Programs Equity Framework

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Contents

Acronyms

CBO   Community Based Organization

CEC   California Energy Commission

CPUC California Public Utilities Commission

ESJ   Environmental and Social Justice Community

EV   Electric Vehicle (includes battery electric and plug-in hybrid vehicle)

LIFT   Low-Income Family and Tenants

PG&E Pacific Gas & Electric

SCP   Sonoma Clean Power

Acknowledgements

Sonoma Clean Power would like to acknowledge that the base for this plan was created by the Greenlining Institute in their document entitled *"Equitable Building Electrification – A Framework for Powering Resilient Communities"*.

We greatly appreciate the foundational work that the Greenlining Institute is doing in this space.

Executive Summary

Sonoma Clean Power (SCP) is turning the tide on the climate crisis, through bold ideas and practical programs. SCP is a not-for-profit public agency based in Santa Rosa and serves the residents and businesses in Sonoma and Mendocino counties. We are committed to offering our customers clean energy solutions that enhance quality of life while helping solve climate change.

The Programs Equity Framework is intended to define a methodology for the inclusion of Environmental and Social Justice Communities in SCP's customer programs to ensure they are not left behind.

Environment and Social Justice Communities

The California Public Utilities Commission (CPUC) defines Environment and Social Justice (ESJ) Communities as communities where residents are:

- predominantly people of color or living on low incomes;

- underrepresented in the policy setting or decision-making process;

- subject to disproportionate impact from one or more environmental hazards; and

- likely to experience disparate implementation of environmental regulations and socioeconomic investments.

Due to a long history of systemic oppression, ESJ Communities have been underrepresented in the policy setting and decision-making process. ESJ Communities are being left out of California's transition toward a clean energy future, and yet, are the most susceptible to the devastating effects of climate change. SCP seeks to offer customer programs that serve all our customers and seeks to invest additional time and funds to ensure that our programs create equity.

Programs Equity Framework

The Framework addresses the considerations that must be made while carrying out programs to reduce total energy use and reduce greenhouse gas emissions. This Framework outlines the steps SCP will take to ensure that equity is integrated when developing new programs.

- Step 1: Assess the Communities' Needs. This should include understanding barriers preventing community members from participating in SCP programs, and learning about their specific needs, wishes and concerns when it comes to energy efficiency and electrification.

- Step 2: Establish Community-Led Decision-Making. Rich community input and engagement strengthen the overall program design quality with stronger cultural competence, ensure local buy-in and investment, and deliver tangible local benefits rooted in the lived experiences of everyday people. Partner with community-based organizations to develop a decision-making process that ensures that decisions are based on community needs and priorities.

- Step 3: Develop Metrics and a Plan for Tracking. Metrics should include both clean energy benefits like greenhouse gas reductions and community benefits such as local hires and residents' ability to pay their energy bills without sacrificing other essential expenses.

- Step 4: Ensure Funding and Program Leveraging. Current low-income energy programs often fail to deliver maximum benefits to all qualifying households due to short and unpredictable funding cycles, poor program design that inadequately reaches qualifying customers, or lack of coordination and integration with complementary programs.

- Step 5: Improve Outcomes. Using the tracking and metrics plan described above, ensure that there is a continuous feedback loop to improve current and future programs' reach and impact in ESJ communities. Consider adjustments to ensure the program reaches the people it seeks to reach and delivers the intended benefits.

Together we can create the foundations for equitable and inclusive programs, but it will require deliberate and inclusive actions. This document will be implemented along with the Programs Strategic Action Plan and will be reviewed at least once a year in May.

Programs Equity Framework

Equity begins by recognizing that not all communities have the same social and economic starting point. African Americans, Native Americans, immigrant communities of color, low-income communities, and others have long suffered systemic exclusion from opportunities such as homeownership, educational attainment, high-road jobs, and the ability to live in a clean and healthy environment.

