

CT EEB

DEI Consultant: 2022 Preliminary Equity Assessment Report

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Goals for Today

Share an overview of the 2022 Equity Assessment

Tie Assessment findings into 2023 DEI workplan goal

Discuss near-term next steps

2022 Preliminary Equity Assessment Report

Assessment Approach

Materials Review: Reviewed 11 documents and reports – Full list of document in Appendix B

Stakeholder Interviews : Interviews 14 Stakeholders. Appendix C. Stakeholder Groups

EEB and Committee Meeting Attendance: Attending EEB , C&I and residential meetings

Gap Analysis: Performed a high-level gap analysis to identify important next steps to achieve E3's goal drawing on the information gathered in materials review and stakeholder feedback.

Equity Benchmarks and Metrics Approach: Provided an approach to developing benchmarks and metrics and outline the key decisions to be made to deliver a unified and agreed-upon measurement framework for C&LM programs.

Industry expertise: Leveraged our experience guiding other states and entities (e.g., New York State, Maine, ComEd) in defining equity, priority populations, and metrics to benchmark progress

About the term "Priority Populations"

Many different words are used to describe communities that may experience disproportionate impacts related to climate change and/or energy service delivery. At both the national and state level, there is no singular term to encompass these communities, and terms have specific meanings in certain contexts. It is challenging to have different, often nuanced definitions – and to align them with company and policy objectives. The future of equitable service will require new forms of collaboration between utilities, communities, stakeholders, and government; coordination around common terminology will be essential in designing initiatives and directing funds toward the end goal of equitably serving all communities.

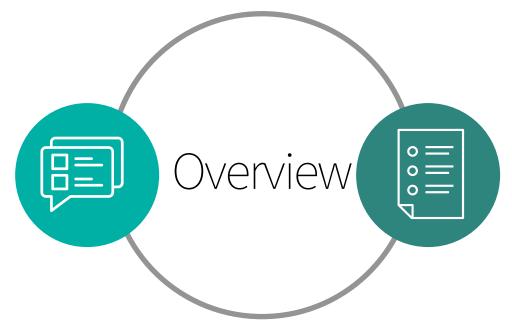
This document broadly references "priority populations" to encompass the myriad of indicators that may result in customers that have been (and may continue to be) marginalized. We acknowledge that other jurisdictions, utilities, communities, and stakeholders may use other terms to describe vulnerable customers and communities.

Gap Analysis

Gap Analysis

The Goal

Identify the potential gaps for understanding, measuring, and pursuing equity within programs. This section provides a summary of our analysis.



What we Found (Cliffnotes Version)

Critical alignment areas are needed to effectively implement and measure equity initiatives:

- 1. Defining who to target as a priority population
- Defining what it means for C&LM programs to be equitable

Gap Analysis: The "Who"



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C&LM program is one initiative within the larger context of the State's efforts to center equity. Consider how equity within energy efficiency programs ties to the broader definitions and strategies being set forth by the State of Connecticut.

Questions to Ask

- Who are we trying to serve by addressing inequities in C&LM programs? Specifically, which households, businesses, and/or communities are to realize more equitable outcomes?
- **How** do we define these populations?
- What data will we use to identify them?

Answers to these questions will serve as the **definition of priority populations**

Gap Analysis: The "What," "How," and "When"

