NARUC
National Association of Regulatory Utility Commissioners
MINI GUIDE

Community Engagement Approaches for Distribution System Resilience

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What is Energy Justice?

In the context of the energy system, energy justice refers to 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. Energy justice explicitly centers the concerns of marginalized communities and aims to make energy more accessible, affordable, clean, reliable, resilient, and democratically managed by and for all communities.[1]

What is Equity?

Equity is defined as the consistent and systematic fair, just, and impartial treatment of all individuals, including those who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise affected by persistent poverty or inequality.

The focus on electric grid resilience has gained significant momentum in recent years. The imperatives behind this focus are multifaceted, including the escalating threats of climate change, extreme weather events, and cyber and physical attacks. These challenges expose the vulnerabilities of the country's aging grid infrastructure and underscore the importance of resilience-centered planning and investment amid society's growing reliance on internet connectivity and electrification.

As a concept, resilience emphasizes the ability of the grid to "resist, absorb, and recover from high-impact, low-probability external shocks."[2] In contrast, grid reliability addresses the system's ability to mitigate lower-impact, higher-probability disruptions. This includes maintaining continuous power delivery during normal operations and managing more common issues, such as equipment failures, localized outages, and temporary imbalances between electricity supply and demand.

While both concepts require approaches to mitigate power disruptions, resilience has a broader scope by considering how the system can (1) withstand or avoid potential shocks; (2) mitigate the consequences of disruptions; (3) quickly respond to disruptions; and (4) adapt, recover, and prepare for the effects of future shocks.[3] This not only implicates planning for operational reliability and resource adequacy, but incorporates consideration of outage impacts across social, economic, health, and other complex dimensions.

The shifting focus toward grid resilience also necessitates a new paradigm of electric system decision-making that balances overlapping and potentially competing objectives. While optimizing for resilience, grid planners, consumers, and other stakeholders are increasingly asked to consider tradeoffs with goals such as social equity, environmental impact, decarbonization, energy affordability, and energy access.[4] These complexities require policymakers, regulators, and utilities to hear the unique

1 Baker, S., DeVar., S., and Prakash, S. Initiative for Energy Justice, 2019, *The Energy Justice Workbook*. https://iejusa.org/workbook/.

2 Unel, B., and Zevin, A. Institute for Policy Integrity, 2018, *Toward Resilience: Defining, Measuring, and Monetizing Resilience in the Electricity System*. https://policyintegrity.org/files/publications/Toward_Resilience.pdf.

3 Ibid.

4 Leader, J. Smart Electric Power Alliance, 2024, *Striking the Right Chord: Energy Policy and Resilience*. https://sepapower.org/knowledge/energy-policy-and-resilience/.

needs of their communities, developing a better understanding of the consequences of grid disruptions, the community's willingness to invest in resilience solutions, and the anticipated benefits of the community's vision for grid resilience.

Addressing these large-scale issues requires collaborative planning and decision-making that connects various institutions while actively engaging a diverse range of stakeholders and communities.[5] However, it is important to recognize the procedural barriers that can limit effective public participation, such as time constraints, lack of technical and financial resources, inadequate accommodations for disabilities or language needs, and unfamiliarity with complex regulatory processes. In response, the energy sector has increasingly prioritized expanding access to decision-making forums, especially for communities that have been underrepresented in decision-making and bear disproportionate burdens from environmental, climate, and grid disruptions. This shift has opened emerging opportunities for these communities—often referred to as disadvantaged, environmental justice, or impacted communities—to engage in and influence the distribution investment planning process.

Public utility commissions (PUCs) provide a central platform for engaging communities in grid resilience planning. By incorporating community needs into their oversight of utility grid planning and operations, PUCs can promote equitable outcomes in the design and functioning of the grid, ensuring that solutions are tailored to the unique circumstances of these communities. An inclusive and accessible PUC engagement can benefit communities and commissions such as by fostering stakeholder support throughout the regulatory process, proactively identifying common interests and areas of disagreement, and bolstering support for prudent capital investment through mutual education.[6]

This mini-guide explores approaches and lessons to advance equitable grid resilience through the stakeholder engagement process. It evaluates engagement through PUC distribution investment planning, the roles of various stakeholders, and the drivers that precipitate engagement in grid resilience planning.

Summary Table of Stakeholder Engagement Models

The following table summarizes the actual engagement models used in eight states, organized by major policy drivers. Stakeholder engagement models are discussed in this mini-guide.

