EQUITY AND ACCESS IN GRID MODERNIZATION

INNOVATION WEBINAR

October 24, 2024

3:00 - 4:00 p.m. ET

NARUC CPI Innovation Webinar

***Moderator*: Commissioner Harold Gray,** Delaware Public Service Commission

Will Kenworthy, Senior Regulatory Director - Midwest, Vote Solar

Alexandra Klass, James G. Degnan Professor of Law, University of Michigan Law School

Kristol Simms, VP, Clean Energy Transition, Economic, Community, and Business Development, Ameren Illinois

About NARUC

- Founded in 1889, the National Association of Regulatory Utility Commissioners (NARUC) is a non-profit organization dedicated to representing the state public service commissions who regulate the utilities that provide essential services such as energy, telecommunications, power, water, and transportation.
- NARUC's members include all 50 states, the District of Columbia, Puerto Rico, and the Virgin Islands.
- Our mission is to serve the public interest by improving the quality and effectiveness of public utility regulation.

About CPI

- The NARUC Center for Partnerships & Innovation (CPI) builds relationships, develops resources, and delivers training to assist state commissions contending with complex current and emerging issues.
- CPI is funded by cooperative agreements with the U.S. Department of Energy (DOE) and the U.S. Department of Commerce's National Institute of Standards and Technology (NIST).
- NARUC CPI conducts work across five key energy areas and many topics within each: generation; transmission; distribution; customers; and critical infrastructure preparedness, response, and resilience.
- For more information, visit: https://www.naruc.org/cpi/cpi-home/

Upcoming Events

Virtual Events:

- **Updated Pathways to Advanced Nuclear Commercial Liftoff –** Oct. 28 (member only)
- **Critical Infrastructure Committee Meeting** – Oct. 28 (member only)
- **EV State Working Group Meeting** – Oct. 29 (member only)
- **ERE Committee FERC 1920 Briefing** – Nov. 5 (member only)
- **Transmission State Working Group Meeting –** Nov. 6 (member only)

October - December In-Person Events:

- **NCEP Annual Meeting**, Phoenix, AZ, Oct. 29 – 30
- **NARUC Annual Meeting**, Anaheim, CA, Nov. 10 – 13
- **IDSP/Electrification Training and optional site visit**, Charlotte, NC, Dec. 11 - 13

See our full list of events: https://www.naruc.org/cpi/cpi-events/

Today's Speakers

Reckoning with Social Policy in Utility Regulation

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Equity and Access in Grid Modernization
NARUC Innovation Webinar
October 24, 2024

Topics

- Energy Justice
- Equity and Grid Modernization
- Implications of Recognizing Social Policy in Utility Regulation

Sources

- Gabriel Chan & Alexandra B. Klass, *Regulating for Energy Justice*, 97 N.Y.U. L. Rev. 1426 (2022)

- Gabriel Chan & Alexandra B. Klass, *Reckoning with Social Policy in Utility Regulation* (forthcoming)

State Utility Commissions and “Social Policy”

- **“Social Policy” Defined**: in the context of utility regulation, includes non-energy state and local socio-economic concerns such as job creation, tax revenues, and economic development as well as past and current inequities regarding the provisioning of electricity service to communities and individuals.
- **Examples:**
  - Addressing past and current inequities regarding the provisioning of electricity service to communities and individuals (energy justice)
  - Addressing future inequities related to non-energy state and local socio-economic concerns around the energy transition, such as job creation, tax revenues, and economic development (“just transition”)

State Utility Commissions and Social Policy (cont.)

- Commissions warned not to make “social policy” or engage in “social ratemaking” for many decades – see low-income rate cases in 1980s and 1990s
- What is the role of the legislature, state commissions, and courts in addressing social policy issues? How to address past and future inequities?

Challenges to Addressing Social Policy in Utility Regulation

- Judgment cloaked with science and technocratic processes
- “Cost causation” principle applied inconsistently
- “Cross subsidization” pervasive but managed only selectively
- Rates based primarily on costs, not benefits
- No fixed scope of authority for commission mandate to set just and reasonable rates to promote “the public interest”

State Precursors: Low-Income Rates

- **Utah:**
  - Commission authorized senior citizen rate in 1979, but state supreme court invalidated it in 1981 in response to arguments that commission not "empowered to act on the basis of social policy" by "subsidizing" one consumer group over another and that such policies are "solely for the Legislature to make." Court left open another attempt with better factual record.
  - In 2000, after additional fact-finding, commission authorized similar low-income rate based on energy burden and lower costs for all ratepayers because lower rate would lead to fewer disconnections and uncollectible accounts.
  - Commission noted that "[e]xamples abound to demonstrate that one person's improper 'social welfare' program is another person's legitimate regulation of utilities in the 'public interest.'"

State Precursors: Economic Development Rates

- **Kentucky** – Commission in 2008 approved discount rate for any customer providing new electric loads despite statute prohibiting unreasonable preferences or advantages regarding rates on grounds that "reasonable" preferences were permitted. Kentucky Supreme Court approved similar rate on similar grounds in 2010.
- **Other states** – Commissions in Arizona, Florida, Oklahoma, and Michigan, among others, have authorized discounted electricity rates for new industrial customers under "just and reasonable" ratemaking authority on grounds that such increased loads result in positive impacts to all ratepayers through spreading overall system costs more broadly and promoting economic development and job creation in the state.
- **Takeaways:** Economic development rates also implicate social policy but not recognized as such like low-income rates.

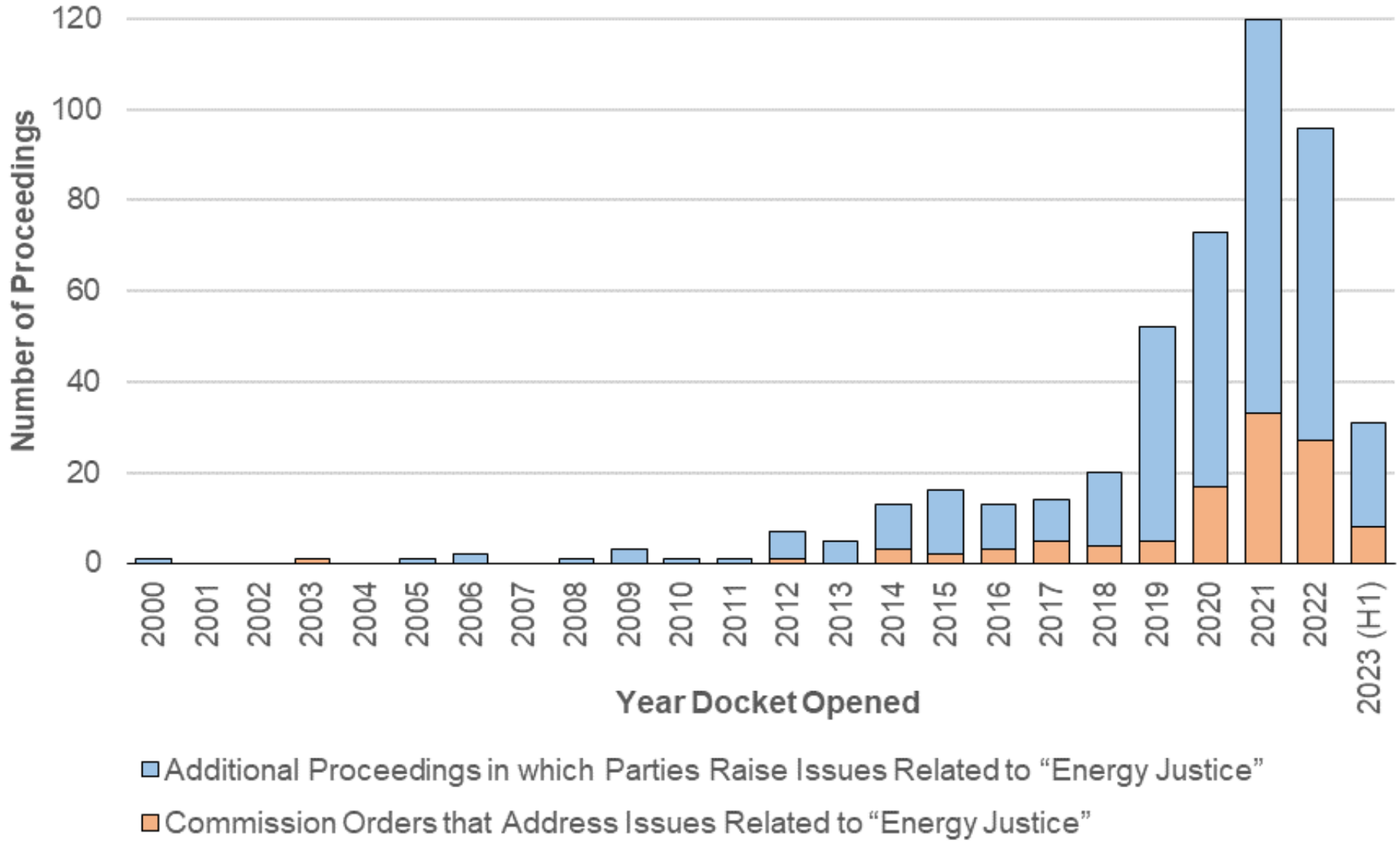
Energy Justice in Utility Ratemaking

Energy Justice Defined: “The goal of achieving equity in both the social and economic participation in the energy system, while also remediating social, economic, and health burdens on those historically harmed by the energy system.” (Inst. for Energy Justice)

