] and the Integrated Climate Adaptation and Resilience Program (ICARP).[87][103] During the workshop process, LCI presented its VCP and how it

[81] Ibid.
[82] Farallon Strategies, Strategic Growth Council; Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento.
[83] Readiness here is defined as the capacity to pursue discrete climate resiliency project(s). Staff consider low readiness an indicator that additional capacity building support is needed, indicating a "small pocket of severe vulnerability" (as noted in 3C of the Adaptive Capacity section).
[84] *2024 California Climate Adaptation Strategy*, California Natural Resources Agency; Pursuant to AB 1482 (Gordon, 2015) the Strategy is updated every 3 years.
[85] Climate Assessment, Science, and Research – Governor's Office of Land Use and Climate Innovation, accessed 2026.
[86] Vulnerable Communities Platform, Governor's Office of Land Use and Climate Innovation, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco.
[87] Integrated Climate Adaptation and Resiliency Program (ICARP) – Governor's Office of Land Use and Climate Innovation, accessed

considers the intersection of climate hazard and social vulnerability to identify priority areas for adaptation actions,[88][104] which could potentially be utilized to address community adaptive capacity. The ICARP process serves as a forum to coordinate across local, regional, and State efforts to support cohesive strategies related to engagement and community adaptive capacity, including in coordination with the utilities. The California Strategic Growth Council explained that its programs provide funding, training, technical assistance, and knowledge exchange to ensure that under-invested communities, including local governments, can address climate issues.[89][105]

The IOUs in their CEFs and CAVAs shall describe:

- How they utilize existing State forums to promote coordination and mitigate duplication in addressing engagement and community adaptive capacity efforts.
- How they leverage existing forums to engage with communities on multiple similar topics to implement efficiencies and thereby minimize community engagement fatigue.

Modification

The requirements of D.20-08-046, OP 6 are modified to provide direction to IOUs for requiring description of coordination with other State agencies for the creation of community adaptive capacity metrics as well as consolidating engagement efforts, as described above.

CEF Evaluations

The CPUC required the IOUs to produce a post-CEP survey report to assess the effectiveness of its community outreach and engagement. The Commission specifically directed IOUs to "ask communities and individuals *to which the IOU has conducted outreach and community engagement"* if the outreach and community engagement was effective.[90] IOUs are required to file their reports as a compliance report with the CPUC, due a year after the CAVA is filed. The Commission's 2020 Climate Adaptation decision outlines detailed requirements for the IOUs.[91] In part, the Commission requires IOUs in their survey reports to:[92]

1) Categorize engagement by type of outreach (e.g., community meetings, printed materials, social media posts, etc.) so that there is data showing what outreach and engagement are most effective.
2) Gather input from the proceeding parties on survey questions and methodology prior to conducting the survey through a meet and confer process that is open to all parties.
3) Utilize metrics, both quantitative and qualitative, to assess the reach of engagement efforts (in website visits, events held, etc.) and the comprehension of the CAVA process (through debriefs

2026.
[88] Vulnerable Communities Platform Fact Sheet via vcp.lci.ca.gov, Vulnerable Communities Platform.
[89] Strategic Growth Council, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles.
[90] D.20-08-046, OP 7.
[91] Ibid.
[92] Ibid.

with partners, listening sessions, and other surveys).

Staff find that the IOUs have applied the Commission's direction on CEP evaluation inconsistently. While all IOUs surveyed their paid advisory group members, only SCE conducted broader outreach with DVC community members. Rather than a report, all IOUs submitted their survey reports to the CPUC in the form of a slide deck. All IOUs displayed survey results from individual survey questions in the form of circle charts and pulled quotes from survey participants.

- **SCE:** For its post-CEP Survey Report in 2023, SCE partnered with research and advisory firm Escalent to survey 6 of 16 Climate Resilience Leadership Group (CRLG) members (38% response rate) and 25 of 575 DVC community members (4.5% response rate) through an online discussion board. Community members received a $150 incentive for participating, and CRLG members received $250 incentives for participating.[93]
- **PG&E:** PG&E submitted its post-CEP survey report in May 2025. PG&E independently conducted its survey only with its five regional Resilient Together Advisory Groups (RTAG) members, representing 51 of 52 CBOs (98% response rate). Survey questions focused on the experience of RTAG members, how members felt their feedback was incorporated, the effectiveness of outreach tools and materials, and areas for future program improvements. PG&E does not appear to have separately compensated RTAG members for survey completion.[94]
- **SoCalGas and SDG&E**: The Sempra Utilities jointly filed their post-CEP survey port on May 11, 2026. The survey was sent to SDG&E's 10 Equity-First Community Climate Coalition (EC3) members, SoCalGas' 27 Regional Advisory Board (RAB) members and 17 Tribal partners, with 21 responses (40% response rate). SoCalGas and SDG&E independently conducted their surveys and did not provide compensation to advisory group members for survey completion.[95]

