

# ACEEE's Leading with Equity Initiative: Year Two Recap and Next Steps

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ACEEE's Leading with Equity initiative convenes community-based organizations and advocates to develop a shared vision for equitable decarbonization and works to ensure that ACEEE's research and policy efforts help realize that vision. This memorandum summarizes the workshops, findings, and lessons learned from the second year of the initiative, 2022.

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## Key Terms

**Disinvested community:** We use this term to refer to communities that (1) receive inadequate social and economic services and resources and (2) experience consequences or impacts from policy decisions more acutely 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 some groups that are more likely to be disinvested. Other terms that are commonly used to refer to communities experiencing similar dynamics include marginalized communities, environmental justice communities, and disadvantaged communities. These terms are often used differently in different settings, and no one term is appropriate for all communities. We choose to use a single term for clarity in this memo, but decision makers should use the terminology that is preferred by the communities they serve.

**Distributional equity:** Distributional equity is achieved when clean energy “programs and policies result in fair distributions of benefits and burdens across all segments of a community, prioritizing those with highest need” (Park 2014, 3), including the benefits and burdens of energy generation and consumption.

**Energy equity:** “Energy equity recognizes the historical and cumulative burdens of the energy system borne by frontline and low-income communities and by Black, Brown and Native people in particular. To eliminate these disparities, energy equity centers the voices of frontline communities in energy planning and decision-making and ensures the fair distribution of clean energy benefits and ownership.” (Energy Equity Project 2022, 9)

**Frontline community:** Frontline communities are defined as “those most impacted by multiple and cumulative sources of pollution and climate impacts due to proximity to toxic factories, fossil fuel refineries, neighborhood oil drilling, freeways, and the like, often without access to clean drinking water or public investment.” (Just Solutions Collective 2022 )

**Procedural equity:** Procedural equity is achieved when decision makers create “inclusive, accessible, authentic engagement and representation in processes to develop or implement sustainability programs and policies,” including in clean energy programs (Park 2014, 3).

**Structural equity:** Structural equity is achieved when decision makers act “with a recognition of the historical, cultural, and institutional dynamics and structures that have routinely advantaged privileged groups in society and resulted in a chronic, cumulative disadvantage for subordinated groups” (Park 2014, 3). For example, decision makers can recognize the ways that structural dynamics have prevented the accumulation of wealth in certain communities and establish policies and processes to address the disparity.

**Transgenerational equity:** Transgenerational equity is achieved when decision makers “consider generational impacts” and ensure decisions “don’t result in unfair burdens on future generations” (Park 2014, 3). For example, decision makers can make policy decisions

that lead to equitable outcomes for future generations, using lessons from how past decisions have affected communities over time.

## Initiative Background and Goals

Stakeholders in the energy efficiency sector, including advocates and some governments and utilities, have turned increasing attention to existing inequities and opportunities to advance an equitable energy future. The urgency of these problems was highlighted in 2020 by the start of the COVID-19 pandemic and reckonings with racial justice. Organizations situated on the frontlines of environmental justice have long recognized the ways that communities of color, low-income communities, and other disinvested groups have been burdened most by pollution and the effects of climate change (Martinez, Lewis, and Patterson 2021; Energy Equity Project 2022). These inequities are influenced by past and current patterns of disinvestment that have concentrated these communities in lower quality, inefficient housing. At the same time, communities that would benefit most from energy efficiency investments as a method to increase wellbeing and reduce financial burdens have faced high barriers to participating in traditional energy efficiency programs and decision-making processes. These barriers include factors such as existing health and safety issues in homes that require upfront repairs before installing energy efficiency measures, lack of information and time to access energy efficiency programs, or lack of outreach and compensation for community input in developing energy efficiency programs (Williams-Tack 2021; EDF 2018).

Recognizing this context, ACEEE has turned increasing attention to incorporating racial and social equity into our mission and research, with a focus on centering the expertise of community-based organizations (CBOs) and other experts in energy equity. This report and the initiative itself aim to share the perspectives and opinions of those organizations.