Initiating Party	Organizations	Relevant Decision-Making Processes	Relevant Dockets	Examples of Engagement Models
Commission Order	Hawaii Public Utilities Commission and Hawaiian Electric	Integrated Grid Planning Docket for Hawaiian Electric, Energy Equity, and Justice	Docket 2018-0165, Docket 2022-0250	Formal: investigation proceeding Informal: public meetings, panel discussions, stakeholder council, working groups, technical advisory panel
Legislation	Connecticut Public Utilities Regulatory Authority	Public Act 19-35, Equitable Modern Grid, Stakeholder Group Compensation Program, Implementation of Legal Services Funding	Docket Nos. 17-12-03, 23-09-34, 23-11-04	Formal: investigation proceeding, rulemaking proceedings Informal: public meetings, working groups
	Illinois Commerce Commission	Senate Bill 2408 - Climate and Equitable Jobs Act, Senate Bill 2814 - Future Energy Jobs Act (2016)	Multi-Year Integrated Grid Plan Workshops	Informal: workshops
	Oregon Public Utility Commission	House Bill 2021 Investigation into Clean Energy Plans, Implementation Activities	Docket Nos. UM 2225, AR 655, AR 651, UM 2272	Formal: investigation and rulemaking proceedings Informal: Community Impacts and Benefits Advisory Group

5 Wendel, J. Pacific Northwest National Laboratory, 2024, *Collaboration, Data Sharing, and Community Engagement Are Key to Building a Resilient Grid.* https://www.pnnl.gov/publications/collaboration-data-sharing-and-community-engagement-are-key-building- resilient-grid.

6 De Martini, P., Brouillard, C., Robinson, M., and Howley, A. ICF, 2016, *The Rising Value of Stakeholder Engagement in Today's High-Stakes Power Landscape.* https://www.icf.com/-/media/files/icf/white-paper/2016/energy-regulation-stakeholder-engagement.pdf.

Initiating Party	Organizations	Relevant Decision-Making Processes	Relevant Dockets	Examples of Engagement Models
Executive Action	Kentucky Governor's Office and Energy and Environment Cabinet	Kentucky Economy, Energy and Environment (E3) strategy	—	Informal: public comments, work groups, public meetings
Community Initiation	Molokai Clean Energy Hui and Sustʻāinable Molokai	Molokai Community Energy Resilience Action Plan (CERAP)	Docket No. 2019-0178	Formal: investigation proceeding Informal: community meetings, workshops, focus groups, one-on-one discussions, surveys
	Energy Equity Hui	Hawaii Clean Energy Initiative	Docket No. 2022-0250	Informal: working groups
Federal Funding	Public Utilities Commission of Ohio	IIJA Sec. 40101(d) application process/public input	Case No. 22-755-AU-COI	Formal: investigation proceeding

PUC and Stakeholder Roles

State Public Utility Commissions

As mandated through state statutes, PUCs traditionally have the role of ensuring that utilities provide safe, affordable, and reliable services to customers. However, recent shifts in state and federal policy, emerging consumer needs, and new federal funding opportunities have prompted commissions to consider a broader range of objectives such as equity and resilience.[7] With these objectives in mind, commissions regulate distribution utilities through means such as setting electric and gas rates, establishing service quality and reliability standards, and reviewing and approving utility infrastructure investments.

State Energy Offices and Other State Agencies

At the state level, other agencies also play a role in enhancing grid resilience. State Energy Offices develop and implement energy policies and programs at the direction of their governors or legislatures. This may include conducting comprehensive energy planning, developing state energy security plans, or coordinating with State Emergency Management Agencies for energy emergency response and preparedness. For example, with the enactment of the Infrastructure Investment and Jobs Act (IIJA), around $2.3 billion was allocated to states, tribes, and territories for investments to enhance grid resilience. Most states have designated State Energy Offices as lead agencies in the implementation of these funds.[8] State Energy Offices also often coordinate with a range of stakeholders including community groups, the private sector, labor unions, tribes, and universities.[9] Related National Council on Electricity Policy (NCEP) mini-guides offer deeper discussion into the roles of State Energy Offices and state agency coordination during energy-related emergencies.

Utilities

Distribution utilities have a central role in preventing power outages as they operate and maintain the grid and respond to disruptive events such as extreme weather and equipment failure. Utilities may take steps to enhance grid resilience through means such as making investments in grid-hardening infrastructure, distributed energy resources, advanced monitoring and control technologies, and vegetation management. However, states are increasingly recognizing the need for utilities to engage in robust distribution investment planning processes to evaluate these solutions across various scenarios and planning horizons. Recent utility planning efforts have expanded to include participation and input from stakeholders and communities previously excluded from the planning process.[10] Unlike investor-owned utilities (IOUs), cooperative and municipal utilities often maintain closer relationships with their communities due to their member-owned and local government-owned structures, respectively.