Evaluation of the community engagement process is necessary to ensure IOU engagement with DVCs is meaningful, effective, identifies barriers, and informs improvements. Staff appreciate the efforts the IOUs have made to solicit feedback from their advisory groups and some DVC community members but find that it would be useful to mitigate potential biases by not limiting data collection from only contracted advisory partners. Additional balance and transparency in the evaluation process would likely lead to increased constructive feedback from community surveys. Given the potential scale of climate impacts and costs on communities, it is essential for post-engagement surveys to include DVC feedback more broadly and beyond only IOU advisory groups.

The Commission requires the completion of a CEF evaluation process wherein the IOUs shall:

- Gather public input after each of the three public Touch Points. The input should inform improvements to subsequent Touch Points as well as its final evaluation report. Surveys shall also be made available to potentially affected individuals who may not have attended the public Touch Point.

[93] Southern California Edison Company's (U 338-E) Submission of Community Engagement Survey Report pursuant to Decision 20-08-046, SCE, filed May 15, 2023, p.A-4.
[94] Pacific Gas And Electric Company's (U 39 M) 2023 Community Engagement Plan Post-Engagement Survey Report, PG&E, filed May 5, 2025, p.A-2-A-4.
[95] *Southern California Gas Company And San Diego Gas And Electric Company 2026 Post-Engagement Survey Report*, SoCalGas, filed May 11, 2026, pp.3-6.

- Develop a common IOU evaluation template in a report format (not slide deck) in consultation with its advisory group and ED Staff, with draft presented at Touch Point 3 public meeting.[96] _bookmark125 The evaluation template should include metrics that reflect relevant criteria described in Section 3.
- The CEF Evaluation Reports must, at a minimum, include discussions of:
    - The appropriateness and effectiveness of the engagement process planning and execution,
    - The impacts on adaptation option identification and prioritization,
    - Once formally adopted by the Commission, the three criteria listed under the Public Interest area for Community Adaptive Capacity,
    - The changes to capacity for participation from DVCs, and
    - Changes to the IOU's capacity to develop and execute other public engagement efforts in the future.
- For transparency, the appendix of the CEF Evaluation report shall include:
    - Organized raw data collected.
    - Table of input received from DVCs, how it was incorporated, or why it was not.
- Implement Commission's intention for IOUs to survey DVCs more broadly, not just advisory group members.
- Create and maintain an open feedback portal, such as an accessibly found email address or website portal, that community members can access at any time and provide comments on the CEF process, consistent with consideration of a continual process.
- Evaluations shall at a minimum include 1) the appropriateness and effectiveness of the engagement process planning and execution, 2) the impacts on adaptation investment proposal identification and prioritization, 3) the changes to capacity for participation from DVCs, and 4) changes to the IOU's capacity to develop and execute other public engagement efforts in the future. IOUs shall propose a template in each of their CEF Plans when the CEF Plans are filed as Tier 2 advice letters, whereupon Commission staff will assess and provide direction for modifications, as needed.
- The evaluation report must include a survey of advisory group members and any community-based partners or groups that collaborated with IOU staff and/or IOU CAVA advisory groups to develop and execute CAVA community engagement, compared with objectives shared in their approved CEF Plan. The Evaluation will also be assessed with the goals and objectives set forth in the IOUs CEF Plan aligned with guidance in this decision. IOUs shall share CEF evaluation report surveys at public Touch Point meetings for the general public. In alignment with Commission goals and objectives set forth in the CEF, IOUs will be evaluated on the representation of DVCs engaged, engagement methods used and would provide written explanations of how DVC feedback was considered in CAVA adaptation option identification and prioritization (and if not, provide justification as to why not), as well as explain how adaptation option prioritization was conveyed

[96] Nothing here prevents the IOU from presenting the information provided in the report format as a slide deck in the public meetings or to the Commission or Commission Staff.

back to DVCs.

- Specify that raw data is to be included as an appendix in the report to the extent possible, unless confidentiality or private personal information is threatened. IOUs would still send Commission staff Excel spreadsheets with raw data.

Modifications

The Evaluation Report shall be due 9 months after the CAVA is due, on February 15 of the first year of a CAVA cycle. This would supersede D.20-08-046, OP 7.

The Commission refines the requirements of OP 7, regarding seeking input on survey questions from parties to the proceeding, to instead collect this feedback at public Touch Point 3 and post-meeting comments for greater community reach.