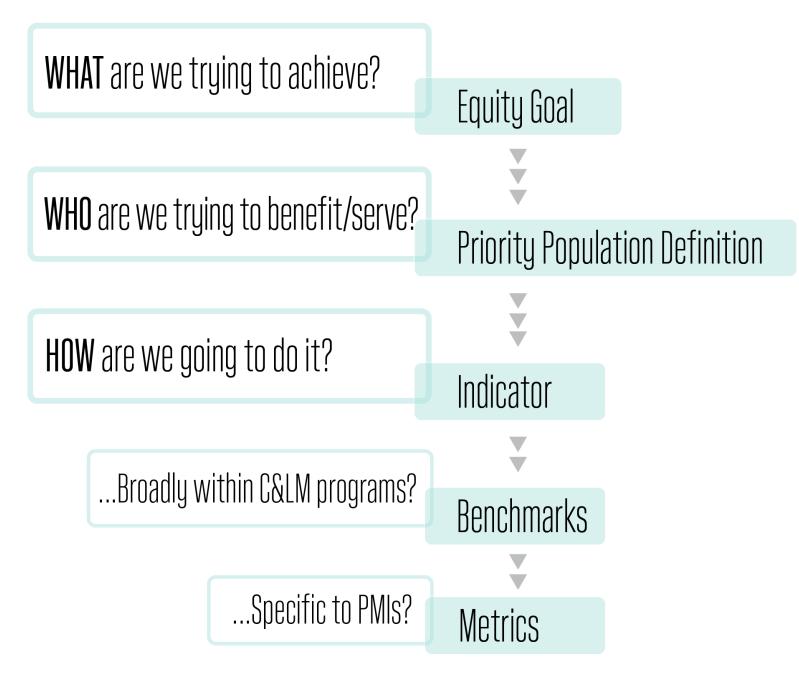
Questions to Ask

- What outcomes are the focus of our equity efforts? What specific benefits can be achieved?
 What specific harms and burdens can be reduced or avoided?
- How can we achieve greater equity?
 Which processes, programs, and services will be held to equity goals?
- *When* do we begin to achieve more equitable outcomes? By what years? In what planning or implementation cycles?

The Answers to These Questions...

- Identify the specific equitable outcomes we aim to achieve.
- Serve as our primary interventions and investments.
- Inform the milestones we will achieve to reach our equity goals.

Combined, the answers to these questions should create a clearly articulated, **unified equity goal** used to create a set of strategies designed to achieve it. Further, the clarity achieved by answering these questions will inform the specific **metrics, benchmarks,** and **indicators** recommended for the C&LM program Goals and Activities



Defining Priority Populations (who)

Methods and Key Finding

Defining Priority Populations (who)

What We Did

Reviewed multiple key sources (on the next three slides) that have define priority population in the state. We also interviewed 14 key stakeholders

What We Found

There are several priority population definitions in use, and there are many units of measuring the "who" in operation. This can cause confusion among stakeholders and make it difficult to track.

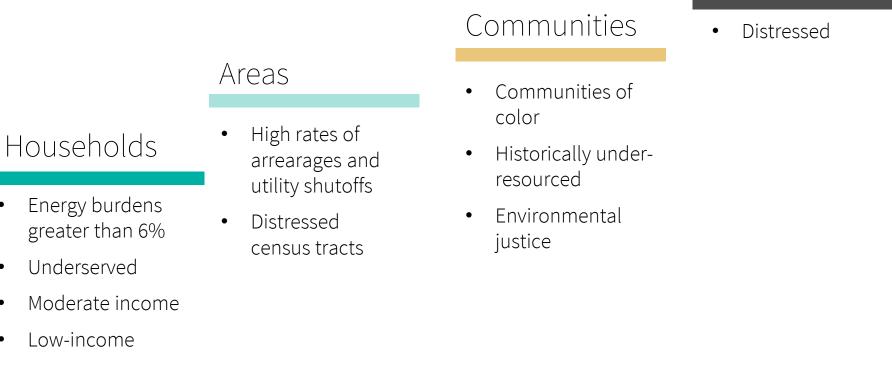
Defining Priority Populations (who)

Priority Populations that Benefit from Equity Focused C&LM Initiatives

Sector	Priority Populations Referenced	Туре
Residential	1 Households with energy burdens greater than 6%	Individual
	2 Communities of color	Geographic
	3 Areas with high rates of arrearages and utility shutoffs	Geographic
	4 Underserved households	Not specified
	5 Historically under-resourced communities	Geographic
	6 Moderate income households	Individual
	7 Low-income households	Geographic
	8 Distressed municipalities	Geographic
	9 Environmental justice communities	Geographic
	10 Distressed census tracts	Geographic
	11 Non-English speaking or limited English proficiency customers	Individual
	12 Customers enrolled in hardship programs	Individual
Business	1 Certified minority-owned, women-owned, and veteran-owned businesses	Individual