### DEFINING AND CONTEXTUALIZING ENERGY EQUITY

While advocates and researchers have developed many definitions of equity and energy equity, ACEEE adapts a framework by Park and colleagues at the Urban Sustainability Directors Network that highlights four types of equity. All four must be advanced to achieve an equitable energy future. This framework includes: **procedural equity** to create inclusive decision-making processes; **structural equity** to recognize and address how institutions and social structures have created inequities; **distributional equity** to ensure burdens and benefits are distributed between communities fairly; and **transgenerational equity** to consider impacts of decisions on future generations (Park 2014).

Using this framework, we share six indicators of an equitable energy system. Fundamental change is required across all six indicators, as opposed to any one individual factor, before an equitable energy future can be realized. ACEEE uses these indicators to analyze whether policies and programs are moving toward this future.

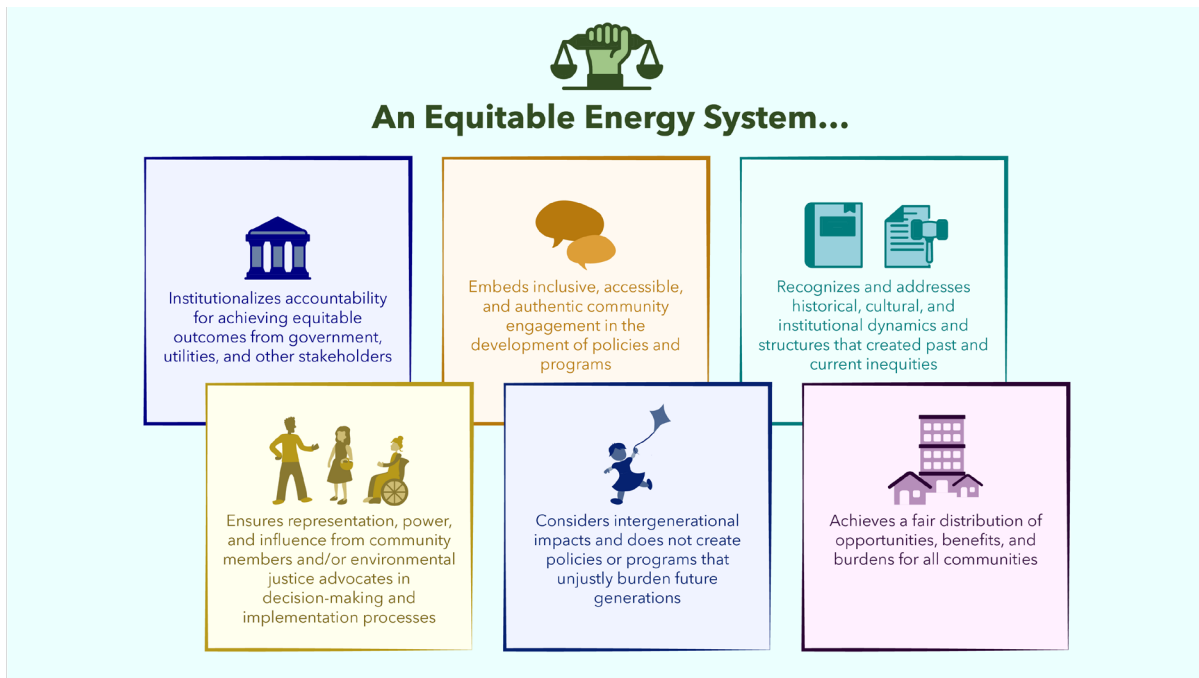


Figure 1. Identifying an equitable energy system

## LEADING WITH EQUITY OVERVIEW, APPROACH, AND GOALS

ACEEE publishes several scorecards, including our [utility-](#), [state-](#), and [city-focused](#) energy efficiency and clean energy scorecards. These are published on a two-to-three-year cycle and evaluate the progress of local governments, state governments, and utilities on clean energy and energy efficiency action. These scorecards provide benchmarks to measure progress over time and incentivize and drive government and utility action. Embedding equity in ACEEE's work requires incorporating equity-related concepts into these scorecards.