Given that IOUs would already confer with advisory groups, the public, and ED staff through the public touchpoints and CPUC check-ins, the current meet and confer requirements for the CEP survey are eliminated.

IOUs shall provide raw data in the report and refer to any additional data related to relevant community adaptive capacity metrics criteria.

Additional Phase II Issues

Staff also address two other issues that were set forth in the Scoping Memo: the DVC definition, and ESJ Impacts.

DVC Definition

Task 2 of the Scope poses whether the DVC definition (as described in the Background section) should be modified. The DVC definition is quite expansive, and IOUs in workshops explained that it can typically define half their service territory.[97] Staff find that CAVAs can be most valuable when considering a broad range of vulnerable communities in the context of high climate risk regions and assets that serve to identify vulnerable communities to be prioritized (described further in Section 3 related to identifying hotspots as part of community adaptive capacity). The DVC definition is also used in other CPUC proceedings.[98] Accordingly, Staff do not recommend modifying the DVC definition. Instead, Staff find value in the IOUs considering climate impacts on other vulnerable communities that may not be captured in the DVC definition, such as rural communities and disabled communities.

In CalEnviroScreen versions to date, not all vulnerable communities are captured. For example, at-risk rural communities (e.g., wildfires) often do not meet the threshold of high pollution burden to qualify as "disadvantaged."[99] Additionally, as explained in workshops, the disabled community are typically excluded

[97] "Climate Adaptation Equity Workshop," SoCalGas, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles, p.71.
[98] For example, the Electric Program Investment Charge (EPIC) RD&D program.
[99] PSE Healthy Energy, Climate Adaptation Community Engagement and Equity Workshop, August 27, 2024, Sacramento.

from the disadvantaged definition.[100] Staff find that adding these groups to the hotspot assessment scenarios that consider their relationship to identified high-risk assets is reasonable and necessary. Other communities identified by IOUs in their CAVA analyses include seniors, youth, unsheltered communities, outdoor and agricultural workers, communities with limited English proficiency, and immigrant communities.[101]

Modification

IOUs are required to consider these vulnerable groups as part scenario comparisons related to community adaptive capacity Criteria 3C, *Sensitivity to Pockets of Vulnerability* and avoid using binary metrics (see Section 3).

[100] Center for Accessible Technology's Comments on September 19, 2024 Community Engagement and Equity Workshop, C4AT, October 11, 2024, p.3.

[101] Community Engagement Plan of Pacific Gas & Electric Company (U 39M) pursuant to Decision 20-08-046, PG&E, filed May 15, 2026, p.9; Southern California Edison Company's (U 338-E) Submission of Community Engagement Plan pursuant to Decision 20-08-046, SCE, filed May 15, 2025, p.217.

Section 2: Community Adaptive Capacity Metrics

D.20-08-046 established broad guidelines for the IOUs in creating metrics for CAVAs (supplemented by the D.24-08-005 modeling guidance) but did not provide guidance for specific criteria for community adaptive capacity. Rather, the Commission placed this role on the IOUs to explain in detail how they apply terms such as "low-adaptive capacity and why."[102]

The Commission defines community adaptive capacity as:

> *"The broad range of responses and adjustments to daily and extreme climate change-related events available to communities. This includes the ability and resources communities have to moderate potential damages, take advantage of opportunities, and cope with consequences."*[103]

The purpose of the community adaptive capacity metric criteria is to provide an iterative pathway toward a rigorous, stakeholder informed, and transparent methodology that can more helpfully inform investment decisions

The Community Adaptive Capacity criteria are intended to build off IOU best practices and formalize criteria and common understanding of analyzing priorities for community adaptive capacity. These criteria are further intended to increase transparency for data and methodologies that inform metrics design and impact communities. Staff acknowledge that these criteria may result in the IOUs needing to balance competing priorities, for which the IOUs should be transparent in their CAVAs in how they assessed trade-offs and determined priorities, explaining their reasoning in the context of the Commission's guidance. Overall, these criteria establish Commission guidance for a common community adaptive capacity framework.

The eight criteria described below shall inform the IOUs' development of community adaptive capacity and engagement metrics. These criteria would be additive to the Commission's current CAVA criteria to inform Staff's assessment of the IOUs CAVA Tier 2 advice letters. The criteria are informed by the workshop record with input from diverse stakeholders, subject matter experts, and community leaders.

The criteria are also informed by IOU feedback and reflect many best practices currently utilized by the IOUs. The criteria provide guidance for a higher degree of transparency for both the public and CPUC oversight. The eight criteria consider the intersection of engagement and community adaptive capacity activities that should also inform plain language communication at public meetings describing measurable and transparent outcomes, including for climate adaptation investment priorities.