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7 Ciulla, J., Cross-Call, D., Felder, C., and Schwartz, A. RMI, 2021, *Purpose: Aligning PUC Mandates with a Clean Energy Future.* https://rmi.org/wp-content/uploads/2021/07/PUC-Clean-Energy-Goals-Report.pdf.

8 O'Brien, D. Environmental and Energy Study Institute, 2023, *Implementing the Inflation Reduction Act and Infrastructure Investment and Jobs Act.* https://www.eesi.org/briefings/view/030923camp.

9 National Association of State Energy Officials, *Grid Resilience.* https://www.naseo.org/issues/electricity/resilience.

10 Schwartz, L. Lawrence Berkeley National Laboratory, 2023, *State Approaches for Distribution System Planning, including Grid Modernization*. https://eta-publications.lbl.gov/sites/default/files/ma_gmac_idsp_state_requirements_20230413_updated.pdf.

Communities

Communities are typically defined by shared characteristics or interests, including geographical location, cultural identity, and socio-demographic factors. Often, through the coordination of community-based organizations, these communities may pursue their own energy resilience solutions, such as securing grants to develop microgrids or resilience hubs or creating their own energy resilience plans.

Promoting equity in the grid resilience planning process, however, often calls for decision-makers and utilities to prioritize investments that support communities facing the greatest social, economic, and environmental burdens. In many regions of the United States, this includes Black communities, communities of color, tribes, and rural and low-income populations. States or utilities may initiate actions toward community energy resilience by adopting standardized methods to identify these communities, utilizing various criteria and indicators such as income levels and pollution exposure (learn more about state approaches to defining these communities of interest). Others may take more targeted approaches that specifically define and assess community vulnerabilities to electric grid disruptions.

To effectively advance grid resilience, it is essential to understand the services that rely on electricity and the consequences of both short- and long-duration outages. Community members and advocacy organizations have leveraged new engagement opportunities to provide critical input on the impacts of power interruptions, identify resilience goals and metrics, and propose appropriately scaled resilience solutions. For instance, communities may share insights on how outages affect local businesses, health outcomes, and essential services, which can help decision-makers prioritize investments that enhance overall resilience.

While commission proceedings must allow for public input, their technical, complex, and quasi-judicial nature often does not create accessible pathways for participation. Emerging regulatory processes are addressing these barriers by creating more informal forums for community engagement that do not require extensive resources or technical expertise. These forums, such as public workshops and conferences, facilitate the inclusion of diverse opinions and experiences from communities, which are crucial for informing decisions related to grid resilience.

Local Governments

Local governments can offer unique perspectives in distribution investment planning. Not only are they well-attuned to the needs of their communities due to their proximity, but they also have often the first responders following extreme weather and other disaster events. As discussed in the *NCEP Mini-Guide: Local Government Engagement with Public Utility Commissions*, local governments are optimally situated to address resilience issues given their roles in public health, emergency services, economic development, and authority over building codes and land use.[11] However, local governments are not expected to represent the voices of all of their constituents, thereby prompting non-governmental community actors to participate in the planning process.

Federal Agencies

Federal investments can help spur necessary improvements to modernize the electric grid. Through the enactment of the Bipartisan Infrastructure Law in 2021, the U.S. Department of Energy (DOE) was authorized to administer $14 billion in financial assistance to enhance the reliability and resilience of the electric grid. This includes $2.5 billion in formula grants for states and tribes to strengthen and modernize their power grids against the threat of climate change and extreme weather.

Drivers of Engagement on Grid Resilience

Drivers of grid resilience can take various forms, each influencing the types of partners involved as well as the design and outcomes of the process. These efforts include formal participation activities, such as rate-setting proceedings, quasi-legislative sessions, and adjudicatory hearings, as well as informal activities such as public meetings and technical workshops. With the increasing accessibility and diversification of engagement in grid planning, these approaches provide critical opportunities to promote equitable grid planning. The following section explores these opportunities, highlighting the successes and challenges of community engagement in enhancing distribution system resilience.

Commission Orders

PUCs may initiate stakeholder engagement via formal and informal processes through commission orders. For example, in 2019, the Hawaii Public Utilities Commission (HPUC) opened the Hawaiian Electric (the largest electric utility in Hawaii) Integrated Grid Planning (IGP) docket (2018-0165) to identify grid needs to support the state's renewable energy transition. The IGP process

11 Crandall, K., and Duncan, J. National Council on Electricity Policy, 2019, *Local Government Engagement with Public Utility Commissions*. https://pubs.naruc.org/pub/41BBF1F5-ED6E-79C8-CC25-14E9721A6E8B.

includes a broad range of stakeholders, with parties formally participating in the docket process as well as in several informal forums for the public, technical experts, and consumer and community representatives. For the public, Hawaiian Electric engaged stakeholders through public meetings and discussions.[12]