Through conversations with community-based organizations (CBOs) and advocates, ACEEE received feedback that while some previous leaders in our scorecards had been lauded for their energy efficiency actions, they had not necessarily been approaching their work in an equitable way. In reflecting on these concerns, we found that our typical scorecard methodology had not sufficiently included considerations around energy equity. We therefore sought to both improve and increase the way that equity-related outcomes were included in the evaluation criteria of the scorecards so that equitable approaches would be embedded in the definition of success.

ACEEE committed to a specified percentage increase in points focused on equity-related actions for each of the three scorecards, in order to set a clear outcome to which ACEEE could be held accountable. The research teams also aimed to strengthen existing scorecard metrics related to equity by improving how existing concepts were measured.

In 2021, the first year of the initiative, ACEEE convened two stakeholder groups. One cohort included CBOs and advocates and the other included utility staff and energy efficiency

program implementers. ACEEE invited participants with the intent to maximize diversity in areas of expertise, geography, and racial and socioeconomic identity. Each cohort met for three workshops of three hours each, with the CBO cohort meeting first and informing the content of the program administrator and utility cohort. CBO participants were compensated for their time during workshops and workshop preparation.

The first workshops of year one of the initiative focused on defining an equitable energy future and brainstorming metrics that could effectively measure city, state, and utility progress toward that future. The second workshops focused on considerations around data required to advance an equitable energy future (like demographic information alongside energy information and program participation patterns), including barriers to collecting data, opportunities to access additional data relevant to energy equity, and ways that data and metrics can be used productively. The final workshops of the first year culminated in prioritizing a list of proposed energy equity actions to include in ACEEE's scorecards. These actions represent strategies for advancing an equitable energy future. A complete review of the process and findings from the initiative's first year can be found in [ACEEE's Leading with Equity Initiative: Key Findings and Next Steps](#) (Drehobl 2021).

## Year Two Workshop Process

In year two of the initiative, we convened one cohort with CBOs and advocates (as opposed to convening a second cohort of utilities and program implementers as we did in the first year). This was consistent with the initiative's goal for CBOs to drive the creation of new metrics. ACEEE convened this cohort of CBO and advocate stakeholders in three, two-hour workshops in 2022.

A workshop in April 2022 focused on ensuring accountability for implementing accurate and robust changes to upcoming scorecards. During the session, authors of the upcoming editions of the utility, state, and city scorecards presented their plans for implementing the priority metrics identified in the first year into the upcoming edition of their scorecards. Workshop participants were asked to discuss and provide feedback on the planned implementation of the identified priorities. The next workshop, hosted in October 2022, focused on using scorecard data to identify recommendations for utilities and states to embed equity in their practices. Participants reviewed example responses by governments, regulators, and utilities sent to ACEEE via the scorecard data requests and used these examples to synthesize their recommendations. The recommendations identified by the workshop participants were combined [into short educational documents](#) that CBOs and ACEEE could use to communicate with decision makers and policymakers. The final workshop of 2022, held in November, focused on identifying actions that support the building of community wealth. While the potential for energy efficiency to support wealth for communities was identified as a priority in the first year of the initiative, the term community wealth is broad and has a variety of potential definitions. ACEEE recognized the need to gather feedback and information in order to specify this connection more fully and make sure it is considered in ACEEE's work. More detailed descriptions of the findings from each workshop are included below.

## Year Two Workshop Findings

### WORKSHOP 1: SCORECARD STRATEGY IMPLEMENTATION

This workshop focused on gathering feedback on the implementation of Leading with Equity priority actions into ACEEE scorecards through participant responses to drafts of new and revised metrics.

This workshop began with an overview of the 2021 Leading with Equity Initiative process and the goals of the initiative. Then, ACEEE staff presented documents outlining the strategy for implementation for each scorecard (which are now published for the [State Scorecard](#), [Utility Scorecard](#), and [City Scorecard](#)). Each strategy included plans for new and improved metrics in the upcoming edition of that scorecard, meeting each scorecard's established target for equity-related points. These scorecards were each at different stages of their research process and therefore were presented in different degrees of detail. The *State Scorecard* was the most advanced in its research process, so the author team shared more detailed scoring plans for the 2022 edition. The *Utility Scorecard* team shared a list of planned metrics, and the *City Scorecard* team, earliest in the research process, shared their planned approach to metrics development over the coming year.