The eight community adaptive capacity criteria are organized into three areas:

1. Public Interest
2. Transparency
3. Data Resolution

[102] Ibid, p.65.
[103] D.20-08-046, OP 3.

1. Public Interest Criteria

1A. Public Interpretability

Because the CAVA's purpose is for the public good, the public needs to be able to understand how to interpret calculations of community adaptive capacity as well as the implications of these findings. Engaging with the community is a fundamental element of the CAVA, therefore communities need to be able to use and understand outputs from the CAVA process. Utilities should make their findings interpretable by the public, especially if models and analysis used to determine community adaptive capacity are complicated methodologically.

Publishing results of community adaptive capacity that are easily interpretable by the public would support meaningful community engagement and healthy discourse between stakeholders. This is consistent with workshop recommendations to ensure procedural equity through accessible public meetings and outreach material.[104]

If communities cannot interpret the results of the CAVA process, then the public cannot rely on the results of the CAVA to inform dialogue with utilities.[105] Characterizing community adaptive capacity is a technically intensive process which may be opaque to community members, despite there being a common understanding of definitions and terminologies.[106] Interactivity with communities provides for exploration of results across multiple measures and scales, allowing for a more complete understanding of the CAVA's analytical results across community stakeholders.[107]

In their CAVAs, the IOUs shall provide relevant metrics and demonstrate compliance:

a. Provide plain-language public explanations of what the metric measures, what it does not measure, and how it should be interpreted.
b. Share public-facing outputs that include geographically accessible summaries of CAVA results, an explanation of the main drivers of community scores, explanation of impacts on communities and priority targets.
c. Utilize public materials designed for accessibility, including multi-lingual summaries where appropriate, reduced use of jargon, and durable feedback channels not limited to one-time workshops.
d. Present assumptions and limitations should be presented in a form that a nontechnical stakeholder can reasonably understand.

Plain-language explanations in CAVAs - and public Touch Points - will ensure that communities can

[104] "Considerations for Equity Metrics in CAVA Process," C4AT, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco, p.90.
[105] "Justice, Equity, Resilience, and Vulnerability," PSE Healthy Energy, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco, p.15.
[106] "Equity Metrics and Outcomes for Resilience," Pacific Northwest National Laboratory, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco, p.14.
[107] Multiple platforms presented within the workshops had a high level of interactivity. See the Vulnerable Communities Platform or the suite of tools made available for the ReNCAT analytical platform, presented at the Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco.

broadly understand the impacts of climate change and community adaptive capacity scoring. Ongoing, regular public Touch Points with communities that are broadly accessible will build community knowledge capacity in improving understanding of technical analyses.

1B. Ground-Truthing through Community Engagement

The role of community feedback is to solicit additional information in a documented pathway, the inclusion of which into the ultimate output would be left to the judgement of the IOU and subject to approval by Commission staff.

Because modeling community adaptive capacity is an inherently relative and subjective measure, any methodology used for community adaptive capacity must be grounded in the lived experience of members of the community to ensure that results are sensical and accurate.[108] Without this step, models may systematically mischaracterize certain communities or have biased results that are hidden by aggregation. Because the CAVA is an iterative, cyclical process, community engagement-based ground-truthing can effectively hone community adaptive capacity results over multiple cycles. Utilities reported that community engagement led to productive and constructive contributions to the analytical process.[109]

Ground-truthing through community engagement is the practical mechanism by which model outputs are tested against a community's lived experience. This is consistent with the Commission's underlying premise that community members' lived experiences equip them to best understand the needs of their own communities.[110][142] Ongoing, regular public Touch Points with communities that are broadly accessible in plain language will build trust and provide a forum for ground-truthing with the communities most impacted by climate change, without community stakeholders having to become a formal party to the proceeding.

For ground-truthing to be meaningful, there must be a defined process for incorporating community feedback into model design, and communities must be informed on how their input was or was not used and explain why, so that seeking community feedback does not become simply a ministerial activity. A recurring theme discussed at workshops is that community engagement occurring before technical analysis is complete can limit the quality of feedback communities can provide. Yet multiple experts within the workshops specifically recommended that models and metrics be developed with ground-truthing input from communities or that they utilized this practice.[111][143,144,145,146]

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[108] D.20-08-046, pp.111-113.

[109] "PG&E CAVA Community Engagement: Lessons Learned and Next Steps," PG&E, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento, p.20.a; "Climate Adaptation Community Engagement: Southern California Edison (SCE) Lessons Learned and Next Steps," SCE, Climate Adaptation Community Engagement and Equity Workshop, October 25, 2024, Irvine, p.14.; "CPUC Climate Adaptation Workshop," SDG&E, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles, p.44.