CT Definitions of Priority Populations

Definitions across geographic boundaries



in hardship

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Customers

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Non-English

programs

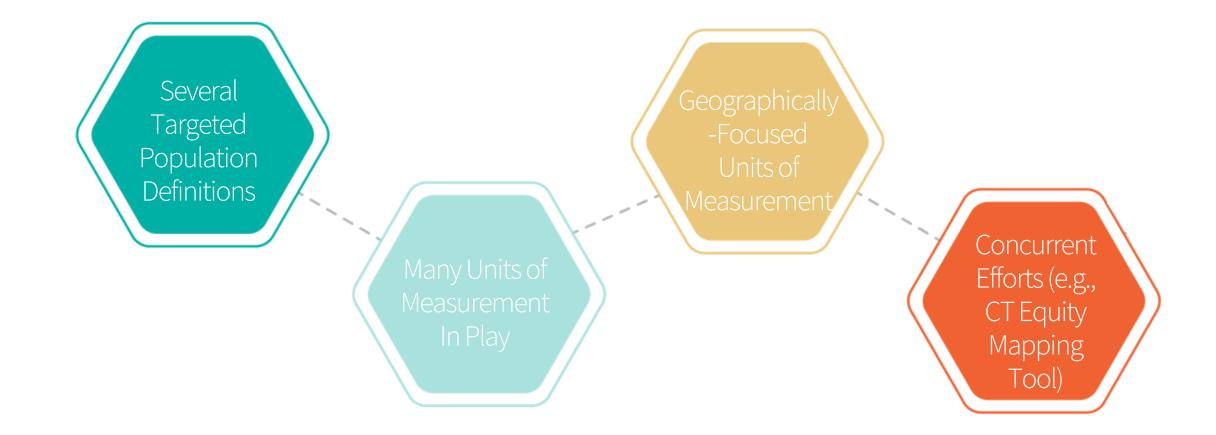
speaking or limited

English proficiency

Customers enrolled

Municipalities

Existing Metrics: Challenges and Considerations



Definitional Considerations

Cited by stakeholders

Theme	Interview Insights
Alignment of Priority Populations within and outside of CT	 C&LM programs should align priority population definitions with statewide efforts and definitions Tension of wanting to make impact <i>now</i> when other efforts are still underway
Criteria used to determine Priority Populations	 Priority populations defined by demographics and income, not proximity to environmental hazards Limitations of census tract-level data for demographics (e.g., race)
Application of Priority Populations in the Business Sector	 Definition and application of priority populations to the business sector. Geographic boundaries may not always be an appropriate way to define target businesses (e.g., large multi-national corporations or national franchises)

Key Takeaways

The most critical component is **establishing a common understanding between stakeholders for how the priority population is defined and what method(s) should be used.**

- Defining priority populations outside of statewide efforts may cause inconsistencies and misalignment with other state programs and services.
 - Defining priority populations too far outside of Justice40 definitions may introduce misalignment with federal investments.

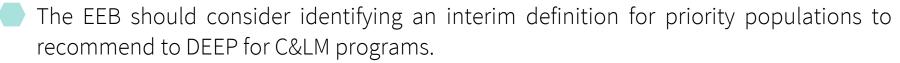
Recommendation

Recommendation 2: Identify a Unified Definition of Priority Populations

Since there are other efforts, such as those of the Governor's Council on Climate Change and the Justice40 Initiative, that are also defining priority populations, the EEB may wish to recommend that DEEP assigns **an interim definition from existing targeted populations in Connecticut, and then coordinate closely with state and federal efforts to identify a more permanent definition for the medium and long-term.**

Considerations

Consideration 1:



Consideration 2:

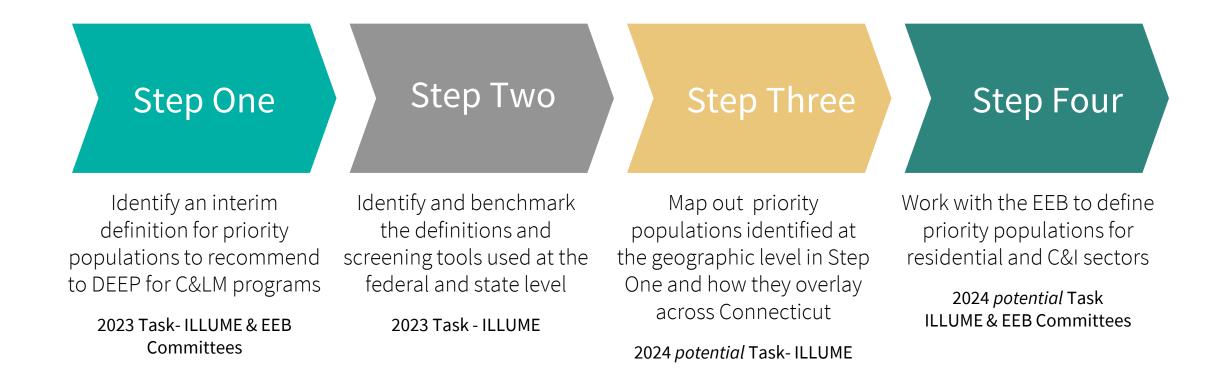
The EEB should consider the value and risks in aligning C&LM programs' priority populations with other efforts underway (e.g., those underway by the Governor's Council on Climate Change or Federal Justice40 definitions).

Consideration 3:

After the items above are addressed, we recommend that the EEB consider identifying how to define and address priority populations for the business sector. If necessary, establish clear priority population definitions by sub-sector.

Next Steps: What to Expect

2023 Work Plan Task 6- Define the "Who:" Target Populations Definition Development



Define "what" is Equitable

Methods and Key Finding

Defining What Equitable Means for C&LM Programs

What We Did

Reviewed four key sources (on the next two slides) that attempt to bring shape around what it means for C&LM programs to be equitable.