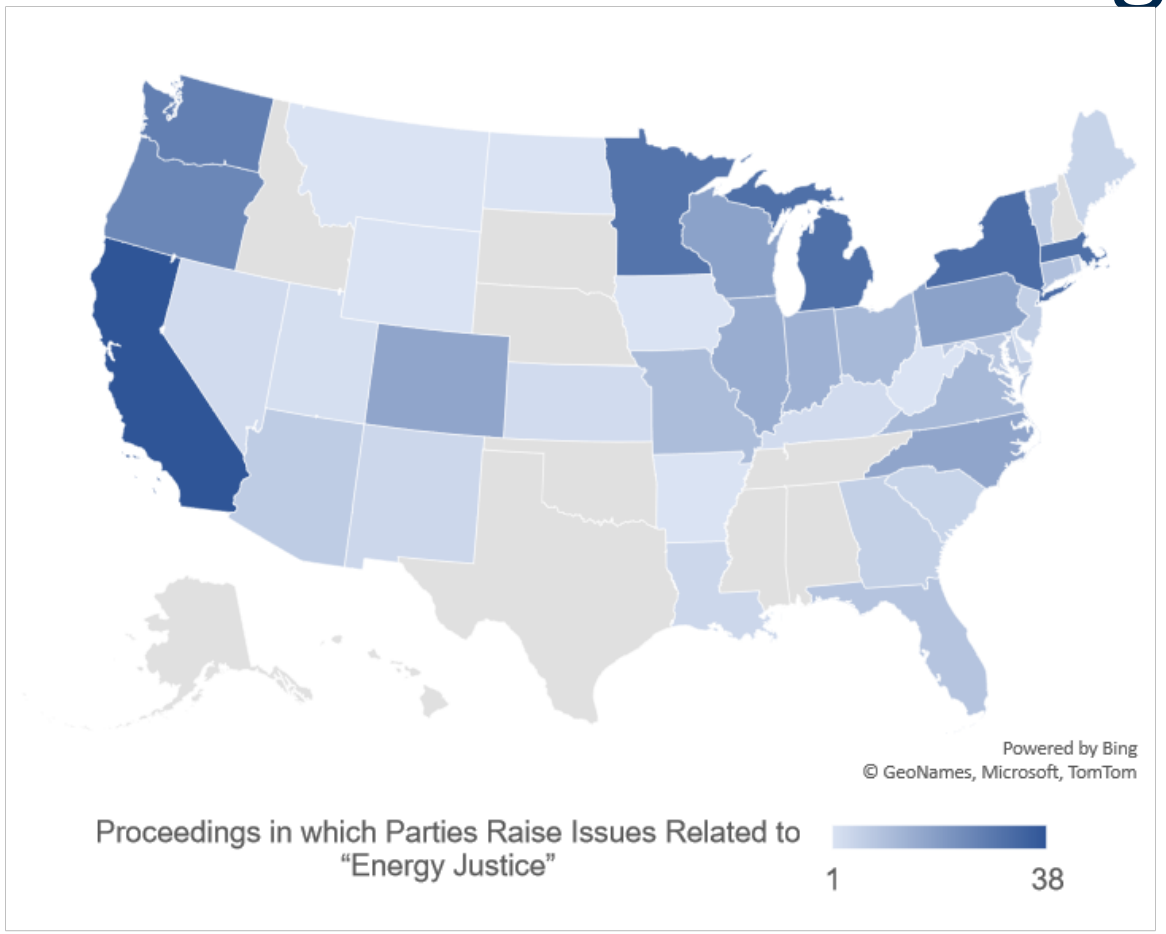
Energy Justice in Utility Ratemaking (cont.)

- **Four tenets of energy justice:**
  - Recognitional justice (who?) – identifying and advocating for communities that are ignored or misrepresented in energy decisions
  - Procedural justice (how?) – ensuring equitable decision-making processes across the energy system
  - Distributional justice (what?) – ensuring the benefits and burdens of the energy system are equitably distributed
  - Restorative Justice (why?) – how to respond to harm caused by the energy system and identifying systemic changes to prevent future harms

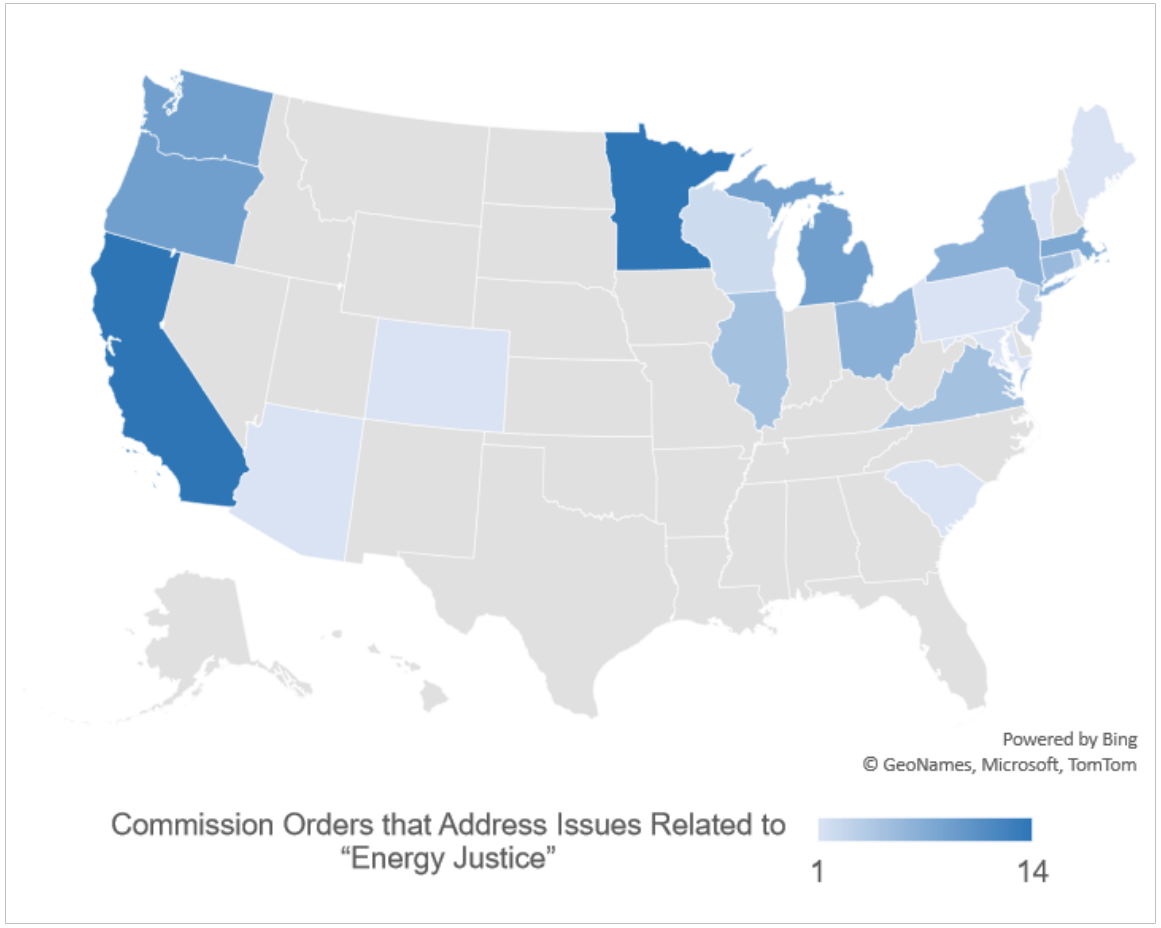
Regulatory Proceedings Engaging with Energy Justice