State Legislation

Legislation can spur a broad range of engagement activities involving PUCs and other stakeholders. In 2021, Oregon enacted House Bill 2021 (HB 2021), creating utility clean energy targets with consideration for benefits to local communities. The legislation also required a risk-based examination of resiliency opportunities. This prompted the Oregon Public Utility Commission (OPUC) to initiate several proceedings, including the Clean Energy Plan Investigation docket (UM 2225) and a rulemaking docket (No. AR 651).[13] Through these proceedings, the OPUC provided formal and informal routes for participation, with a large focus on the "community lens" to inform the resiliency planning via questionnaires, workshops, written comments, and public meetings.[14] State legislation may also prompt local action on grid resilience. For example, Colorado House Bill 22-1013 created the Microgrids for Community Resilience grant program for cooperative- and municipal-owned utilities to establish microgrids in rural communities.[15]

In Illinois, energy equity has been integrated through legislation across the last few decades. Recent key legislation includes the 2016 Future Energy Jobs Act (Senate Bill 2814), which updated the state's Renewable Portfolio Standard and required the Illinois Commerce Commission (ICC) to approve long-term renewable resource plans, and the 2021 Climate & Equitable Jobs Act (CEJA), which initiated comprehensive grid planning requirements, including IOUs to submit Multi-Year Integrated Grid Plans (MYIGPs). To provide input to the utilities' MYIGPs, the ICC hosted stakeholder workshops with a broad array of stakeholders including representatives from environmental justice and low-income communities, organized labor, and third-party technology providers.[16]

Common barriers inhibiting the meaningful participation of community members and organizations in stakeholder activities are time and resource limitations. Monetary compensation, particularly to those who may be the most impacted by a decision, enables greater participation and access to an engagement, and states may authorize agencies to provide compensation to community members. For example, Washington's Second Senate Bill 5793 (2022) enabled all state agencies to provide a stipend to individuals who are low-income or have lived experience to support their participation in activities such as boards, commissions, task forces, committees, and work groups.[17]

Executive Actions

Governors are well-positioned to direct their State Energy Offices or other state agencies to pursue efforts to advance grid resilience. They can appoint a Chief Resilience Officer who can coordinate interagency resilience efforts across the state. They may lead the development of energy resilience plans that bring together various facets of state government as well as community stakeholders. Kentucky's E3 strategy, which was announced in 2021, is an example of this strategic effort to build community and energy sector resilience.[18]

Community-Initiated Efforts

Across the country, there are diverse examples of communities leading the charge to identify their grid resilience needs and implement or advocate for their preferred solutions. The Molokai Clean Energy Hui's Community Energy Resilience Action Plan (CERAP) exemplifies the role of grassroots efforts in fostering resilience at the community level in Hawaii. Motivated by a desire to center their needs in Hawaii's energy planning efforts, the community of Molokai invested in their community-driven energy resilience planning. Through a robust process of co-creation, the community developed the CERAP and submitted it under HPUC Docket No. 2019-0178 as an alternative to a proposal by Hawaiian Energy.[19] At the state level, a community-led initiative in

12 Hawaii Public Utilities Commission. Updated April 2023, Integrated Grid Planning Docket for Hawaiian Electric (2018-0165). https://puc.hawaii.gov/energy/integrated-grid-planning-docket-for-hawaiian-electric-2018-0165/.

13 Oregon Public Utility Commission (OPUC). HB 2021 Implementation Activities. https://www.oregon.gov/puc/utilities/pages/hb2021-implementation-activities.aspx.

14 OPUC. 2022, UM 2225 Investigation into Clean Energy Plans. https://edocs.puc.state.or.us/efdocs/HAH/um2225hah91948.pdf.

15 Colorado House Bill 22-1013. 2022, Microgrids for Community Resilience Grant Program. https://leg.colorado.gov/bills/hb22-1013.

16 Illinois Commerce Commission (ICC). n.d., *Multi-Year Integrated Grid Plan Workshops.* https://icc.illinois.gov/informal-processes/multi-year-integrated-grid-plan-workshops.

17 Wash. Legis. Second Substitute S.B. 5793, Reg. Sess. 2022, https://lawfilesext.leg.wa.gov/biennium/2021-22/Pdf/Bills/Session%20Laws/Senate/5793-S2.SL.pdf?q=20220526134140.

18 Kentucky Energy and Environment Cabinet. *Kentucky Energy Strategy*. https://eec.ky.gov/Energy/Pages/KYE3.aspx.

19 Molokai Clean Energy Hui. 2023, *Molokai Community Energy Resilience Action Plan.* https://simplebooklet.com/5r9UVtxXxSR9WX0HSmmHrx#page=1.