What We Found

The definition and goal for equity as implied in the E3 Phase 1 goals, which speak to **distributive and procedural** equity, is not yet enshrined in C&LM policies.

Dimensions of Equity

E3 Core Concepts of Equity



Distributive

Relates to the **distribution of benefits and costs** and calls for directing resources to the most vulnerable communities.



Contextual

Recognizes the legacy of racial and income equality, among other factors, in the development of policy.



Procedural

Relates to **planning processes** and calls for open, accessible planning processes in partnership with low-income communities and communities of color.



Corrective

Recognizes that the most vulnerable communities often lack traditional forms of economic resources or political influence and calls for a process by which communities can **hold institutions accountable**.

Equity Definitions under Consideration

Defining What Equitable Means for C&LM Programs

Source	How Equity Is Defined
(1) 2018 Equitable Distributions Report <i>Distributive</i>	Cost-to-benefit parity for specific priority populations : DEEP must annually evaluate whether small load customers in distressed census tracts have "received investment and services from the C&LM programs and Connecticut Green Bank programs commensurate with the financial contribution of those customers through surcharges on their utility bills.", Census tracts receiving an <i>equal or greater percent of total incentives</i> than that tract's <i>C&LM bill contributions</i> will have achieved " equitable distribution ."
(2) EEB Operating Procedures <i>Distributive</i>	Cost-to-benefit parity geographically and by different classes and sub-classes : The EEB must "review and approve plans proposed by the utility administrators, municipal electric cooperatives, and other parties including reviewing program proposals, new initiatives, budgets, and budget allocations, <i>ensuring both geographic and class and sub-class parity in EEF benefits relative to revenues received when viewed over time</i> ." (Section 1, 1ii)

Equity Definitions under Consideration

Defining What Equitable Means for C&LM Programs

Source How Equity Is Defined

(3) E3 FINAL
 DETERMINATION
 Distributive Energy Efficiency Equity Baseline (E3b) for low-income populations: E3 Goal 3, Action Item
 3.2, proposes an additional measure of equity to be included in the annual Equitable
 Distribution Reports, with a goal of maintaining the baseline. This measure is based on the
 University of Michigan's Energy Efficiency Equity baseline (E3b) metric, which estimates
 equitable utility investment by looking at the proportion of low-income population within a
 utility service territory compared to the percent of low-income investment in the energy
 efficiency residential portfolio.

(4) 2022 – 2024 C&LM Plan

Procedural

C&LM activities to address equity: The 2022 – 2024 plan provides high level activities and action items to illustrate how equity will be addressed within programs, primarily through improvements to *procedural equity*. While the plan does not definitively state what it means to be equitable, the Energy Efficiency Equity baseline (see No. 3 above) is referenced.

Equity Definitions under Consideration

Defining What Equitable Means for C&LM Programs

E3 Phase 1 Goal	Core Concept Of Equity
Goal 1: Embed greater equity in decision- making	Procedural
Goal 2: Enhance tracking of equity indicators in C&LM programs	Distributive
Goal 3: Develop metrics and goals to assess equitable distribution of energy efficiency funding	Distributive
Goal 4: Improve program participation and impacts among moderate-income customers	Distributive, Procedural
Goal 5: Streamline the eligibility process for low-income programs	Procedural
Goal 6: Improve outreach to high-need or high-impact populations	Procedural
Goal 7: Address health and safety barriers to low-income weatherization access	Contextual
Goal 8: Address and remove barriers to participation among renters	Procedural

Equity Considerations Raised by Stakeholders

Consideration Stakeholder Insights

"In the **past parity has been the way that the energy efficiency board has directed (the program) to look at it and there is a major shift now** where we're looking at things, you know, differently from that perspective."

"Traditionally we've really tried to **stay very close to the specific language that drives our mission** without kind of looking beyond those parameters... staying in our lane."

Including Definitions of Equity that Exceed Parity

Area For

One stakeholder noted that the question of what equity means and how this will work in practice is outstanding, suggesting that it's likely not equitable (in the context of E3) for people to benefit solely based on how much they pay in bill contributions, when vulnerable communities may have not been reached by programs and have gone several years without benefit.

One stakeholder noted that the question of equity goes beyond funding and brings up questions related to how you work towards outcomes. For example, is an infrastructure in place to support equity efforts (i.e., contractor network, the right outreach efforts, etc.)? What is the desired result? When do you want it by?

Aligning with Other State Policies "(There are) other state policies that that DEEP is trying to accomplish here, and they have amended the law a couple times and I think to some degree. **One of the lines is consistency with other state policies, but there's not a clear mandate** for (programs) to go out and have the clear objective of advancing those policies.