Regulatory Proceedings Engaging with Energy Justice

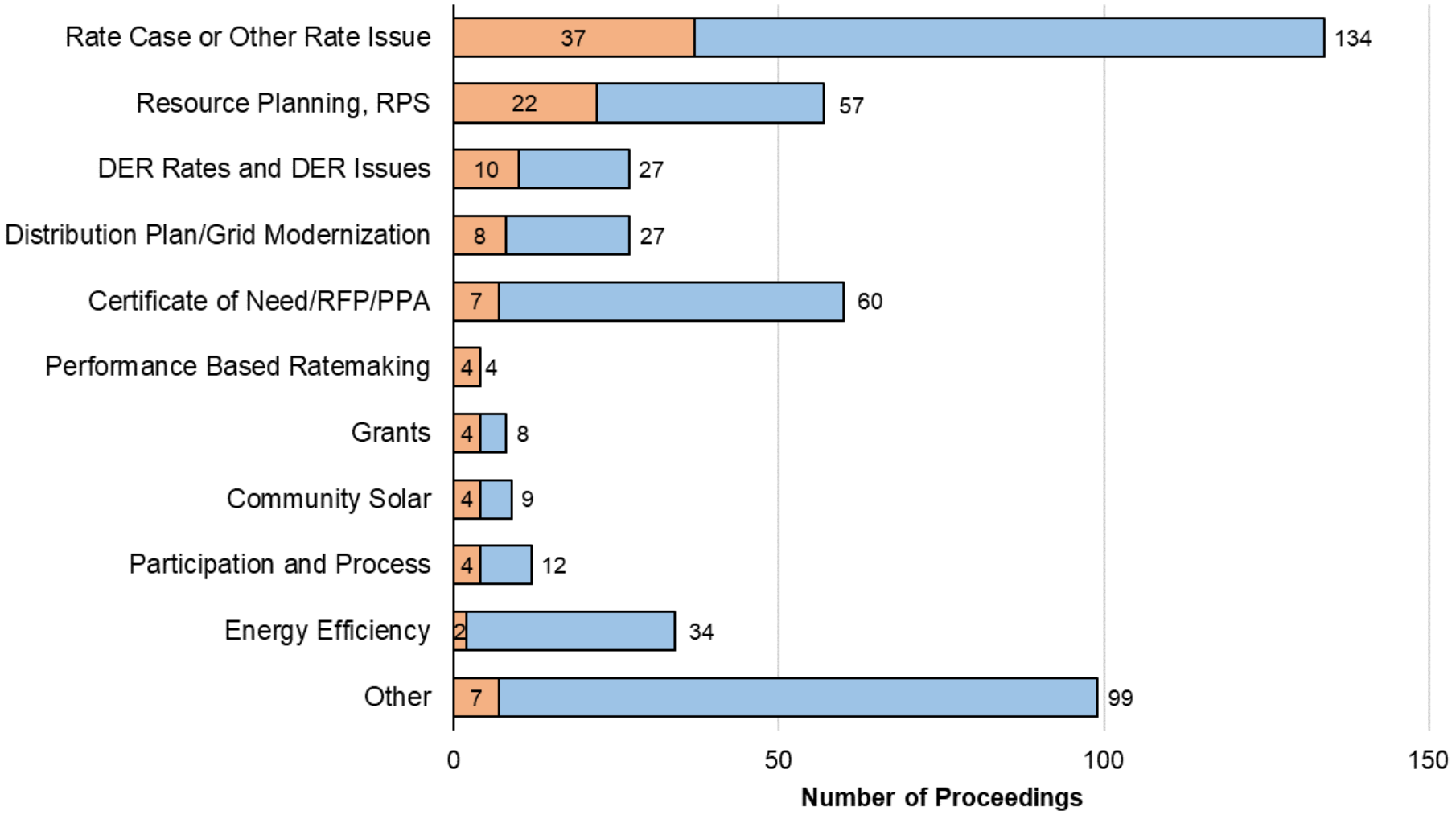


Proceedings in which Parties Raise Energy Justice



Proceedings in which Commission Orders Address Energy Justice

Regulatory Proceedings Engaging with Energy Justice



Energy Justice in Utility Ratemaking and Performance (with statutory mandate)

- **Statutory Mandates for Commissions to Consider Equity and/or Energy Justice in Ratemaking and other Proceedings** -- California, Colorado, Illinois, Maine, Massachusetts, New York, Oregon, and Washington
- **Example Language from Colorado:** Requires utilities to provide 40% of funds for renewable energy and retail distributed generation programs to "programs, incentives, or other direct investments benefitting low-income customers and disproportionately impacted communities" to address "historical equity issues concerning access by low-income customers to renewable energy and retail distributed generation programs . . ." Colo. Rev. Stat. § 40-2-124.

Energy Justice with Statutory Mandate (example)

- **Washington:**
  - Legislature enacted a statute expanding the Commission's "public interest" standard to include "[t]he equitable distribution of energy benefit and reduction of burdens to vulnerable populations and highly impacted communities" along with other factors.
  - Commission applied statutory mandate by adopting "the four core tenets of energy justice" to "bring equity into the context of utility ratemaking."
  - In later order, Commission approved utility proposal to apply "equity metrics" in performance measures and outcomes which included tracking the average energy burden of customers over time and by location and setting a 6% threshold for energy burden concerns.

Energy Justice in Utility Ratemaking and Performance (without statutory mandate)

- **Minnesota:**
  - 2023 PUC decision relied on “just and reasonable” ratemaking authority to require utilities to expressly incorporate “energy justice tenets” into future ratemaking proceedings in parallel with commission supervised “Equity Stakeholder Advisory Group” (ESAG).
  - Rejected argument by Xcel Energy that energy justice should not be part of ratemaking proceedings but instead addressed exclusively through ESAG proceedings

Energy Justice in Utility Ratemaking and Performance (without statutory mandate) (cont.)

- **Minnesota (cont.)** – 2024 Proposal by Xcel Energy arising out of Equity Stakeholder Advisory Group (ESAG):
  - two-year pilot project providing monthly electricity bill credits to every household within the U.S. Census Block Groups (CBGs) across the service territory where the "electric energy burden" exceeded 4% of gross median household income.
  - Would apply to 23,000 households with credits averaging $458 per household per year.
  - Annual program costs of $5.4 million to be funded by settlement between utility nuclear plant owners and DOE over nuclear waste storage (i.e. Yucca Mountain).

Energy Justice in Utility Ratemaking and Performance (without statutory mandate) (cont.)