[110] D.20-08-046, Findings of Fact 32.

[111] "Integration of equitable resilience metrics into electric utility planning processes," Sandia National Laboratories, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco, p.11.; "Equity Metrics and Outcomes for Resilience," Pacific Northwest National Laboratory, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco, p.6.; Office of Land Use and Climate Innovation, Climate Adaptation Equity Metrics Technical Workshop, November

In their CAVAs, the IOUs shall provide relevant metrics, explanation, and demonstrate compliance:

- Solicit structured community feedback on model outputs, key inputs, and major assumptions after initial results are available for review as part of the community engagement process.
- Maintain a response matrix that documents the feedback received, whether the feedback was incorporated, and the reason for any decision not to incorporate it for publishing in its CAVA filing.
- Explain where community input materially conflicts with model outputs and whether the conflict led to revision of inputs, model structure, weighting, or interpretation.
- Demonstrate in the CAVA how the engagement informed the analysis.

1C. Investment Decision Interpretability

Community adaptive capacity metrics are meant to exist not as academic exercises but as inputs to real investment decision-making processes. If community adaptive capacity metrics cannot be readily translated into the language and format of these investment processes, they risk becoming informational artifacts that sit alongside, rather than within, the decision-making framework. Accordingly, the outcome of community adaptive capacity modeling should be interpretable in formats that can inform actual investment decisions within existing planning processes such as the GRC. Workshop participants expressed that the value of the CAVA and its equity metrics depends on their ability to be integrated into the established investment planning pipeline including for improved flow of information between the CAVA, RAMP, and the GRC.[112][147],[148],[149] Fostering dialogue in the development of CAVA metrics between decision-making teams on different proceedings will help ensure that the effort behind determining community adaptive capacity delivers as much deliberative value as possible.

In their CAVAs, the IOUs shall provide relevant metrics, explanation, and demonstrate compliance:

a. Distinguish between attribute metrics, which describe underlying community conditions, and performance metrics, which describe outcomes affected by utility action.

b. Demonstrate how community adaptive capacity metrics may inform priorities for climate adaptation investments in GRCs.

c. Include at least one worked example showing how community adaptive capacity results would affect prioritization, screening, benefit/cost analysis, or vulnerability weighting in an actual decision context

d. Demonstrate consultation with internal IOU planning, risk, and investment teams occured during

20, 2024, San Francisco.; "Energy Equity: Recent Research on Equity Metrics / How to Include Within Climate Adaptation Vulnerability Assessments (CAVAs)," RAND Corporation, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco, p.73.

[112] "CPUC Climate Adaptation Equity Workshop: IOU Presentation on Refinement to Equity Integration in CAVAs," PG&E, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco, pp.37-38.; "Incorporating Equity Metrics Into CAVA" Just Solutions Collective, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco, pp.82-83.; "Climate Adaptation Equity Workshop," SoCalGas, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles, p.68.

model development and is described in the filing.[113]

2. Transparency Criteria

2A. Auditability and Transparency in Data Sources and Methods

In the 2025 workshops, stakeholders identified that verification and transparency are critical in the implementation of future community adaptive capacity metrics.[114] Broad groups of stakeholders, including researchers, community members, and regulators, must be able to verify, replicate, and potentially critique community adaptive capacity methodologies and outputs to ensure they reflect the lived experiences of communities. It also empowers communities to more meaningfully engage with the analysis that utilities provide and should explain in meaningful public forums and plain language reports.

Because technical stakeholder engagement is supported by effective independent verification, auditability and transparency should be fully integrated into Commission requirements of community adaptive capacity modeling. This is consistent with addressing issues raised by stakeholders highlighting the importance of using publicly available data[115] or asked utilities be transparent and clearly explained in the CAVA process.[116]

In their CAVAs, the IOUs shall provide relevant metrics and demonstrate compliance with:

a. Public documentation for an external party to understand, implement, and review the process by which the utilities' determined community adaptive capacity scores.

b. Model logic, variable definitions, transformations, weighting choices, assumptions, exclusions, and limitations should be documented in a public online repository.

c. Where non-public data are used, the IOU should document why public substitutes are insufficient and provide a public surrogate, synthetic dataset, or approximation method sufficient to enable independent review of community adaptive capacity scores.

d. Documentation should include a version history and change log across CAVA cycles.