In a large group, participants were asked to share answers to the following questions:

- To what degree do these strategies accurately reflect the recommendations gathered from the Leading with Equity Initiative?
- Do you have any suggested changes to the approaches outlined in these strategies?
- Do the proposed strategies achieve the goals of the initiative? How so/not?

Participants then met in smaller groups to discuss these questions and to provide feedback on ACEEE's accountability. The findings from this workshop focused on broad approaches to improving the scorecards, priority items to add for consideration in scoring, and opportunities to strengthen methodologies.

Participants generally shared that ACEEE incorporated the recommendations from 2021 in an accurate way. They also identified several broad considerations and requests that ACEEE should consider to improve scorecard methodologies in the future. These included:

- Both ACEEE and scored entities need to clearly define equity and target populations or beneficiaries. ACEEE can facilitate this by setting our own definitions of terms like "low-income communities" or "disinvested communities" and scoring based on those definitions.
- ACEEE should continue to add nuance to last year's recommendations, building in more detailed requirements and scoring criteria to improve the way concepts are measured.
- Success in implementing these metrics in the scorecards depends on how terms are defined and how criteria are measured. Participants would like to better

understand details around how ACEEE decides how to allocate points between metrics and topics and what criteria are used to award points for each metric.

- ACEEE should continue to increase the share of points focused on equity. Additionally, ACEEE should include equity-focused prerequisites to earning points for metrics that are not currently explicitly equity-focused. This could look like a government or utility only being eligible for points for a metric if they had approached that action in a way that would achieve more equitable outcomes.

In discussion, participants also identified actions that were not sufficiently reflected in the most recent scorecard changes that should be prioritized in future revisions. Priority items to add to or improve in future scorecards were the following:

- Institutional and staff support should be incorporated in scoring, including if a government or utility is sufficiently resourcing their staff to reach goals around equity.
- Community wealth building should be a higher priority for implementation of all scorecards, and could add particular value to the *Utility Scorecard*.
- Broad concepts could be broken into smaller components in scorecards to make them more clear and specific. For example, community engagement is difficult to evaluate as one action and encompasses many parts.
- ACEEE could incorporate additional attention to renewable energy in addition to energy efficiency.
- ACEEE could include issues around reliability and protection from power outages as well as lawsuits against utilities for health and safety issues.
- Transgenerational equity needs to be included in scorecards, although participants acknowledged that doing so is more difficult than the other dimensions of equity because the timescale for measuring outcomes is much wider.
- ACEEE should work to include more data and metrics around racial identity and refugee and immigrant communities so that inequities related to these communities are better emphasized.

Some pieces of feedback from participants reflected tools, approaches, and leverage points that could help ACEEE staff strengthen the scorecards. Opportunities to strengthen scorecard methodologies included the following:

- ACEEE could look for additional opportunities to use methodology consistent with other rating systems, like LEED rating standards and environmental justice screening tools.
- ACEEE should provide quality checks on data as much as possible, such as by soliciting CBO input on government data request responses.



Participants also shared that ACEEE can be more accountable by offering more formats for giving feedback, partnering with other organizations, conducting surveys of organizations, sharing more details of scorecard research processes, continuously improving scorecards as working documents, and publicly specifying the degree of decision-making power that CBOs have in scorecard outcomes.

## **WORKSHOP 2: DISTILLING RECOMMENDATIONS FOR STATES AND UTILITIES**

This workshop focused on analyzing existing utility and state energy policy and programs to identify specific practices to recommend to regulators, utility staff, policymakers, and state energy offices in order to advance equity in their clean energy efforts. The goal of this workshop was to create and publish a list of priority policy and program actions driven by CBO expertise that could be easily communicated to these audiences.