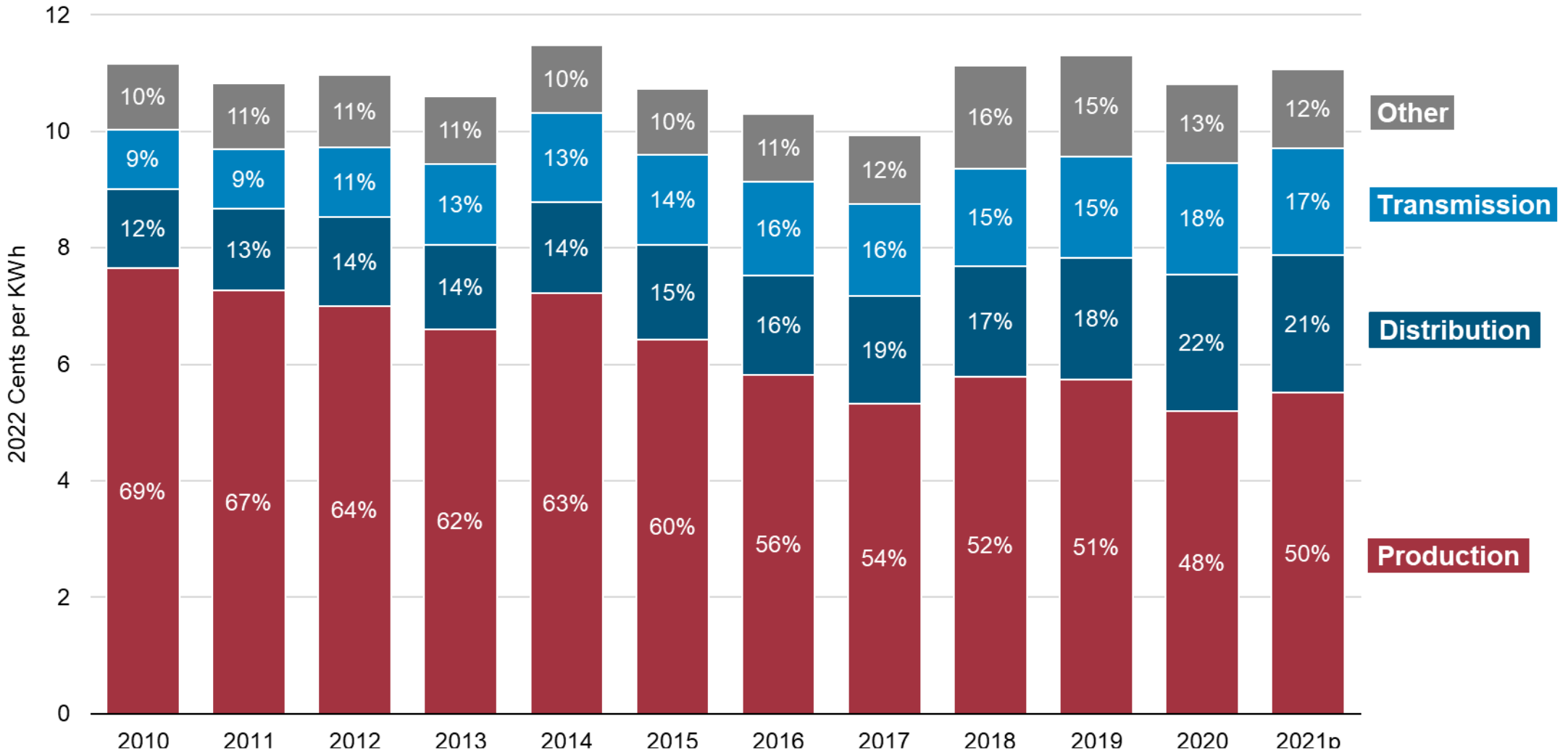
- **Minnesota (cont.)** – 2024 Proposal by Xcel Energy arising out of Equity Stakeholder Advisory Group (ESAG):
  - Xcel included legal analysis of why program was not "unreasonably preferential, prejudicial, or discriminatory" under relevant statute
  - Xcel reasoned proposal met the statutory standard because "it has the effect of addressing past discrimination—not by the Company, but due to systemic and long-term societal inequities that have led to geographic concentration of poverty, older and less efficient housing that increases energy costs, lower incomes, fewer job opportunities, and other disparities in certain identified CBGs."
  - "While the program may be considered preferential, if it is, we believe it to be reasonable, and in an anti-discriminatory direction."

Equity and Grid Modernization (goals/metrics)

- Energy burden and affordability
- Equitable distribution of DER costs and benefits
- Transparency and responsiveness of regulatory processes
- Equity concerns in outages and restoration times
- Improved access to weatherization and energy efficiency programs
- Distribution of federal clean energy funding and tax benefits to historically disadvantaged communities (Justice40, BIL, IRA)

- Select Resources:
  - Nichole Hanus et al., LBLN, PNNL, & E9 Insight, *Assessing the Current State of U.S. Energy Equity Regulation and Legislation* (Feb. 2023)
  - Kamila Kazimierczuk et al., PNNL, Bosque Advisors, SNL, *Equitable Electric Grid: Defining, Measuring, and Integrating Equity into Electricity Sector Policy and Planning* (Dec. 2023)

Delivery Costs of Electricity are Rising Nationally



Source: FERC and EIA estimates

Illinois Multi-Year Grid Plans

- Illinois passed the Climate & Equitable Jobs Act (CEJA) in 2021: 100% carbon-free power by 2045 including focus on equity programs
- CEJA included major regulatory reforms following the ComEd bribery scandal
- ComEd and Ameren proposed new regulatory processes for performance-based regulation, multi-year rates, and multi-year grid plans
- Advocacy groups argued that initial grid plans were inconsistent with statute to demonstrate efforts to bring at least 40% of the benefits of grid modernization to “Equity Investment Eligible Communities”
- Regulators rejected the grid plans, finding “that both utilities failed to sufficiently incorporate customer affordability into their proposals and their grid plans did not outline how 40 percent of plan benefits will be directed to low-income and environmental justice communities, among other shortcomings.”
- Both utilities have submitted revised grid plans.

Next Steps : Recognizing Social Policy

- Recognize commissions have always been social policymakers
- More transparency surrounding what social policies are at issue how they intersect with ratemaking, IRPs, grid modernization decisions
- More financial support for intervenors in regulatory proceedings
- Recognizing unique forum commissions can provide
- Recognize and support dynamic relationship between state commissions, legislature, and courts

Implication #1: New Theories of Utilities?

- Growing legal literature reviving study of “regulated industries” under the umbrella of “networks, platforms, and utilities” or “NPUs”
- Draws parallels between history and “social infrastructure” aspects of energy, water, postal service, railroads, telecommunications, banking and credit card platforms, and internet platforms like Google and Uber
- Should more of these industries be subject to public utility regulation in the public interest to address power imbalances?
- What about the flaws in current public utility commission work? (regulatory capture, insufficient regulatory capacity, etc.)

Implication #2: New Doctrinal Approaches?

- If state commissions are recognized as legitimate makers of social policy alongside legislatures, courts should grant commissions more deference to make that policy and allow legislature to correct, not courts
- Long history of commissions acting as a forum for evidence gathering, stakeholder engagement, and policy incubator with active legislative involvement
- Can compare with lack of same level of involvement by Congress in FERC context
- State commissions can act outside confines of Major Questions Doctrine and other recent Supreme Court decisions limiting federal agency discretion.

Implication #3: “Social Policy Process”

- Recognizing role of social policy in commission decisions provides important framing for stakeholders based on policy process theory.
- State commissions are “action situations” where diverse stakeholders can form coalitions, develop deep knowledge, invest in networks, and participate for long periods of time.
- New advocacy groups are forming around the country to join longtime advocates and raise profile of state commission work and support stakeholders in that work.

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NARUC Regulatory Innovation Webinar

Equity and Access in Grid Modernization

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October 24, 2024

Ameren Illinois Clean Energy Transition

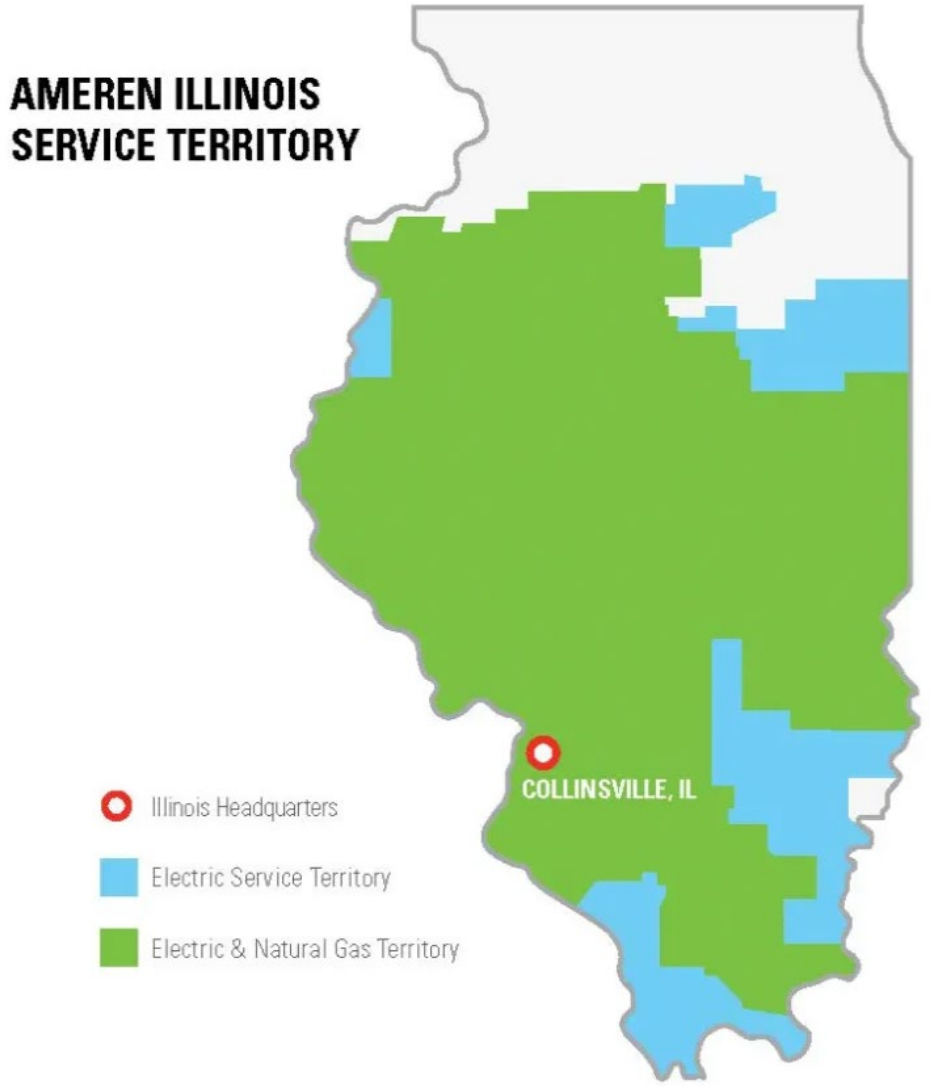
- Grid Transformation
- Clean Energy Transition
- Energy Efficiency
- Economic Development
- Business Development
- Regulatory Policy Implementation
- New Technology Implementation (i.e. demand response, NWAs, etc.)
- eMobility
- Beneficial Electrification