Key Takeaway:

Most actors are clear on the current parity-focused definition of equity. In addition, stakeholders also cited a need to determine how to align C&LM's definition and goal for equity better with the vision of E3

What Are the Challenges?

Current State: Misalignment

Consequence

Longer-term Implications

Current definitions equity — including the primary definition of cost-benefit parity — are not aligned with E3's vision and goals.

If this misalignment is not resolved, the intended outcomes of E3 will be more challenging to achieve.

As a result, program administrators may have—or will likely set—different targets or goals across and within programs.

As Connecticut further explores other forms of equity in future E3 proceedings, the gap between parity and E3's vision will continue to grow wider.

Equity Goal Development

What Others Are Doing

"State agencies, authorities and entities, in consultation with the environmental justice working group and the climate action council, shall, to the extent practicable, invest or direct available and relevant programmatic resources in a manner designed to achieve a goal for *disadvantaged communities* (who) to receive forty percent of overall benefits of spending (what) on clean energy and energy efficiency programs, projects, or *investments* (how) in the *areas of housing*, *workforce* development, pollution reduction, low-income energy assistance, energy, transportation, and economic development (what)...

Within 120 days of the date of this order, the Chair of the Council on Environmental Quality, the Director of the Office of Management and Budget, and the National Climate Advisor, in consultation with the Advisory Council, shall jointly publish recommendations on how certain Federal investments might be made toward a goal that 40 percent of the overall benefits (what) flow to disadvantaged *communities* (who). The recommendations shall focus on investments in the *areas of 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 (how).

– New York CLCPA

- Justice 40

Key Takeaways

Connecticut has or has had multiple operating definitions of what it means to serve its constituents equitably. Current primary focus **on equity within C&LM programs is defined by ensuring cost-to-benefit parity** within customer sectors.

But E3 implies a meaning and goal for equity that goes beyond parity as it is currently defined.

- E3 point to improvements in C&LM program delivery to provide additional access and investment in low-income and other targeted populations, which will increase the level of distributive and procedural equity.
 - Mitigating and eliminating barriers to low- and moderate-income customer participation
 - Driving **accessible and transparent processes** to incorporate residents' priorities and lived experiences into program design and decision-making
 - Ensuring equitable access to the benefits of energy efficiency

Recommendation

Recommendation 3: Formalize a Definition of, and Goal For, Equity in C&LM Programs that Aligns with E3's Vision and Goals. in particular communities and the investment that may be needed to achieve contextual equity.

As C&LM programs continue to apply an equity lens to their policies and offerings, having a unified meaning in place for what is equitable will help to align efforts and ensure they are mutually supportive. At this time, and during E3 Phase 1, this definition may be largely focused on the distributive concept of equity, with other core concepts being addressed later.

Considerations

Consideration 1:



The EEB should consider setting an equity goal to recommend to DEEP, in collaboration with Stakeholders.

Consideration 2:

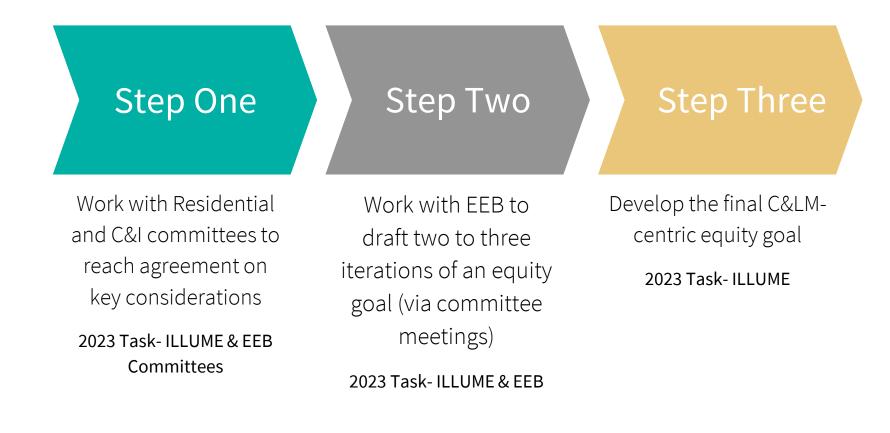
Once consideration #1 is addressed, the EEB may wish to explore how (and if) goals for other forms of equity—such as corrective and contextual—may be achieved within C&LM programs.

Consideration 3:

The definition and goal for equity as implied in the E3 Phase 1 goals, which speak to distributive and procedural equity, is not yet enshrined in C&LM policies.

