



# Energy Justice Program Metrics: Examples from Other States

April 9, 2025



# Introduction

- Energy justice is a foundational component of the DE Energy Plan (Plan)
  - i.e. identifying and addressing inequities from energy systems and related extractive economies
- Developing energy justice program targets and metrics a key strategy in the Plan
- Presentation provides a high-level overview of how other states are using energy justice/equity metrics
  - Specific focus on Massachusetts



# Mass Save Overview

The Mass Save Program Administrators (PAs) work under a three-year plan

- Current plan term is 2025-2027
- Equity targets first included in 2022-2024 Plan



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Together, we make good happen for Massachusetts.



# Timeline of Key Equity Developments

Green justice advocates regularly present public testimony at EEAC meetings about vulnerable populations not being well served by Mass Save

2019-2021 Plan filed and approved with commitment to conduct nonparticipant studies

Equity Working Group develops recommendations  
Equity Targets developed

PAs have committed additional funds and expanded offerings to serve equity populations

2013

2018

2019

2020

2021

2022-24

2025-27

MA PAs implement a few different programs to serve renters and moderate income customers with tepid results

Nonparticipation studies completed  
Equity Working Group formed

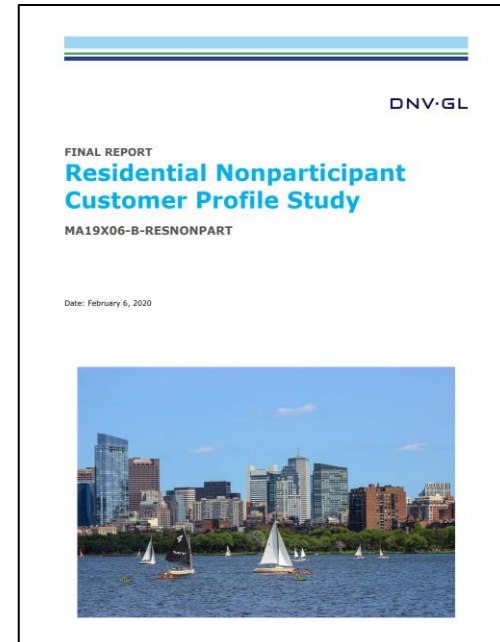
PAs implement equity commitments  
Equity Targets tracked and reported



# Nonparticipant Studies Background

- Assessed whether data supported anecdotal evidence
- **Commitment** for the 2019-2021 MA EE Plan:

The Program Administrators will conduct tailored evaluations in 2019 that address participation levels and potential unaddressed barriers for (a) businesses (small, medium and large) and (b) residential customers by income levels and by non-English speaking populations (utilizing proxy methods that do not rely on specific income or demographic information from Mass Save® participants). The Program Administrators will leverage the existing EM&V framework, and present full results of the studies to the EEAC.

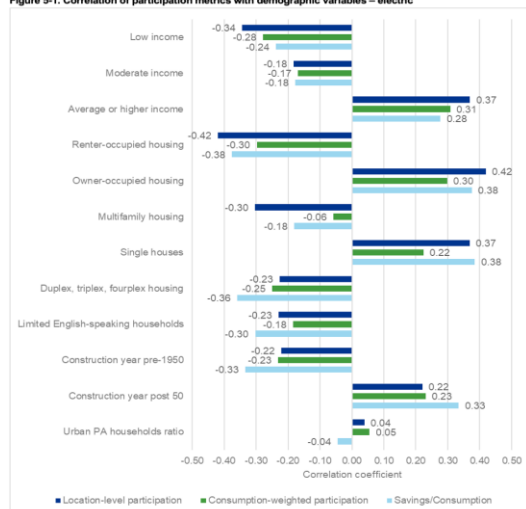


- First Completed in 2020 looking at years 2013-2017
  - Updated in 2024 looking at years 2013-2023
  - PAs to update study in 2025-2027 Term

