ACEEE'S LEADING WITH EQUITY INITIATIVE: KEY FINDINGS AND NEXT STEPS

Ariel Drehobl

December 2021

An ACEEE White Paper

ACEEE
American Council for an Energy-Efficient Economy

Contents

About ACEEE

The **American Council for an Energy-Efficient Economy** (ACEEE), a nonprofit research organization, develops policies to reduce energy waste and combat climate change. Its independent analysis advances investments, programs, and behaviors that use energy more effectively and help build an equitable clean energy future.

About the Author

Ariel Drehobl is a manager on the local policy team where she leads work related to energy equity, energy affordability, and low-income energy efficiency programs. She provides direct policy and research assistance to stakeholders working to advance equitable clean energy policies and programs. Ariel earned a master of science in environmental science, policy, and management from a joint-degree program that awarded degrees from Central European University in Hungary, Lund University in Sweden, and the University of Manchester in the United Kingdom. She also holds a bachelor of arts in history and international studies from Northwestern University.

Acknowledgments

This report was made possible through the generous support of the Barr Foundation, the Kresge Foundation, and The JPB Foundation. Special thank you to Daphany Rose Sanchez with Kinetic Communities Consulting for workshop design and facilitation support, and to Bryndis Woods, Elizabeth Stanton, and Sagal Alisalad with Applied Economics Clinic for research support. Thank you to the work of the ACEEE Leading with Equity project team: Rachel Gold, Utilities Program Director; Lauren Ross, Senior Director for Policy; Charlotte Cohn, Research Analyst; and Amanda Dewey, Senior Research Analyst.

The author gratefully acknowledges the community-based organizations, advocates, and utilities who participated in the three Leading with Equity workshops and provided external review of this report. Those individuals and organizations are listed in Appendix A. External expert reviewers included Amanda Dewey, Charlotte Cohn, Stefen Samarripas, and Steve Nadel, ACEEE; Bryndis Woods and Liz Stanton, Applied Economics Clinic; Natalia Brown, Catalyst Miami; Andie Wyatt, Grid Alternatives; Daphany Rose Sanchez, Kinetic Communities Consulting; Amy Vavak and Amanda Formica, National Grid; Tawe Wongbuphanimitr, Stewards of Affordable Housing; Jacquie Moss, Texas Energy Poverty Research Institute; and Cynthia Zwick, Wildfire AZ. Participation in the Leading with Equity workshops and external review of the report do not imply affiliation or endorsement.

Last, we would like to thank Mary Robert Carter for managing the editorial process, Keri Schreiner for copy editing, Phoebe Spanier for proofreading, Kate Doughty and Roxana Ayala for graphics support, and Ben Somberg and Wendy Koch for their help in launching this report.

Suggested Citation

Drehobl, A. 2021. *ACEEE's Leading with Equity Initiative: Key Findings and Next Steps*. Washington, DC: American Council for an Energy Efficient Economy. aceee.org/white-paper/2021/12/aceees-leading-equity-initiative.

Executive Summary

In February 2021 ACEEE kicked off our two-year Leading with Equity Initiative, with the goal of defining and driving toward equitable energy efficiency policy and programs at the state, local, and utility levels. To this end, initiative team members from ACEEE, Kinetic Communities Consulting, and Applied Economics Clinic engaged in a collaborative process through two cohorts—one of community-based organizations (CBOs) and advocates, and one of utilities and energy efficiency program implementers—to identify metrics that capture progress toward deployment of energy efficiency policies and programs that are inclusive and prioritize equity.[1] The initiative aimed to ensure CBOs and disinvested community interests are represented in and driving development of improved equity-centered metrics for ACEEE scorecards while also increasing our understanding of current utility, state, and city capacity to report on desired metrics, including barriers and leverage points.[2]

PRIORITIZED METRICS FOR SCORECARDS

The Leading with Equity Initiative consisted of a series of three interactive workshops (six workshops in total) held with two separate stakeholder cohorts.[3] We held the workshop series with CBOs and advocates first, and then framed the workshops with utilities and program administrators around the priorities that emerged from the CBO workshops. During these workshops, we explored a shared vision for an equitable energy system, discussed barriers and leverage points to collecting equity-related data, and identified areas of agreement on how to prioritize equity-focused metrics in the ACEEE scorecards. We explored the metrics across three dimensions of equity.[4]

- ***Procedural equity*** embeds inclusive, accessible, authentic engagement and representation in processes to develop or implement programs and policies.

[1] See Appendix A for list of workshop participants.

[2] ACEEE publishes state, city, and utility scorecards with the goal of benchmarking entities whose actions affect energy efficiency and clean energy investment (i.e., states, cities, and utilities) and of holding decision makers accountable to their commitments and actions. ACEEE's scorecards also collect data to support policy action and identify best practices, enabling the user to envision a roadmap for policy reforms.

[3] Community-based organizations (CBOs) are representative of a community or significant segments of a community and provide financial, educational, and/or other resources aimed at enhancing health, wealth, and overall community well-being.

[4] ACEEE adapted the dimensions of equity framework from the 2014 Urban Sustainability Directors Network report researched and written by Angela Park, *Equity in Sustainability: An Equity Scan of Local Government Sustainability Programs*.

- ***Distributional equity*** ensures that programs and policies result in fair distributions of benefits and burdens across all segments of a community, prioritizing the highest need.
- ***Structural equity*** institutionalizes accountability so that decisions are made with a recognition of the historical, cultural, and institutional dynamics and structures that have routinely advantaged privileged groups and resulted in chronic, cumulative disadvantage for subordinated groups.

Based on feedback from CBO workshop participants and additional research, ACEEE developed a list of prioritized metric categories across the dimensions of equity for inclusion in future scorecards. This report details the metric categories, potential questions, and potential metrics to score that emerged from workshop discussions and community feedback. Following are the prioritized metric categories across procedural, distributional, and structural dimensions.[5]

Prioritized procedural equity metric categories are as follows:

- **Program targeting.** The state, city, or utility has created and uses a definition of historically disinvested and/or underserved communities to target a percentage (e.g., 40%) of programs and resources to these communities.
- **Engagement processes.** The decision maker has processes in place to ensure equitable access and participation of people from historically disinvested communities in its decision-making process.
- **Compensation for engagement.** The decision maker compensates community members for participation in stakeholder engagement processes.
- **Language access.** Community engagement materials are accessible in the languages spoken across the communities served.

Prioritized distributional equity metric categories are as follows:

- **Energy affordability goals.** The decision maker has set a goal to achieve an energy affordability threshold (i.e., to lower high energy burdens to an agreed upon level, e.g., 6%) and progress toward this goal is tracked with publicly accessible data.
- **Access to existing program resources.** The decision maker collects data to understand which communities have historically lacked and currently lack access to the benefits of clean energy investments.
- **Equitable distribution of benefits.** The decision maker uses data to make commitments and create accountability structures that will ensure that historically

[5] We combined metrics related to transgenerational equity into the structural, distributional, and procedural categories for this prioritization exercise.

disinvested communities receive equitable benefits through policy commitments and commensurate investments.

- **Disconnections and access to energy.** The decision maker collects demographic data on which community members experience disconnection or energy service shutoffs, makes these data publicly available while also ensuring customer privacy, and takes steps to ensure equitable energy access and prevent disproportionate impacts on disinvested communities.

Prioritized structural equity metric categories are as follows:

- **Consumer protections.** These policies protect customers from loss of energy services, exploitative energy services, and exclusion from clean energy sector benefits.
- **Data access and transparency.** These policies require reporting on demographic data, with privacy protections, for the purpose of measuring access to, participation in, and benefits from clean energy programs in ways that are transparent and easily accessible.
- **Community wealth building.** These policies and programs directly build community wealth and include renewable energy resources owned by community members, clean energy investments that build homeowner wealth, and upgrades to community-owned affordable housing.
- **Benchmarks and evaluations.** Policies and programs include initial benchmarks and are consistently evaluated on progress toward achieving stated equity-related goals. Policies and programs are on track to achieving those goals, which should connect distributional equity impacts to accountability metrics to ensure that broader equity-related goals are achieved.

TRANSPARENCY, ACCOUNTABILITY, AND NEXT STEPS

We successfully achieved our first-year objectives for the Leading with Equity Initiative while continually working to learn and improve through the process. In addition to identifying priority metrics for the scorecards, we received feedback on how to discuss and define equity, data collection, and support needs, as well as on holding interactive virtual workshops.

ACEEE is committed to ensuring that the priorities of CBOs are integrated into our upcoming scorecards in the second year of the project through a transparent and collaborative process. We will take concrete steps to incorporate equity metrics that align with the priorities of CBOs and disinvested communities into our scorecards. We are also committed to authentic relationship building with CBOs and historically disinvested communities to cocreate a feedback mechanism to support the continual improvement of our metrics and practices over time.

As a next step, the lead authors of the state, city, and utility scorecards will develop roadmap documents that highlight the current state and equity metric gaps in each scorecard, as well

as the priority metrics it should add or change to reflect the Leading with Equity feedback. The lead authors will also develop a timeline and process for designing and incorporating new metrics that include opportunities for stakeholder engagement, outreach, and feedback.

Background

Low-income communities and communities of color stand to benefit from clean energy investments, healthier housing, and local job creation; however, they often are unable to take full advantage of clean energy opportunities.[6] For example, low-income households have less access to upfront capital to make clean energy investments, frequently rent their homes and therefore have limited control over their energy systems, and are often excluded from policy development and planning processes. At the same time, low-income and disinvested communities suffer the most from the costs and externalities of an unjust energy system.

ACEEE's research has found that low-income households living in both single and multifamily buildings are consistently overburdened not only by high energy bills but also by the environmental and health impacts of energy generation and consumption. They are also underserved by residential energy efficiency and clean energy programs, as well as by recent state and local climate/energy planning. Utilities and local governments are increasingly developing climate and clean energy strategies in response to state directives or local climate action planning. However, these strategies are often developed without an implementation plan or specific guidance to achieve climate and clean energy goals in a way that will have the greatest impact on the health, wealth, climate resilience, and social welfare of historically disinvested communities.[7]

For more than 15 years, ACEEE has been releasing numerous scorecards and other progress reports to benchmark and drive clean energy action among states, cities, and utilities. Through these efforts, we aim to identify best practices and set a high bar for clean energy leaders. Even so, we can do better to ensure that equity concerns are front and center. To ensure that everyone has equitable access to and benefits from clean energy investments, ACEEE—with support from the Barr Foundation, the Kresge Foundation, and The JPB Foundation, and in collaboration with Kinetic Communities Consulting and Applied Economics Clinic—launched our Leading with Equity Initiative, which aims to ensure that all our scorecard leaders—whether they be states, cities, or utilities—are also leading on equity.