California is attempting to address some of these harms by committing to more equitable environmental and energy policies. Sonoma Clean Power (SCP) therefore proposes the following framework to function as a roadmap for achieving equitable outcomes in our programs.

Early Equity Actions Taken to Date

- Providing increased incentive amounts for the lease or purchase of new and used electric vehicles (EVs) as part of the Drive EV program;

- Providing incentives to non-profit organizations to purchase or lease EVs;

- Conducting target, on location Ride & Drive events in partnership with low-income employers;

- Providing up front incentives to lower the barriers to program participation;

- Providing larger incentive amounts for low-income homeowners rebuilding through the Advanced Energy Build;

- Working directly with grassroot organizers and participating in fire recover events to encourage rebuilding energy-efficient or all-electric homes;

- Providing increased rebate amounts to low-income, disadvantaged, and rural locations in the Sonoma Coast Incentive Project to encourage infrastructure investments in these communities';

- Providing free Do-It-Yourself Energy & Water Saving Toolkits through the two library systems to help decrease energy and water usage; and

- Providing bilingual marketing and collateral materials, among other outreach efforts by the SCP Marketing Team.

We recognize that while these are good initial efforts, more is needed to be done as we work to fulfill our mission of turning the tide on the climate crisis.

Programs Equity Mission Statement

SCP customer programs shall be designed, implemented, and evaluated with the goal of being practical and inclusive of Environmental and Social Justice Communities.

Environment and Social Justice Communities

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- subject to disproportionate impact from one or more environmental hazards; and

- likely to experience disparate implementation of environmental regulations and socioeconomic investments.

Three-Dimensional Approach

This five-step Framework is guided by the USC Program for Environmental and Regional Equity's three-dimensional approach to equitable implementation of programs that help close the equity gap[1]. The three dimensions are:

1. Past - Prioritize investments that close historic equity gaps in a way that will improve access to workforce training and jobs for the benefit of the local economy and improve environmental health for underinvested communities.

2. Present - Create authentic partnerships that focus on impacted communities, support community-based participation, and result in shared decision-making, while also strengthening the health and well-being of the entire region.

3. Future - Mitigate disparities likely to emerge in the future by leveraging funding for long-term community health and organizational capacity. Also, by incorporating metrics and evaluation to promote adaptable and effective implementation.

Step 1 - Assess Community Needs and Set Goals

Prior to designing programs, staff will conduct community needs assessments to identify communities' unique needs, the underlying reasons or causes of issues, existing barriers, and the types of resources that are already available to address issues. Keeping in mind that various communities, even neighborhoods, should not be treated the same as they have different characteristics and needs, a community needs assessment is necessary so that stakeholders can conduct a meaningful inquiry into the possible benefits that programs can deliver to ESJ communities and the challenges that residents will face in switching from fossil fuels to clean energy, improving energy-efficiency, and reducing cost. Assessing the needs and barriers of renters since many bear the higher cost burden of inefficient buildings and appliances and lack of authority to participate in programs.

Questions to consider
- What kind of existing resources does this community have (this includes community-based or faith-based organizations that serve the community, free or low-cost social services programs, after-school programs for kids, energy-related programs for low-income or disadvantaged communities, or workforce development programs for unemployed adults)?

- What are the Community's perspectives on SCP and how does the community engage with SCP now? Is SCP a trusted organization?

- What barriers prevent residents in this community from participating in programs?

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[1] Vanessa Carter, Manuel Pastor, and Madeline Wander (2018). Measures Matter: Ensuring Equitable Implementation of Los Angeles County Measures, 22

- Do residents have access to broadband internet?

- What do people care about and which issues do they want to prioritize?

- What is the benefit for this community to be associated with SCP? Where is the relevancy?

- How much do people already know about programs offered? Who has access to this information and who does not?

- Who do people in this community trust? Where do they get their information? Where do they go when they have questions?

- Who has participated in other energy programs and who has not? Of those who have not, why haven't they?

- Which communities should be prioritized and what would it take to ensure that they benefit from a program?