Kristol Simms
VP – Clean Energy Transition, Economic, Community and Business Development

Who We Are

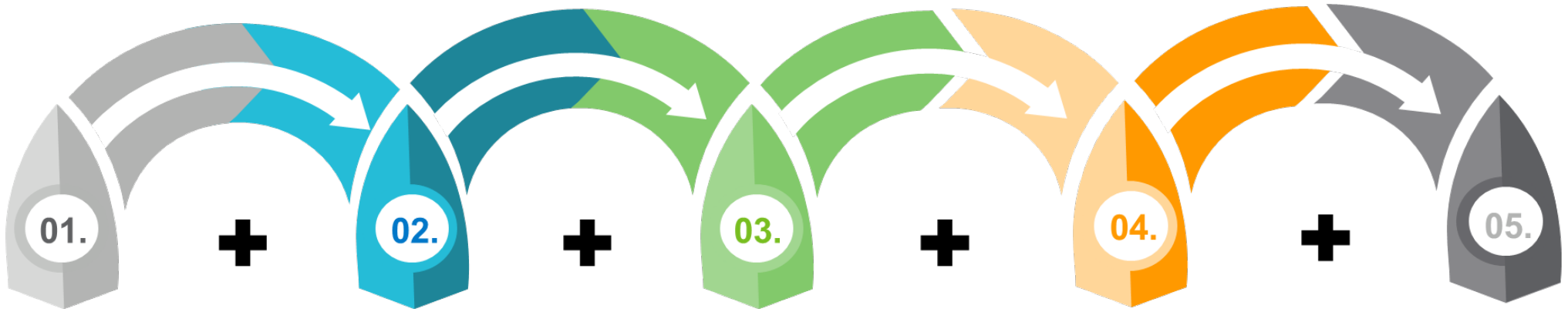
Ameren Illinois provides **energy** to customers in downstate Illinois

- **1.2M** Electric Customers
- **816,000** Natural Gas Customers
- **3,300+** Employees
- **1,200+** Communities Served
- **89** Counties in Territory



Evolution of System Planning

Grid planning has evolved in an additive way in the last two decades



Traditional Grid Planning
Time Immemorial

- One-way power flows
- No visibility beyond the substation
- Planning for worst case – peak hour on peak day

Grid Modernization
c. Late 2000s

- Driven by technology advancements and aging infrastructure
- Focused on new utility capabilities
- Cost benefit analysis to justify investments

DER-Inclusive Planning
c. Mid-2010s

- Two-way power flows
- Greater customer emphasis
- Forecasting load and DERs
- Off-peak planning periods
- Using DER as alternative solutions

Distribution System Plans
c. 2020s

- Expanded objectives (e.g., equity, cost-effectiveness)
- Heavy stakeholder involvement
- Broader scenario planning

Integrated System Planning
c. Mid-2020s

- Integration of distinct planning processes that historically have been separate
- Planning processes inform one another
- Coupled with other system planning (e.g., gas)

Grid planning addresses a broader scope of technical, customer, stakeholder, and regulatory objectives including equity

Directives from ICC Final Order

December 2024

In response to the Final Order, Ameren worked to develop a benefits framework incorporating stakeholder input that complies with the Act and meets the directives laid out in the Final Order.

- Demonstrate how 40 percent of benefits accrue to EIEC, EJ, and low-income communities using the Strawman proposed by JNGO and EDF as a starting point
- Identify a framework for identifying, tracking, and reporting
    1) What specific benefits are being supported (created)
    2) How much of these benefits are resulting from Grid Plan investments
    3) Who is receiving these benefits
- Coordinate with ComEd and Stakeholders before Grid Plan is refiled

AIC's Equity and Supporting Benefits Framework

Beginning with the benefits identified and quantified in the cost-effectiveness analyses

Figure 95: Equity Benefits Framework [2024 Refiling Update]

1 Identify in-scope Investments

- Identify projects and investments that fall within benefits sharing scope per the Act
- **Section 16-105.17(d)(3)** = clean energy and grid modernization investments
- **Section 16-105.17 (f)(2)(J)(i)** = MYIGP Programs, Policies and Initiatives

2 Quantify Benefits

- For cost effectiveness **Category 3** projects, benefits are an output of the Copperleaf analysis
- For cost effectiveness **Category 4** projects, monetized benefits are an output of net benefits or BCA analysis

3 Identify Communities

- Identify EIEC, EJ and low-income communities as defined by the Act
- **Section 16-105.17(d)(3)** = EIEC (EJ+R3) and low-income communities
- **Section 16-105.17 (f)(2)(J)(i)** = EJ and low-income communities
- Determine the proportion of customers in the in-scope communities

4 Allocate Benefits

- For each investment, allocate the share of benefits to the applicable communities based on the allocation methodology (targeted, general, geographic)
- Perform allocation investment types according to the Act:
  - **(d)(3)** - clean energy & grid mod investments
  - **(J)(i)** - MYIGP programs, policies and initiatives

5 Calculate Equity Benefits

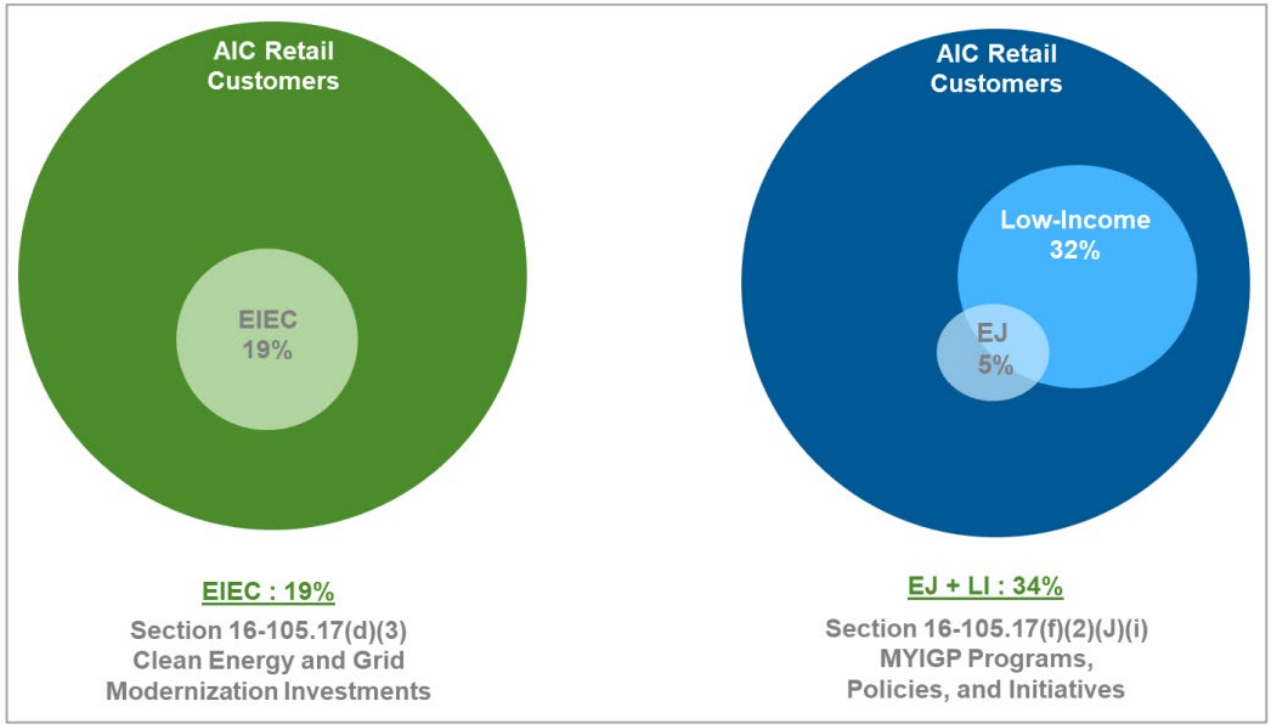
- Calculate the share of benefits for each allocation/investment type
- For each section of the Act, sum the share of benefits that flow to the identified community
- Divide the sum of the equity benefits by the total benefits created by the investments