---

[6] We use the term *clean energy* to describe projects, solutions, initiatives, evaluations, investments, programs, and/or policies that relate to energy efficiency and renewable energy.

[7] *Disinvested communities* are those most impacted by community decision making and whose life outcomes are disproportionately affected by social structures. These groups might include people of color, low-income residents, youth, the elderly, recently arrived immigrants, people with limited English proficiency, people with disabilities, and the homeless. In some contexts, disinvested communities are referred to as *disadvantaged* or *underserved* communities.

While ACEEE's state, city, and utility scorecards have been effective in driving action around energy efficiency at all levels, there is a gap between scorecard performance and progress on equity in leading states and cities. As the scorecards continue to set a high bar and policy roadmap for energy efficiency planning and implementation, we need to ensure that the assessments are centered more around equity and informed by the needs of historically disinvested communities, recognizing diversity across the country and within the environmental justice community.

If we do not prioritize equity metrics, we risk rewarding states, cities, and utilities that may be advancing clean energy policies at the expense of the communities they serve. We cannot achieve a successful clean energy transition without centering equity. By elevating equity to the forefront of ACEEE's publications and scorecards, we aim to identify best practices, assess outcomes, and provide examples for decision makers to best develop policy and programs to advance equitable outcomes for their communities.

PROJECT OVERVIEW

In February 2021 ACEEE kicked off the two-year Leading with Equity Initiative, with the goal of defining and accelerating equitable energy efficiency policy and programs at the state, local, and utility levels. To this end, we created and led a collaborative process with community-based organizations (CBOs), advocates, utilities, and energy efficiency program implementers to identify metrics that capture progress toward deployment of energy efficiency policies and programs that are inclusive and put equity front and center. We also researched the current state of equity data in the utility sector, how state and local governments and utilities are engaging in equitable stakeholder engagement practices, and the impacts of equity-driven policies.

Our project has three main goals:

- Ensure disinvested communities are represented in and driving development of improved equity-centered metrics for ACEEE's scorecards.
- Better understand current state, city, and utility capacity to report on desired metrics, including barriers and leverage points.
- Generate proposed changes and roadmaps for each scorecard, setting the bar in a way that represents real performance on the metrics that matter to communities.

In addition to updating metrics in our scorecards, we are also committed to working with the broader community of energy equity metrics practitioners to ensure that any CBO priorities that are not included in ACEEE scorecards at the end of this process are addressed through

the broader energy justice community's work.[8] To this end, ACEEE is partnering with the University of Michigan's Energy Equity Project to create a research collaborative for the energy equity metrics community to better align projects, goals, and outcomes to the needs of CBOs and historically disinvested communities.[9]

Equity Framework and Definitions

Recently, the federal government and many states and cities have been taking steps to address the disproportionate impact that the energy sector has had on disinvested communities as well as the lack of benefits these communities have received from clean energy investments. The Justice40 Initiative is a federal effort across the whole of government to deliver at least 40% of the overall benefits from federal climate and clean energy investments to disadvantaged, or disinvested, communities.[10] This federal commitment emphasizes the need to ensure that communities that have been historically excluded from accessing the benefits from clean energy investments are prioritized as we move forward with innovative and ambitious climate solutions. ACEEE wants to ensure that our scorecards reflect this commitment in the metrics we use to score states, cities, and utilities.

ACEEE uses the dimensions of equity framework, which defines energy equity across procedural, structural, distributional, and transgenerational dimensions (see figure 1).[11] This framework addresses how decisions are made, how benefits and burdens are distributed,

[8] Community-based organizations (CBOs) are representative of a community or significant segments of a community and provide financial, educational, and/or other resources aimed at enhancing health, wealth, and overall community well-being.

[9] The Energy Equity Project aims to create a framework for measuring equity across energy efficiency and clean energy programs among utilities, state regulatory agencies, and other practitioners. This effort complements ACEEE's scorecard-focused effort to build a framework for decision makers to measure the equity outcomes of their policies, programs, and decisions. To learn more, see energyequityproject.com.

[10] Climate and clean energy investments included in the Justice40 Initiative include clean energy and energy efficiency, clean transit, affordable and sustainable housing, training and workforce development, the remediation and reduction of legacy pollution, and the development of critical clean water infrastructure. To learn more, see www.energy.gov/promoting-energy-justice.

[11] ACEEE adapted the four dimensions of equity framework from the 2014 Urban Sustainability Directors Network report researched and written by Angela Park, *Equity in Sustainability: An Equity Scan of Local Government Sustainability Programs*.

how decision makers address current barriers and structures, and how these issues may impact future generations.[12]

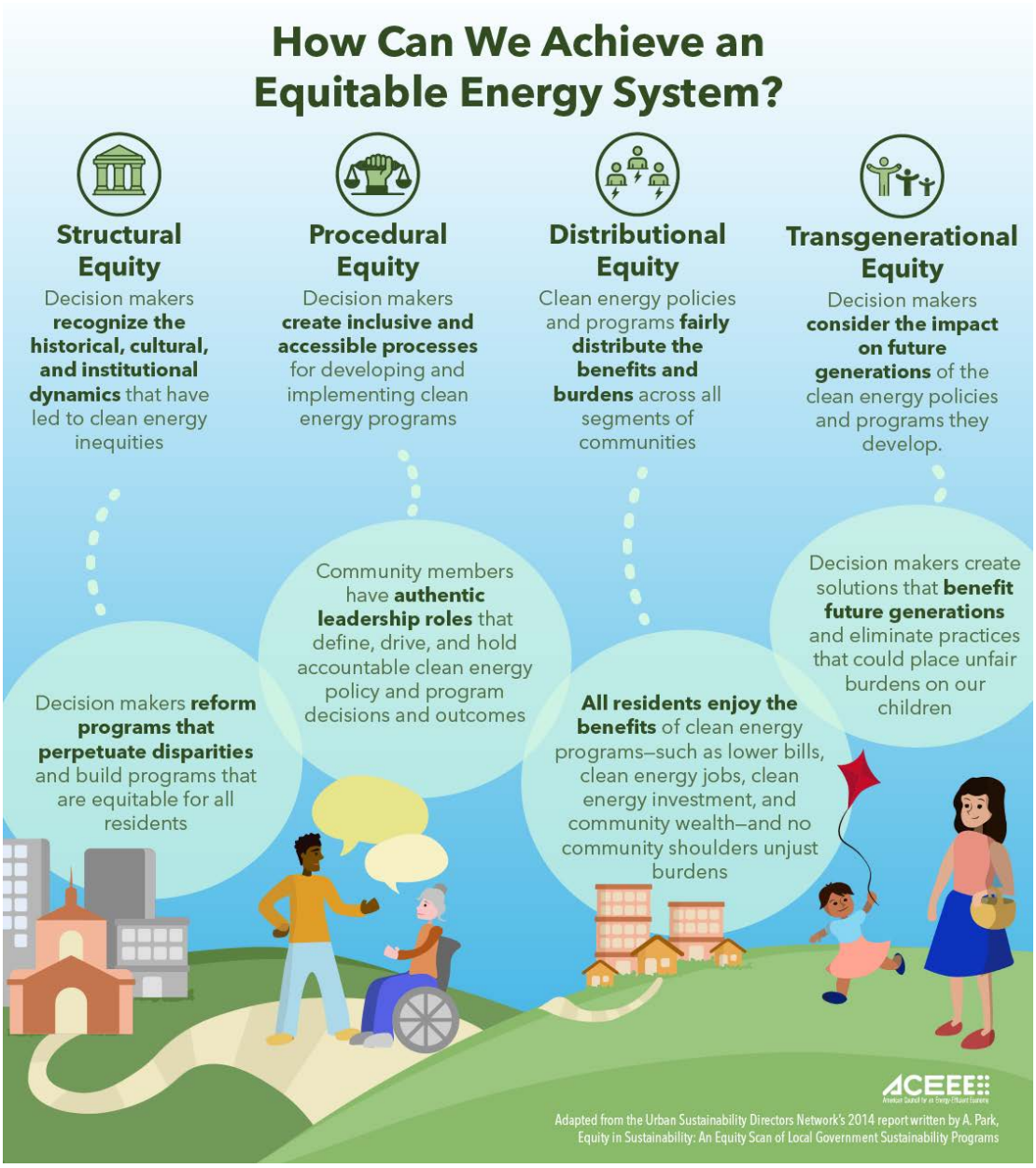

Figure 1. Four dimensions of energy equity

[12] We combine transgenerational equity-related metrics with the other three categories for the Leading with Equity Initiative, exploring how structures, impacts, and processes can impact future generations.

We used the dimensions of equity framework to structure our workshop conversations and our metric recommendations for the scorecards. Ultimately, our goal is to integrate new category-spanning metrics into our scorecards, as all equity dimensions must be addressed to move toward a more equitable energy system.

ACEEE's State, City, and Utility Scorecards

The purpose of ACEEE's scorecard metrics is to benchmark entities whose actions affect energy efficiency and clean energy investment and to hold decision makers (i.e., states, cities, and utilities) accountable to their commitments and actions. ACEEE's scorecards also collect data to support policy action and identify best practices, enabling users to envision a roadmap for policy reforms. ACEEE has incorporated metrics that assess the equity of energy efficiency investments in our state, city, and utility scorecards. Each scorecard is at a different stage of incorporating equity-focused metrics and outcomes into its methodology. Table 1 includes a brief overview of each scorecard and their equity metrics to date.

ACEEE Scorecard Data Transparency
ACEEE publishes all data collected for our state and city scorecards online in our State and Local Policy Database and in a data sharing dashboard for the utility scorecard.