- Which data must be collected and considered for this assessment?

- What would a community needs assessment look like? Will it reach the intended audience?

- Do the CBO's we want to connect with already meet? Can SCP join already occurring coordination meetings?

- How can SCP programs strengthen the broader North Bay community?

Equity indicators must also be established to ensure that investments that close historic wealth and environmental gaps are targeted for ESJ residents. Equity indicators can be used in two ways:

1. They can be used to identify specific communities where program investments should be prioritized.

2. They can be used to measure the impacts of investment in ESJ communities.

For example, the California Energy Commission's (CEC) [*Energy Equity Indicators*](#) *report identifies a set of equity indicators that the agency may use to track and measure investment, access, and resilience resulting from clean energy programs.*

The community assessment will lead to a greater understanding and creation of equity-driven goals. The goals must be broad enough to encompass an issue or address a need within a community but also narrow enough to help determine the appropriate equity indicators, timing and level of funding, and metrics needed to track impacts.

Recommendations

- Leverage the Community Engagement and Education Program from SCP's Marketing Department to partner with locally trusted community-based organizations (CBOs) and local government to engage residents of ESJ communities and to make engagement opportunities as accessible as possible.

- Collaborate with a diverse group of CBOs, local governments, and other partners,

- Identify how SCP can help CBOs and local governments achieve their goals and objectives.

- Identify what SCP can offer to help the community in exchange for their time.

- Coordinate with other SCP Department on outreach and engagement and leverage the work they are doing to inform programs.

- Identify the most pressing community needs, including determining the residents' fuel source(s), access to clean energy and energy efficiency programs, and non-energy issues such as housing, health, food, and transportation needs and identify how those needs intersect with energy and climate change.

- Identify the historical structural, economic, and logistical barriers of the communities in general, as well as barriers to upgrading homes to be resilient, efficient, electric, and affordable. Identify strategies to overcome these barriers while keeping residents in their homes.

- Ensure that marketing campaigns are culturally and linguistically appropriate for the intended audience.

- Work with Black, Indigenous, and People of Color (BIPOC) marketing agencies and individuals to re-invest in small business communities.

- Establish equity-driven goals that address the communities' needs.

Step 2 – Establish Community Led Decision Making

Community leaders and advocates face an exceptional challenge to get the attention of decision-makers and help them understand the unique needs of their families or communities. At the same time, decision-makers (*e.g., government, PG&E, SCP*) create new programs that directly affect the lives of impacted communities without their voices being heard. At the heart of community-driven decision-making lies the key environmental justice principle that those closest to the problem are those closest to the solution. Robust community input and engagement improves local buy-in and makes programs better at reaching the communities they intend to reach. Further, bringing community voices to the table helps to demystify the linkages between energy bills, indoor and outdoor air quality, health, local jobs, and community resilience. Developing partnerships with local agencies and CBOs will take time. It is important to build trust with community leaders and advocates, understanding that it may take time given the history of not being heard.

Questions to consider
- Which CBOs that have been serving the residents should be contacted to support this effort (this may include social services organizations, energy efficiency providers, and workforce development organizations)?

- What kind of resources or support do the CBOs need?

- What kind of resources or assets are in the communities? How can SCP help to amplify these resources?

- When, where, and in what context should we engage residents on the issue of equitable program design?

- Are all the relevant stakeholders at the table?

- What level of technical assistance do the CBO reps and residents need in order to fully engage in the program topic?

- What should decision-making processes look like?

- How can SCP support the mission of CBOs?

- How can SCP connect CBOs to each other to further the conversation?

Recommendations

- Develop trust by making time to talk to people early and often and leveraging their feedback. Effective and rooted community organizing is very slow work.

- Be Inclusive. Meet communities where they are. Attend existing meetings, workshops, and opportunities for engagement in accessible places, at convenient times, with appropriate accommodations, including Spanish language. Create meeting opportunities where they do not already exist.

