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Subject: Feedback on Ava Community Energy's Local Development Business Plan Roadmap

July 14, 2025

Dear Ava Community Energy Board, Community Advisory Committee and Alternates,

The Local Clean Energy Alliance appreciates the effort that staff have put into developing the Local Development Business Plan (LDBP) and forthcoming strategic roadmap. However, we, along with many other community organizations, are deeply concerned by the limited scope, structure, and ambition of the current approach.

This roadmap narrows the focus of the LDBP to customer programming and electrification, at the expense of its broader goals of investment—particularly those related to energy supply. When the LDBP was first adopted, it envisioned community-driven, distributed energy resources and investments in local clean energy supply in addition to programs and projects that make transition accessible. This updated roadmap appears to abandon that original commitment by the agency. Why is Ava Community Energy not including commodity supply in this plan? Why has the focus on energy supply been dropped?

Electrification can and should be a powerful tool for local development. Furthermore, electrification will increase the need for power, but also ignores that other prerequisites like demand and energy efficiency should precede electrification. Following suggestions in the <u>July 2018 Final LDBP</u>, Ava Community Energy could invest in increasing local solar electricity, to offset increased demand from electrification. This would also provide a more resilient source of electricity than dependence on rising costs of long distance transmission lines that are consistently mismanaged and have caused catastrophic mega wildfires. Locally produced energy would help address the utility affordability issue that Ava Community Energy is currently grappling with by being dependent on contracting remote sources of energy.

We are also concerned how the roadmap completely has not addressed growing and urgent political threats on the state and federal levels. Rising rates imposed by PG&E and the CPUC on CCA customers, and Trump slashing renewable energy funding undermine Ava Community Energy's ability to deliver cost savings and community benefits. What political strategies is Ava Community Energy pursuing to push back? Why is there no mention of ratepayer advocacy, legislative resistance, or even litigation to protect clean renewable community energy?

Another troubling aspect is the roadmap's timeline and process. Community engagement is at the final stages of the plan, rather than being included throughout the process. This contradicts Ava Community Energy's stated commitment to building trust and centering community input. Delaying authentic community participation only reinforces mistrust in Ava Community Energy. We ask that community co-governance, education, and input be integrated from the beginning—not as an afterthought.

We urge Ava Community Energy to commit to a Local Development Business Plan that is not only more expansive, but also financially resilient and ambitious. Is there a strategy to grow the LDBP even in the face of state and federal uncertainty?

The climate crisis is accelerating, and the stakes are higher than ever. What we need is to be bold, audacious, and forward-looking, and therefore we should build off of the visionary roadmap we started. The political, economic, and energy landscapes have changed dramatically since the original Local Development Business Plan was developed. In this moment, we need community investments that meet the scale of the challenge and include:

- Recommitment to developing local energy supply and distributed energy resources,
- An aggressive political strategy to challenge PG&E and CPUC rate hikes & other impacts,
- Full integration of community voices from the earliest phases of planning,
- Programs beyond electrification, such as local solar installations, energy efficiency, green workforce initiatives, and seed funding for innovation,
- A strategy to secure financial stability beyond ratepayer dependence,
- A commitment to local development of family-sustaining wage and union jobs.

We urge you to revise the roadmap accordingly and recommit to the transformative vision of the Local Development Business Plan. The communities you serve—and the future of community energy—deserve nothing less.

Clean Power to the People,

Jessica Guadalupe Tovar, Local Clean Energy Alliance