Table 1. Overview of ACEEE's state, city, and utility scorecards

	State Scorecard	*City Scorecard*	*Utility Scorecard*
Year first published	2006	2013	2017
Number of editions (as of Dec 2021)	14 editions (2006, 2009–2020)	6 editions (2013, 2015, 2017, 2019–2021)	2 editions (2017, 2020)
Entities included	50 States and District of Columbia	100 largest metropolitan statistical areas	52 largest electric utilities
Chapters (2020 editions)	• Utility and Public Benefits Programs and Policies • Transportation Policies • Building Energy Efficiency Policies • State Government-Led Initiatives • Appliance and Equipment Efficiency Standards	• Local Government Operations • Communitywide Initiatives • Buildings Policies • Energy and Water Utilities • Transportation Policies	• Energy Efficiency Program Performance • Energy Efficiency Programs • Enabling Mechanisms
Number of total metrics (2020 editions)	68 metrics	32 metrics	20 metrics
Equity-focused points (2020 editions)	4% of points	19% of points	6% of points

	State Scorecard	*City Scorecard*	*Utility Scorecard*
Equity-focused point target for next editions	20% of points	30% of points	20% of points
Downloads (2020 editions, as of Nov 2021)	1,600	1,500	2,200

City Clean Energy Scorecard

First published in 2013, *The City Clean Energy Scorecard* assesses 100 major U.S. cities on policies related to local government operations, communitywide initiatives, buildings policies, energy and water utilities, and transportation policies.[13]

Of all our scorecards, the *City Scorecard* is farthest along in terms of incorporating equity-focused metrics. In 2019 ACEEE overhauled the report's methodology to integrate more considerations of equity.[14] We did this through an extensive methodology review process with stakeholders and cities. We also convened a working group of CBOs to advise on the development and scoring of new equity-focused metrics, and the working group continued to support improvements for the 2020 and 2021 scorecards.

As of 2021, approximately 19% of the possible points in the *City Scorecard* are from equity-focused metrics, including equitable community engagement in climate planning, workforce development programs, comprehensive low-income and multifamily programs, incentives for low-income programs, and low-income access to transportation. Figure 2 provides an overview of the 2021 equity metrics dimensions in the *City Scorecard*.

[13] The 2013, 2015, and 2017 editions were called the *City Energy Efficiency Scorecard.* In 2019, we added new metrics into the scorecard, including equity-focused metrics and renewable energy metrics. To represent this change from energy efficiency to a broader clean energy focus, we renamed the 2019, 2020, and 2021 scorecards the *City Clean Energy Scorecard*.

[14] To learn more about the 2019 changes to the *City Clean Energy Scorecard,* see our fact sheet: www.aceee.org/fact-sheet/2020/06/fostering-equity-local-clean-energy-policy-lessons-2019-city-clean-energy.

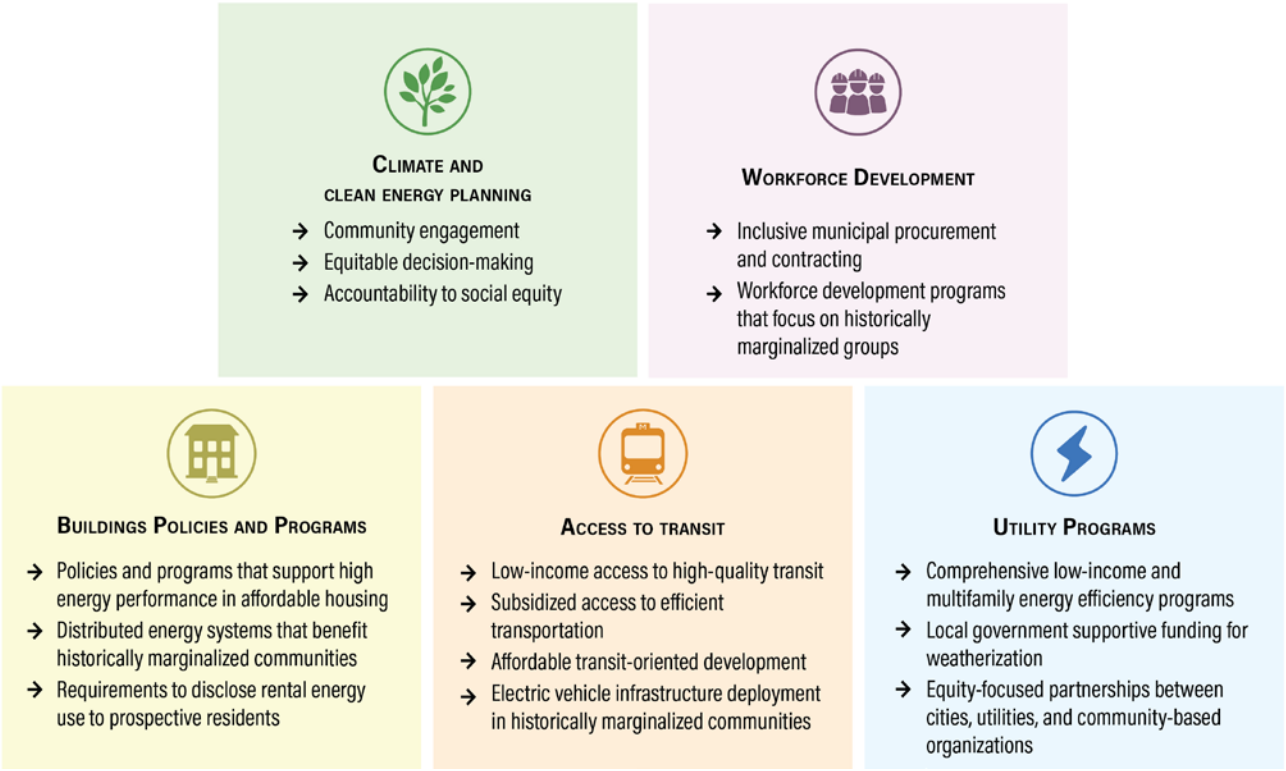

Figure 2. Equity metric dimensions in ACEEE's 2021 City Clean Energy Scorecard

State Energy Efficiency Scorecard

Published annually or biannually since 2006, *The State Energy Efficiency Scorecard* is our longest continually published scorecard. This scorecard assesses state utility and public benefits programs and policies, transportation policies, building energy efficiency policies, state government-led initiatives, and appliance and equipment efficiency standards.

In 2020, 6% of metrics in the *State Scorecard* were equity focused. These include metrics related to state-level utility policies to support low-income program spending and savings requirements and special cost-effectiveness rules (e.g., exempting low-income programs from traditional cost-effectiveness tests), as well as transportation policies focused on incentives for low-income access to transit-oriented neighborhoods. The 2021 *State Scorecard* data request included new questions aimed at measuring equity metrics related to community engagement and accountability in climate and energy planning and decision making, inclusive workforce development, access to public transit and electric vehicles (EVs), and specific goals and metrics used to track climate and energy initiative impacts on disinvested communities.

Utility Energy Efficiency Scorecard

Published in 2017 and 2020, the ACEEE *Utility Energy Efficiency Scorecard* is the newest of ACEEE's three main domestic scorecards. This scorecard assesses the 52 largest U.S. electric utilities on energy efficiency program performance, energy efficiency programs, and

enabling mechanisms. In 2020, 6% of the metrics were equity focused, including metrics on low-income savings achieved per residential customer, spending on low-income energy efficiency programs (as a percentage of total spending), and the comprehensiveness of program offerings, such as programs that provide deep energy-saving measures for low-income households.

Process and Methodology

The Leading with Equity Initiative consisted of three interactive workshops with the stakeholder cohorts in April, June, and September 2021 to inform the development of equity-related metrics for ACEEE's state, city, and utility scorecards. We also published a monthly newsletter to inform the broader clean energy community about both the initiative's outcomes and progress, and opportunities to provide input through surveys on their perspectives, ideas, and metric prioritizations. To support the engagement efforts, we explored additional research questions to better understand data needs, current practices, and potential equity-related policies and outcomes.

WORKSHOP OVERVIEW

We held six three-hour workshops in total, with each cohort (i.e., CBOs/advocates and utilities/program administrators) attending three workshops. The three workshops focused on (1) envisioning a more equitable clean energy future, (2) data barriers and leverage points, and (3) metrics prioritization for scorecards. We conducted preworkshop surveys before each workshop to engage participants and gather information to inform the workshop design and activities. After each workshop, we shared a summary of key takeaways with participants to inform the next workshop's development. We held each of the workshops with CBOs and advocates first, then used the priorities that emerged to frame each of the parallel workshops with utilities and program administrators.

The following graphic shows the timeline for the three workshops:

Participants

We convened two parallel stakeholder engagement groups for our workshops: one of CBOs and advocates, and another of utilities and energy efficiency program implementers.[15] We invited approximately 20 participants/organizations for each stakeholder group. We chose to engage with two separate cohorts so that we could first meet with CBOs and advocates to center their needs and priorities in our subsequent conversations with utilities and program managers. We were also able to explore the barriers that each group faces in collecting, reporting on, and holding themselves accountable to equity data. **Appendix A1 includes a list of workshop participants**.[16]

We invited CBOs and advocates based on three factors: geography, intentional racial and socio-economic diversity, and group expertise. We also sought to invite organizations focused on various topics related to energy efficiency work, such as health, transportation, affordable housing, environmental protection, and workforce development.

We invited utilities and statewide program implementers based on geographic diversity, utility ownership type (i.e., investor-owned utilities, municipal utilities, cooperative utilities, and third-party implementers), and fuel type (i.e., electric, gas, and dual fuel).

Workshop Objectives

We designed the three workshops to follow the diverging, emerging, converging process and support creative problem-solving.[17] The first workshop focused on *diverging*, and we explored broad visions for an equitable energy future. The second workshop focused on *emerging*. In it, we dug into themes from the first workshop to identify patterns and to leverage points and differing perspectives on collecting equity-related data and holding decision makers accountable to equity commitments. The final workshop focused on *converging* and on prioritizing the most promising metrics for inclusion in the scorecards. Table 2 shows each workshop's objectives.

[15] We provided stipends of $1,500 to each CBO to compensate for their time and expertise across their workshop participation and for providing additional feedback throughout the process.

[16] Table A1 in Appendix A includes only participants who provided their consent for us to list them in this report.

[17] To learn more about divergent and convergent thinking, see professional.dce.harvard.edu/blog/divergent-vs-convergent-thinking-how-to-strike-a-balance.