Next Steps: What to Expect

2023 Work Plan Task 4- Define the "What": Equity Goal Development



BENCHMARK & METRICS

Methods and Key Finding

Understanding the landscape of current equity indicators

📄 What We Did

Identified equity-focused indicators within the 2022 – 2024 C&LM Plan, the 2018 Equitable Distribution Report, the 2022 Education, Workforce Development, and Community Engagement Evaluation, and the 2021 Annual Legislative Report.

What We Found

Connecticut's current indicators focus on two goals that serve as a throughline to C&LM programs' working definitions of equity:

- ensuring cost-to-benefit (incentives) parity within customer classes and across subgroups, and
- increasing participation among incomequalified customers

Stepping back...

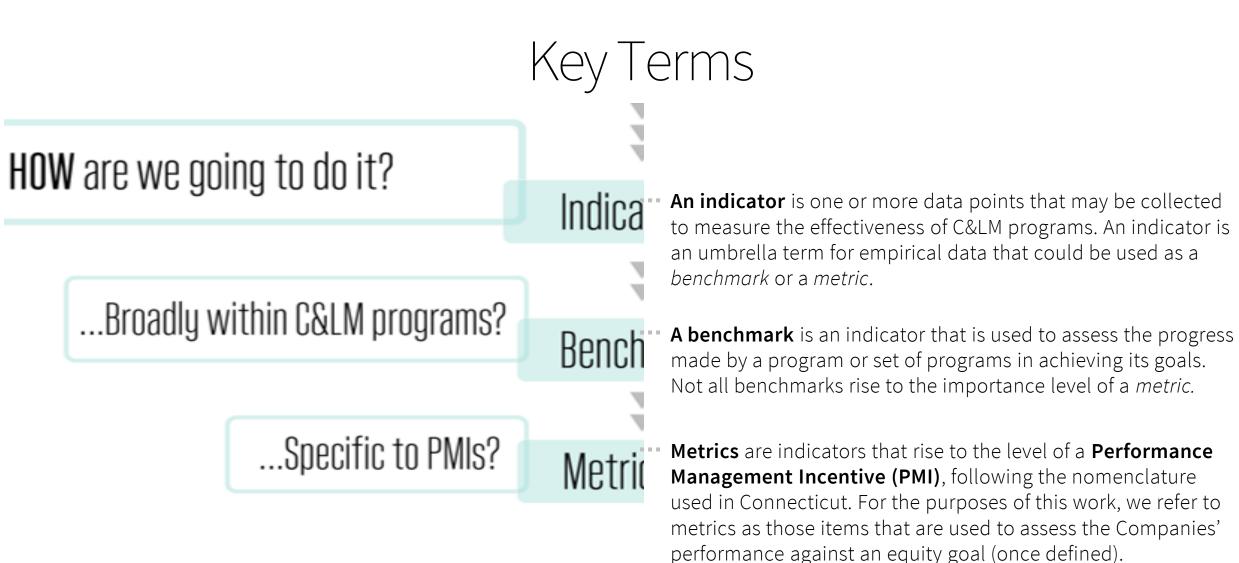
The overall goal

Creating benchmarks and selecting PMIs from aligned goals and priority populations.

2023 activities: "who" and "what" Once aligned on **who** should be served to achieve **what** equitable outcomes, the immediate next step is to operationalize these goals into metrics and strategies (e.g., interventions or program goals) to achieve the goals

2023-2024 activities: "what" and "when"

Then, the Companies can determine **how** to achieve greater equity and through which processes, programs, and services. In all cases, each metric should have a clear time-bound goal, indicating **when** DEEP and the EEB expect to see results from C&LM investments in equity.



PMI Secondary Equity Metrics

2022 – 2024 C&LM Plan

Sector	Metric	Description			
Residential	Percent of hardship customers participating in HES and HES- Income Eligible	The Companies will track the participation in 1–4-unit HES or HES- Income Eligible from Jan. 1, 2022 through Dec. 31, 2022 of all electric heat customers that are coded "hardship" (Eversource MPP, IE, New Start and UI Forgiveness Programs) on Nov. 1, 2021			
Commercial and Industrial	2022: Increase the equitable distribution of savings across all customer quartiles	This metric is designed to increase savings from customers in the Quartile 1 Healthcare sector, the Quartile 2 Financial, Real Estate & Insurance sector, the Quartile 3 Healthcare sector, and			
	2023: Fully executed project agreements for DECD towns: 69 in UI territory and 339 in Eversource territory	the Quartile 4 Retail sector (relative to the baseline avera Quartiles may change over term. These specific sectors in e quartile were chosen as the result of an analysis of participa and savings data over the previous 5 years.			