Hawaii, the Energy Equity Hui[20] brings together a diverse group of government and non-government partners to build equity in Hawaii's clean energy transition.

Federal Funding

The Public Utilities Commission of Ohio (PUCO) 40101(d) application process demonstrates how commissions may coordinate with communities and stakeholders through federal funding vehicles. Ohio's goals for the funding include improving reliability in disadvantaged communities and improving customer experience, demonstrating beneficial community impact using metrics developed with community input, and improving customer experience with a focus on communication and understanding customer.[21] PUCO also facilitated informal forums as part of DOE's Grid Resilience Innovation Program, receiving expansive feedback from stakeholders on the application process.[22]

Challenges and Success in Community Engagement for Distribution System Resilience

CHALLENGE: Asymmetry of information and expertise between incumbent stakeholders and communities.

Adequate education about the energy system, the utility planning process, and commission decision-making is a critical foundation for successful engagement. In Illinois, an objective of the MYIGP stakeholder workshops was to educate and equip interested stakeholders to effectively and efficiently provide input.[23] This need is similarly recognized in Hawaii where lack of access to information is attributed to low participation asymmetry between stakeholders.

"I think we need more foundational education about the energy system and what we need to do to get to a hundred percent renewables. Molokai's CERAP process is a good model to look at for community information-sharing and education that can inform an in-depth process for equitable planning for grid resilience." – Pete Polonsky, Hawaii Public Utilities Commission (HPUC)

CHALLENGE: Commission staff and communities have limited capacity.

The increasing calls for engagement and equity have stretched the capacity of commission staff and the communities they hope to engage. One way to address this is for commissions to partner with other organizations to engage multiple networks and share capacity.

"I think the ideal mix is partnering with other organizations because then we can bring in multiple networks to make people aware of meetings, especially when we're having them in communities." – Pete Polonsky, HPUC

SUCCESS: Informal engagements may help streamline decision-making and help find common ground between stakeholders.

Engaging communities outside of formal processes, such as through technical workshops, may be more efficient than dealing with back-and-forth filings, making commission decision-making easier and quicker. This approach also enables stakeholder groups to present and address their respective perspectives and work together to find common ground.

"One tactic we use is to set up technical conferences to push stakeholders to resolve their conflicts. We can use the in-person conferences to address the perspectives of different groups. This is oftentimes more productive than back-and-forth filings. It might enable more middle ground because if we can get parties in a docket to come to a consensus on an issue, it makes our decision-making so much easier and allows us to focus on other priorities." – Pete Polonsky, HPUC

"We do PURA 101s. We go out to different places in the state and talk about our agency. We try to keep it as simple as possible; really try to talk about the topics that impact the individual." – Thomas Lopez, Connecticut Public Utilities Regulatory Authority (PURA)

20 Energy Equity Hui. https://weare100.org/energy-equity-hui/.

21 U.S. Department of Energy, Grid Deployment Office. 2023, *Grid Resilience State and Tribal Formula Grants: Ohio.* https://puco.ohio.gov/utilities/electricity/resources/iija-program-narrative.

22 NARUC. 2023, *Staff "Surge Call" – Tuesday, March 14th, 2023: Federal Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA).* https://pubs.naruc.org/pub/CE050DF0-0C9E-0B02-9A0D-31B55C4A2046.

23 ICC. n.d., *Multi-Year Integrated Grid Plan Workshops*. https://icc.illinois.gov/informal-processes/multi-year-integrated-grid-plan-workshops.

SUCCESS: Integrating flexibility in the community engagement process.

Commission staff noted success in enabling flexibility throughout the engagement process, particularly in informal engagements. This allows them to acknowledge and address issues raised by participating communities and improve the quality of engagement. Flexibility also looks like offering different mechanisms for individuals to provide input, such as by accepting both written and oral comments.

"I think it is really important to help people understand the hard dates, but also understand where flexibility and fluidity can occur… You start out by opening the channel of communication and then you have to demonstrate that you are listening to the community. If you don't do that, you can dishonor the effort that they took. And so that was important for us not to appear that rigid and learn from what we were hearing." – Heidi Caswell, Oregon Public Utility Commission (OPUC)

SUCCESS: Building transparency and accountability throughout the process.

Commissions can help to build transparency within the decision-making process by clearly communicating when and why community input is or is not factored into a decision. They may also encourage utilities to reframe how they communicate costs and charges on customer bills, making this information more relatable to a non-technical audience and helping draw connections between arcane regulatory decisions and the financial impacts for the consumer.