Table 2. Workshop objectives

	Workshop #1 objectives: Envisioning an equitable system	Workshop #2 objectives: Data barriers and leverage points	Workshop #3 objectives: Metrics prioritization
CBO and advocate workshop	• Provide an overview of the project scope, purpose, and vision. • Share participant visions for a more equitable energy system. • Explore procedural, distributional, and structural dimensions of equity. • Surface ideas for what we can measure to hold policymakers and utilities accountable to the vision we create.	• Share insights and major themes around equity metrics from the first workshop. • Explore how participants will use different equity-focused metrics to advance their advocacy and policy work. • Identify barriers to and leverage points for equity data collection. • Produce a list of metrics/data to incorporate into scorecards for prioritization in the final workshop.	• Identify ways that ACEEE's scorecards and other partner efforts can collaborate to advance our visions for an equitable energy system. • Prioritize and elicit agreement and disagreement regarding metrics for inclusion in ACEEE scorecards. • Discuss how ACEEE can be held accountable to this process.
Utility and implementer workshop	• Provide an overview of the project scope, purpose, and vision. • Explore procedural, distributional, and structural equity dimensions, and how that relates to utilities' definitions of equity for their portfolios. • Share and reflect on how CBO/advocate visions for a more equitable energy system can inform how utilities measure success. • Surface ideas for what utilities would like to be able to measure to hold themselves accountable to equity outcomes, and what their customers and stakeholders are asking them to measure.	• Share insights and major themes around equity metrics from the first workshop. • Explore how participants will use different equity-focused metrics to advance their organization's goals. • Identify barriers to and leverage points that can enable equity data collection. • Produce a list of metrics/data to incorporate into each scorecard for prioritization in the third workshop.	• Identify ways that ACEEE scorecards and other partner efforts can collaborate to advance our visions for an equitable energy system. • Prioritize and elicit agreement and disagreement regarding metrics for inclusion in ACEEE scorecards. • Discuss how ACEEE can be held accountable to this process.

Additional Research Questions

In addition to holding workshops to narrow down next steps on equity metrics, we also explored the following complementary research questions:

- To what extent are utilities tracking geographic participation, diversity of their workforce, and social demographics of customers and program participants?

- How are states and utilities conducting community engagement and stakeholder processes around state and utility planning?
- What measures can cities and states take to facilitate equitable energy efficiency evaluation and reporting on energy efficiency efforts?

The next section summarizes the key findings from these research questions.

Research Findings

This section includes key findings from research and additional interviews conducted to answer our research questions on utilities' efforts to track demographic and geographic data, state and utility community engagement practices, and city and state efforts to facilitate equitable energy efficiency evaluation and reporting. We have more detailed findings from these research questions in supplemental memos, which include additional case studies and examples across the different engagement and data access strategies.

State, City, and Utility Community Engagement Strategies

We identified the need for better strategies and accountability measures for procedural equity. We conducted a literature review of available resources, surveyed our utility working groups for feedback on utility engagement processes, reviewed our scorecard data for city and state engagement processes, and interviewed three organizations for more information about intervenor compensation, community codesign processes, and community feedback collection. The goal of this research was to determine current community engagement for states, cities, and utilities. We identified the following five strategies:

- **Short-term advisory groups.** These groups steer the development of a specific plan or program and constitute the most common engagement model used. An example of this is the Equity Advisory Group pilot project convened by the DC Department of Energy and Environment (DOEE) and the Georgetown Climate Center.[18]
- **Long-term advisory or working groups.** These groups bring together program administrators and stakeholders to discuss common issues or provide feedback. Some states and utilities, such as the Hawaii State Energy Office and Puget Sound Energy, have working groups that include representatives from the local community.
- **Decision-making bodies.** Some cities establish bodies of residents who are empowered to make decisions around climate and energy policy. Examples of this

[18] For more information about the DOEE Equity Advisory Group, see pages 12–13 of the following report: www.georgetownclimate.org/files/report/community-engagement-guide_10.05.18_web.pdf.

include Providence's Racial and Environmental Justice Committee and Minneapolis's Green Zones Initiative.[19]

- **Intervenor compensation.** Nine states have established some version of intervenor compensation, i.e., offering financial compensation for advocates to facilitate their participation as intervenors in state-level energy proceedings. Oregon's legislation that enables intervenor compensation explicitly includes environmental justice considerations.[20]
- **Soliciting public feedback.** Most governments and utilities have established mechanisms to solicit or allow for public feedback on activities. However, these feedback processes are often not transparent about how feedback will be used, and they often lack accountability measures.

The following are promising practices that support equitable community engagement. On their own, these practices are necessary but not sufficient to address inequities; combining them can achieve the most inclusive outcomes.

- **Structuring processes to respond to feedback.** Design processes with time and staff capacity, including sufficient budgeting and resources, to respond to the feedback received by participants.
- **Transparency and accountability.** Decision makers should clearly state processes, constraints, or decisions already made at the beginning of engagement processes, as well as how feedback will be used. For example, Detroit's Climate Equity Advisory Council uses a framework called *Hart's Ladder* to determine if processes are informing, asking for input, advising on a decision, sharing decision making, cocreating something new, or delegating creation.[21]
- **CBO and community partnerships.** Establish trusted partnerships that are not transactional (i.e., decision makers taking from community members but providing no direct benefits in return) to encourage more participation in engagement and better feedback.

---

[19] For more information about Providence's Racial and Environmental Justice Committee, see www.rejc401.com. For more information about Minneapolis's Green Zones Initiative, see www2.minneapolismn.gov/government/departments/coordinator/sustainability/policies/green-zones-initiative.

[20] For more information, see Slocum, T. 2021. *FERC Office of Public Participation: A Transformative Opportunity for Public Interest Advocacy: Presentation to WE ACT For Environmental Justice.* Public Citizen. mkus3lurbh3lbztg254fzode-wpengine.netdna-ssl.com/wp-content/uploads/TysonWEACT.pdf.

[21] To learn more about Hart's Ladder of Participation, see organizingengagement.org/models/ladder-of-childrens-participation.

- **Staff training.** Decision-maker staff members who are managing engagement processes can participate in trainings to identify and begin to address systemic racism within decision-making organizations and practices (i.e., stakeholder engagement processes) to prevent harm to communities.
- **Access.** Ensure that community members have access to engagement platforms by reducing barriers (e.g., language access and compensation).
- **Benchmarking and tracking progress.** Decision makers need to continually evaluate their approaches and make improvements. They can do this by collecting demographic data on participants and qualitative feedback on the process.

Through improved metrics in our scorecards, we will begin to collect data and score states, cities, and utilities on their engagement strategies, emphasizing these practices to ensure that equity is centered in community engagement efforts.

Utility Equity Data: Collection and Transparency

We analyzed data collected from several sources: our 2020 *City Scorecard* data request to utilities, a survey to our utility workshop participants, and additional research exploring which types of equity-related data utilities most often collect. We found the following:

- **Most utilities** collect data related to customer addresses; household energy usage; bill payment status, including arrearages; service quality, including frequency and duration of outages and interruptions; and participation in income-qualified programs.
- **Some utilities** combine the above data with census-level income data to deliver targeted demand-side strategies.
- **Few utilities** track metrics related to household race, spoken language, tenure status, energy burdens, energy-related health impacts, and workforce diversity.
- **Very few utilities** track metrics around wealth building in disinvested communities, diversity of leadership within the utility, and representation of disinvested groups in decision-making processes.

In cases where utilities do collect some of the above data, those data are not always transparent and made available to the public or to relevant stakeholders, such as multifamily building owners. A small subset of utilities uses customer demographic data in combination with geographic data to monitor service distribution and identify high-need areas. Utilities

often rely on regional data providers where available, such as CalEnviroScreen in California and Open-NY in New York.[22]

Some utilities and/or program implementers are centering equity through concerted efforts. For example, Energy Trust of Oregon's 2018 Diversity, Equity, and Inclusion Operations Plan lays out 10 key goals and outcomes to advance DEI, including goals to track demographic data on program participation, workforce development, and community engagement.[23] The Sacramento Municipal Utility Department (SMUD) Sustainable Communities Initiative involves a data-driven analysis incorporating data on racial and geographic inclusion, workforce growth, and economic prosperity.[24] In addition, the Massachusetts Program Administrators' 2022–2024 Energy Efficiency Plan includes new equity metrics such as tracking program participation and investment across environmental justice populations, as well as workforce development and community partnerships.[25]

Through improved metrics in our scorecards, we will begin to score utilities and state public utility commissions on their efforts to collect and/or require the collection of equity-focused data for benchmarking and tracking purposes, with an emphasis on making data transparent and accessible.

City and State Measures for Equitable Evaluation and Reporting

Applied Economics Clinic (AEC)—a Massachusetts-based nonprofit consulting group working at the intersections of energy, environment, consumer protection, and equity—supported this project through research on how cities and states can facilitate equitable energy efficiency evaluation and reporting of energy efficiency efforts. To identify recommendations, AEC reviewed the low-income energy efficiency efforts of ACEEE's top-scoring cities and states in their 2020 city and state scorecards. It found that most of ACEEE's top 10 cities and states offer low-income energy efficiency programs, yet most do not provide detailed and publicly available data on program outcomes.

To enhance the ability to evaluate programs for equity-related impacts, AEC recommends three main improvements:

---

[22] To learn more about the CalEnviroScreen tool, see oehha.ca.gov/calenviroscreen. To learn more about the New York Open-NY platform, see data.ny.gov.

[23] To learn more about Energy Trust of Oregon's Diversity, Equity, and Inclusion Operations Plan, see www.energytrust.org/about/explore-energy-trust/diversity-equity-and-inclusion.

[24] To learn more about SMUD's Sustainable Communities Initiative, see www.smud.org/en/Corporate/Landing/Sustainable-Communities.

[25] Learn more about the Massachusetts's 2022–2024 plan at www.mass.gov/info-details/eeac-energy-efficiency-three-year-planning.

- **Mandate disaggregated efficiency program performance reporting** to reveal the distribution of costs and benefits more robustly within and across program communities.
- **Identify, target, and track vulnerable populations** to help ensure that energy efficiency benefits reach the households that need them most.
- **Integrate energy efficiency, climate-focused, and equity-focused planning and reporting** to ensure that climate and equity progress are complimentary, that representation is diverse, that community engagement is robust, and that transparency and accountability are facilitated.

These improvements to efficiency reporting would not only improve the ability of states and cities to evaluate low-income energy efficiency programs for their equity impacts, they would also help to hold states and cities accountable to their equity goals, build historically disinvested communities' capacity both to better access available programs and to engage and advocate for improvements, track program impacts and progress, and advocate for better program design to increase community benefits.

Workshop Findings

The following sections include the key takeaways from the stakeholder workshops, as well as what we learned from our research to support our additional research questions.

WORKSHOP KEY TAKEAWAYS

Workshop 1: Envisioning a More Equitable Clean Energy Future

The first workshop focused on what an equitable energy system could look like in an ideal future. We explored types of metrics that we could measure to track progress toward this future, which was our first attempt to identify potential new metrics for the scorecards.

Following are the main takeaways that emerged from the equity visioning workshops:

- The energy system should be affordable, clean, reliable, representative, accessible, and accountable.
- Language access for clean energy programs and utility resources is crucial.
- Procedural equity is needed in ways that are inclusive, representative, and not tokenizing.
- Utilities and policymakers need to establish baselines in order to track progress on equity-related goals.
- Energy should be a basic right that should be accessible to all regardless of ability to pay, and advocates supported policy that prevents all disconnections.
- State-level and public utility commission policy is necessary to direct utility efforts around equitable policies, programs, data collection, and accountability.

