



## 4. Identifying Equity-Centered Tracking Metrics

Equity-related tracking efforts, whether in the energy efficiency space or beyond, are important ways to better understand current practices, identify gaps, see trends over time, and provide accountability. Traditional energy efficiency program metrics focus on [energy and demand savings](#), which perpetuate program design that focuses on cost-effective programs that deliver guaranteed savings. The focus on costs and savings disregards concerns about equitable impact and access. Equity-focused tracking metrics help set appropriate and achievable equity-related goals to undo these past disparities.

It is important to identify and implement equity-focused tracking metrics in energy efficiency programs because these metrics highlight gaps in program accessibility and delivery between customer groups and provide accountability to reduce those gaps. By using metrics, program administrators can monitor the success of programs and, if underperforming, modify programs in real time. Below we have outlined how states and programs can begin to incorporate equity-focused tracking metrics, and have proposed metrics to address structural, distributional, and procedural equity.

### *Creating Equity Centered Tracking Metrics*

Establishing equity-focused tracking metrics is an important early step in the process of working towards more equitable energy efficiency programs. Legislation, an order from the regulatory agency, or a request from advocates in a state can mandate that program administrators track equity-focused metrics. Below are three key components policymakers should incorporate into equity-focused tracking metrics to improve energy efficiency program delivery and performance for all customers.

- **Step 1: Initiate a public process to inform and identify proper metrics.** Program administrators can create public meetings or establish a working group. The meeting or group must include representatives from the community and they must have equal voting power to effect change. Their engagement and input should be the primary driver in identifying proper metrics.
- **Step 2: Identify tracking metrics for current and future planning cycles.** Initial efforts can target easy-to-measure and low-cost metrics such as program participation and EE workforce development for future cycles, and states can expand their efforts to cover other harder to measure and/or more costly equity-focused metrics. Further, data from the equity-focused tracking metrics can inform equity-related goals and performance incentives.
- **Step 3: Report these metrics publicly and in a timely manner.** States can mandate program administrators to report these metrics publicly and use this information to inform the next suite of programs, but administrators can also publish their reports without any legislation or regulation. Reports must present metrics in an easily understandable and accessible manner, including clear, readable tables, graphs, and charts, to all members of the public. Public reporting allows for transparency and accountability in program implementation. Additionally, frequent reporting allows for continuous program modifications and timely improvements.

## Equity Centered Tracking Metrics

For policymakers and program administrators, tracking equity-centered metrics is an important step to ensuring more equitable program design and implementation, as this data allows them to measure progress and the impact of programs. To encourage energy equity, states can use many different metrics and tailor them to their policies and desired outcomes.

Below is a sample of ways programs can track equity that focus on outcomes and accountability, using metrics outlined in the [ACEEE Leading with Equity Initiative](#) and [VEIC's the State of Equity Measurement: A Review of Practices in the Clean Energy Industry](#). These metrics are divided into three categories based on whether they primarily promote procedural, distributional, or structural equity, with transgenerational equity considerations embedded into each of the three buckets.

### **Procedural Equity Metrics:**

Programs achieve [procedural equity](#) when they embed inclusive, accessible, authentic engagement and representation in processes to develop or implement programs and policies. Tracking metrics that align with procedural equity can encourage program implementers to create more opportunities for stakeholder engagement and input on energy efficiency plans and implementation practices. Program administrators can track efforts to encourage procedural equity through engagement processes that incorporate feedback into plans and outreach efforts such as language access.



- **Engagement Processes:** This metric can assess whether programs have processes and input structures in place to ensure access to and participation in decision-making processes for people from historically marginalized and/or excluded communities. Program administrators can measure this through working groups, stakeholder meetings, and other opportunities for inclusive and accessible public comment. Additionally, government staff and program implementers can publish and respond to written comments online, in an effort to show why they adopted certain policies.
- **Language Access:** This metric informs the number and type of communication channels the program administrators used to ensure that historically marginalized and/or excluded communities are part of the engagement process. Program implementers can gather information by working with existing community organizations that can provide guidance on the languages spoken in the community and possible language barriers to engagement. They can also use community data to find commonly spoken languages in the community. From there, the administrators can track, record, and report the various channels of communication they provided, such as interpretation and translation, to ensure better access to the engagement process.

### ***Distributional Equity Metrics:***

Distributional equity-focused tracking metrics can measure whether programs and policies result in fair distributions of benefits and burdens across all segments of a state, and encourage program implementers to prioritize areas with the highest need. Historically, program implementers have only been required to offer equal access in programming or to [spend a minimum amount](#) to reach historically marginalized and/or excluded communities. Distributional equity-focused metrics are important tools to right this wrong because they require program implementers to report on participants in programs and can identify if programs meant to target historically marginalized and/or excluded communities are accomplishing these goals or if they should be modified or changed.