By requiring robust and independent verification of community adaptive capacity determinations, utilities can engage in constructive conversations with community members and organizations around community adaptive capacity to help build trust between stakeholders, something the CAVA process is well-suited to enable.[117]

[113] "CPUC Climate Adaptation Workshop," SDG&E, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles, p.44.
[114] Sandia National Laboratories, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco.; "CPUC Climate Adaptation Equity Workshop: IOU Presentation on Refinement to Equity Integration in CAVAs," PG&E, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco, p.33.
[115] Comments of Southern California Edison on the September 25, 2025 Climate Adaptation Equity Metrics Workshop, SCE, September 25, 2025, p.2.
[116] Just Solutions Collective, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco.
[117] PG&E, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento.

2B. Reliability of Data and Methods

To ensure that CAVAs remain credible and actionable over multi-decade planning horizons, rigorous standards should be established for data reliability that prioritize stability. Several federal datasets and models previously used or suggested for use by utilities, such as the FEMA BRIC index, Sandia Laboratory's Social Burden index, and the EPA's EJScreen service have been discontinued or defunded,[118] creating instability in the data and model sources utilized by IOUs for the analysis of community adaptive capacity. This instability of data can contribute to instability for the CAVA process.

Some utilities have relied on proprietary, non-peer reviewed, or non-open source methodologies. This should be avoided when possible. Utilizing proprietary and non-peer reviewed methodology risks introducing bias without the opportunity for independent review by the public or regulators. In addition, these data streams can lose funding from one cycle, risking instability. Thus, reliable data is necessary to verify and confirm quantitative analysis and methodologies. Without explicit guidance by the Commission to address this issue, CAVA community adaptive capacity models risk undermining long-term relevance. To increase continuity in community adaptive capacity modeling and demonstrate data reliability, the IOUs should use demonstrated stable and documented data sources and methods. These recommendations are in alignment with workshop stakeholders that these metrics be practical and reliable.[119] Recommendations to use open-source or publicly available data is also in alignment with these recommendations.[120]

In their CAVAs, the IOUs shall provide relevant metrics and demonstrate compliance:

a. Maintain a transparent versioned inventory of all datasets and methods used in community adaptive capacity modeling that are publicly accessible. This would allow regulators and stakeholders to review and verify IOU analysis and methodology regarding information that impacts communities and public safety. This inventory should include the data, geographic coverage, refresh cadence, public/private status, and continuity risk.

b. Use by default public California data sources and state-supported base frameworks for continuity because federal data has proven to be unstable and private and/or proprietary data prohibits verification. If unavoidable, the use of federal, proprietary, commercial, or bespoke sources in place of such resources should be justified within the CAVA and include an explanation of how state data sources were deficient and how their usage of non-state data addresses these deficiencies.

c. Not rely upon datasets or methods lacking evidence of stability, validation, or established as core model components because non-peer reviewed, established, or verified methodologies introduce too large a degree of uncertainty in quantifying the inherently subjective quality of community adaptive capacity. If such datasets or methods must be used, the IOU must provide the following to demonstrate that their use is justified:

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[118] "Climate Adaptation Equity Workshop," SoCalGas, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles, p.67.
157 "EPA Removed EJ Screen Removed from Its Website," Environmental & Energy Law Program, Harvard Law School, last updated March 13, 2026.
[119] Sandia National Laboratories, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco.
[120] Comments of Southern California Edison on the September 25, 2025 Climate Adaptation Equity Metrics Workshop, SCE, p.4.

- written explanation of the need for the proprietary data set;
- validation results; and
- an alternative data source in the event the resource becomes unavailable.

3. Data Resolution Criteria

3A. Ability to Compare Across Time

The CAVA process is structured as a recurring, iterative cycle: IOUs file assessments with the expectation that each cycle builds on and improves upon the last. To support this iterative process, community adaptive capacity metric outputs should be able to be compared across cycles. If each successive CAVA filing uses fundamentally different data, methods, or scales, it reduces the efficacy of comparing vulnerability determinations between CAVA cycles. Comparability across time fosters accountability, learning, and demonstrating progress in serving vulnerable communities.[121] The CAVA depends on temporal continuity sufficient to support trend analysis, accountability, and learning across cycles.

In their CAVAs, the IOUs shall provide relevant metrics, explanation, and demonstrate compliance:

a. Maintain a stable core metric architecture across CAVA cycles sufficient to support trend analysis and accountability.

b. Publish a crosswalk that documents what changed, when methodology changes occur, explaining why it changed, and how outputs under the new method relate to outputs under the prior method.

c. Re-score a representative set of prior-cycle geographies using the new method, where feasible, or otherwise back-cast results, to preserve interpretability over time.

d. Publish publicly available versioned prior-cycle outputs.