- CBOs and advocates emphasized the importance of energy democracy, with a desire for communities to own their own energy resources outside of investor-owned utility models.

Through the first workshop, we created a list of more than 40 potential metrics across structural, procedural, and distributional categories. The takeaways from this workshop informed our broader thinking about how to best center equity in the clean energy system across ACEEE's work and how equity fits into our scorecards. We continued to build on this initial list of metrics for our second and third workshops.

Workshop 2: Data Barriers and Leverage Points

The second workshop explored how participants will use and benefit from new types of equity-focused metrics to advance their advocacy or organizational goals. We conducted an iceberg-style activity to identify barriers to and leverage points for enabling equity data collection from states, cities, and utilities.[26]

From the CBO and advocate workshop and the utility and program implementer workshop, the following main takeaways on barriers and leverage points emerged:

- The clean energy community can gain leverage for better data collection and accountability toward equity-related goals by changing how we define and measure the success of clean energy programs, moving away from measuring success in terms of energy savings to look at broader success metrics and outcomes (e.g., health impacts, community wealth building).
- More robust demographic data (i.e., race and ethnicity), location data, and workforce data are all needed to understand the equity-related impacts of utility, state, and local clean energy programs.
- Regulators have a key role to play in leveraging data; they can, for example, require and/or standardize rules around data access, data sharing, and utility equity-related goals.
- CBOs and advocates emphasized the need for more equitable representation, both in stakeholder processes and among those making decisions (i.e., government staff, public utility commissions, utility staff).

[26] The iceberg activity is a systems thinking approach to help groups identify deeply set assumptions, societal barriers, and leverage points to influence change. Through this activity, we discussed an energy equity–related event and the patterns, structures, and mental models that influenced that event in order to identify barriers to change and leverage points for changing the event in the future. See here for more information on the iceberg framework: thesystemsthinker.com/connecting-systems-thinking-and-action/.

- CBOs and advocates identified a disconnect between the best practices for equitable policies and outcomes lauded by ACEEE scorecards (and other forms of industry recognition) and the experience of people on the ground.

The barriers and leverage points that emerged through these workshops helped us refine our equity metrics categories for prioritization in the final workshop.

Workshop 3: Metrics Prioritization for Scorecards

The third workshop focused on prioritizing metrics for the scorecards, with the goal of identifying agreement and disagreement among participants regarding which metrics to prioritize. In this section, we describe participant priorities and present other key takeaways from the third workshop, including how ACEEE scorecards can better support partner efforts and what other issues the clean energy community needs to address to move forward on these commitments.

Based on our conversations with support advocates, CBOs, and utilities about what they need to move forward on energy equity, we offer the following key takeaways:

- CBOs emphasized the need for an energy equity–focused collaborative to bring organizations and advocacy groups together to support and grow resources and consolidate and centralize data and tools for equity metrics.
- CBOs identified the need for more research and policy support around disaster preparedness, resilience, and equitable response to climate disasters, focusing on boosting community resilience through access to clean energy.
- CBOs requested more research to understand how decision-maker representation impacts policy and program outcomes.
- Utilities and program implementers emphasized challenges they face in collecting and tracking energy equity–related data at the household level due to issues of accuracy, data privacy, cost, and data access.
- CBOs emphasized the importance of accountability mechanisms and transparency to hold decision makers accountable to their equity-related commitments across policy, programs, and initiatives.

These discussions are informing how ACEEE will continue to work in the energy equity space and how we can make our scorecards more supportive of CBO, advocate, and utility needs.

Proposed Metrics and Prioritization

PROCESS FOR ADDING NEW SCORECARD METRICS

To incorporate new metrics into our scorecards, we developed the following process. First, we brainstorm and surface potential metric topics to prioritize in upcoming data collection efforts (i.e., data requests sent directly to state energy offices, local governments, or utilities). Next, we conduct outreach to states, cities, and/or utilities to determine whether these

entities have data available to score on this metric. If so, we include new questions in our data requests, then review the data provided to create a new scorecard metric. Finally, we create and score the new data in a final metric, often with different thresholds based on the extent of the action, policy, or program (e.g., 2 points max, with options to earn 1.5, 1, 0.5, or 0 points). In some cases, if very few respondents can provide the necessary data, we will not move forward with creating a new metric. In recent years, we have begun including priority metrics even in cases when many decision makers are not yet making progress on those metrics. In all cases, we engage stakeholders throughout the process to receive feedback on proposed metrics, data request questions, and final metrics.

From the themes that emerged in the Leading with Equity workshop discussions, we developed high-level questions that could be incorporated into the state, city, and utility scorecards to score on priority categories. Appendix B contains a list of all metric categories/questions that emerged for prioritization in the final workshop.

PRIORITY METRICS

In the workshops, many CBOs said that new equity-focused metrics should focus on outcomes and accountability, rather than on high-level commitments to equitable policies, programs, and actions. Based on this feedback, we sent a metrics prioritization survey to workshop participants and the broader clean energy community. We also held discussions to identify areas of agreement and disagreement around which metrics to prioritize. The following sections highlight the priority metrics that emerged from the Leading with Equity process for inclusion in future ACEEE scorecards.

Each section focuses on a key metric area and contains a table highlighting the top four highest priority metrics in that area based on CBO rankings. The tables also include the overall metric category, potential data request questions to collect data to score on a new metric, and potential metrics that could be scored related to the metric category. These are all preliminary questions and metrics that will be refined through a robust metric review process for each scorecard. Appendix B has a full list of metrics categories, as well as the data request questions for each metric for the state, city, and utility scorecards.[27]

Procedural Equity

As table 3 shows, CBOs and advocates prioritized four procedural equity categories: creating metrics around program targeting, engagement processes, compensation for engagement, and language access.

[27] We combined metrics related to transgenerational equity into the structural, distributional, and procedural categories for this prioritization exercise.

Table 3. Procedural equity metrics in CBO prioritization order

Cross-cutting metric category	Potential data request questions	Potential metrics to score
Program targeting: State, city, or utility has created and uses a definition of historically disinvested and/or underserved communities to target a percentage (e.g., 40%) of programs and resources to these communities.	• Has the entity defined historically disinvested communities? • What is included in this definition? • How was the definition created (e.g., was it created through a community engagement process)? • What percentage of benefits are targeted to this group?	Points if • States have defined historically disinvested communities • Definition includes key factors determined through consensus (i.e., more than just income) • Community led the creation of the definition
Engagement processes: State, city, or utility has processes in place to ensure equitable access and participation from people from disinvested communities in the state, city, and/or utility decision-making processes.	• What types of engagement processes are in place? What types of policies or programs include engagement processes? • How many people, from what types of backgrounds, and what demographic categories participated in stakeholder engagement processes? • Is there a process to ensure accountability to community/stakeholder feedback (i.e., beyond a check box) with feedback driving and defining outcomes?	Points if • State, city, or utility has an engagement process in place that embeds transparency and accountability • Engagement process is more than just a "check box" and decision maker is accountable to the feedback provided • Engagement process addresses major barriers to participation • Credit received only if state, city, or utility is partnering with a CBO or community leader on the engagement process in which the CBO defines and drives outcomes of the process • State, city, or utility collects and reports on data to improve stakeholder engagement processes
Compensation for engagement: State, city, or utility compensates community members for participation in stakeholder engagement processes.	• What types of incentives do state, city, or utility provide to participants to ensure the process is not extractive?	Points if • Financial compensation or grants are available to support time and effort to participate in

Cross-cutting metric category	Potential data request questions	Potential metrics to score
	• What barriers are in place to accessing these incentives? • How much of the available incentives are accessed annually?	engagement process (e.g., intervenor compensation) • Policies are in place to allow for compensation at the local or state level (e.g., funds available from government agencies)
Language access: Community engagement materials are accessible in the languages spoken across the communities served.	• What government and utility materials are translated into other languages? • Are materials about stakeholder engagement processes translated? • Do engagement meetings, call centers, and other program services have live interpretation services?	Points if • Engagement materials are offered in the top three to five most-spoken languages in a state, city, or utility service territory • Translation/interpretation services are offered at stakeholder engagement meetings

We will prioritize the inclusion of metrics related to these four procedural equity categories in our next city, state, and utility scorecards.

Distributional Equity

As table 4 shows, CBOs and advocates prioritized four distributional equity categories: energy affordability goals, access to existing program resources, energy access, and equitable distribution of benefits.

Table 4. Distributional equity metrics in CBO prioritization order

Cross-cutting metric category	Potential data request questions	Potential metrics to score
Energy affordability goals: The state, city, or utility has set a goal to achieve an energy affordability threshold (i.e., to lower high energy burdens to an agreed upon level, e.g., 6%) and data are tracked and publicly accessible.	• Has the state, city, or utility set an energy affordability target? • Are household energy usage and/or energy burdens tracked geographically? • If so, what is the disproportional impact on low-income and communities of color?	Points if • State, city, or utility has an energy affordability goal in place *and* has taken actions to achieve the goal through policy and programs • State, city, or utility reports on progress toward achieving this goal through transparent data reporting (to support distributional metrics)

Cross-cutting metric category	Potential data request questions	Potential metrics to score
Access to existing program resources: State, city, or utility collects data to understand who historically and currently lacks access to clean energy benefits and investments, and is taking steps to address structural barriers.	• Who receives clean energy investments (e.g., EV infrastructure, mobility access, solar, weatherization, energy efficiency, energy storage) by demographics (e.g., race/ethnicity, immigrant/refugee status, homeowner/renter)? • What percentage of disinvested communities are and are not participating in these programs? • What barriers are in place preventing their participation?	Points if • State, city, or utility is tracking demographics on program participation and putting strategies in place to correct disparities • State, city, or utility conducts participant studies to understand barriers to participation *and* takes action to address these barriers
Disconnections and access to energy: State, city, or utility collects demographic data on who experiences disconnections or shutoffs from energy services, makes this data publicly available while ensuring customer privacy, and takes steps to ensure equitable energy access and prevent disproportionate impacts on disinvested communities.	• Are service disconnections and outages tracked for local communities? • What disconnection prevention strategies or requirements are in place at the state or local level? • How frequent and how long are outages and shutoffs? • Do disconnections and outages disproportionally impact historically disinvested communities? • Are these data publicly available?	Points if • City or state requires disconnection and outage data to be publicly reported • Points allocated based on lowest to highest disconnections • Utility makes disconnection and outage data publicly available • State, city, and/or utility has explored who disproportionally experiences disconnections *and* has created a plan to address disproportional impacts through bill arrearage support and energy efficiency programs
Equitable distribution of benefits: State, city, or utility uses data to make commitments and create accountability structures to ensure that historically disinvested communities receive equitable benefits through policy	• Are there processes in place to ensure that disinvested groups receive benefits at least in proportion to what they have paid into the system? • Has the state, city, or utility aligned with the Justice40	Points if • State, city, or utility has a policy or program in place to ensure that disinvested communities receive equitable benefits • Evaluations exist to show that the state, city, or utility's efforts

Cross-cutting metric category	Potential data request questions	Potential metrics to score
commitments and commensurate investments.	initiative? Is it working to allocate at least 40% of clean energy benefits to historically disinvested communities?	have ensured or are working toward ensuring that disinvested communities receive equitable benefits in proportion to policy commitments (e.g., Justice40)

We are also exploring additional priorities that CBOs raised in the workshops, including metrics around community ownership of clean energy resources, policies and programs to build community wealth, access to financing, low-income program participation in non-low-income and low-income targeted programs, and local workforce development programs. In particular, **CBOs emphasized the importance of policies that build local community wealth** through community ownership of resources, workforce development investments, and wealth-building structural investments in residential and nonresidential buildings in local communities. Additional suggestions of metrics include tracking arrearage and debt accumulation with associated fees, shutoff moratorium protections, and access to model weatherization programs that include utility debt forgiveness.