- Seek to minimize the burden of engagement on community members. Investigate providing compensation to community members for their significant contributions of time, whether monetary or other in-kind value.

- Seek to minimize the burden of feeling like community members are the only ones to solve the problem.

- Partner with trusted and experienced local community workers, especially community-based organizations. Stretch and work with new players and foster unexpected partnerships.

- Be Innovative. Other issues may be identified that SCP may be able to help address.

- Listen actively. Trust that community members are experts on their stories, histories, challenges, and priority solutions. Listen first before approaching community members with any solutions. Listen for needs and not for program ideas/feedback.

- Be Practical. Make improving people's actual lives (air, health, home, family, community) the central priority. Technical expertise should respond to community needs and priorities.

- Develop a decision-making process with community members and work with the community during program design.

- Set expectations early on with CBOs about the key decisions that CBOs can make and can influence.

Step 3 – Develop Plan and Metrics for Tracking

Metrics are essential for assessing the effectiveness of equitable program efforts in meeting established program goals. Metrics should be used for all three activities involved in advancing programs.

1. **Policy adoption:** Metrics should articulate the principles being embraced and set target benchmarks or expectations for what progress is desired.

2. **Program Design:** Metrics should help specify program objectives, decide program parameters, and target audiences, and determine the necessary data collection schemes to inform evaluation.

3. **Post-implementation:** Metrics should largely support program evaluation, execution effectiveness, and expenditure value—as feedback to policy and program oversight.

Because equitable program efforts focus on reducing energy and non-energy hardships that affect ESJ communities, metrics cannot just measure energy savings monetarily or by greenhouse gas emissions. Stakeholders must also be open to both quantitative and qualitative metrics. Without qualitative measures there will be no consideration of quality-of-life type of improvements in program design. Lastly, tracking the metrics' progress is a significant programmatic tool that must be designed and planned at this early stage. Tracking will allow stakeholders to reach a deeper understanding of the challenges and successes of programs. Tracking also identifies areas for improvement and allows for regular and transparent reporting to the public to improve accountability.

Questions to consider

- What quantitative and qualitative benefits can a program deliver to ESJ communities?

- What kind of baseline data is needed to compare against our metrics?

- Who should conduct tracking?

- Where will the metrics be housed, displayed, and shared?

- How and at what interval should data be collected and reported? Are certain communities or individuals excluded by the data collection method chosen.

Recommendations

- Identify metrics, including baseline or control group, that will be tracked and measured based on the goals and indicators.

- Identify and establish both quantitative *(e.g., pounds of greenhouse gas saved)* and qualitative *(e.g., increased comfort)* metrics.

- Develop a plan to track metrics. Ensure that this plan maximizes the best feedback loop to improve current and future program design and provides transparency.

- Be aware that data collection may raise trust issues. Be flexible with collecting data and ensure data privacy and protection.

- If collecting ethnicity and racial data, ensure that the list of options is inclusive.

- When appropriate, utilize trusted outside entities to measure, audit and/or report metrics.

Step 4 – Ensure Funding and Program Leverage

Funding for energy efficiency and clean energy programs shall be directed to ESJ communities. Low-income energy programs struggle to maximize benefits to all qualifying households. Additionally, barriers to program integration and lack of information on how to leverage funding limit opportunities to streamline services and lock complementary funding sources into silos. We must encourage coordination which combines low-income and non-low-income energy programs along with public health and climate programs. California needs to incentivize building owners to invest in energy efficiency and electrification, without the risk of increasing costs and displacing ESJ renters. We also need to determine how many ESJ residents do not qualify for low-income energy programs and identify ways to meet their needs.

Questions to consider

- What other programs or funds exist to serve the same community and meet similar needs?

- Are there other organizations that are already doing work in the community we can partner with to augment their work and implement solutions?

- Will a new program align with other programs and make leveraging easy, or will it become yet another silo?

- How can non-low-income programs expand their reach and services to low-income populations?