Stakeholders from multiple perspectives emphasized that the value of metrics depends on their ability to show change over time.[122] Both the IOUs (that need to plan investments) and equity advocates receive critical information by evaluating trends over time from CAVA analytical outputs.[123] The practical challenge of temporal comparability comes down to whether the underlying data sources remain available and comparable across cycles. Changes in census methodology, survey response rates, or indicator definitions can inhibit accurate comparisons.

3B. Ability to Compare Across Geography

Community adaptive capacity is a fundamentally relative attribute; its analytical value is derived from

[121] Aligns with that metrics need to enable the ability to verify that outcomes are equitable, especially considering historical inequities. See "Energy Equity: Recent Research on Equity Metrics / How to Include Within Climate Adaptation Vulnerability Assessments (CAVAs), RAND Corporation, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco, pp.72-77.
[122] Vulnerable Communities Platform Fact Sheet via vcp.lci.ca.gov, Vulnerable Communities Platform.; "Considerations for Equity Metrics in CAVA Process," C4AT, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco.; The value of time-based trend analysis is demonstrated in the CPUC's Affordability Ratio tool. See "CPUC Affordability Metrics: Climate Adaptation Equity Metrics," CPUC, September 25, 2025, Los Angeles, pp.116-120.
[123] "Refinement of Community Engagement Requirement for CAVA Process," Blue Lake Rancheria, Climate Adaptation Equity Metrics Workshop, August 27, 2025, San Francisco, p.98.

comparing values between different communities. Because IOUs serve diverse territories, the metrics used must produce outputs that are meaningfully comparable across these varied geographies. If a municipality with better data infrastructure can produce more granular inputs than surrounding areas, incorporating that data asymmetrically could distort relative comparisons and misallocate attention. Gaps in data coverage must be handled explicitly, otherwise the resulting analysis will have obfuscated data-based limitations. Because of the inherently comparative nature of community adaptive capacity, geographic comparability must be preserved. California's extraordinary climate and demographic diversity make geographic comparability both important and challenging. As demonstrated by IOU and other stakeholder presentations, most analytical tools and methodologies presented in the workshops align with community adaptive capacity analysis to consider diverse geographic regions, including the Community Resilience Metric,[124] the "Social Burden" metric,[125] the Vulnerable Communities platform,[126] and the proposed Lumen tool.[127]

In their CAVAs, the IOUs shall provide relevant metrics, explanation, and demonstrate compliance:

a. Include a core set of indicators, definitions, and methods should be applied uniformly across the IOU's service territory.

b. Utilize regional customization only where it follows a pre-specified rule set tied to hazard profile, data availability, or service conditions, and where it does not undermine cross-geography comparability.

c. Address missing or unevenly available data through explicit, documented handling rules, including use of proxies, imputation, exclusion, or confidence flags, as appropriate.

d. Explain how any local data enhancements affect comparability with areas lacking equivalent data.

Ensuring that analytical methods within the CAVA are broadly comparable across California's diverse geography provides consideration of coastal communities facing sea level rise to inland valleys experiencing extreme heat to mountain communities threatened by wildfire.

3C. Sensitivity to Pockets of Vulnerability

Community adaptive capacity metrics are highly dependent on the geospatial resolution at which they operate. Census tracts, the most commonly available unit, can contain thousands of residents with widely varying vulnerability profiles. When metrics are computed at a coarse resolution, averaging effects can mask small but severely vulnerable populations — the very communities that adaptive capacity metrics are designed to identify. Similarly, binary vulnerability designations (vulnerable/not vulnerable) cannot capture the gradient of need that exists across communities.

[124] *Climate Adaptation Vulnerability Assessment*, SCE, filed May 15, 2026, Appendix B; *Climate Adaptation Vulnerability Assessment*, SDG&E, filed May 15, 2025, p. 186.
[125] The social burden metric which is especially methodologically predisposed to calculate equity values regardless of data fidelity due to its reliance on point adjacency matrix calculations as opposed to most methods in the space, which rely on geospatial polygons. See Integration of equitable resilience metrics into electric utility planning processes, Sandia National Laboratories, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco.
[126] Vulnerable Communities Platform, Governor's Office of Land Use and Climate Innovation, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco.
[127] "Equitable Resiliency Index: Strategic Planning and Climate Adaptation," CPUC, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco, CA.