Structural Equity

As table 5 shows, CBOs prioritized four structural equity categories: consumer protections, data access and transparency, community wealth building, and benchmarks and evaluations.

Table 5. Structural equity metrics in CBO prioritization order

Cross-cutting metric category	Potential data request questions	Potential metrics to score
Consumer protections: Protections are in place to shield customers from loss of energy services, exploitative energy services, and exclusion from the benefits of the clean energy sector.	• Does the state government, city government, or other public advocate have consumer protections in place to protect households from loss of energy services or exclusion from energy sector benefits? • Does the utility have corporate consumer protection policies? • Are barriers in place that prevent households from accessing the consumer protections (i.e., application requirements)? • Does the state or city uphold model consumer protection	Points if • City or state has model consumer protections in place that protect households from loss of energy services or exclusion from the benefits from the energy sector • State, city, or utility has removed barriers to accessing consumer protections

Cross-cutting metric category	Potential data request questions	Potential metrics to score
	policies as indicated by the National Consumer Law Center or other consumer advocates?	
Data access and transparency: Policies are in place that require reporting on demographic data and that include privacy protections, for the purpose of measuring access to, participation in, and benefits from clean energy programs in ways that are transparent and easily accessible.	• Does the state or city require utilities or government entities to report data on demographics or program participants, energy burdens, and/or other disparities? • Are these data not only required to be reported but also easily accessible? • Are these data accurate and reported in real time?	Points if • Equity-focused data reporting requirements are in place • Data are easy to find and easy to access by being readily available on a state, city, or utility website • Data are reported accurately and in a timely fashion for relevant decision making and evaluation
Community wealth building: Decision makers have developed policies and programs that directly build community wealth.	• Are programs in place that close the racial wealth gap (e.g., green mortgages, community-owned solar)? • Are programs in place to build wealth through both residential and commercial/small business investments or through hiring and contracting? • Have these programs been evaluated to measure their impact on local wealth building?	Points if • City or state developed policies and programs with the intention to build local wealth, with policies that build more wealth earning more points • These programs address both residential and nonresidential needs • These programs are evaluated to track their impact on economic well-being
Benchmarks and evaluations: Policies and programs include initial benchmarks and are consistently evaluated on progress toward stated equity-related goals. Policies and programs are on track to achieve those goals.	• Are there consistent benchmarks in place with accountability timelines to track progress toward equity-related goals? • Are program outcomes consistently evaluated against benchmarks to track progress toward equity-related goals? • Are these evaluations publicly available?	Points if • Equity-related goals include both benchmarks and evaluations to track progress toward achieving them • Evaluations are publicly available, transparent, and recent • Evaluations tie distributional equity impacts to accountability measures

Cross-cutting metric category	Potential data request questions	Potential metrics to score
	• Do the evaluations tie distributional equity impacts to accountability metrics to ensure that broader equity-related goals are achieved?	

Additional structural categories to explore include metrics on decision-maker representation and incentives for investment in clean energy resources. During the workshop, CBOs and advocates also discussed the need to measure the administrative burden placed on both customers participating in programs and program implementers. They also felt it was important to explore how decision-maker representation would impact outcomes through further research and data collection.

Accountability, Next Steps, and Lessons Learned

ACCOUNTABILITY AND NEXT STEPS

During the second year of the Leading with Equity Initiative, we are committed to ensuring that CBO priorities are integrated into our upcoming scorecards through a transparent and collaborative process. The previous section includes potential metrics for inclusion in the scorecards, and we will use transparent engagement processes to develop the most impactful and effective metrics for these categories. We are committed to authentic relationship building with CBOs to cocreate a feedback mechanism that supports the continual improvement of our metrics and practices over time. To this end, ACEEE makes the following commitments:[28]

- **Evaluation.** ACEEE will track progress toward its **goal of incorporating equity metrics that align with CBO priorities into its scorecards**. To achieve this commitment, scorecard leads will draft roadmaps indicating planned next steps for adding new equity metrics to their upcoming scorecards and will share this information with workshop participants for feedback.
- **Transparency.** ACEEE will publicly express its commitment, plan, and outcomes related to this goal. We will share these roadmaps publicly and create opportunities for stakeholder and CBO engagement as we draft the data request, score the metrics, and review the final report.

[28] We adapted our accountability statement from the Sierra Club's 2020 *Shared Accountability Guide*, www.sierraclub.org/ready-for-100-toolkit/campaign-roadmap/implementation-and-beyond.

- **Relationships.** ACEEE will continue to build mutually beneficial and supportive relationships with CBOs and historically disinvested communities. We will engage with and listen to CBOs to ensure that our research and technical assistance will support their needs and will support advocacy campaigns where applicable.
- **Improvement.** ACEEE will continue to revise its plans and measures over time to stay on track to achieve its equity metrics–related goal. We recognize that this is a continuous process, and we are committed to revisiting the ACEEE scorecard metrics to ensure that they meet the priorities of historically disinvested communities to move clean energy policy toward a more equitable future.

As a next step, the lead authors of the state, city, and utility scorecards will develop roadmap documents that highlight the current state of equity metrics in each scorecard, as well as the goals we're aiming for in the next edition; priority metrics to add or change in each scorecard to reflect the Leading with Equity feedback; and a timeline and process for designing and incorporating new metrics that includes opportunities for stakeholder engagement, outreach, and feedback. Throughout the process of developing and implementing the new metrics, we will offer CBOs and advocates pathways to provide feedback and input.

We are also committed to working with the broader clean energy community and energy equity metric practitioners to ensure that any CBO priorities not addressed through the upcoming scorecards are addressed through the work of partners in the field. To this end, ACEEE is partnering with the University of Michigan's Energy Equity Project to create a collaborative for the energy equity metrics community to better align projects, goals, and outcomes to address the needs of CBOs and historically disinvested communities.[29]

LESSONS LEARNED

Throughout the Leading with Equity Initiative, we convened CBOs, advocates, utilities, and program administrators through virtual workshops that led to many successes and lessons learned. We facilitated interactive meetings with opportunities for deep discussion, questions, and input, resulting in a list of metrics to inform our next scorecards. Workshop participants indicated that these activities were helpful in facilitating discussion and personal and group learning. After the first workshop, 80% of participants indicated that the workshop was extremely useful or useful, with 20% reporting a neutral experience. For the second and third workshops, more than 90% of participants indicated the workshops were extremely useful or useful, with less than 10% reporting a neutral experience.

[29] The Energy Equity Project aims to create a framework for measuring equity across energy efficiency and clean energy programs among utilities, state regulatory agencies, and other practitioners. To learn more, see energyequityproject.com.

We also encountered barriers and lessons learned. Some participants indicated that holding three-hour virtual workshops made it hard to stay focused and engaged, even with breakouts and interactive activities. We also heard from some participants that the equity framework's dimensions pose accessibility barriers, and that using more accessible language could help ground equity conversations in real-world experiences. Utilities and program implementers expressed the need for more guidance and support for equity data collection. Some participants also indicated that the information about scorecard processes and metrics priorities in the final workshops was hard to follow. To address this feedback, we plan to continue exploring the language ACEEE uses to discuss energy equity and to create more interactive and engaging opportunities for transparent, accessible feedback as we move forward with the creation of new equity-focused metrics.

Overall, while this process was imperfect, we were able to achieve our objectives and are continuing to learn and grow as we create transparent, accessible processes for feedback and collaboration with partners to support our equity-focused research and scorecards. We will continue this work into the next year to ensure that all of our scorecard leaders are also leading on equity.

Appendix A. Workshop Participants

Table A1. Participants in the Leading with Equity Initiative

Community-Based Organization	*Representative*	*Title*
Catalyst Miami	Maya Cruz and Natalia Brown	Climate Justice Program Manager
Cleveland Neighborhood Progress	Divya Sridhar	Manager of Climate Resiliency and Sustainability
HousingNOLA	Andreanecia Morris	Executive Director
GreenRoots MA	John Walkey	Director of Waterfront & Climate Justice Initiatives
PUSH Buffalo	Clarke Glocker	Director of Policy and Strategy
Center for Earth, Energy, and Democracy	Ansha Zaman	Energy Policy Coordinator
Front and Centered	Mariel Thuraisingham	Clean Energy Policy Lead
NAACP	Tia Johnson	Environmental & Climate Justice State Chair of NAACP Wisconsin
Neighbor to Neighbor MA	Andrea Nyamekye	Associate Director
Partnership for Southern Equity	Chandra Farley and Alicia Scott	Just Energy Program Manager
Verde	Oriana Magnera	Energy, Climate, Transportation Program Manager

Advocacy Organization	*Representative*	*Title*
Clean Water Action MA	Paulina Casasola	Climate Justice Organizer
Dream Corps/Green for All	Harry Johnson II	Government Affairs & Policy
GRID Alternatives	Andie Wyatt	Policy Director and Legal Counsel
Stewards of Affordable Housing for the Future	Tawechote Wongbuphanimitr	Senior Associate, Energy and Sustainability
Texas Energy Poverty Research Institute (TEPRI)	Jacquie Moss	Research Fellow
University of Michigan	Justin Schott	Project Manager, Energy Equity Project
Fresh Energy	Ben Passer	Lead Director, Energy Access and Equity
Vote Solar	N/A	N/A
+1 additional advocate		