Looking Ahead: the Indicator Framework

As a first step to developing a more comprehensive framework to achieve E3 Goal 3, Action 3.3 (*the development of new equity metrics*), DEEP, the EEB, and the Companies will need to come to agreement on a unifying definition of "equity" (*Recommendation 3*).

This will ensure that our framework produces clear, consistent, and measurable metrics across C&LM programs that will help the State meet its C&LM equity goal.



Current Equity-Focused Indicators

Type of Equity	Indicator Category	Indicator	Target Population	Desired Impact	Measurement Approach	Source	
Distributive	Benefit	Energy savings (compared to bill contributions)	C&I Customer Segments within Electric Usage Quartiles	Equitable Distribution	Proportion	2022 – 2024 C&LM Plan	
Distributive	Benefit	HES-IE Savings	Income Eligible Homes	Increase	Quantity	(Performance Management Incentive Metrics, or PMI	
Distributive	Access	Participation in HES or HES-IE	Hardship Customers	Increase	Proportion	Metrics)	
Distributive	Access	Homes weatherized	Income Eligible	Increase	Quantity		
Distributive	Access	Participation in targeted programs (HES-IE, SBEA, Multifamily Initiative, Demand Response)	Distressed Municipalities or EJ Communities	Increase	Quantity	Community Partnership Initiative (CPI) program	
Distributive	Access	HES and HES-IE incentives Allocated	Distressed Tracks vs. Non-distressed Tracts	Equitable Distribution	Proportion	2018 Equitable Distribution Report	

Current Equity-Focused Indicators

Type of Equity	Indicator Category	Indicator	Target Population	Desired Impact	Measurement Approach	Source
Distributive	Access	Low-income households served	Income eligible	Increase	Quantity	2021 Annual Legislative Report
Distributive	Access	Projects	Small businesses in distressed municipalities	Increase	Quantity	2021 Annual Legislative Report
Distributive	Cost	C&LM incentives received	Small load customers in distressed census tracks	Equitable distribution	Proportion	2018 Equitable Distribution Report
Distributive	Cost	C&LM incentives received	All customer load types in distressed census tracts	Equitable distribution	Proportion	2018 Equitable Distribution Report
Distributive	Cost	Supplemental benefit-cost ratio: bill contributions paid compared to the sum of C&LM incentives and resulting annual energy cost savings	Distressed municipalities	Equitable distribution	Proportion	2018 Equitable Distribution Report

Benchmarks and PMIs

Current State and Gaps Identified

The current state of indicators introduces several gaps that—to remedy—will require **defining what impacts the C&LM programs should aim to achieve among its priority population**, and **which impacts will take priority in program-level decision-making**. These decisions will determine the focus of C&LM programs and should be carefully considered. These gaps include:

Current equity metrics and indicators are established at the program level and do not "roll up" to a unified framework. Programs need to have a governing framework that all indicators align with mad developing indicators that serve as both benchmarks to track progress over time and ultimately **support** goal-focused PMI metrics.

Key Challenges

The current party-focused indicators **do not** address the underlying disparities between income-qualified or vulnerable populations relative to other populations.

Example: due to historic or "contextual" equity concerns, health and safety issues may need to be remedied to serve households with energy efficiency measures, ultimately requiring additional funding to result in the same benefit – energy efficiency. Programs primarily focus on energy savings, whereas E3 emphasizes the alleviation of multiple forms of economic hardship.

Because energy efficiency programs are aimed at reducing energy usage, usage is the most consistent units of measure across programs. While this is appropriate, it will be important to consider how to measure whether energy savings are alleviating high energy burden.

Key Challenges

Current indicators are primarily distributive and do not address other forms of equity – including procedural, contextual, and corrective.

While Phase 1's focus is to drive distributive and procedural equity, C&LM programs will benefit from a clear set of benchmarks within a single framework to understand what is and will be expected of programs and by when, and which rise to the level of metrics.

Challenges with the current landscape of equity benchmarks and indicators result in:

Uncertainty in Tracking and Monitoring

Reducing C&LM programs' ability to track and monitor the effectiveness of C&LM program investments in achieving E3's goals overall and over time.

Confusion about Impact

Introducing confusion as to who the programs have had an impact on, the cumulative (positive) effect of serving specific populations, and why populations were targeted in the first place to remedy inequities.

Misalignment with Justice40

Undermining the ability of C&LM programs to demonstrate their effectiveness in meeting Federal Justice40 goals should the programs or the state seek co-funding from these programs.



