

# **New Voices, New Energy! Diversifying Representation in Front of Commissions**

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## **ABSTRACT**

Utility regulation has far-reaching impacts on disadvantaged communities and people of color. Despite this, advocates and experts in proceedings remain predominantly white and male and bring with them personal, cultural, and professional perspectives that are not representative of the diverse constituencies impacted by Commission decisions. This lack of representation remains the case both due to historical practices that default to exclusion and because utility regulatory procedures and processes are arcane: participation requires not only expertise in increasingly complex technical subjects, but also a keen understanding of the milieu. For those who work in the regulatory space, fluency has typically been developed by learning on the job with the guidance of experienced colleagues. Improved representation in regulatory proceedings is unlikely to occur without intentionally expanding such learning and mentorship opportunities for people of color, and without the sponsorship of current participants' use of professional capital to open doors for new entrants.

Based on learnings from over two dozen interviews with leading energy regulatory advocates, attorneys, justice advocates, and procedural justice experts, we have developed the framework and principles for an ongoing 2-year Fellowship program to support the entry and success of advocates from under-represented communities. Fellows would work on behalf of a community or frontline organization or for a minority-owned consultancy supporting such organizations. The full-time Fellowship would provide on-the-ground experience advocating in active proceedings at utility commissions. Topics would include learning the commissioners and staff, politics and ecosystem of other advocates, accessing information, developing partnerships, and successfully leading advocacy.

## **Introduction**

Participation in regulatory proceedings is essential to affect change on utility-related issues. Public utility commissions are responsible for policy development and implementation on essential matters such as rate making, utility infrastructure investments, and utility-provided clean energy programming. In many instances, if a proposal or recommendation is not made in these proceedings (or procedurally “on the record”), it cannot be considered in the commissions’ decision-making.

The regulatory system has profound legacies in legal structures, economic theory, and monopolistic powers that make it difficult to navigate and engage as an advocate. To effectively participate in regulatory advocacy and decision-making, one often (but not always) must be a paid professional with both technical and industry experience. Successful advocates and expert witnesses must be able to navigate and make arguments on issues of cost-effectiveness, legal precedence, data and evidence, and compliance with other lengthy and complicated laws (Sevier and Stamas 2023). Utility regulatory processes were designed for those with resources,

knowledge, power, and influence. This has led to significant disparities in the perspectives that are considered in utility regulatory decision-making, leading to greater benefits for some and fewer benefits and often harm to others.

An informal investigation by the authors confirmed what they had seen in their own experience: professional advocate representation<sup>1</sup> of BIPOC and members of disadvantaged communities<sup>2</sup> is largely absent from utility regulatory proceedings. This absence results in two distinct, but related failures of regulatory systems. First, few qualified BIPOC professionals have been able to benefit from potentially meaningful and rewarding work opportunities in the regulatory field, which, in the authors' experience, is the domain of predominantly white, predominantly male professionals. Secondly, the lack of adequate representation of BIPOC and disadvantaged communities means that regulators lack information in the procedural records of their cases to support decision-making that is reflective of community needs and that recognizes the challenges, needs, and priorities of those communities.

This paper provides a straw proposal for a professional development and pathways program concept to increase BIPOC and disadvantaged community representation within the industry of regulatory advocacy professionals. While the authors do not assume that doing so will automatically improve regulatory decision-making with respect to the needs of BIPOC and disadvantaged communities, our proposal for implementing this framework within organizations that advocate for the needs of BIPOC and disadvantaged communities could support progress by diversifying representation in decision making and encouraging procedural justice at commissions.

We hypothesize that subject matter expertise exists across an increasingly diverse cohort of energy advocates, researchers, service professionals, and consultants, including those with perspectives historically excluded in regulatory policymaking. However, genuine and enduring barriers exist to accelerating the entry of greater numbers of BIPOC advocates into effective careers in regulatory commission work. Our research indicates that a workforce initiative to support entry into professional advocacy could enable greater numbers of these professionals to confidently enter and successfully navigate regulatory commissions' procedural and political nuances. Mentoring and sponsorship, paired with “on-the-job” paid experience, will prepare and support these individuals so they will ultimately be successful as professional advocates and expert witnesses in utility regulatory proceedings. This paper describes a straw proposal to increase professional advocate representation of BIPOC and disadvantaged individuals and communities in utility regulatory proceedings.

