

October 31, 2012

California Energy Commission
Docket Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512



Subject: Docket No. 12-EPIC-01

The National Asian American Coalition (“NAAC”) appreciates the opportunity to file these written comments with the California Energy Commission (“CEC” or “Commission”), and supports the final draft of the *Electric Program Investment Charge (“EPIC”) Proposed 2012-14 Triennial Investment Plan*.

However, we are dismayed to see that there is no explicit mention of community group involvement in the stakeholder consultation process. We strongly urge that “community-based organizations” be added to the list of stakeholders to be involved in the periodic consultation process, as mentioned on page 200 of the Investment Plan.

The NAAC believes that a formal advisory structure that offers a voice to underserved communities is essential and recommends that no less than three community based organizations be members of the advisory board.

These groups should be located in California and provide direct services to communities in California. Each organization should be tax-exempt, as described in Section 501(c)(3) or 501(d) of the Internal Revenue Code. Each group’s total revenue (as reported on a Form 990) should not exceed \$35 million. These groups should be rotated following each investment cycle.

The NAAC appreciates the opportunity to comment on the Electric Program Investment Charge Proposed 2012-14 Triennial Investment Plan, and is generally pleased with the form it has taken. Yet it is crucial to have a grassroots, community-based perspective, not only to provide critical input to the program, but to legitimize any action that is taken in the name of the ratepayers.

We hope that these changes will be incorporated into future EPIC investment plans.

Sincerely,



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