Participants received a selection of anonymized responses to ACEEE's scorecard data requests from states and utilities describing their policies and programs. We focused on topics most closely aligned with the priorities that emerged from Leading with Equity workshops in 2021, including low-income utility program spending, energy affordability goals set by utilities, state policies to encourage equitable transportation access, community engagement approaches, state programs to address health and safety barriers, utility approaches to targeting and identifying customers, and the creation of state equity task forces.

In small groups, participants identified which aspects of the state or utility's approach were beneficial and which aspects were harmful. They then discussed the responses in a larger group, identifying common recommendations for best practices for decision makers. ACEEE staff compiled the recommended actions [into fact sheets](#) that were published in February 2023.

The following actions were synthesized as priority actions that states and utilities should take and that ACEEE should incentivize:

- Reduce deferrals from low-income energy efficiency programs because of health and safety problems (for example, mold damage, structural issues) by using strategies like dedicating additional funding or collaborating with other programs to address home health and safety problems
- Prioritize reduced pollution and improved safety for frontline communities when planning transportation projects like vehicle electrification and public transit
- Improve language accessibility, with specified approaches around how languages are chosen
- Undertake community engagement with cross-agency collaboration or partnership
- Share results transparently, even if they are not positive or goals are not met

Allow residents to qualify for energy efficiency programs through other means-tested programs (programs with eligibility determined in some fashion by income level of the participant, such as the Supplemental Nutrition Assistance Program (SNAP))

- Take data-driven and granular approaches to energy efficiency policies and programs
- Establish distinct efforts and carveouts for multifamily buildings, which face numerous and specific challenges for decarbonization
- Take action to avoid displacement and gentrification resulting from energy efficiency efforts

Participants also identified some practices that states and utilities should avoid because they can harm communities. These include:

- Insufficient goals and spending requirements for energy efficiency programs focused on disinvested communities. For example, 10% to 20% of spending targeted to disinvested households is not enough, and investment needs to reflect the true needs of communities
- Bare-minimum approaches, such as states only conducting efforts through federal programs like the Low Income Home Energy Assistance Program and Weatherization Assistance Program. ACEEE should not reward bare minimum efforts, but ACEEE can distinguish if a state has an ambitious target
- Inclusion of moderate-income households with low-income households in program parameters without a nuanced approach accounting for their different resources
- Inconsistency in funding year to year that makes efforts vulnerable to cuts and disinvestment

Finally, participants identified a set of recommendations around ACEEE's data request processes and suggested information that ACEEE can request from respondents to ultimately allow for more robust scoring. Data request responses should include clear and detailed information about:

- How the entity is tracking and defining co-benefits in addition to energy savings (for example, the health benefits of energy efficiency)
- Community engagement approaches
- Terms and definitions of groups and communities
- Unique requirements for rural, suburban, and urban transportation (where applicable)
- How governments and utilities are supporting CBOs in addition to services for individuals
- Accountability measures around energy equity

- How funding is distributed between direct services and indirect costs and who pays and who benefits
- Internal metrics and procedures for evaluating the success of policies and programs

### **WORKSHOP 3: COMMUNITY WEALTH BUILDING AND ENERGY EFFICIENCY**

This workshop focused on identifying intersections between energy efficiency and community wealth, broadly defined as strengthening community assets and wellbeing, including but not limited to financial wealth. Throughout the Leading with Equity Initiative, CBOs have highlighted the importance of building community wealth as a priority concept for ACEEE to include in research and scorecards. This was designated a priority action in the first year, but is a broad concept with multiple potential definitions spanning considerations around financial resources, health, wellbeing, and relationships. This made it challenging for ACEEE to translate the concept into a defined scorecard metric, so we undertook an effort to specify the connections between community wealth building and energy efficiency as a first step.

In this workshop, we shared some initial definitions with participants alongside notes from a recent discussion focused on community wealth building hosted at ACEEE's 2022 Summer Study on Energy Efficiency in Buildings. The notes from the discussion served as a starting point for conversation. Through an interactive activity, CBO and advocate participants brainstormed energy efficiency-related activities undertaken by governments and utilities that can support community wealth, broadly defined. These actions were identified individually and then shared in groups to identify areas of agreement and disagreement about what it would look like for community wealth to be included in energy efficiency research and policy. In discussion, participants emphasized that different communities may have different definitions of wealth and communities should be empowered to drive and define outcomes that they define as positive.

