

# Strengthening Equity in Energy Efficiency Programs: Case Studies of Two Utilities

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*In this memo, we summarize utilities' energy equity efforts in six key areas considered in [ACEEE's 2023 Utility Energy Efficiency Scorecard](#). We also provide two examples of utilities taking initial actions to advance procedural equity, which is a crucial component of advancing an [equitable energy system](#).*

Among other benefits, utility energy efficiency efforts can help reduce household energy bills and improve energy security.<sup>1</sup> Such efforts, however, often miss opportunities to reach the communities that need those benefits most. Utilities can help reduce burdens for disinvested communities<sup>2</sup> by intentionally designing accessible, effective programs and incorporating equitable practices in their work.

Recognizing this need, ACEEE's *2023 Utility Energy Efficiency Scorecard* [increased its focus on energy equity](#) compared to previous editions. This focus represents a substantial departure from how ACEEE has historically assessed utilities: on the scale of their energy efficiency efforts, without significantly considering the differing impacts on communities. In addition to expanding previous metrics focused on low-income utility programs, the [2023 Scorecard](#) newly assessed utilities on six actions that can support equitable outcomes:

- Engaging community members in program planning and feedback opportunities (page 126)

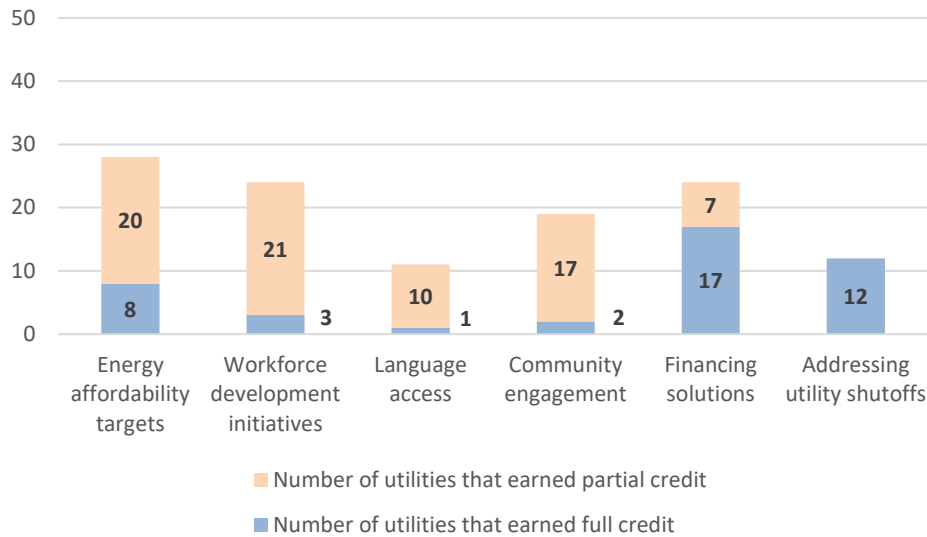
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<sup>1</sup> Energy security refers to a household's ability to meet its energy needs without forgoing other household necessities, which can include potentially harmful strategies such as using a stove to heat their home or falling behind on their bills. For more information about energy security, see [https://www.researchgate.net/publication/351440651\\_Surviving\\_a\\_Shut-Off\\_US\\_Households\\_at\\_Greatest\\_Risk\\_of\\_Utility\\_Disconnections\\_and\\_How\\_They\\_Cope](https://www.researchgate.net/publication/351440651_Surviving_a_Shut-Off_US_Households_at_Greatest_Risk_of_Utility_Disconnections_and_How_They_Cope) and <https://www.aceee.org/blog-post/2022/08/one-third-tenants-behind-utility-bills-highlighting-need-energy-upgrades>.

<sup>2</sup> Disinvested community: We use this term to refer to communities that (1) receive inadequate social and economic services and resources, and (2) experience particularly acute consequences or impacts from policy decisions due to historic marginalization. These communities also often face high barriers to participation in decision-making processes. Communities of color and Indigenous communities, low-income communities, and immigrant communities are among some of the groups that are more likely to be disinvested. For more details, see: Dewey, A., and E. Runge. 2023. *ACEEE's Leading with Equity Initiative: Year Two Recap and Next Steps*. Washington, DC: ACEEE; <https://www.aceee.org/memo/2023/04/aceees-leading-equity-initiative-year-two-recap-and-next-steps>.