"When something is not acted upon, people need to know why. How do you honor input and respond politely? Part of this is to be transparent about what is being heard and what actions you have taken. This can happen with both the utility and commission, and requires being clear about how community input influences a decision." – Heidi Caswell, OPUC

"We are helping customers demystify their utility bills by describing the different rate components. We recently redesigned the electric bill in Connecticut, and the bill is divided into four components: supply, transmission, distribution, and public benefit." – Thomas Lopez, Connecticut PURA

SUCCESS: Building upon lessons learned over time.

Commissions may undertake different methods to engage communities on equity and resilience. While these efforts may be met with varying levels of success, it is important to recognize that achieving equity is not simply black and white, but an ongoing process. Accordingly, accepting the need for continuous improvement and occasionally reflecting on progress achieved to date may help motivate continued efforts in light of challenges.

"We are at the leading edge of this evolution, and I think we should be accepting that we do not have to get it right but should keep trying. It is also important to see how far we have come in a few years and be mindful that just having these types of conversations is a huge step forward." – Heidi Caswell, OPUC

Conclusion

In conclusion, this mini-guide has delved into the critical intersection of grid resilience, equity, and stakeholder engagement. By exploring the roles of various stakeholders, the drivers that motivate them, and successful engagement models, it is evident that equitable distribution system planning is vital to achieving grid resilience. The insights shared by key interviewees and perspectives in this field shed light on the challenges, successes, and lessons learned, contributing to a more comprehensive understanding of advancing grid resilience through stakeholder engagement.

Interview Excerpts

The following text is an abridged transcript of interviews conducted with Thomas Lopez, Connecticut PURA; Pete Polonsky, Former Utility Analyst II, HPUC; and Heidi Caswell, Division Administrator of Safety, Reliability, and Security, Utility Division, OPUC.

Connecticut

How would you define your organization's role in advancing grid resilience?

We have a pretty large role in advancing grid resilience. We have several dockets looking at performance-based rates and how that mechanism is going to work in Connecticut moving forward. We also had the Equitable Modern Grid Initiative, and 11 dockets were aimed at supporting the growth of Connecticut's green economy, enabling a cost-effective and economy-wide transition to a decarbonized future, and enhancing customers' access to more resilient and reliable energy (foundational record Docket No. 17-12-03). The review looked at a few things such as energy affordability. PURA has an annual program review of energy affordability, looking at payment plans of utilities and other things. PURA also developed an innovative technology applications program, looking for pilots. We're also looking at interconnection standards and practices, non-wire alternatives, distributed energy resources programs, resource adequacy, and rate design. These are the building blocks of performance-based rates.

How would you define your organization's role in advancing community engagement?

This is a very interesting area right now because we have two different dockets expanding non-traditional stakeholder engagement to get better outcomes for customers. One (Docket No. 23-11-04) is related to legal representation for customers and would essentially pay for legal representation for an individual who has a problem with a regulated utility. This is not necessary for formal engagement in a docketed process but can lead to informal negotiation with the utility.[24] The other docket (No. 23-09-34) is to incentivize participation from broader stakeholder groups and non-traditional groups (through stakeholder group compensation).[25]

Describe the types of engagement activities in your organization, and how these processes inform the decision-making related to grid resilience.

We have a lot of formal and informal processes. We have a lot of working groups on topics such as interconnection, residential solar, etc., but those are more traditional stakeholders. We worked on an agreement where social services would share the data with the utility companies so that the utility companies directly would know whether folks would qualify for the low-income discount rate. Hopefully, it will reduce the amount of people falling through the cracks, qualifying for programs.

What are some successes that have been achieved through the engagement processes?

Annual reviews of the dockets are great. It is like, "Hey, we all thought that was a problem," and we can change that, and it is changed, and we move forward. I think that getting everyone and as many stakeholders as possible in the room does help solve a lot of that and move it forward.

Hawaii

How would you define your organization's role in advancing grid resilience?

The HPUC has statutory obligations to ensure that the public has access to safe, reliable, economical, and environmentally sound utility services. Grid resilience is not specifically called out, but it goes hand in hand with reliability and safety, and we enable the utility to advance grid resilience. The commission currently has a few planning dockets in Hawaii focused on resilience, including Hawaiian Electric's IGP docket (Docket No. 2018-0165).

How would you define your organization's role in advancing community engagement?

Our role is evolving. Traditionally, we've interacted with a subset of traditional stakeholders such as the utility, consumer advocates, developers, and a few advocacy groups. However, with the nature of the clean energy transition, we need buy-in from everyone. We are facing this massive large-scale build-out of renewable energy projects, as well as the transmission and distribution system to enable those projects. We have seen some community pushback to specific projects where community engagement has not been sufficient or has come too late in the process. One example is the protests around the Na Pua Makani wind energy project on the North Shore of Oahu.