- **Program Interest by Demographic:** This metric provides additional context beyond actual program participation to see how many customers want to participate in programs, even if they do not take further steps to participate. Depending on program priorities, this metric can also include the number of outreach activities in historically marginalized and/or excluded communities.
- **Program Participation by Demographic:** Measuring the number of customers a program serves can gauge the extent to which residents of historically underserved territories or traditionally disadvantaged populations participate in programs. States can tailor this measure to track participation by zip code or census tract, income level, race, educational background, age, and owner/renter. For additional analysis, program implementers can compare program participation to the percent of marketing spent to target that specific demographic.
- **Money Spent on Marketing:** Tracking and reporting on program administrator investment in marketing materials for historically marginalized and/or excluded communities will ensure that program administrators appropriately market programs to targeted communities to increase participation.
- **Program Participant Average Age:** Program administrators, government staff, and other stakeholders can use data on the age of program participants to determine whether programs exclude certain age ranges and customer types. This can be important if a program aims to target renters, who are usually younger and older residents that typically have limited income and lack access to typical marketing channels.
- **Home Type Served (single family or multi-family, homeowner or renter-occupied):** Program administrators can report on the types of homes participating in energy efficiency programs through total homes served or percentages (i.e. percentage of multi-family homes compared to all residential homes). Tracking this metric can help program administrators see the extent to which programs serve the rental and multi-family market.
- **Income Level of Households Served:** This metric can help determine if the average income level of households served by an energy efficiency program is higher or lower than the area, state, or federal average. Participation rates for lower-income households are often lower than participation rates for higher-income households. This metric can show the extent of this

disparity in energy efficiency programs. Program administrators can also use this information to inform incentives, marketing, and financing offered in energy efficiency programs.

- **Program Investment by Demographic:** This metric can determine if program spending is equal to the percentage of customers a utility serves. With this metric, stakeholders can see the level of program investment compared to customers broken down by demographic sector or community level. This can include incentives received by program participants as well as other program costs (administrative, evaluation, and marketing) that utilities invest.
- **Clean Energy Technologies Installation:** This metric can track the number of technologies adopted by participants and certain communities. Program administrators can use this measurement to track adoption of technology by participants throughout the state divided by geographic or demographic region. Measurements can show where programs succeed and where changes in delivery and marketing may need to take place. For example, Efficiency Maine Trust has [established program goals](#) related to weatherization and heat pump installation that specifically focus on low-income populations and require geographic tracking of program participation to ensure programs install technologies in historically marginalized and/or excluded communities.

### ***Structural Equity Metrics:***

Structural equity metrics track whether decisions on program design and implementation are made with a recognition of historical, cultural, and institutional dynamics that have routinely disadvantaged historically marginalized and/or excluded communities and routinely advantaged privileged groups. Some of these metrics include investment in historically marginalized and/or excluded communities and whether the workforce is representative of the local population.



- **Workforce/Jobs Created:** These metrics evaluate a workforce program’s effectiveness in prioritizing targeted communities and can ensure equal opportunities from energy efficiency investment benefits. They can include demographic data of participants, number of workers trained and licensed in the field, training opportunities offerings, outreach to targeted communities, partnerships with local organizations, and investment in creating program and subsidizing trainings and certifications for participants.
- **Local Business Participation:** These metrics can track participation of local and small businesses to ensure that these programs focus on providing community wealth. Metrics that track workforce growth and hiring practices can provide accountability and access to help undo these barriers. For example, public-facing reporting on transactions with women-owned or minority-owned businesses (WMBE) can encourage companies to expand their relationships with businesses. This metric can go beyond how many jobs a program created and dig deeper to see the percentage of LMI communities, women, and/or BIPOC individuals working those jobs.

### ***Examples of States Incorporating Equity Metrics***

States have started to create specific tracking metrics to assess equity in program design and delivery. Below are examples of several efforts:

- **Massachusetts:** In Massachusetts, the Energy Efficiency Advisory Council (MA EEAC) and energy efficiency program administrators (PAs) have pledged to improve the equitable delivery of energy efficiency programs. As a step towards this commitment, the MA EEAC convened an Equity Working Group that established [equity-related targets for the state's 2022-2024 three-year energy efficiency plan](#). These targets require tracking equity-related metrics on a quarterly basis in several categories.
- **Connecticut:** In 2020, the Connecticut Department of Energy and Environmental Protection (DEEP) engaged in an Equitable Energy Efficiency (E3) Proceeding to define equity in the state's energy efficiency programs, develop metrics to better understand which customer segments the programs underserved, and work toward greater participation and inclusion of those underserved customer groups. One of this proceeding's goals is to "enhance tracking of equity indicators in C&LM (conservation and load management) programs." Actions in this area include tracking and assessing historic, current, and future energy efficiency program participation in priority communities, which a census tract basis defines as: households with high-energy burdens, communities of color, and areas with high rates of arrearages and utility shutoffs.
- **Oregon:** In 2018, the Energy Trust of Oregon developed [equity related targets](#) by engaging with the diversity, equity, and inclusion committee and the management team for six months. The proceeding aimed to create a plan for providing program benefits to historically marginalized and/or excluded communities. It included metrics such as the "number of contracts executed by minority and women-owned businesses" and "increase[d] customer participation in energy efficiency programs for all underserved population". Its [2021 progress report](#) provides updates on the status of the targets and how close they are to completion, including specific percentages and a color-coded key.

## **Resources**

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