



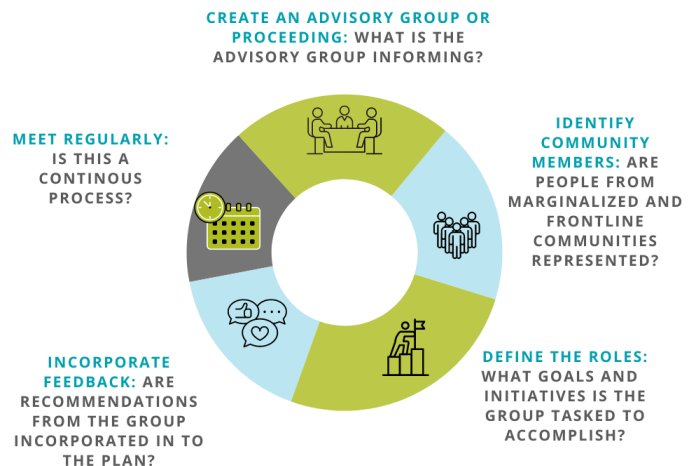
1. Creating a Process for Meaningful Stakeholder Engagement

The first step to centering equity metrics in energy efficiency programs is for policymakers to create a process for meaningful stakeholder engagement that allows for members of historically marginalized and/or excluded communities to inform and decide what metrics will be used to measure program success. This process should then inform any metrics used to center equity in energy efficiency program design, implementation practices, and employment opportunities. As explained in the [Community Engagement to Ownership Spectrum](#), engagement from community members who are the most vulnerable provides greater knowledge, new solutions, and better procedures – all of which benefit not only the most vulnerable, but also everybody else.

Equity advisory groups (a term this paper will use for either committee or proceeding) are decision-making bodies that consist of representatives of underserved and marginalized communities. An equity advisory group helps policymakers and program administrators learn about and implement equity metrics important to historically marginalized and/or excluded communities. It is an intentional space where communities engage and are partners in driving equitable energy efficiency policies and programs.

Steps to Creating an Equitable Public Process

Ensuring an equitable development process and assessing community participation avenues to produce community-driven solutions are key to procedural justice. [Procedural equity](#) is when programs embed inclusive, accessible, authentic engagement and representation into processes to develop or implement program and policies. Ensuring procedural equity means that community members have “[authentic leadership roles](#) that define, drive, and hold accountable clean energy policy and program decisions and outcomes.” In addition to the steps outlined below, policymakers and program implementers can reference [The Community Engagement to Ownership Spectrum](#), which outlines indicators to measure engagement and input and advises how to encourage greater engagement and input.



1. **Establish the equity advisory group or proceeding to provide input on plans:** The ability of an equity advisory group to have meaningful impact on programs will depend on its initial scope and intent. The American Council on an Energy-Efficient Economy (ACEEE)’s [Leading with Equity Initiative](#) outlines three commonly used modes of input that, if they effectively center the voices

of historically marginalized and/or excluded communities, can help achieve equity. The most powerful of these are decision-making bodies of community members who directly control, create, and/or change the program. They have the power to vote and have direct impact on program plans and initiatives. Policymakers should be clear that these groups will not only have a voice in energy efficiency programs but will also be able to directly impact design and implementation decisions.

2. **Identify equity advisory group members and role of the public:** Policymakers and program administrators must take steps to ensure the group consists of members representing marginalized and frontline communities and that there is a proportional number of advocates, utilities, businesses, and government staff. To identify members, administrators should use diverse marketing strategies and [partner with local community organizations](#). It is important to include community representatives and advocates, especially those who have actively participated and advocated on related topics, because they know more about the various aspects of the program and have the expertise in implementing new ideas to change it. The group must also include members that the program intends to impact the most. Membership should be fluid and evolve over time. This will allow new members to bring new expertise which will diversify the input along the way.
3. **Define the role and tasks of the equity advisory group:** Policymakers should be transparent in explaining the role of the group, its decision-making power, and the scope of its impact and ability to make changes in energy efficiency program design and implementation from the outset. When identifying and establishing metrics, the group's input should be a primary decision maker rather than a secondary concern, with the power to affect changes, modifications, and new initiatives. The [four dimensions of energy equity](#) (procedural, distributional, structural, and transgenerational) can serve as a starting point for the equity advisory group to identify objectives and goals. The input should actively transform and create a program informed by the equity group members instead of serving as optional feedback administrators can neglect.
4. **Incorporate feedback into energy efficiency plans:** The equity advisory group should serve as a [trusted partnership](#) between policymakers and community members to incorporate the members' input and transform energy efficiency programs so they work for everyone. Their feedback may include: providing inputs into the cost-benefit analysis, developing program recommendations, identifying tracking metrics, and improving goals and performance incentives to encourage equitable program implementation. Policymakers and program administrators can stay accountable and transparent by publishing progress reports, including graphics, on a public-facing website. These progress reports should clearly define the goals, progress on the goals, and additional actions the program administrators must take to achieve those goals.
5. **Regularly meeting and maintaining the equity advisory group:** Over time, priorities, needs, and information can change. To ensure that plans continue to serve historically marginalized and/or excluded communities equitably, the equity advisory group should meet and provide input regularly before and during plan creation and implementation. It is important to maintain the equity advisory group beyond the initial stages as the group may make additional adjustments

or modifications over time. Meetings should take place at a time and place that the group can easily access, such as a common library after work hours. An online component can further increase accessibility for those who may not be able to attend in person. Finally, program administrators must compensate group members for their time, as they are offering their expertise and consultation to improve programs. Compensation should include payment for the time, travel, and other expenses incurred, including childcare.