# Nonparticipant Studies Findings

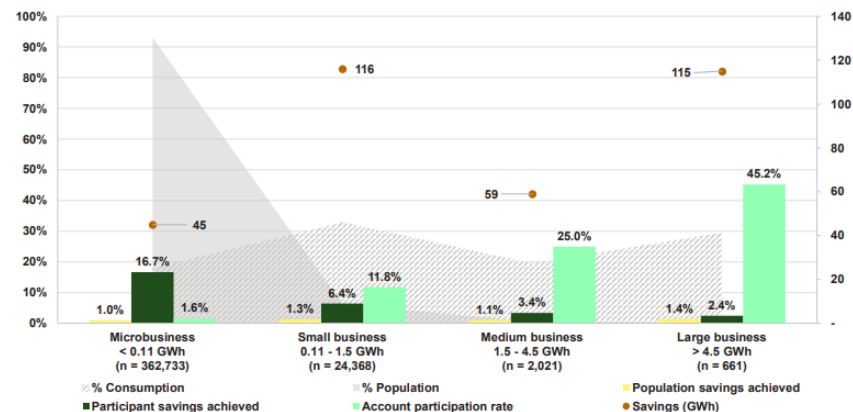
**Residential:** Moderate-income households, renter households, and limited English-speaking households participated at a lower rate than other populations in 2013-2017

Figure 5-1. Correlation of participation metrics with demographic variables – electric



**Commercial & Industrial:** Microbusinesses have consistent patterns of lower population savings and account participation rates than small and non-small businesses

2020 participation, savings achieved, and total savings (GWh) by consumption size, electric



**Updated Residential Nonparticipant Study (2013-2022):** Increased participation for all customer groups analyzed; participation gap narrowed for low and moderate income; increased for renters and MF+ and limited English within electric programs



# 2022-2024 Equity Targets Overview

- Modeled on equity targets created by Energy Trust of Oregon
- Key goal is to provide accountability for tracking and achieving results for plan commitments and associated financial investments
- Developed through a collaborative process
  - Initially negotiated by consultants and PAs
  - Reviewed, revised, and approved by Equity Working Group and then EEAC
  - Submitted by PAs with full 2022-2024 Plan and approved by DPU
  - PAs' approach was that they would not agree to a target they did not feel they could meet
- Quantitative focus where possible
  - Leveraged existing reporting in several instances to establish baselines
  - Where new data collection was required, worked to keep reasonable
  - Some task-oriented commitments as well



Various reporting schedules

# 2022 -2024 Specific Equity Targets

Population	Targets	Reporting
Renters	<ul style="list-style-type: none"> <li>• Increase unit participation</li> <li>• Increase units served in attached low-rise buildings</li> </ul>	Twice each year
Moderate Income	<ul style="list-style-type: none"> <li>• Increase # of weatherization jobs</li> <li>• Increase # heating systems replaced</li> </ul>	Quarterly
English Isolated	<ul style="list-style-type: none"> <li>• Increase participants who receive services in other languages</li> <li>• Develop a language access plan</li> <li>• Be able to offer energy assessments in five languages other than English</li> </ul>	Twice each year
Small Business	<ul style="list-style-type: none"> <li>• Complete number of SB Wx projects</li> <li>• Repeat 2020 non-participant study</li> </ul>	Quarterly
Workforce	<ul style="list-style-type: none"> <li>• Conduct studies to analyze disparities in procurement for vendors</li> <li>• Train and place people in industry positions through internship program</li> <li>• Track M/WBE contracts and spending</li> <li>• Workshops for new M/WBE vendors</li> <li>• Target outreach to all certified M/WBEs</li> </ul>	Quarterly
Partnerships	<ul style="list-style-type: none"> <li>• Partnerships in majority of EJ Municipalities</li> <li>• Track and report # on participation in partnership municipalities</li> <li>• Track and reporting on outreach activities in partnership municipalities</li> <li>• Track and report on program investment in partnership municipalities</li> </ul>	Quarterly
EJ Municipalities*	<ul style="list-style-type: none"> <li>• Increase investment</li> <li>• Increase # of participant</li> </ul>	Annual in Q4 Report