Further, DVCs often comprise a significant portion of an IOU's service territory,[128] making prioritization unclear across a broad range of DVCs. And, as Staff proposed above, IOUs should also consider broader sensitivities for vulnerable communities, such as rural[129] and medical baseline,[130] which may not be considered in the DVC definition. Accordingly, the IOUs conveying, or continuing to convey, priorities at the intersection of at-risk assets and various layers of vulnerable communities is essential. Attuning to pockets of vulnerability is also aligned with SCE's proposed criteria to incorporate" multiple dimensions" of community sensitivity and adaptive capacity.[131]

Because vulnerability can be masked by aggregation, community adaptive capacity metrics should be designed to detect pockets of severe need rather than only average conditions. Census tracts, while practical and widely available, can obscure important variation. This is the primary reason SDG&E cites when implementing their hex-bin downscaling methodology.[132] SCE's Community Resilience Metric, with its 37-indicator continuous scoring[133][174] and Sandia's Social Burden metric[134][175] both represent examples of the inadequacy of binary designations. To avoid a mismatch between fine-grained community data and the coarser geospatial resolution of infrastructure investment impacts, indicative metrics must be used to capture fine-grained vulnerability. Computed community adaptive capacity scores can augment sensitivity as well by locating areas through this analysis which might otherwise be missed from direct input from the community.[135][176]

In their CAVAs, the IOUs shall provide relevant metrics, explanation, and demonstrate compliance:

a. Demonstrate that the metric can identify small pockets of severe vulnerability that may be masked by aggregate averages.

b. Use continuous or ordinal measures of relative vulnerability should be used; binary classifications should not be the sole basis for prioritization.

c. Wherever possible or otherwise explain why not, supplement where tract-level or similarly coarse inputs are used, with either finer-resolution analysis or a documented method (such as quantile-based methods) designed to detect tail risk or within-area heterogeneity.

d. Report how rankings change when alternative aggregation methods are applied.

e. Identify hotspots at the intersection of climate risks and vulnerable communities. Such climate risks should also identify regions of low community adaptive capacity / readiness that may inform the State more broadly on needed technical or financial assistance. Hotspot assessments are areas of

[128] "PG&E CAVA Community Engagement: Lessons Learned and Next Steps," PG&E, Climate Adaptation Community Engagement and Equity Workshop, September 19, 2024, Sacramento.
[129] "Responses to Major Comments on the CalEnviroScreen 4.0 Public Review Draft," OEHHA, accessed 2026.
[130] Center for Accessible Technology's Comments on September 19, 2024 Community Engagement and Equity Workshop, CforAT, October 11, 2024.
[131] Comments of Southern California Edison on the September 25, 2025 Climate Adaptation Equity Metrics Workshop, SCE.
[132] "CPUC Climate Adaptation Workshop," SDG&E, Climate Adaptation Equity Metrics Workshop, September 25, 2025, Los Angeles.
[133] See SCE's description of sensitivity and adaptive capacity indicators which comprise the Community Resilience. Climate Adaptation Vulnerability Assessment, SCE, May, 13, 2022, p. B-4.
[134] "Integration of equitable resilience metrics into electric utility planning processes," Sandia National Laboratories, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco.
[135] Demonstrated by BRIC index being a complementary tool in evaluating PG&E's community feedback. "Climate Vulnerability Metrics," PG&E, Climate Adaptation Equity Metrics Technical Workshop, November 20, 2024, San Francisco.

shared utility and community vulnerability within a DVC. The Commission considers the term "hotspots" to mean a consideration of where the IOUs have identified climate risks in communities with low climate adaptive capacity and where the CAVA is seeking to prioritize solutions.

Adoption Community Adaptive Capacity Criteria

For these proposed new criteria:

- To facilitate further investigation of the existing metrics and/or development of new metrics, the Commission staff should convene a technical working group and/or hold a workshop to vet pre-existing metrics, such as VCP or Cal-CRAI.
- Following the workshop, the Commission to approve the adoption of the appropriate basis metric for community adaptive capacity metrics through a staff resolution with a goal of the criteria taking effect starting in 2028, with the Sempra Utilities' (SDG&E's and SCG's) May 15 CAVA filings, in order for IOUs to have sufficient time to incorporate any new practices. The next 2027 CAVA from PG&E should address these criteria to the extent possible for transparency, particularly for those criteria they already utilize.
- ED Staff should facilitate a workshop to present the post-Decision criteria for the purpose of providing a stakeholder forum for and discuss of metrics and clarifications for how they should be applied.
- IOUs shall explain in CAVA filings how they utilized criteria, where there may be competing priorities amongst criteria, and how they propose to address such prioritizing in alignment with Commission guidance.
- This information shall be reported in CAVAs in plain language and presented at public Touch Point meetings.

Modification

The IOUs shall adopt additional community adaptive capacity criteria consistent with the criteria outlined above, which would be additive to those originally established in D.20-08-046, OP 9.