



www.sunflower-alliance.org
**Resisting fossil fuels. Working
for climate Justice.**

Subject East Bay Community Energy-Local Development Business Plan

East Bay Community Energy
% LDBP Comments
1111 Broadway, 3rd Floor
Oakland, CA 94607

June 20, 2018

Dear East Bay Community Energy,

We appreciate the East Bay Community Energy board, community advisory committee, staff and the Local Development Business Plan team for all your hard work. The Local Development Business Plan is a roadmap for paving the way for community benefits like clean energy, energy efficiency and other incentives that will create jobs, stimulate our local economy, reduce local pollution; thereby improving our health and safety in the East Bay. We support the comments by the East Bay Clean Power Alliance and also demand the following be included and clarified within the final Local Development Business Plan document.

1. **Acknowledgement of the values, priorities, and advocacy of the East Bay community as a driving force behind EBCE and the LDBP.**
2. **Highlight important strategies for addressing community needs.**
 - a. Community benefit adders
 - b. Partnerships with community
 - c. Protecting most vulnerable customers and achieving equity
3. **Specifying the LDBP performance metrics**
 - a. Metrics specified for assessing increased equity and social justice,
 - b. Local hires on projects in EBCE territory,
 - c. Projects installed in disadvantaged communities as defined by CalEnviroScreen,
 - d. Asset ownership by low-income customers,
 - e. Percentage hires by EBCE from communities of color,
 - f. Progressive electricity rate structures
 - g. Clearer reporting of job creation

- g.i. New, permanent jobs, or average number of new jobs in existence per year
- g.ii. Use of a metric like job-years, clarify if it is average or cumulative over the period in question
- g.iii. A metric for labor:
 - g.iii.1. Project Labor Agreement (PLA)
 - g.iii.2. Community Workforce Agreement (CWA)
 - g.iii.3. Family sustaining wage pay

4. An implementation plan of the LDBP

As a grassroots climate justice organization, we see community clean energy as a way to make the necessary connections between climate protection, local economic development, and environmental and economic justice. A strong local development business plan, with quantifiable measures of progress towards key objectives, is critical to meeting these goals.

Thank you,

Margaret Rossoff
Steve Nadel
For Sunflower Alliance