This activity resulted in an initial brainstormed list of energy efficiency actions that ACEEE could consider adding to our scorecards and other research to be responsive to the request to prioritize community wealth. The energy efficiency actions identified by workshop participants as potentially supportive of building community wealth are:

- Financial tools and literacy
  - Removal of financial risks and barriers for households investing in clean energy projects
  - Profit sharing of energy projects with residents, communities, and organizations
  - Financial literacy efforts in programs led by or endorsed by CBOs
  - Funding from insurance providers for energy efficiency efforts, recognizing the impact that health, renter's, and homeowner's insurance companies can play in building or reducing wealth
  - Education on energy efficiency measures

- Changes to tiered rate structures that currently include lower rates for higher energy use to more fairly include communities and residents that use less energy or live in smaller homes
- On-bill financing
- Housing
  - Upgrades and renovations that address health and safety problems
  - Comprehensive retrofits of homes
  - Reduced energy burden through utility, city, or state programs
  - Tenants' rights to make home improvements and compensation to tenants for home improvements
  - Collaboration across sectors like health and housing in an intersectional approach
  - Increased property values resulting from more efficient and healthy homes and anti-gentrification and displacement measures that preserve the ability to remain in community
  - Projects requiring pathways to ownership for tenants
- Employment
  - Workforce development and eliminating workforce barriers for disinvested communities
- Other Actions
  - Carveouts that ensure community members own solar installations and other renewable energy resources
  - Infrastructure that enables increased mobility for community members
  - Parameters on projects to ensure community members (especially disinvested communities) are prioritized, centered in the work, and compensated fairly
  - Community input and direction
  - Improved health outcomes through energy efficiency and clean energy
  - Investment and support of communal farming to remove food deserts via energy services for agriculture or from program resources
  - Regulation and legislation to establish consumer protections—such as accessible information, health and safety regulations, and fair pricing and policies—for utility and energy services

Participants then discussed the above list of energy efficiency actions that could build community wealth and identified general considerations for governments, utilities, and researchers. Findings included the following:

- Most of the individual actions discussed as supporting community wealth need to be pursued together to be successful. They do not exist in a vacuum.
- Energy efficiency upgrades have the potential to increase the value of buildings and contribute to gentrification. It is important to develop concrete strategies to prevent displacement in the wake of improvements.
- A key component of community wealth is considering which communities have access to job opportunities and economic opportunities. Therefore, jurisdictions need to specify who benefits from their efforts and how this impacts community wealth,

especially for disinvested communities like communities of color, who face high barriers to building generational wealth.

- Jurisdictions need to consider how immigration status impacts access to jobs and the potential for worker exploitation, and how to best hire from within communities. For example, hiring energy efficiency installers to serve their own communities increases trust and connection.
- Entities can consider coal-impacted communities and target them in their efforts to build community wealth.
- On-bill financing is an important consideration. The responsibility for the costs of improvements then attaches to the property that will be accruing the energy savings, without burdening an individual moving from place to place.

ACEEE will be working to further define and operationalize the concept of community wealth, including the items listed above. Our goals are to enable scorecard authors to include community wealth building concepts in future editions and to allow future research at ACEEE to incorporate community wealth in relation to energy efficiency.

## Accountability and Next Steps

### LESSONS LEARNED

Building on the lessons learned and general findings from the first year of the initiative, ACEEE identified key takeaways from the workshops in 2022 that can be applied both to ACEEE's work and to the energy efficiency sector broadly.