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<sup>1</sup> We want to distinguish, at this point, that there are important efforts to expand the role of community perspectives in expert witness testimony, such as [Environmental Defense Fund's Community Voices in Energy Initiative](#). This paper seeks to address the barriers specific to entry into a professional career as a regulatory advocate.

<sup>2</sup> We envision the most inclusive definition of “disadvantaged communities” in our writing. For those interested in a specific definition, [Justice40 uses the Climate and Economic Justice Screening Tool](#) and the [California Public Utilities Commission uses CalEnviroScreen](#). Important to note, none of these tools (are legally able to) explicitly consider race. Further, while this paper uses the term, “disadvantaged communities” we also support the use of “communities of concern” to highlight the urgent burden and harms that require attention.

## Methodology and Interviews

In 2022, to better understand how current professionals began their regulatory careers the authors spoke<sup>3</sup> with over two dozen individuals with experience as environmental advocates, attorneys, environmental justice advocates, regulatory staff, and philanthropic officers.<sup>4</sup> Organizations were from across the nation, some doing regional work in the southeast, northeast, Midwest, or west coast; many working nationally across several states or multiple regions. Individuals were mostly staff of larger established groups with a track record and experience in regulatory advocacy, and thus, in training their own staff or fellows in regulatory work. Some organizations were smaller justice-focused, frontline community-based organizations with perhaps a team of 1-2 regulatory professionals.

Individuals' experience was mostly senior or executive level, allowing them to speak to their own experience entering regulatory advocacy work. There were also some entry and mid-level folks who shared their experiences trying to find their way into regulatory advocacy (successfully or unsuccessfully, at the time of interview). Educational and background experience of individuals included law, policy, public administration, organizing and activism, research, and advocacy. Without conducting a survey, authors' impressions are that interviewees were majority but not predominately white, middle-to-higher income, and at least a college degree if not more education. Gender-wise, a couple individuals publicly identify as non-binary, otherwise there was an even divide between female- and male-identifying.

The authors' line of questioning was open-ended. Individuals knew the topic of inquiry and conversation before entering the conversation. The authors asked questions to test hypotheses, asked for additions and elaborations based on individuals' experiences, and shared proposed ideas and solutions (sometimes the authors' and sometimes ideas from prior interviewees). Interviewees were asked for input and feedback. The authors, when applicable, asked about individual interviewees' journeys into regulatory work, highlighting the access, opportunity, and support they received.

Lastly, the authors did follow-up research, to learn more about programs, opportunities, concepts, or events raised in interviews. We explored intervenor compensation programs and representation within certain proceedings in certain states. We informally assessed clean energy and policy professional development programs for emerging and BIPOC professionals and considered aspects of the nonprofit (and profit) industrial complex that might support or challenge any proposed workforce initiative or career development programming concepts.

## Findings: Lack Of Representation in Regulatory Venues

Utility regulators make decisions about what households should pay on their utility bills that can determine whether households can keep their lights on and afford other essential needs.

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<sup>3</sup> These conversations began as informal inquiries, intentional conversations on the topic of representation in regulatory advocacy and were part of the authors' own initiative before ever envisioning submitting a paper to Summer Study. As such, while the authors took notes, the effort lacked some normal formality often applied in research efforts. Authors have done their best to capture quotes, with permission, summarize anonymously, and paraphrase when attribution is not possible.

<sup>4</sup> Quotes included herein are paraphrased from notes taken during interviews. Since so many of the sentiments were shared across many different discussions, the authors did not include specific attributions. Some advocates also declined to be named. For the purposes of this paper, we did not seek approval from each advocate to be named in this paper.

Decisions about where energy infrastructure is placed and updated for safety, reliability, and other compliance issues determine which households could experience significant levels of air pollution and associated health impacts. Clean energy program design determines who can access public resources to further access clean energy health, financial, and safety benefits.

Advocates in proceedings representing all types of parties remain predominantly white and male and bring personal and professional perspectives that are not representative of the diverse constituencies impacted by utility regulations (Patterson and Hua 2022 and Provost 2023). Personal bias, along with institutional bias, leads to policy shaped by advocates who often have limited or no experience with unique challenges that BIPOC and disadvantaged communities face. These include high or severe energy burden, trade-offs between paying a utility bill versus paying for medications, finding time to take public transit to print a form or provide identification for program eligibility, or enduring longer blackouts than others in the community. Such advocates, if not from communities of color or disadvantaged communities, may not fully understand and, therefore, completely represent those community needs or priorities, even in advocacy and testimony intended to support those communities. Ideally, to bring these voices to the table, advocates would have direct ties, such as personal experience or another form of accountability to the community or communities that should be represented in proceedings.