Communities

In-Scope community and customer groups

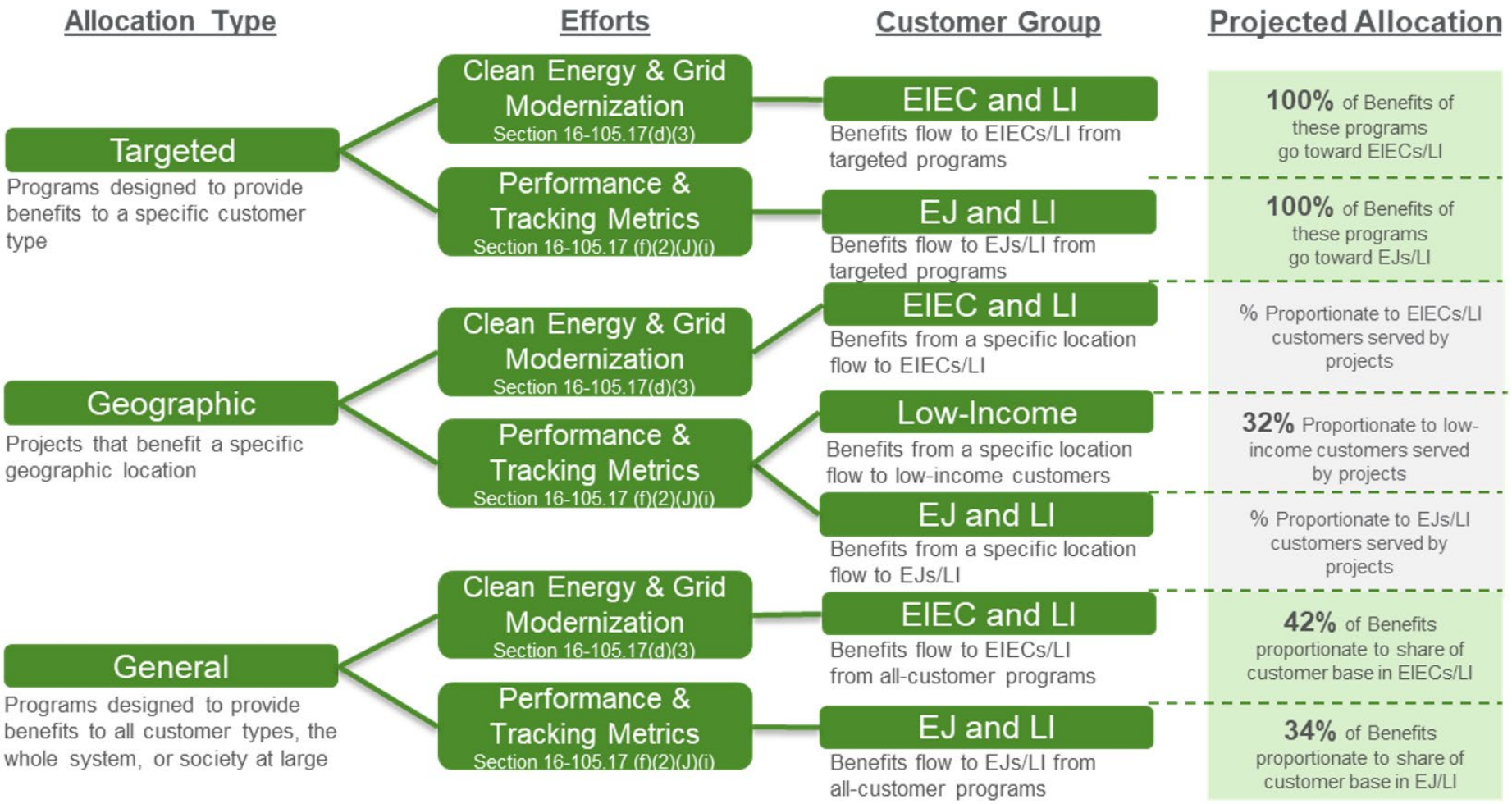
- In alignment with Section 16-105.17(d)(3) and 16-105.17(f)(2)(J)(i), Ameren identified the numbers of retail customers living in EIECs, EJs and R3 communities, and low-income customers.
- EIEC communities are defined as a combination of R3 and EJ areas and 19 percent of AIC's retail customers live in these communities
- The Company defines low-income customers as those customers with household incomes at or below 200 percent of the Federal Poverty Level ("FPL"). Throughout Ameren Illinois' service territory, approximately 32 percent of households meet this definition.

Figure 97: EIEC, EJ, and Low-Income Customers[155] [2024 Refiling Update]



Allocation Model

Each investment is assigned an allocation type



The allocation type governs the percent of overall benefit value allocated to EIECs, EJs, and low-income customers