\*Per MA DPU, eligible municipalities must: be served by an electric and/or gas PA, contains at least on EJ population as defined by EEA Environmental Justice Policy, has historically low participation rates





# Reporting

- PAs report progress against targets in their quarterly reporting

## Moderate Income

Program Administrators	Weatherization Jobs			
	2019	2022	2023	2024
Electric PAs				
National Grid	234	66		
Eversource	63	17		
Cape Light Compact	139	28		
Unitil	1	-		
Gas PAs				
National Grid	129	54		
Eversource	26	-		
EGMA	86	14		
Unitil	4	-		
Liberty	11	3		
Berkshire	6	2		
STATEWIDE TOTAL	699	184	-	-
STATEWIDE TARGET		1,398	2,796	5,592

- Other example from Energy Trust of Oregon:

## Goal 1B: Support participation of small and medium commercial business customers and commercial business customers in rural areas.<sup>2</sup>

2021 Target	Results	Status
Serve 1,082 small and medium businesses and 54 customers in very rural areas	Served 1,270 small and medium businesses and 39 customers in very rural areas	

- Energy Trust served 1,270 small and medium businesses in 2021, exceeding goals for this customer group by 17%. Small and medium businesses installed lighting, smart thermostats and food service equipment most commonly.
- Energy Trust fell short of its goal to serve more businesses in very rural areas. Staff should develop more solutions to support businesses in these areas by continuing to focus on local community engagement.

# Where Are We Now in MA?

- Equity Working Group continues to meet, now a formal subcommittee of the Council
- Equity topics and performance are regular agenda topics at the EEAC
- Achieving equitable program delivery and results are heavy lifts
  - PAs have struggled to meet some equity targets
- 2025-2027 Plan included new equity offerings and additional equity investment than previous plan
  - 50% of PA performance incentive based on achieve benefits for equity populations



# Examples from Other States

## Rhode Island

- Equity Working Group
- National Grid administered a Nonparticipant Market Barriers Study in 2020
  - Almost 40% of survey respondents indicated that they were not aware of National Grid's energy efficiency programs
- Focus on addressing equity metrics in single- and multifamily program participation, pre-weatherization barriers, and small business participation
- Reporting in quarterly Equity Updates

## Vermont

- Efficiency Vermont conducted a statewide energy burden study in 2023
  - Identified areas with the highest energy burdens and designed programs to meet their needs
- Procedural, distributional, and structural equity metrics including participation rate, program benefits, lifetime savings, and program investments
- Reports on equity metrics on an annual basis

# Examples from Other States

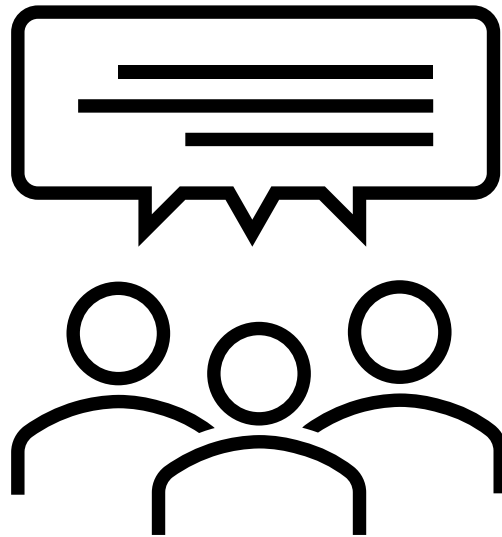
## California

- California Energy Efficiency Coordinating Committee (CAEECC)
  - Holds meetings for stakeholders to discuss energy efficiency matters under the California Public Utilities Commission
- California Energy Commission conducted a Low-Income Barriers Study in 2016
  - Need for targeted investments in disadvantaged communities
- Emphasis on addressing barriers to clean energy investments for low-income and disadvantaged communities
  - Increasing access
    - Number of customers served
  - Advancing investments
    - Energy savings
  - Strengthen resilience
    - Lower high energy bills