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Key Takeaways

- Connecticut's current indicators focus on ensuring cost-to-benefit (incentives) parity within customer classes and across subgroups and increasing participation among income-qualified customers.
- Parity-focused indicators alone do not address the relative need of vulnerable populations. Programs primarily focus on energy savings, doesn't fully aligned with E3 emphasis on alleviation of multiple forms of economic hardship.
- Current indicators are primarily distributive and do not address other forms of equity including procedural, contextual, and corrective

Recommendations

Recommendation 4: Consider Updates to the 2024 PMI Equity Metrics, While Also Building the Foundation for a Long-term Equity Indicator Framework

Companies are interested in updated secondary PMI equity metrics for 2024 that better align with the goals of E3. To create greater consistency over time, we recommend that this effort run parallel to a process to align on an **equity goal, priority populations,** and a **long-term framework of benchmarks** and **indicators** that may be more fully implemented in the 2025 – 2027 planning cycle.

Consideration 1: Determine the most expedient approach to updating PMI equity metrics while ensuring long-term viability and consistency

Consideration 2: Determine whether there is a benefit to increasing funding in 2023 to support long-term equity indicator framework development for 2024 and beyond

Recommendations

Recommendation 5: Prioritize the Development a Long-Term Equity Indicator Framework after Alignment on Goals and Priority Populations

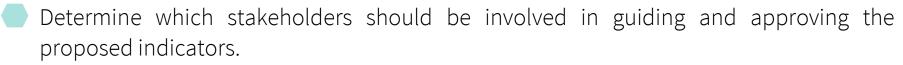
Once there is alignment on a consistent set of equity goals and priority populations, we recommend developing equity benchmarks and updated PMI metrics that both support E3 goals and C&LM program objectives, identifying how these indicators work together to create a cohesive metrics framework capable of measuring C&LM programs' progress over time.

We recommend that the EEB consider working through a **clearly defined decisionmaking process** with Stakeholders to create a framework that measures the effectiveness of C&LM program activities in creating multidimensional equity.

Considerations

Recommendation 5

Consideration 1:



Consideration 2:



Enable a process to prioritize equity indicators and to determine what criteria will be used to make decisions.

Consideration 3:

Ensure indicators have clear short-, medium-, and long-term focuses.

Consideration 4:

Determine whether it is feasible to align C&LM program indicators with Federal and State efforts.

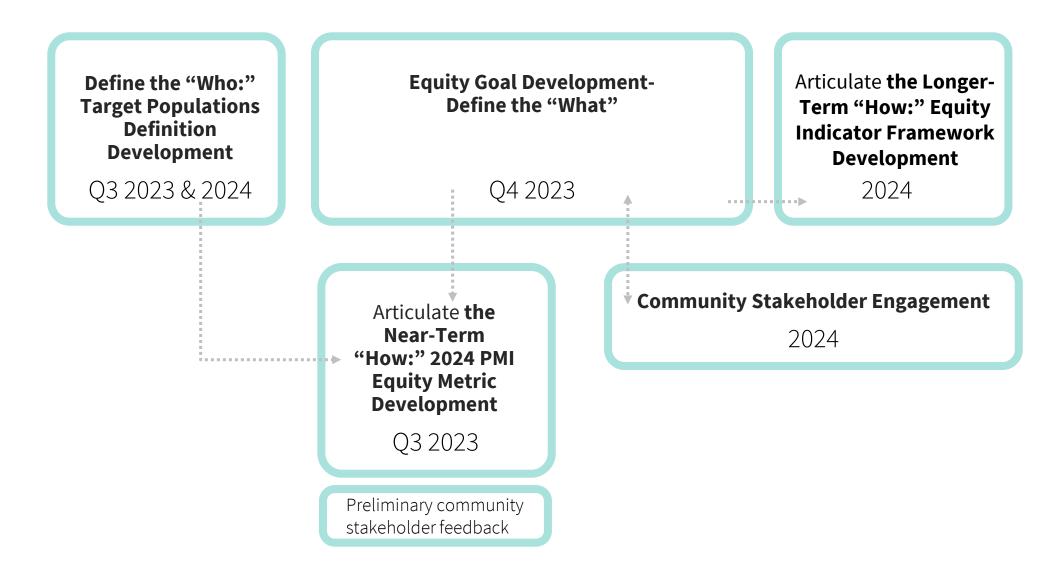
Next Steps: What to Expect

2023 Work Plan Task 5: Articulate the Near-Term "How:" 2024 PMI Equity Metric Development

Step Three Step One Step Two ILLUME will work EEB, Incorporate preliminary Based on Steps one and DEEP, and Committees to community two, ILLUME will facilitate define potential secondary stakeholder feedback decision-making to finalize PMI equity metrics for on the preliminary set updated 2024 secondary consideration PMI equity metrics of PMI equity metrics 2023 Task- ILLUME 2023 Task- ILLUME 2023 Task- ILLUME

& EEB Committees

Bringing It All Together



Questions?

We've Got Answers