Equity Advisory Group Examples

Many states have started to form equity advisory groups to ensure equitable program implementation, including [New Jersey](#), [Rhode Island](#), Massachusetts, and Connecticut. Massachusetts created an Equity Working Group in recognition that Mass Save must [prioritize equitable access](#) to benefit all customers. Similarly, Connecticut created [Equitable Energy Efficiency](#) in recognition of the need to make conscious efforts to ensure that they provide benefits to customers equitably. Below is an overview of their working groups and recommendations.

Massachusetts Equity Working Group (EWG)

In May 2020, the Massachusetts Energy Efficiency Advisory Council (MA EEAC) established the [Equity Working Group \(EWG\)](#) to identify and recommend “priority actions, plans, and partnerships, to increase participation among [moderate-income customers, customers with limited English proficiency, renters, and small businesses].” The EWG consisted of six councilors who represented non-profit organizations, the Office of the Massachusetts Attorney General, organized labor, the Massachusetts Department of Energy Resources (MA DOER), cities and towns in the Commonwealth, and residential customers. The EWG Councilors also included two consultants, program administrators, and one representative from the [Low-Income Energy Affordability Network](#).

In January 2021, the EWG created a [framework](#) outlining its process and goals, stakeholder engagement, and an overview of recommendations for program changes. The EWG prioritized data-driven recommendations with meaningful participation and engagement from organizations that represent underserved communities. The EWG held workshops every other week where stakeholders could share their input on a predetermined topic and discuss that input with a consultant team. The meetings included a follow-up questionnaire and survey to identify any needs or recommendations not captured during the meeting. As a result, the EWG created a list of [recommendations](#) that included modifications to reporting, reviewing performance of program administrators, moderate-income programs, programs for renters and landlords, improving whole-building services, small businesses, reducing language isolation, ensuring employment opportunities, and creating partnerships.

The EWG used this work to establish a list of [Equity Targets for the 2022-2024 Three-Year Plan](#). The targets provided a framework to guide investments in equity and performance for energy efficiency programs. The targets are time-bound with a quarterly reporting requirement. This allows for continuous feedback and holds the administrators accountable. Additionally, the framework proposed that tracking metrics be broken into customer segments (e.g. moderate-income renter house will be counted as moderate and renter) and created a separate set of tracking metrics for Environmental Justice Municipalities to follow the 2021 Climate Law. The [Equity Targets for 2022-2024 Three-Year Plan](#) report provides more details and goals.

Connecticut Equitable Energy Efficiency Proceeding (E3)

Unlike Massachusetts, Connecticut did not establish an equity working group, but instead created an equity proceeding that is ongoing. In September 2020, Connecticut's Department of Energy and Environmental Protection (CT DEEP) initiated the [Equitable Energy Efficiency Proceeding \(E3\)](#). The goals of this proceeding included (1) defining equity in the context of the state's ratepayer energy efficiency programs by developing specific metrics to determine barriers that exist in program adoption among underserved communities, and (2) identifying ways to ensure inclusion and participation from underserved communities.

E3 is an iterative, ongoing process with multiple phases of goal setting and public comments. For each phase, CT DEEP releases proposed goals and actions informed by topics outlined in CT [DEEP's Scoping Notice](#). These topics include defining and measuring progress towards more equitable energy efficiency programs; assessing innovative ways to enhance equity; establishing inclusive marketing, outreach and education approaches; and addressing health and safety barriers to participation. For each topic, the public and interested parties may submit written comments. At the end of the phase, CT DEEP releases a [Final Determination](#) that either adopts, modifies, or rejects the proposed goals and actions. The Determinations include a summary of comments from the public and an outline of recommended changes from the stakeholder meetings and public comments. CT DEEP also releases progress reports to ensure consistent inventory of progress on E3 goals. These documents help all stakeholders identify and track the progress of the proceeding.

In July 2021, CT DEEP completed [Phase 1](#) of the program. Phase 1 characterized the current state of energy efficiency programs and identified short-term actions to enhance equity based on the identified barriers and challenges. This phase will serve as a basis for embedding equity further into CT DEEP's programs and institutions. Additionally, in the [Winter 2022 Progress Report](#), CT DEEP hired a diversity, equity, and inclusion (DEI) consultant to help inform program work moving forward. The progress report includes 19 total actions with a 10-box tracker that details progress on the actions. Some important actions include:

- Updating the [Equitable Distribution Report](#) to make equity data accessible to a wider audience.
- Including new equity metrics in consultation with the DEI consultant, in addition to equity indicators that are already included.
- Creating a checklist to ensure that public participation is accessible to a diverse group of stakeholders.
- Remediating health and safety barriers to weatherization for low-income homes by developing a DEEP-administered program.

Resources

- Drehobl, Ariel. "ACEEE's Leading With Initiative: Key Findings and Next Steps." ACEEE, Dec 2021. <https://www.aceee.org/sites/default/files/pdfs/Leading%20with%20Equity%20final%201-28-22.pdf>
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- "2019 – 2021 Conservation and Load Management Plan." Connecticut Department of Energy and Environmental Protection, Sep 2022. [https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/12c36ce3c4b5a80c852585d80046845f/\\$FILE/Notice%20of%20Equitable%20EE%20Proceeding%20&%20Req%20for%20Written%20Comments.pdf](https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/12c36ce3c4b5a80c852585d80046845f/$FILE/Notice%20of%20Equitable%20EE%20Proceeding%20&%20Req%20for%20Written%20Comments.pdf)