## Oregon

- Energy Trust of Oregon conducted a Customer Insights Study in 2020
  - Significantly lower program participation rates among low-income groups, African American/Black and Hispanic/Latinx communities, residents of rural areas and renters
- Focus on equitable distribution of energy efficiency program benefits to low-income communities
- Adopted 2025 metrics including access to support for communities, access to information, energy burden reduction, and community resilience
- Reports on progress towards equity metrics on a quarterly basis

# Questions and Discussion



# APPENDIX

# Equity Working Group (EWG)

- Formation of EWG approved by EEAC in May 2020 after presentation of nonparticipant studies results
- Includes six voting representatives of the Council, four PAs, Low Income Energy Affordability Network, consultants, and three outside stakeholders
- Co-chaired by two voting members of EEAC; agenda planning and meeting preps conducted by co-chairs, DOER, and consultants conferring with PAs when appropriate
- Initial focus was to develop equity-related recommendations for the 2022-2024 Plan
- Met 2 times per month for more than six months
- Outside stakeholders participated at many meetings to provide input



# Additional Resources

- [Residential Nonparticipant Customer Profile Study](#)
- [Nonparticipant Market Barriers Study](#) (residential)
- [Nonparticipant studies presentation](#) to EEAC (residential)
- [Commercial and Industrial Small Business Nonparticipant Customer Profile Study](#)
- [Equity Working Group Recommendations](#) to inform 1<sup>st</sup> draft of 2022-2024 Plan
- [Massachusetts Equity Targets](#)
- [Final EEAC resolution supporting 2022-2024 Plan](#)
- [Energy Trust of Oregon DEI goals progress report](#)





# Example of Equity Content in MA 2022-2024 EE Plan

Equity: Rental Properties			
<b>Goals</b>			
<ul style="list-style-type: none"> <li>• Increase the number of rental properties that are served by Residential and Income Eligible Sector programs.</li> <li>• Create greater ease of access to Residential and Income Eligible Sector programs for owners of rental properties.</li> </ul>			
Barriers	Example Tactics	Applicable Initiative(s)	Short, Mid, Long-Term
<ul style="list-style-type: none"> <li>• Split incentive whereby the landlord is the decisionmaker and the tenant pays the utility bills affects customer interest and engagement.</li> </ul>	Create a rental unit strategic plan with additional tactics to increase renter customer outreach and unit participation.	RCD	S
	100% weatherization incentive for individually-metered rental units.	RCD	S
	Updated approach for 3–4-unit homes where only one unit is income eligible (Mixed-Income Protocol) to both streamline delivery of services by both RCD contractors and CAP agencies.	RCD, Income Eligible	S
<ul style="list-style-type: none"> <li>• Lack of customer awareness of services and incentives, especially landlords of smaller (5-25 unit) buildings.</li> </ul>	Continue to leverage online assessments and virtual HEAs for renters, while continuing to try to reach the landlord to serve the whole building.	RCD	S
	Consideration of no cost high-efficiency lighting provided to renters in addition to other instant savings products delivered via the Online Store.	RCD, Retail	S
<ul style="list-style-type: none"> <li>• Customer lack of time to participate in an HEA.</li> </ul>	Use of data and alignment with Community First Partnership Program for targeted outreach to owners of 5–25-unit buildings in municipalities with an above-average density of rental units.	RCD, Income Eligible	S
<ul style="list-style-type: none"> <li>• Landlord concern for code violations limiting unnecessary access to the property.</li> </ul>	Provide owners of rental properties and customers who are renters information about income-based HVAC and pre-weatherization barrier incentives, in addition to the 100% weatherization incentive.	RCD, Retail	S
<ul style="list-style-type: none"> <li>• Lack of priority for property owner.</li> </ul>	<ul style="list-style-type: none"> <li>• Explore a targeted marketing approach through the use of visual aids to better inform and connect renters and landlords to energy efficiency offerings.</li> <li>• Foster opportunities with external stakeholders to deepen understanding of varying incentive models to increase renters' and landlords' program participation rates.</li> <li>• Work with local industry partners who service and engage landlords to market energy efficiency programs.</li> </ul>	RCD	S, M, L

## Appendix





# Thank you

Questions?