- What other kinds of programs, like MCE's Low-Income Family and Tenants (LIFT) pilot, exists that leverage various programs and agencies?

- How can a public agency like SCP leverage these programs?

- What role does financing have in increasing building electrification in ESJ communities, especially for households that do not qualify for free upgrades?

- Are there existing SCP services or programs that can be leveraged to financially support ESJ communities?

> **MCE Low-Income Family and Tenants (LIFT) Pilot Program**
>
> In 2017, the CPUC awarded $3.5 million to MCE to conduct a two-year pilot program to better serve income-qualified multifamily communities.
>
> Qualified properties received:
>
> - $1,200 per unit in addition to rebates provided by MCE's Multifamily Energy Savings Program to lower the cost of common area upgrades in deed-restricted buildings.
>
> - Referrals to other programs to enable additional savings

Recommendations

- Establish research funding and conduct effective research.

- Identify available sources of funding for energy-related or building-related programs.

- Identify gaps in funding for needs that should be addressed, including tenants (renters) and commercial and business owners.

- Create a new program that integrates new and current energy, climate, and health programs available to ESJ communities to maximize benefits.

- Find ways to support ESJ households through alternative financing such as tariffed on-bill financing.

Step 5 – Improve Outcomes

Performance of any given program must be measured to ensure that it is delivering the intended impact. To determine the equitable impacts of programs, measurement and evaluation efforts must be based on three principles:

1. Document and assess the energy and non-energy impacts of the program on ESJ communities.

2. Provide programmatic transparency to hold both programs and program administrators accountable to achieving the goals the program was set to meet, using equity metrics; and

3. Ensure that there is a continuous feedback loop to improve current and future programs' reach and impact in ESJ communities.

Questions to consider
- Are there improvements post-program participation? How much progress has been made between the baseline data and the post-implementation data?

- Are the results on track for achieving short and long-term goals? What factors could have influenced the change between the baseline and post-implementation metrics?

- Has the program reached all the communities it was intended to reach? If not, what adjustments need to be made so that the next program cycle is more effective?

- Has the program delivered all the benefits it was intended to deliver? If not, why not, and what can be improved?

- Does the program mitigate unintended consequences like displacement?

- Does the program have any unintended negative consequences?

- Is the program participation too burdensome? Is the process to participate in the program too demanding for potential participants? Example: providing a lot of personal information and documentation.

- How should the evaluation results be framed and communicated in order to reach important stakeholders?

Recommendations

- Create a calendar of scheduled updates on tracking and evaluation.

- Ensure that the right people receive the evaluation results. Provide time to solicit the audience's input because they may lead to further clarity and improvement in the tracking, evaluation, and reporting process.

  o Ensure that the community feels heard and understood when feedback is not incorporated.

- Develop an immediate feedback loop for lessons learned and adjust existing programs and a longer and more comprehensive feedback process to change and inform the implementation and evaluation of future programs.

- Evaluate existing partnerships, include an analysis of partnerships and trust building with organizations.

- Highlight and share important data relevant for strategic and budget planning processes.

- Collaborate with community organizations and local government to share results that may be connected to achieving their goals.

Conclusion

To turn the tide on the climate crisis, SCP must provide comprehensive solutions that improve the lives of ESJ communities. Reducing greenhouse gas emissions leads to healthier, safer, and thriving communities.

As important as it is to reduce total energy consumption and remove fossil fuels from our homes, we need to center equity in this process. Failing to do so will repeat past mistakes in energy efficiency and renewable energy programs that failed to effectively prioritize underserved communities. This will result in insufficient investment in the communities that need the help the most, leaving ESJ communities behind once again.

This equitable program framework provides step-by-step guidance for SCP programs staff on how to approach the creation and review of equitable programs. By assessing the communities' needs, establishing meaningful community decision-making, developing equitable metrics and tracking, leveraging program benefits, and creating a process that allows for improvements, SCP can ensure that the benefits of programs prioritize people who could benefit the most.