Initial Results

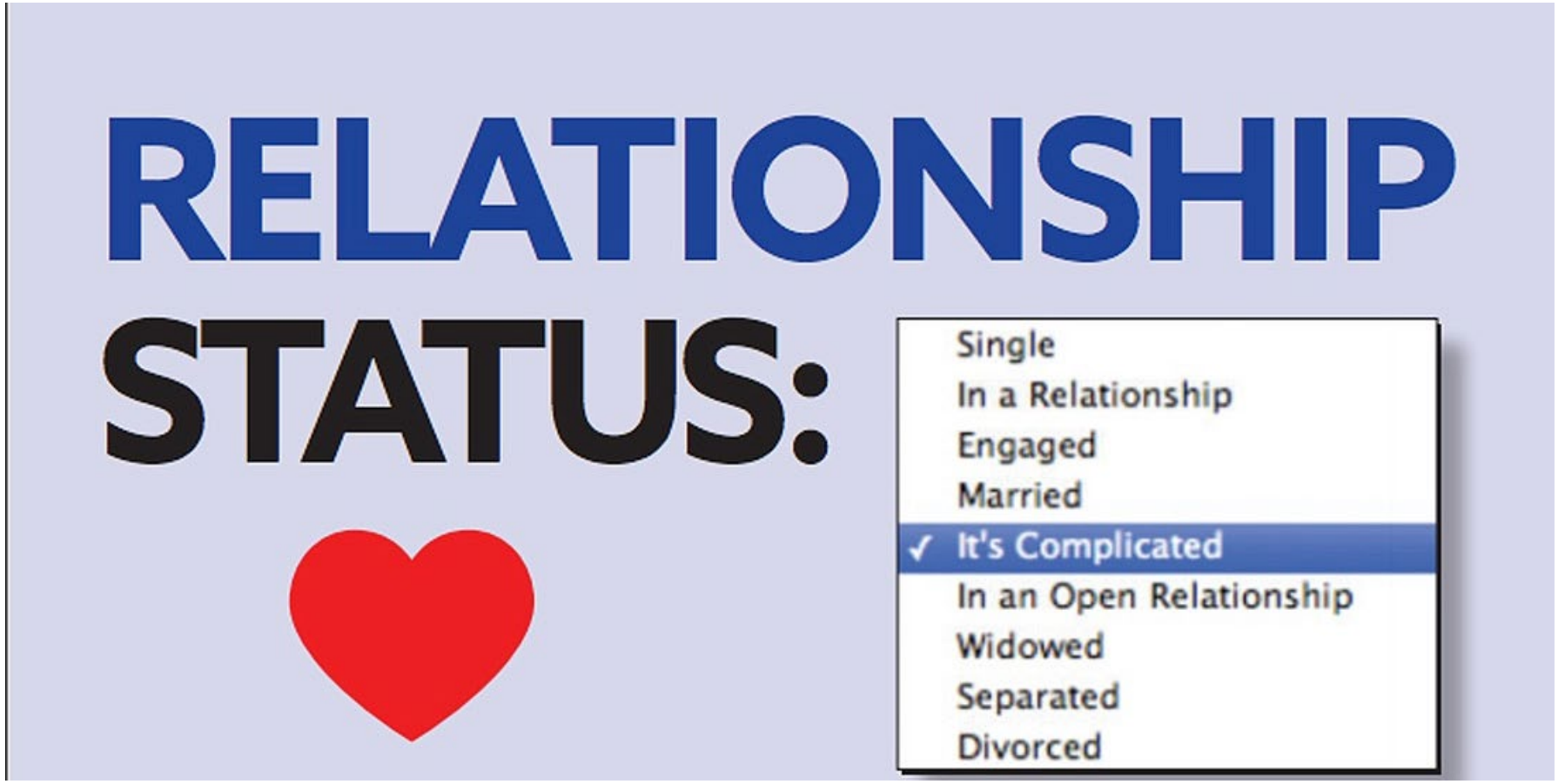
Filed in the March 13, 2024 Grid Plan

- Results indicate that as much as 58 percent of benefits of investments contained within the Grid Plan will flow to a combination of EIECs, EJs, and/or low-income customers (equity communities)
- Based on feedback from stakeholders, the Company's benefits calculation examines the proportion of benefits flowing to equity communities in three ways:
  - Clean Energy and Grid Modernization (1)
  - Performance Metrics (2)
  - Total Grid Plan Benefits (3)
- Two additional narrower analyses were considered accounting for a narrower interpretation of the Act, which limits both investment types and applicable communities and results in under-counting of benefits distribution

Table 62: Benefits Analysis Summary [2024 Refiling Update]

		Investment Type	Applicable Communities	Calculation	%
Equity Benefits Analyses					
1	Section 16-105.17(d)(3) plus low-income	Clean Energy and Grid Modernization Programs	EIECs (EJ+R3) + Low-income	Sum of benefits from clean energy and grid modernization investments flowing to EIECs and low-income customers / Sum of benefits from clean energy and grid modernization investments	52%
2	Section 16-105.17 (f)(2)(J)(i) plus R3	Performance Metrics Programs, Policies and Initiatives	EJ + Low-income + R3	Sum of benefits from Performance Metrics Programs, Policies & Initiatives flowing to EJs and low-income customers / Sum of benefits from Performance Metrics Programs, Policies & Initiatives	58%
3	Total Grid Plan	All MYIGP Programs, Policies and Initiatives	EIECs (EJ+R3) + Low-income	Sum of all MYIGP investments flowing to EIECs, EJs and low-income customers / Sum of all MYIGP investments	51%
Limited Analyses					
4	Section 16-105.17(d)(3)	Clean Energy and Grid Modernization Programs	EIECs (EJ+R3) (exclude low-income)	Sum of benefits from clean energy and grid modernization investments flowing to EIEC / Sum of benefits from clean energy and grid modernization investments	26%
5	Section 16-105.17 (f)(2)(J)(i)	Performance Metrics Programs, Policies and Initiatives	EJ + low-income (exclude R3)	Sum of benefits from Performance Metrics Programs, Policies & Initiatives flowing to EJs and low-income customers / Sum of benefits from Performance Metrics Programs, Policies & Initiatives	34%

It’s Still Complicated



Market Development Initiative

Overview

- The Market Development Initiative (MDI) is comprised of projects and partnerships all working together to engage customers and businesses who have not previously benefited from energy efficiency. MDI is delivering Energy Efficiency for All, and has three foundational goals:
    1. Engage customers who have not previously benefited from energy efficiency
    2. Increase number of energy efficiency jobs available to local and diverse candidates
    3. Support new or growing energy efficiency businesses

Market Development Initiative (MDI)

MDI Serves as the Connector

- Deploying strategies aimed at providing energy solutions that are holistic in nature and reduce the energy burden for customers, especially those in EIECs
- Intentionally seeks input and integrates community to gain insights into solutions developed and implemented through MYIGP
- Serves to educate the community on wealth building opportunities and support removal of barriers especially for energy equity investment customers.
- Develop and implement clean energy programs and initiatives that aim to reduce the energy burden and are inclusive of customers in energy income eligible communities
- Increase diversity in clean energy related career opportunities through innovative workforce solutions, education and training opportunities, and community partnerships
- Expand industry-wide network of diverse vendors and suppliers providing energy related services and products that benefit energy income eligible communities.

Why it matters

Real People.
Real Solutions.

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October 24, 2024

VOTE SOLAR

Defining Equity in Grid Modernization: Lessons from the Midwest

Will Kenworthy

Vote Solar

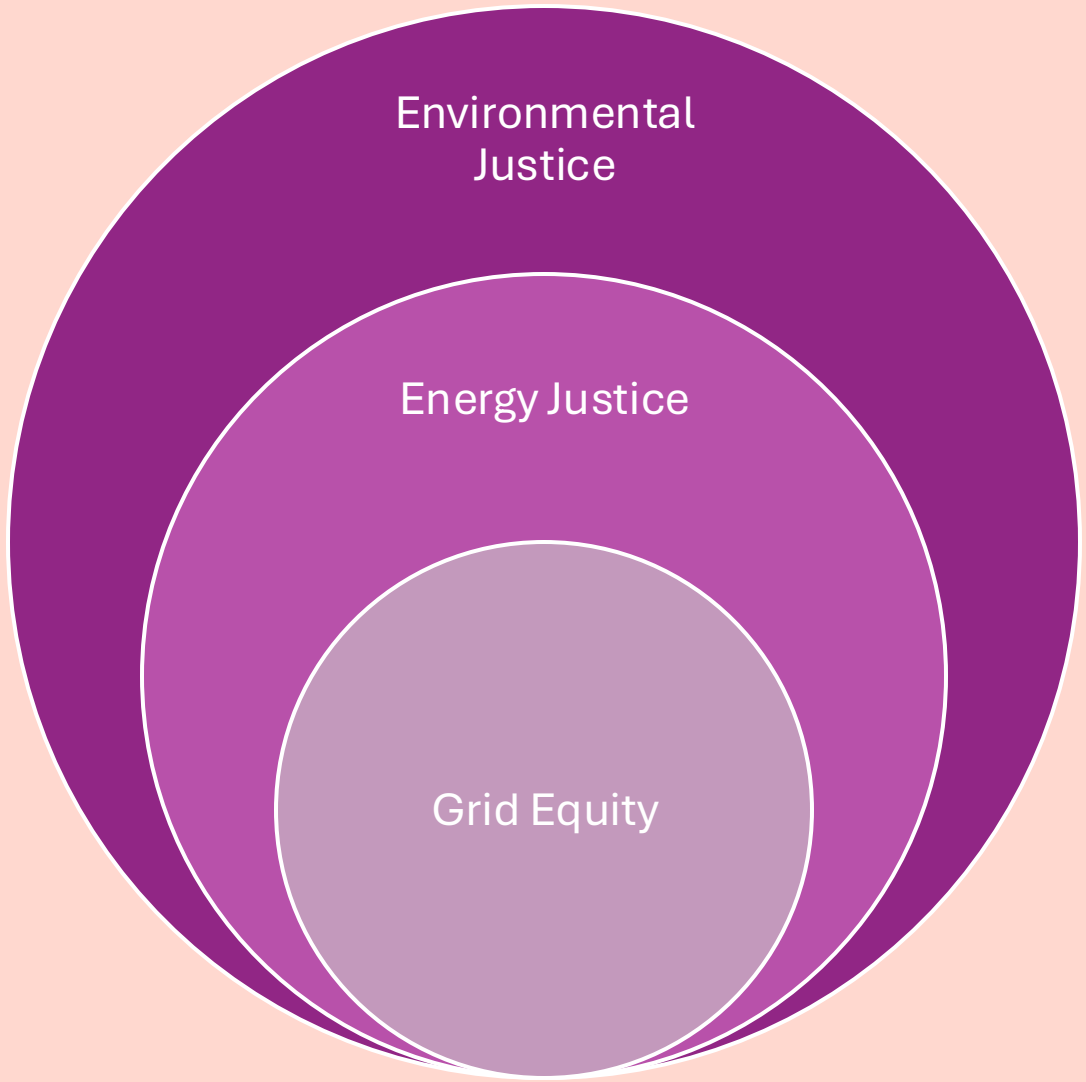
October 24, 2024

What Do We Mean by Grid Equity??