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24 Connecticut PURA approved the Customer Legal Advocacy Services Program in July 2024 and will allow qualified providers seeking reimbursement to begin providing services on January 1, 2024. See more here.

25 Connecticut PURA established the Stakeholder Group Compensation Program in January 2024, which provides funds to groups representing the interests of residential utility customers residing in an environmental justice community, residential utility customers receiving protection as hardship cases, or small business customers. See more here.

How much discretion do you have at the public utility commission to set a vision for new practices around community engagement and equity?

This depends on the legislative environment and the priorities of the commissioners. Right now, it is very much a priority to improve our community engagement and incorporate equity more holistically into our decision-making, and this was initiated with a few legislative resolutions in 2022[26] requesting the commission to look more closely at energy equity.

I will say we are a bit limited by our statutory authority and our guiding mission, but working on equity and community engagement does not necessarily take away from our other responsibilities to ensuring safety and reliability. We get a little bit more flexibility and discretion in determining the best new practices to try and to even pilot new practices. This is especially the case with the equity docket. Additionally, because this is not a decision-making docket, we have had the flexibility to adapt our planning and what we are doing with that docket quite a few times over the past year and a half. For example, we can have one-on-one conversations with communities about our efforts in the equity docket, although we try to make everything as public as possible to ensure accessibility.

Describe the types of engagement activities in your organization, and how these processes inform the decision-making related to grid resilience.

Our dockets generally have requirements for conducting some sort of community engagement. For rate cases, we have to have a public hearing. For investigative dockets such as the IGP docket, we have conducted both formal and informal community engagement throughout. We have enabled the utility to conduct as robust community engagement as they can, which requires flexibility in adapting to new conditions.

Does the PUC/your org always conduct stakeholder engagement? When is it typically appropriate to have utilities conduct engagement, and what tradeoffs have you seen?

The commission is much less frequently the host of stakeholder engagement aside from what we've been working on for the equity docket. We have been evaluating new opportunities to go out into the community to facilitate conversations about community priorities, especially for the renewable energy transition. Most of the time it is the utility and/or the developer that hosts conversations about specific projects that they are working on. However, there are also tradeoffs with who is hosting the engagements. The commission is perceived as an agency that is entrusted with the public interest so customers may feel more comfortable coming to us with issues. On the other hand, Hawaiian Electric has a much greater capacity to plan and execute. I think the ideal mix is partnering with other organizations because then we can bring in multiple networks to make people aware of meetings, especially when we are having them in communities.

How do you translate the input gathered from stakeholders for different processes to actual decisions on resilience?

The formal types of engagement elevate input to be reflected in decision-making. We try to incorporate and reflect public comments to the extent they are pertinent to issues in decisions. Still, sometimes it is hard because they are less well incorporated in a traditional decision-making process. I think we can do a better job of translating the more informal types of input we get from public meetings and public comments and those types of engagement to decision-making. We have started to address this by reducing some barriers to participation. One simple thing is to have a note taker at all of our meetings and then file notes in a docket. When we have working group processes, we will also put together a staff report at the end of them with recommendations that are sort of based on the community's input and feedback

What types of information, relationships/partnerships, or resources have been important to your stakeholder engagement process for equitable grid resilience?

There are a lot of other agencies we have begun to collaborate with more, including the Hawaii State Energy Office (HSEO), the Hawaii Natural Energy Institute, and Hawaii Energy. We have been working more with HSEO since they have more flexibility in their mission.

How do you define or measure successful stakeholder engagement?

We are still actively developing metrics to determine what successful stakeholder engagement is. Potential goals include increasing the number and variety of stakeholders at the table and also increasing the sophistication of their engagement, which can indicate meaningful input and feedback.

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26 The relevant resolutions from the 2022 legislative session are Senate Resolution 33, Senate Concurrent Resolution 48, Senate Concurrent Resolution 242, Senate Resolution 133, and House Resolution 44; see https://puc.hawaii.gov/wp-content/uploads/2022/12/Energy-Equity-and-Justice-Legislative-Report-with-Appendix.pdf.

What are some successes that have been achieved through the engagement processes?

In the equity docket, we have seen a lot more non-traditional stakeholders participating. Since this is not a decision-making docket, what we have done is we have lowered the barrier to participation. We have averaged 70 to 100 people across 10 meetings over the past year.

What types of challenges did you encounter, and how did you overcome them?

With these different processes and stakeholder engagement opportunities, we are limited in staffing.

Another challenge concerns public education about the commission and how people can get involved. I think we need more foundational education about the energy system and what we need to do to get to a hundred percent renewables. Molokai's CERAP process is a good model to look at for community information-sharing and education that can inform an in-depth process for equitable planning for grid resilience. Additionally, despite new participation from non-traditional stakeholders, Native Hawaiians remain underrepresented in our engagement, but we are working with organizations, such as the Office for Hawaiian Affairs, to enable their participation in the future.