- Setting and tracking energy affordability goals for reducing energy burdens (page 130)
- Facilitating financing solutions to help customers pay for energy efficiency upgrades and energy bills (page 132)
- Reducing language barriers to participating in energy efficiency programs (page 134)
- Supporting workforce development, with a focus on creating equitable access to energy efficiency job opportunities (page 138)
- Directing energy efficiency opportunities to customers who are at risk of utility shutoffs (page 142)

On average, utilities received only one quarter of the possible points for equity-related practices in the *Scorecard*, indicating that many utilities are not taking significant action to serve disinvested communities and advance equity.<sup>3</sup> Most utilities particularly need to improve their language access measures and community engagement. As figure 1 shows, of the 53 utilities scored, only one received full credit for language access, while 10 received partial credit. For community engagement, only two utilities received full credit and 17 received partial credit.



**Figure 1. Number of utilities that received full or partial points for equity-related metrics in the Utility Scorecard, which scored 53 utilities. The metric on addressing utility shutoffs did not offer partial credit. Source: Specian et al. 2023.**

<sup>3</sup> Specian, M., W. Berg, S. Subramanian, and K. Campbell. 2023. *2023 Utility Energy Efficiency Scorecard*. Washington, DC: ACEEE. [aceee.org/research-report/U2304](https://www.aceee.org/research-report/U2304)

Below, we profile two initiatives that illustrate replicable approaches to language accessibility and community engagement. Utilities can use these case studies and [other recommendations in ACEEE’s Leading with Equity initiative](#) to identify actions they can take to advance equitable outcomes.

## Improving Language Access in Utility Programs

Language accessibility is critical to ensuring that all households can access energy program benefits, contribute to program design, and share feedback without language-related barriers. Utilities can improve language access in several ways, including by taking an evidence-based approach to providing materials in languages other than English that are spoken in the community, reducing energy industry jargon in materials, and translating written and spoken resources into multiple languages.<sup>4</sup> Utilities can also collaborate with community members and community-based organizations (CBOs)—and compensate them for their time—to more accurately understand community needs and develop metrics to track language accessibility.

### CASE STUDY: MASSACHUSETTS’S LANGUAGE ACCESS PLAN

[A study](#) analyzing nonparticipants in Massachusetts energy programs showed that limited-English-speaking households participate at lower levels than English-speaking households. Providing materials in languages commonly spoken in a utility’s service area can help customers better access program offerings. To facilitate this, Mass Save—a collaborative of Massachusetts’ energy efficiency service providers—committed to adopting and implementing a formal Language Access Plan in its three-year energy efficiency plan.<sup>5</sup> CBOs and customers who primarily speak languages other than English will provide input, identifying barriers and solutions to accessing program resources to inform the Language Access Plan’s development. The plan will primarily focus on improving access to utility services in Spanish, Portuguese, and Mandarin, which (after English) are the languages spoken most often in the state. Selected program materials will be translated into these four languages. Centralized program websites and call centers will be available in English, Spanish, and Portuguese. The access plan will also include workforce development efforts to hire and train multilingual employees. After the plan’s adoption, research will be needed to assess its impacts.

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<sup>4</sup> For more resources focused on language accessibility, see Racial Equity Tool’s resources for language justice. <https://www.racialequitytools.org/resources/plan/issues/language-justice>

<sup>5</sup> Mass Save. 2021. “Three-Year Plan 2022–2024.” <https://ma-eeac.org/wp-content/uploads/Exhibit-1-Three-Year-Plan-2022-2024-11-1-21-w-App-1.pdf>

## Engaging Communities in Utility Program Design and Implementation

Customers and community members living in a utility’s service territory have valuable expertise on how energy efficiency programs can effectively meet their needs. Thoroughly engaging community members requires providing accessible feedback mechanisms, transparently integrating community feedback into energy efficiency programs, and developing strong collaborative relationships with community members in planning and decision making. By prioritizing inclusive and accessible community engagement, utilities can better meet the needs of their communities.<sup>6</sup>

