



October 7, 2026

Valley Clean Energy Alliance
Board of Directors
604 2nd Street
Davis, CA 95616

Re: October 8, 2026 Board Meeting, Item 9, Power Project Selection Criteria Guidelines

Dear Chair Loren and Members of the Board,

We are the CCA Workforce & EJ Alliance, a coalition of organized labor, environmental justice organizations, climate advocates, and community choice agencies working for high-road clean energy standards that deliver real benefits for workers, communities, and the climate. We support adoption of the Power Project Selection Criteria Guidelines and offer three suggestions that would help VCE deliver on them: a short account of how each project measured up, the same standards when VCE buys with partners, and recognition of Habitat Conservation Plans.

The Guidelines bring VCE largely in line with the high-road standards most of its California Community Power partners have adopted. Our thanks to Chad Curran, VCE staff, and the Community Advisory Committee for the care they put into the Guidelines. They apply to VCE-owned projects as well as projects it contracts for, prefer California projects, give priority to projects that commit to defined financial investments, and define who counts as a Priority Worker. Above all, they focus on good jobs: high priority for a labor agreement covering all the building trades and a goal of hiring 30% of workers locally.

A standard earns trust when people can see it being kept. Our three suggestions are meant to help with that. Each can be made with a motion or a direction to staff, and none takes away the flexibility staff have said they need.

1. **Show how projects measured up.** Staff say the Guidelines are meant to make VCE's decisions clearer. They commit VCE to ask developers how their projects measure up when VCE runs a formal bidding process, but staff report that VCE is not actively planning one. Nothing in the Guidelines requires staff to tell the Board how a project measured up. We ask that staff report to the Board on each long-term power contract twice: at approval, evaluating the project against the Guidelines and what the developer promised, and at construction completion, evaluating whether the project delivered on those commitments. Together, these reports will show the Board whether the Guidelines are doing the job.

2. **Keep the Guidelines when VCE procures power with others.** VCE joins other community choice agencies in projects through California Community Power (CC Power), and the Board took up one of them, Willow Rock, in February. An earlier draft of the Guidelines said VCE may use them when deciding whether to join a project like that. The final version dropped that language. We ask that the participation language return, that "may seek and consider" in Section 3.1 become "will seek and consider," and that VCE's representative at CC Power speak for the standards in those discussions. Joining a CC Power project is a Board decision that can commit VCE to a long-term contract. The Guidelines are the Board's own statement of what a good project looks like, so they should shape that decision the way they shape VCE's other contracts.
3. **Recognize habitat plans.** A Habitat Conservation Plan is a plan, often regional, that gives developers one way to meet federal and state endangered species rules. Section 2.7 now rewards projects that assess habitat impacts early and commit to reducing them, which is a good step, but it does not mention Habitat Conservation Plans. We suggest adding that projects in an area covered by an applicable Habitat Conservation Plan should commit to complying with it. That tells developers up front what a good project looks like, and helps ensure the proposals the Board sees are ready to comply with the plan.

Staff report that VCE supplied about 87% of its retail customers' electricity with renewable energy in 2025. These Guidelines carry that record, and VCE's founding goals of local renewable energy jobs and stable rates, into the next projects. With these additions, a developer, a worker, or a neighbor can read the Guidelines, know what VCE will ask of a project, and later see whether it delivered. Thank you for considering our suggestions.

Respectfully submitted,

Eric Veium, Tim Frank, Leslie Austin
Co-Directors, CCA Workforce & EJ Alliance
StrongerCCAs.org