Utilities and Program Implementers (Organization)	*Representative*	*Title*
Consolidated Edison	Linnea Paton	Project Specialist, Strategy & Planning, Distributed Resources Integration
City of Fort Collins Utilities	Brian Tholl	Energy Services Supervisor
Duke Energy	Tim Duff	General Manager, Regulatory Strategy and Analytics
Efficiency Vermont	Lauren Wentz	Program Manager, Low Income and Multifamily Housing
Energy Outreach CO	Andy Caler	Director, Energy Efficiency Programs
Energy Trust of Oregon	Andy Griguhn, Julianne Thatcher	Data & Business Intelligence Analyst Communications Manager
Eversource MA	Ruth Georges	Supervisor, Equity, Strategic Partnerships and Workforce Development
National Grid	Amy Vavak	Low- and Moderate-Income Customer Strategy Principal, New England
NW Natural	Cecelia Tanaka	Manager, Community Partnerships
NYSERDA	Scott Oliver	Program Manager, Energy Affordability and Equity
Pacific Gas & Electric	Marlene Murphy-Roach	Director, Low-Income Programs and Disadvantaged Communities
PacifiCorp	Jackie Wetzsteon	Environmental Program Manager
Seattle City Light	Jennifer Finnigan	Energy Planning Supervisor, Customer Care & Energy Solutions
SoCal Gas	Darren Hanway, Rodney Davis	Manager, Energy Programs & Strategy Manager, Energy Program Outreach
Tampa Electric Company (TECO)	Mark Roche	Manager, Regulatory Rates
PEPCO	Nathanial Zorach	Senior Energy Efficiency Program Manager
+5 additional utilities and implementers		

Appendix B. Potential Equity Metrics

The following tables contain the full list of potential metrics that workshop participants identified in the first two workshops and then prioritized in the third workshop in the Leading with Equity workshop series. Participants prioritized metrics across procedural, distributional, and structural categories, looking at the *cross-cutting metric category* for prioritization. The tables show the potential ways that these metrics could be incorporated through sample data request questions for decisionmakers for the state, city, and utility scorecards.

We arranged the metrics in alphabetical order within the categories of how difficult they are to score (easy, medium, and hard) based on data availability and scoring complexity. We are open to including new metrics from across all three of these categories in the next scorecard editions.

Table B1. Potential procedural equity–focused questions for inclusion in data requests for each ACEEE scorecard

PROCEDURAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Difficulty to score
Compensation for engagement: What financial and/or other support is provided to compensate community members' participation in decision-making processes?	*Has the state established requirements and processes to provide financial assistance for CBOs participating in PUC regulatory proceedings or other decision-making processes?*	*What financial and/or other support is provided to compensate community members' participation in climate action planning or other decision-making processes?*	*What financial and/or other support is provided to compensate CBOs for participating in PUC rate cases and other regulatory decisions?*	Easy
Language access: Are community engagement processes accessible in the languages spoken across the communities served? Is there existing documentation available	*Are materials about state-funded clean energy programs offered in the most commonly spoken languages in the state?*	*Were community engagement events conducted in languages other than English? Please list these events and the language used to conduct each.*	*Does the utility offer customer services in additional languages (besides English)?* *If so, which languages?*	Easy

PROCEDURAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Difficulty to score
in the most commonly spoken languages within specific geographic regions?			*Has the utility made efforts to engage with non-English speakers in planning, program development, etc.?*	
Community engagement topics: What types of policies and/or programs has the state/city/utility created equitable stakeholder engagement processes around (e.g., building performance requirements, urban heat island mitigation, EV infrastructure)?	*How has the state government created equitable stakeholder engagement processes around the adoption or implementation of a single policy, program, or project (e.g., building performance requirements, statewide climate and energy plans, EV infrastructure deployment)? Please list these and provide supporting documentation.*	*How has your city created equitable stakeholder engagement processes around the adoption or implementation of a single policy, program, or project (e.g., building performance requirements, urban heat island mitigation programs, EV infrastructure projects)? Please list these and provide supporting documentation.*	*Has the utility engaged in any equitable stakeholder engagement processes (town halls, customer focus groups, etc.)?* *If so, what actions has the utility taken as a result of engaging with customers from disinvested groups?*	Medium
Data access and transparency: Are needed data available to measure progress toward equity-related goals (e.g., are data on dollars spent and savings achieved from equity-focused programs made publicly available)?	*Has the state established common metrics to track progress toward equity goals? Are these data publicly available? Please share links to relevant documents.*	*Please share links to all publicly available data that track progress toward equity-related goals.*	*How publicly accessible are key inputs for utility decision-making processes on resource planning? Are documents redacted?* *OR* *Does the utility track progress toward equity-related goals and*	Medium

PROCEDURAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Difficulty to score
			outcomes (LMI customer participation, savings, etc.)? If so, are these data publicly available via a website, regulatory filing, etc.? Please share links to the relevant documents.	
Program accessibility: How many applicants for clean energy programs come from historically disinvested neighborhoods?	*Please share all available program data documenting participation from those living in historically disinvested neighborhoods. How well do the state-funded programs reach disinvested households?*	*Please share all available program data documenting participation from those living in historically disinvested neighborhoods.*	*Has the utility used mapping or other geographic tools to measure participation in clean energy programs across its service territory?* *Are there any processes in place to ensure these programs are reaching disadvantaged communities?*	Medium
Program targeting: Has the state/city/utility decision maker identified and defined historically disinvested communities and/or underserved communities and does it use this definition to target a percentage (e.g., 40%)	*Does the state have a definition for historically disinvested communities, and has the state set policy to specifically meet the needs of these communities?*	*Has your city formally identified its historically disinvested and/or underserved communities? If so, what are these communities?*	*In addition to household income, what other criteria does the utility use to target programs and services to disadvantaged customers and communities?*	Medium

PROCEDURAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Difficulty to score
of programs or resources to these communities?				
Engagement processes: What processes are in place to ensure access and participation in utility/city/state decision-making processes for people from historically disinvested communities? How many people, from what types of backgrounds, and what demographic categories participated in stakeholder engagement processes? Is there a process to ensure accountability to community/stakeholder feedback (i.e., beyond a check box) with feedback driving and defining outcomes?	*What processes are in place to ensure access and participation in state agency decision-making processes (e.g., PUCs, SEOs)? Is compensation available? Who engages and who doesn't?*	*What types of platforms does the city use to engage on each policy? How accessible is information about engagement? What accountability measures are in place for community input to impact final decisions?*	*What types of platforms are used for utilities to engage with stakeholders (e.g., workshops, public comments, working groups)? How accessible is information about engagement opportunities?* *Does the utility facilitate opportunities for community input to program design for offerings that serve those communities?*	Hard

Table B2. Potential distributional equity–focused questions for inclusion in data requests for each ACEEE scorecard

DISTRIBUTIONAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Scoring difficulty
Energy affordability: Has the state/city/utility set an energy affordability goal (i.e., to lower high energy burdens to an agreed upon level, e.g., 6%)? Is household energy usage and/or energy burdens tracked geographically? If so, what is the disproportional impact on low-income or communities of color? Is the goal tracked with publicly accessible data?	*Has the state set an energy burden reduction and/or affordability goal and, if so, has it tracked progress on this goal?*	*Has the city adopted a specific energy affordability goal? If so, please describe the goal and share any data it is using to track progress toward it.*	*Are you tracking customer energy burdens? In what ways do you monitor customer energy costs in relation to household income?*	Easy
Access to existing program resources: Who is receiving clean energy investments (e.g., EV infrastructure, mobility access, solar, weatherization, EE, energy storage) by demographics (e.g., race/ethnicity, immigrant/refugee, homeowner/ renter)? What percentage of these populations are and are	*Has the PUC initiated a proceeding dedicated to ensuring all customers benefit from the clean energy transition? For example, issues addressed may include requirements to include data-driven assessments of impacted communities from building or taking down assets/infrastructure, workforce development, or increasing*	*What is the makeup of city-level investments in distribution infrastructure, and where are these investments prioritized to support community distributed resource planning (i.e., substation infrastructure, broadband, interconnection of facilities)? What MOUs are in place with utilities to support data collection on utility infrastructure?*	*In terms of the utility's investment in clean energy infrastructure, how are these benefits distributed in terms of recipient income/race/citizenship status? Have there been any efforts to ensure that benefits from investments reach disinvested groups?*	Medium

DISTRIBUTIONAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Scoring difficulty
not participating in these programs?	*program participation among low-income and EJ communities.*			
Access to financing: How accessible are financing tools for disinvested communities to access clean energy investments?	*Please share detailed participant qualification criteria for all state-administered or -sponsored clean energy financing programs.*	*Please share detailed participant qualification criteria for all city-administered or -sponsored clean energy financing programs.*	*Do you offer any on-bill financing programs for energy upgrades? If so, what are the qualification criteria to participate?*	Medium
Access for LMI: What percentage of LMI households qualify for programs but do not have access due to deferrals for home quality, credit scores, funding, etc.? What is the service gap?	*How many homes/buildings have received resources and how many need investment? What is the potential for investment? Can this investment achieve statewide climate goals?*	***(For surveyed utilities serving cities)*** *Please share all available data documenting instances of LMI households not being able to participate in energy efficiency programs due to deferrals for home quality, credit scores, or insufficient upfront funding.*	*Has the utility conducted any nonparticipant studies for LMI programs? What is the gap between qualified customers and those who receive benefits?*	Medium
Disconnections and access to energy: Are service disconnections and outages tracked for local communities? How frequent and how long are outages and shutoffs? If tracked, what is the disproportional impact on communities of color or LMI communities?	*Does the state track service outages and disconnections? How frequent and how long are outages and shutoffs, and is there a cost associated with reconnecting? If so, what is the disproportional impact on communities of color or LMI communities?*	***(For surveyed utilities serving cities)*** *Are service disconnections and outages tracked for local communities? How frequent and how long are outages and shutoffs, and is there a cost associated with reconnecting? If so, what is the disproportional*	*Are service disconnections and outages tracked for local communities? How frequent and how long are outages and shutoffs, and is there a cost associated with reconnecting? If so, what is the disproportional impact on communities of color or LMI communities?*	Medium

DISTRIBUTIONAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Scoring difficulty
		impact on communities of color or LMI communities?		
Equitable distribution of benefits: Are there processes to ensure that disinvested groups receive benefits at least in proportion to what they have paid into the system (if not greater)?	*Have any state agencies (including SEOs, regulators) initiated an energy equity study including geospatial analysis of impacts of current health and pollution impacts, levels of participation, and identifying obstacles to engagement?*	*How has your city institutionalized equity accountability measures such that all policy and planning documents undergo structural equity assessments?*	*In delivering programs to customers, what methods do you use to ensure that benefits are reaching customers from disadvantaged groups (e.g., geographic targeting, focus groups, participant surveys, etc.)?*	Medium
Participation for LMI: What percentage of eligible LMI households participate/access program benefits? What is the participation gap?	*Does the state have electrification goals that prioritize low-income customers and their affordability needs, and has the state made progress on this goal?*	*Who is participating in locally funded clean energy programs by demographics and geography?*	*Has the utility conducted any participant studies of clean energy programs?* *Any nonparticipant studies?* *If so, what is the gap between eligible customers and participants?*	Medium
Community ownership: Who owns and profits from clean energy investments? Are certain investments building wealth in local communities or building wealth for corporations? Are	*How have clean energy investments in the state created wealth? Who has most benefited from these economic impacts?*	*Does your city track owners and investors in local clean energy projects? Please share all available data or reports detailing information about these owners and investors.*	*For any utility-owned generation facilities, has the utility developed any profit-sharing or wealth-building agreements (local hiring, etc.) with communities where clean energy developments are sited?*	Medium/ Hard

DISTRIBUTIONAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Scoring difficulty
there community-ownership models in place?				
Energy use: Are there data on energy usage per square foot for LMI households? If so, what is the disproportional impact on communities of color or LMI communities?	*Please share aggregated state-level residential energy use data broken down by building type and geographic location across the state.*	***(For surveyed utilities serving cities)*** *Please share aggregated neighborhood-level residential energy use for the city you serve.* ***(For surveyed cities)*** *Please share any available data your city has compiled to characterize the total square feet of residential buildings.*	*Does the utility track customer energy burdens (i.e., energy spending in relation to household income)?* *If so, are there any efforts to compare energy burdens with other indicators of equity (race, renter status, age, etc.) to deliver targeted services?*	Hard
Health impacts: Are health impacts regarding energy-generation pollution, indoor air quality, pollution burdens, and asthma rates tracked in local communities? If so, what is the disproportional impact on communities of color or LMI communities?	*What does progress toward state climate goals look like? Has the state purchased offsets to achieve climate goals and, if so, have those offsets impacted disinvested communities?*	*Does your city track health equity indicators or metrics? If so, please share all available data or reports.*	*What are the health impacts associated with the utility's fuel generation facilities? What is the occurrence of asthma or other health impacts in the radius of the utility's generation facilities?*	Hard
Procurement: Who is benefiting from hiring and workforce development initiatives, training	*Has the state government conducted a disparity study of its procurement and contracting for state-funded programs and*	*Has your city conducted a disparity study of its procurement*	*Does the utility promote diversity in its own workforce or*	Hard

DISTRIBUTIONAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Scoring difficulty
for contracts, and innovation and R&D investments?	*policies? Please share a link to or copy of the document.*	*and contracting? Please share a link to or copy of the document.*	*its partnerships with third-party implementers?*	
Targeted investments: Are investments such as jobs and community wealth-building resources being focused on communities most impacted by fossil fuel generation? Have funds increased over time and where do funds come from?	*What is the total statewide energy efficiency investment toward low-income households and disinvested communities (through utility, state, health-related, and other sources)?*	*Has your city tracked its clean energy investments designed to provide community wealth-building resources and jobs to local communities most impacted by fossil fuel generation? If so, please share all available data characterizing these projects along with their funding sources and amounts.*	*Has the utility made any efforts to engage with "environmental justice" communities in delivering programs and services? If so, what methods is the utility using to track and report on its engagement?*	Hard
Workforce: What is the diversity of the clean energy workforce? Are clean energy jobs high paying with good benefits? Do these jobs benefit LMI and disinvested communities?	*Has the state conducted an analysis of the diversity, wages, and community benefits from the statewide clean energy workforce?*	*Has your city conducted an analysis of the diversity, wages, and community benefits from local clean energy firms?*	*Has the utility made any efforts to track the diversity of its workforce or that of its partner organizations?*	Hard

Table B3. Potential structural equity–focused questions for inclusion in data requests for each ACEEE scorecard

STRUCTURAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Scoring difficulty
Consumer protections: What protections are in place to protect customers from loss of service, unaffordable energy, etc.?	*Do states have consumer protections in place? If so, do the state's consumer protections protect disinvested communities from exploitation from third-party energy suppliers and/or unaffordable energy?* *What are the criteria to qualify for protection (i.e., health related)? What barriers are in place to receiving protections? How equitable are the consumer protections generally?*	*(For surveyed utilities serving cities) What steps does your company take to protect customers from unexpected high energy bills and disconnections?*	*What steps does your company take to protect customers from unexpected high energy bills and disconnections?*	Easy
Comprehensiveness: How comprehensive are services offered to LMI and disinvested communities (e.g., lighting vs. weatherization)?	*Please list the specific measures or services that your clean energy low-income incentive or financing programs provide or fund for participants.*	*Please list the specific measures or services that your clean energy low-income incentive or financing programs provide or fund for participants.*	*Please list the specific measures or services that your clean energy low-income incentive or financing programs provide or fund for participants.*	Easy
Incentives for clean energy: What types of incentives do the city/state/utility offer to support investment in clean energy?	*What types of tax breaks and incentives are in place at the state level to incentivize clean energy (e.g., solar tax breaks)? What types of tax breaks are in*	*Does the city offer clean energy financial incentives or financing programs (e.g., tax abatements, rebates, loans, PACE) and/or nonfinancial incentives*	*What tax breaks and/or incentives has the utility received to subsidize its operations? How much of those tax breaks go toward utility profits?*	Easy/ Medium

STRUCTURAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Scoring difficulty
	place to support fossil fuel generation?	*(e.g., density bonuses, expedited permitting, permit fee reductions) for low-income households and communities? Please describe the programs and indicate if they are offered by a municipal utility. Please provide a link or other supporting documentation for each. If available, please provide data on the impacts of programs. This could include the budget expended, number of participants, and/or energy savings.*		
Language access: Is program information available in the languages of communities that are historically underserved by programs?	*Please share links to or copies of program information that has been made available in the languages of communities that have been historically underserved.*	*Please share links to or copies of program information that has been made available in the languages of communities that have been historically underserved.*	*Please share links to or copies of program information that has been made available in the languages of communities that have been historically underserved.*	Easy
Benchmarks: Are there consistent benchmarks in place with accountability timelines to track progress toward equity-focused goals? These should	*Have you adopted specific goals, metrics, or protocols to track and/or evaluate how multiple energy, sustainability, or climate action initiatives are affecting*	*Have you adopted specific goals, metrics, or protocols to track and/or evaluate how multiple energy, sustainability, or climate action initiatives are affecting*	*Are there mandates for utilities to achieve equity-related targets? Are there financial repercussions (i.e., penalties or benefits) attached to those targets? Do*	Medium

STRUCTURAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Scoring difficulty
connect distributional equity impacts to accountability metrics to ensure that broader equity-related goals are achieved.	*local disinvested groups? If so, please describe them here and provide a link to or copy of documents or other materials detailing them.*	*local disinvested groups? If so, please describe them here and provide a link to or copy of documents or other materials detailing them.*	*utilities report on standardized data to track progress and accountability?*	
Data access and transparency: Are data on demographics for program participants, energy burdens, and/or energy consumption transparent and easily accessible across clean energy programs, including low-income and multifamily programs? Are these data provided accurately and in real-time?	*What is the geography and demographics of WAP and LIHEAP participants, and where are these programs oversubscribed? Are states combining federal WAP/LIHEAP programs with other funding sources for weatherization and clean energy?*	*Please share all tracked clean energy program participant data characterizing demographics, energy burdens, and/or energy consumption. How often are these data compiled? How are they shared within your city government and with the public?*	*Does the utility track and/or publicize data on clean energy program participation, customer energy burdens, service outages, and/or disconnections? Are these data available to the public? Please share any and all reports the utility has created regarding the metrics above.*	Medium
Evaluation: Are program outcomes consistently evaluated against benchmarks to track progress toward equity and other goals? Do these include accountability measures?	*Are there repercussions for utilities or program admins who fail to achieve equity-related or other targets? Do regulators require standardized data from utilities to track progress and accountability?*	*How are local governments enforcing data collection efforts on housing quality and building performance data?*	*Does the PUC include equity-focused outcomes in its evaluation of the success of utility programs?* *Is utility management evaluated and compensated based on success in achieving equity outcomes?*	Medium

STRUCTURAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Scoring difficulty
Community wealth building: Are there programs in place that close the racial wealth gap, especially for smaller property owners and homeowners (e.g., green mortgages, stormwater mitigation)?	*How many projects are owned by local communities rather than by government or for-profit entities (e.g., community-owned, co-op energy projects)?*	*What policies does the city have in place to prevent negative affordability outcomes from its clean energy programs?*	*What is the proportion of utility profits to customer debt for each utility? How much are some utilities profiting at the expense of customers/communities?* *How do utility profits compare to the wealth build in local communities through utility investments?*	Hard
Decision-maker representation: What percentage of decision makers (e.g., PUC staff, utility leadership/staff, state and local policymakers) are from communities of color or from historically disinvested communities?	*What percentage of decision makers (among PUC and SEO staff) are from communities of color or from historically disinvested communities?*	*Have you created a formal role (e.g., city boards, working groups, or committees) for disinvested community residents and/or the local organizations representing them to participate in decision making that affects the creation or implementation of a local energy, sustainability, or climate action plan? Please describe any formal roles you have created, share a list of the group's members, and provide a link to or copy of supporting documents or other materials.*	*What percentage of decision makers (among utility staff) are from communities of color or from historically disinvested communities?*	Hard

STRUCTURAL EQUITY METRICS Cross-cutting metric category	*State Scorecard* Data request question	*City Scorecard* Data request question	*Utility Scorecard* Data request question	Scoring difficulty
One-stop-shop model: How is the state/city/utility streamlining program offerings and enrollment to make it easier for households to access services?	*How is the state working to streamline program enrollment in its communities? How are cities addressing barriers to participating in programs (e.g., creating a separate program for roof repairs)?*	*How is the city working to streamline program enrollment in its communities? How are cities addressing barriers to participating in programs (e.g., creating a separate program for roof repairs)?*	*What efforts has the utility made to streamline its program delivery process and make it easier for households to access services?*	Hard