### CASE STUDY: PORTLAND GENERAL ELECTRIC

Portland General Electric has begun implementing strategic community engagement plans to “co-develop solutions with customers and communities that provide transparency, direct community benefits and access to clean energy.”<sup>7</sup> Between 2021 and 2022, PGE hosted more than 20 workshops for various audiences, including technical experts and community members, to inform its community engagement practices.<sup>7</sup> PGE hosts a Community Benefits and Impacts Advisory Group (CBIAG) that was launched in 2023 and advises the utility on issues related to equity and justice such as inclusive contracting, energy burden, and distribution infrastructure.<sup>8</sup> CBIAG members are compensated for their time and any travel costs. To track outcomes, PGE uses the Government Alliance on Race and Equity’s Results-Based Accountability (RBA) tool<sup>9</sup> to measure the results of their engagement processes.<sup>7</sup> Because PGE’s community engagement plan is still in early implementation stages, results from the CBIAG and RBA are not yet available.

PGE is working to institutionalize community engagement practices across the company by creating full-time staff positions focused on community engagement, educating staff, and

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<sup>6</sup> For additional information on community engagement, see Facilitating Power’s *Spectrum of Community Engagement to Ownership*. <https://movementstrategy.org/wp-content/uploads/2021/08/The-Spectrum-of-Community-Engagement-to-Ownership.pdf>

<sup>7</sup> Portland General Electric Company. 2022. “UM 2225 Investigation into Clean Energy Plans; Draft Clean Energy Plan (CEP) Engagement Strategy from Portland General Electric Company.” <https://edocs.puc.state.or.us/efdocs/HAH/um2225hah175022.pdf>

<sup>8</sup> Portland General Electric Company. 2022. *2022 Environmental, Social, & Governance Report*. [https://assets.ctfassets.net/416ywc1laqmd/6DyinUJ9dQKq7ZnpXEbMel/5d9c2cf8013e5d9c8f84a6a555498f7a/103122\\_PGE\\_2022ESG\\_R23b.pdf](https://assets.ctfassets.net/416ywc1laqmd/6DyinUJ9dQKq7ZnpXEbMel/5d9c2cf8013e5d9c8f84a6a555498f7a/103122_PGE_2022ESG_R23b.pdf)

<sup>9</sup> Government Alliance on Race and Equity. 2017. *Racial Equity: Getting to Results*. [https://www.racialequityalliance.org/wp-content/uploads/2017/09/GARE\\_GettingtoEquity\\_July2017\\_PUBLISH.pdf](https://www.racialequityalliance.org/wp-content/uploads/2017/09/GARE_GettingtoEquity_July2017_PUBLISH.pdf)

investing in workforce development. For example, PGE dedicates staff for engagement efforts, such as community outreach managers to help underrepresented communities access demand response programs in neighborhoods with pilots for PGE's Smart Grid Test Bed programs.<sup>10</sup> PGE also has a long-term strategic plan for engaging with Indigenous Peoples in its service area.<sup>11</sup> This plan includes a full-time staff tribal liaison to help lead the company's efforts to engage appropriately and respectfully with Indigenous communities. PGE's work to take a more equitable and robust approach to community engagement provides several models that other utilities can consider.

## Progressing to a More Equitable Utility Energy System

Utilities can learn from their peers who have taken action to center disinvested communities in their program design and to steer their programs' benefits to those who need them most. To learn more about how utilities scored across all equity-related metrics, see the [2023 Utility Energy Efficiency Scorecard](#). You can also read ACEEE's reports on [equitable energy efficiency programs](#) and [equity in Energy Efficiency Resource Standards](#) to learn more about equitable approaches in energy efficiency programs. Contact Emma Runge ([erunge@aceee.org](mailto:erunge@aceee.org)) or Amanda Dewey ([adewey@aceee.org](mailto:adewey@aceee.org)) with any questions.

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<sup>10</sup> Portland General Electric Company. "Diversity, Equity, and Inclusion." <https://portlandgeneral.com/about/who-we-are/diversity-equity-and-inclusion>

<sup>11</sup> Portland General Electric Company. "Strategic Tribal Engagement Plan." [https://assets.ctfassets.net/416ywc1laqmd/4y5tkLGXKcYkVAcuwNqHXq/4192a3b5ec98ee93ab71103b42cae8c5/RES-Strategic\\_Tribal\\_Engagement\\_Plan.pdf](https://assets.ctfassets.net/416ywc1laqmd/4y5tkLGXKcYkVAcuwNqHXq/4192a3b5ec98ee93ab71103b42cae8c5/RES-Strategic_Tribal_Engagement_Plan.pdf)