

**GRIDWORKS**

Cathy Boies <cboies@gridworks.org>

RE: DRAFT Community Engagement Principles

1 message

Devashree Saha <Devashree.Saha@wri.org>

Mon, Jul 8, 2024 at 1:21 PM

To: Cathy Boies <cboies@gridworks.org>, Maury Galbraith <mgalbraith_CETA@outlook.com>

Hi Cathy, thanks for sharing this. This looks fantastic, and a helpful process. I am sharing some thoughts below, based on research we have been doing on different models of community benefit sharing such as Detroit's community benefit ordinance and community benefits agreements.

++ It would be helpful to clarify who is the responsible party for carrying out various activities. For instance, is the transmission developer responsible for all the things that are currently mentioned under information sharing, communication, community benefits, and accountability? Or will some of these be CETA's responsibility? With skepticism of project developers high among local communities, developers entrusted with the responsibility of mediation services and third-party advisory resources may not generate lot of trust amongst local communities.

++ Will CETA be reviewing the "comprehensive engagement plans" to make sure plans are robust and provide details on key sections? DOE currently recruits those with community engagement expertise to review community benefits plans submitted by project developers applying for DOE funding. So wondering what process can be put in place that is not just leaving everything to the developer without any oversight and monitoring.

++ It would also be helpful to be clear about what the pre-application information sessions (under communications) would include and what exactly we are expecting developers to do here. In this regard, just want to flag concerns we have heard. Projects can provide benefits and also impose costs on communities. A transparent discussion of how the project can negatively impact communities and how the developer proposes to address those impacts is helpful. This also provides opportunity for communities and developers to jointly identify alternatives in the project design process because this is still early stages of planning when alternatives can be considered. We also heard that strategies to address negative impacts should not be included as "benefits" to communities.

++ Is there a way to include mention of environmental justice considerations as part of the community engagement process? There are likely to be already overburdened and historically disadvantaged communities. Anything we can do to avoid and minimize new impacts on these communities while strengthening equity in planning processes would be great. Relatedly there can be calls to weigh the cumulative environmental, economic and health impacts of transmission projects proposed in or near EJ communities.

++ Lot of time communities don't even know what counts as a meaningful benefit and what are the types of benefits that could be made available. This kind of education is not something that project developers are likely to do. Would CETA be open to developing some mechanisms where it is providing education and technical assistance to communities that can level the playing field between communities and developers?

++ On the accountability section, I am just worried that it reads as developers will somehow keep themselves accountable. Are we expecting the developer to develop "clear monitoring metrics?" Who is going to ensure that the developer is meeting those metrics? What recourse is available to communities if they find that the developer is in breach of contract? Is CETA or the state of Colorado going to impose fines or other types of penalties if things are not working out? My comments here are related to the first point I raised: what is the role of each actor (CETA, local communities, developer) in design, implementation, monitoring of community engagement process?

Thank you for giving WRI the opportunity to weigh in on these principles. It is really exciting CETA and Colorado developing these and my hope is that Colorado becomes a leader that other states can learn from.

Best

Devashree

From: Cathy Boies <cboies@gridworks.org>
Sent: Monday, June 17, 2024 12:44 PM
To: Maury Galbraith <mgalbraith_CETA@outlook.com>
Subject: DRAFT Community Engagement Principles

Hello,

Last week the Colorado Electric Transmission Authority (CETA) released draft community engagement principles for transmission development. You are receiving this email because of your work related to this issue. Please find the draft principles [here](#).

How You Can Get Involved

- **Oral comments** – join CETA at a virtual study session on July 15, 1:30pm. CETA directors will be discussing the draft principles and taking public comment. Find more info [here](#).
- **Written comments** – provide your written comments to CETA (mgalbraith_CETA@outlook.com) through Aug. 2

These principles will guide CETA's community engagement for transmission development in the state. CETA is eager to get your input before the Board finalizes the principles later this year.

Thank you for your consideration,
Cathy Boies, consultant for CETA



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