How has your organization approached balancing competing or conflicting stakeholder interests?

I think where we can find compromises, we try, but at the end of the day, we just have to consider what is in the public interest. One tactic we use is to set up technical conferences to push stakeholders to resolve their conflicts. We can use the in-person conferences to address the merits of different groups. This is oftentimes more productive than back-and-forth filings. It might enable more middle ground because if we can get parties in a docket to come to a consensus on an issue, it makes our decision-making so much easier and allows us to focus on other priorities.

Oregon

How would you define your organization's role in advancing grid resilience?

Our role is to oversee the safety, reliability, and security of electric, natural gas, and telecommunication utility infrastructure.

How would you define your organization's role in advancing community engagement?

As part of HB 2021, the OPUC is required to engage in an investigation focused on resilience and community outreach. While community outreach predated the legislation, HB 2021 brought it to a zenith. It also required community input in the development of clean energy plans that recognize the dual value of community-based renewable energy for resilience and as non-emitting resources. This was part of an investigation that was conducted by the OPUC in docket UM 2225, and the outputs were developed with the Grid Modernization Lab Consortium.[27]

How much discretion do you have at the public utility commission to set a vision for new practices around community engagement and equity?

The OPUC has a lot of flexibility. I should note that while UM 2225 and HB 2021 had a couple of designated expectations for engagement and equity, those were not by themselves. We have a variety of different dockets underway that all are stretching that capacity to understand how stakeholders can interact. There was also advancement of intervener compensation funding in order to forward some of those stakeholders to participate and make sure that they would be properly compensated for the efforts they expended. So all of those are things that are kind of in play.

There is a lot of shifting sand, making sure that you are getting the right composition of voices in the room that will build that optimal input to plan and process. So, we are still working through a lot of those mechanics and trying to figure it out. The biggest part so far has been just trying to help people understand the processes we have and then the extent to which those processes can provide flexibility for individuals who are not regularly in this venue. We are trying to build some mechanisms for us to be more open to that kind of input and make sure that it is given proper accord. Flexibility looks like giving people different ways to comment and information on how to add a document to the record. We add an easy chat-like function to a docket for this. We have also created structured presentations to help people learn about the process and make sure that this information is readily accessible on our webpage. We also want our staff to be aware of these resources so they can easily share them with the public.

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27 Homer, J., Boenker, K.M., Lippert, A.A., Oikonomou, K., Tapio, R.M., and Cosair, H.J. Pacific Northwest National Laboratory, 2022, *Considerations for Resilience Guidelines for Clean Energy Plans: For the Oregon Public Utility Commission and Oregon Electricity Stakeholders.* https://doi.org/10.2172/1905600.

Describe the types of engagement activities in your organization, and how these processes inform the decision-making related to grid resilience.

We have both informal and formal processes as part of UM 2225. I think it is really important to help people understand the hard dates, but also understand where flexibility and fluidity can occur. It is also important to be open to feedback. We have had some stakeholders step forward and tell us things that don't work. This has allowed us to have more free-flowing dialogue with the stakeholder community. You start out by opening the channel of communication and then you have to demonstrate that you are listening to the community. If you do not do that, you can dishonor the effort that they took. And so, that was important for us not to appear that rigid and learn from what we were hearing.

At which stages of the process or processes does stakeholder input tend to be most important?

I do not think it is constrained to one part of it. I think that if you establish an investigative arc, it could be dramatically changed by an element that you are completely blind to because nobody pointed that out before or was not part of the original mission. We need to be a little bit more open to having it not be perfect from the start, and if it fails, let it fail fast and very quickly address if it. Address what is making it fail and modify it quickly and then try again. So there is an element of forgiveness and tolerance that needs to be there.

How do you define or measure successful stakeholder engagement?

Part of the UM 2225 investigation included identifying community benefit indicators such as the number of outreach efforts, the number of participating parties, and/or the number of customer reliability calls received by the utility. We are still in the early stages of trying to understand all of the metrics that define success, but at a minimum, it is important to get more voices on the record.

What are some successes that have been achieved through the engagement processes?

Success in the UM 2225 investigation was how some of the stakeholder communities joined together as a single voice on behalf of four to six different organizations. This really helps to cement the importance of what they are saying.

What types of challenges did you encounter, and how did you overcome them?

Everybody wants to hear from stakeholders, so they get tapped out. Small groups of stakeholders are expected to spread themselves across dockets that are happening concurrently. Additionally, there are different procedures for engaging in this kind of quasi-judicial process. We are working to address this by being more thoughtful about how we set schedules.

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