What is grid equity? Ensuring fair distribution of both costs and benefits of utility distribution system performance and grid modernization

Equity is about ensuring that all customer segments, particularly low-income and marginalized communities, receive access to clean energy technologies, greater grid reliability, and reduced energy costs

Identify whether there are disparities in grid reliability, access, and affordability



Foundational Question:

Do customers in disadvantaged communities have the same reliability and access to the benefits of grid modernization and electrification as customers in wealthy communities?

Success Stories & Lessons Learned in the Midwest

- Grid equity is part of the ”just and reasonable” standard
- Maintenance of effort is important to ensure equitable outcomes
- You can’t manage what you can’t measure. Need for equity/reliability metrics and equity/access metrics.
- Varies by state and Commission

Minnesota | Michigan | Illinois

Grid Equity in Minnesota

Engagement on Grid Equity Across Dockets

- Xcel Energy Rate Case
  - Energy justice incorporated into ratemaking
- Xcel Integrated Distribution Plan
- Safety, Reliability, and Service Quality Dockets
- Performance Metrics
- Separate Equity Stakeholder Advisory Group (ordered in 2019 Integrated Resource Plan)

MPUC Order in Xcel Rate Case: Role of Energy Justice

"The Commission recognizes the importance of Energy Justice tenets as recommended in its proceedings, including general rate cases. While the Commission must decide issues in each rate case based on the record before it in such proceedings, the Commission finds that ***the tenets of Energy Justice recommended by Just Solar are relevant to setting rates*** in this proceeding. " (MPUC Order, Xcel Rate Case, Docket No. 21-630, July 17, 2023)

U of M Study on Reliability and Service Quality in EJ Communities

Conclusion:
"The findings of this paper reveal strong associations between socioeconomic variables, including race and income, with utility disconnections and reliability metrics. Although the findings do not make causal claims, we believe that these **statistically significant associations** demand attention from energy system planners and policymakers." (Pg. 23)

Grid Equity in Michigan

Rate Cases

- Nearly annual cadence, especially for the largest IOUs

Distribution System Planning

- Single overarching docket for the three largest IOUs
- Not contested cases
- No Commission decision

Performance Based Ratemaking

- Deferred equity to phase 2

Many examples of the Commission's interest in ensuring equitable outcomes:

"The Commission continues to seek a comprehensive, detailed, and longer-term plan for this work, with benchmarks for performance, and with an analysis of the equity aspects of this work which are embedded in the safety aspects. As discussed in later sections and as recommended by the Staff, future equity analyses must include, at a minimum, EJ analyses that provide information in community vulnerability gradations based on the MiEJScreen composite score for the circuits." (MPSC Order , U-21297, pg. 93)

In the Dx Planning Docket Order of Sept. 26, 2024:

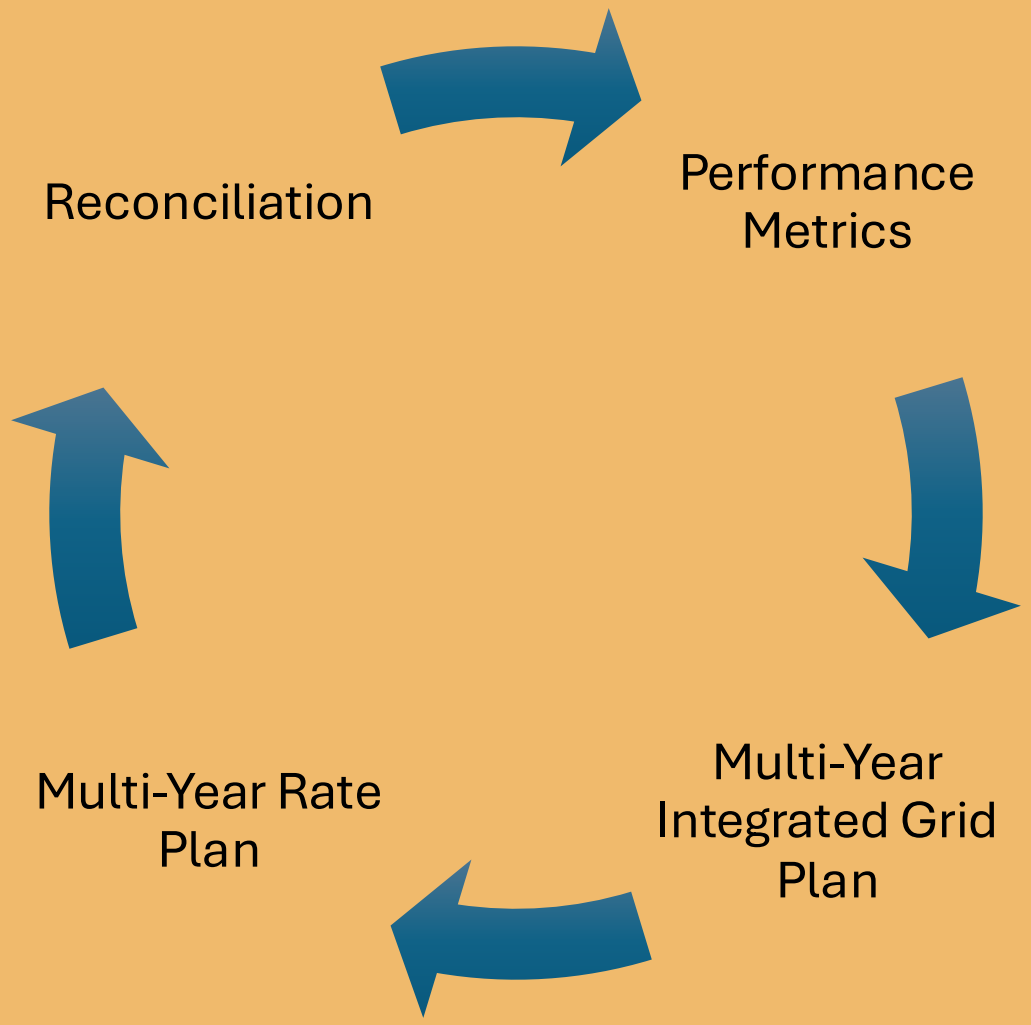
On the fifth common theme on customer affordability, rate impacts, and cost effectiveness, the Commission acknowledges the tension between capital expenditures and O&M and the need for core investments. The Commission thus emphasizes the importance of alternatives analyses, **along with EJ analyses**, in distribution plans and rate cases to show that the utilities" proposed investments are **equitably distributed** and in the best interest of customers and for utilities to seek alternative funding options, other than ratepayer dollars, whenever possible and engage in thirdparty and community outreach as set forth in the Staff"s straw proposal to aid in addressing customer affordability, rate impacts, and cost effectiveness." (MPSC Order, U-20147, September 26, 2024, pp 139-140)

Grid Equity in Illinois

Foundational and Transformational Statutory Framework:

- Climate and Equitable Jobs Act (CEJA) enacted in 2021
- Previously, Illinois operated under a decade-old formula rate mechanism
- CEJA fundamentally reshaped regulation of distribution utilities in Illinois (a restructured state, so not energy supply) and **explicitly incorporated equity** throughout the new process

Since 2022, Illinois has been engaged in a series of litigated cases for each of the large investor-owned utilities (Ameren Illinois and ComEd)



Policy Tools for Advancing Grid Equity

Equity Benefits Analysis aka Distributional Equity Analysis

Affordability & Energy Burden

Distribution System Planning

- DSP Filing Requirements
- Utility Processes

Utility Programs

- Affordability and Low-Income Assistance
- Community Solar
- Distributed Energy Resources (DER)

Equity Performance Metrics and Incentives in Performance Based Ratemaking Mechanisms

- Reliability
- Grid Access
- Benefits of Grid Modernization

Path Forward

Equity should be a foundational element of all grid modernization efforts.

You can’t manage what you can’t measure. Need for equity/reliability metrics and equity/access metrics.

Continued collaboration between regulators, utilities, and communities is essential to ensure no one is left behind in the clean energy transition

- Utilities should incorporate equity into their core investment and planning processes
- Commissions should ensure outcomes and utility performance are equitable

Maintenance of effort and attention across time and dockets

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