*First, we continued to hear that the energy efficiency sector needs to change how it defines and measures the success of clean energy programs, moving beyond only energy savings to consider broader outcomes related to health and community wellbeing. Utilities, regulators, advocates, researchers, and policymakers can then embed these success measures into their decision-making processes. In addition, organizations need to provide the support and resources necessary to implement the equity-related work to which they commit.*

*Second, participants emphasized the need for more equitable representation and engagement in decision-making processes, both in stakeholder processes and among staff of decision-making bodies, such as government staff, public utility commission staff, and utility staff. Equitable engagement processes and staff representation are necessary to accurately understand and meet the needs of the most disinvested communities. Through these workshops, ACEEE staff and workshop participants moved toward a more detailed understanding of the criteria that should be set for determining if a process is truly equitable, including degrees of decision-making power and proportions of feedback implemented.*

*Third, we consistently heard that it is critical to set and communicate clear goals and definitions as we translate priority actions into methodological details in ACEEE's research. This applies both to asking governments and utilities to be clear about the terms and definitions*

they are using, and to ACEEE's own need to set clear criteria. For example, in our scorecards and other research, we need to use consistent definitions across jurisdictions when scoring to enable clear comparison, as opposed to evaluating actions based on each jurisdiction's definition. For example, this could entail ACEEE including a definition of disinvested communities in questions posed to governments and utilities about how they serve those customers and in final publications. This will ensure that terminology is being used in a consistent way across the scorecards and scoring is comparable and transparent between places that use different definitions. ACEEE should use the feedback and expertise we have gathered from CBOs throughout the initiative when determining which definitions to use. This approach to consistently scoring and defining terms aligns with principles of taking a data-driven approach based on a community's context and needs when evaluating whether or not a government or utility is truly taking an equitable approach.

## ACEEE'S COMMITMENTS AND NEXT STEPS

ACEEE committed to dedicating a percentage of points in upcoming *City*, *State*, and *Utility Scorecard* editions to equity-related actions, substantially increasing the percentage of equity-related points from past editions. The *State Energy Efficiency Scorecard* achieved this target, and the *City* and *Utility Energy Efficiency Scorecards* will be published in the coming months and will meet or exceed their committed targets for increased points for equity-related actions (table 1).

**Table 1. Scorecard timelines and equity-related point targets**

Scorecard	Estimated publication date	Equity-related points in previous edition	Targeted equity-related points in upcoming edition
<i>State Scorecard</i>	December 2022 (published)	4%	20%
<i>Utility Scorecard</i>	Summer 2023	6%	20%
<i>City Scorecard</i>	Early 2024	19%	30%

A consistent finding throughout this initiative is that more robust demographic data, location data, and workforce data are needed across the clean energy sector. ACEEE plans to contribute to this need by using these scorecard improvements to benchmark and measure progress in the sector, providing a source of data to support the actions needed to advance an equitable energy future and encouraging governments and utilities to move toward better data collection and reporting.

The Leading with Equity Initiative will continue in 2023. The priority of the third year will be to implement recommendations in the upcoming *City* and *Utility Scorecards*. This will complete the first cycle of implementation of recommendations into ACEEE scorecards since the start of the Leading with Equity initiative. ACEEE will create processes that hold us

accountable to implementing CBO feedback and meeting the needs of CBO partners. First, each scorecard author team will complete reporting forms detailing which pieces of feedback they did and did not implement in their publications. Second, scorecard authors and Leading with Equity Initiative staff will undertake expanded external review processes for scorecards and compensate CBOs for their review. This process aims to provide fair compensation to CBOs for their time and expertise and more accountability to incorporating their perspectives throughout the drafting of scorecards. Third, staff will focus on publishing companion resources to scorecards to complement the priorities of CBOs and needs of the communities they serve that have been identified through the initiative. For example, CBO and advocate participants in the Leading with Equity Initiative communicated that concise documents showing high-level equity trends from scorecard research, case studies of successful policy or programs, or key recommendations for best practices would be useful resources in their advocacy work.

Overall, the learnings and feedback from this initiative will be a consistent source of information that ACEEE staff will use to continually improve their research methodologies. They will also inform deliverables that are intended to be useful to CBOs. Ultimately, these improvements aim to reflect ACEEE's commitment to equity, embedding equity into our work and moving toward an equitable energy future.

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