As one former senior utility commission staff shared, “The policies the commission makes, and as a result, the people who tend to benefit from those policies, are limited by the people who end up in the metaphorical (or actual) rooms where policy is made, and it is really hard for new people to break into those rooms.” (Anonymous 2022)

Without representation from the most impacted communities in utility regulation decision-making, commissioners will likely continue to make decisions based on a record developed from a narrow set of perspectives. This limited representation perpetuates policymaking and programs that favor the needs of communities that look largely like the current industry of professional advocates, which from interviews, is perceived to be predominately male-identifying professionals from middle-to-upper-income households and larger businesses. This means that only some parts of our society can access and effectively receive clean energy benefits and that even as a movement towards a clean energy transition accelerates, we, as a society, will never achieve clean energy goals that require widespread adoption and inclusion.

### **What Goes into Training a New Regulatory Advocate?**

The topics addressed in utility regulatory proceedings touch on a conglomeration of law, engineering, economics, financing, and politics. Each of these fields alone has exclusionary aspects to entry, but together create an environment, dialogue, and processes that are difficult even for career experts in these professions to enter. To successfully navigate regulatory advocacy, let alone effectively make credible and compelling arguments, participants need to understand the processes, vocabulary, and culture of these spaces, and the interests of the parties that participate. It is extraordinarily difficult for newcomers to enter the field or build a career.

There was widespread agreement that without access to some kind of “on-the-job” training, it is difficult to gain entry to utility regulatory advocacy and to meaningfully influence outcomes. Roger Lin, from the Center for Biological Diversity remarked, “One can gain a lot of skills going to law school, but not all commissions require a law degree, and accessing that education comes with its own significant barriers. Another pathway is needed that provides on-the-job training for those with and without law or policy degrees.” (Lin 2022)

Further, accessing “on-the-job” training is difficult. Accessing such training comes with all the barriers of accessing a professional job, and the “on the job” aspect requires the presence and capacity of a sponsoring and mentoring advocate to train this person, often making it affordable for only well-funded organizations. The pathway to a meaningful career as a regulatory advocate is one nested deeply within privileged, technical, and resourced contexts, making it challenging for anyone to access. The barriers are only greater for those also battling institutional discrimination.

The authors found overwhelming agreement that entering a professional regulatory advocacy practice is a rare and narrow career pathway and that there are not broadly available and accessible ways for interested practitioners to gain the necessary training to become fluent and successful regulatory advocates. This issue leads to and exacerbates a significant lack of representation in regulatory proceedings, which becomes a barrier to addressing the dramatic inequities in how regulatory policymaking is conducted and how energy services and programs are developed, designed, and implemented. Unless advocates and their perspectives begin to represent more closely those of all communities impacted by regulatory policy, the authors believe inequities for BIPOC and customers from disadvantaged communities are likely to worsen as commissions are faced with difficult questions regarding rates, affordability, transmission planning, clean energy and resource planning, and investments away from fossil fuels.

### **An Emergent Proposal: Regulatory Fellows Program**

The following program concept was developed based on the ideas, input, brainstorming, and refinement provided through the interviews mentioned above. It is intended as a straw concept, and the authors invite other collaborators to further develop it, and even pursue implementation if resources and capacity provide for it.

### **How to Train an Advocate: Support an On-the-Job Training Experience**

As mentioned before, many advocates remarked about their own experience of “learning on the job” and directly engaging and advocating in proceedings as part of their own career development. Many emphasized the important role of mentors and/or sponsors in supporting their growth and learning. Advocates discussed how the organizations that provided their training had those mentors/sponsors available, on staff, and with the capacity to provide training. Following these discussions, and after conducting a brief landscape assessment of possible programs where emerging advocates might be able to garner regulatory experience, it became clear that training a regulatory advocate requires a few key components:

- Being with or representing an organization with a clear vested interest in at least one focused area of regulatory proceedings.
- Access to an experienced advocate who can serve as mentor/sponsor and has the capacity to do extensive training and provide detailed proofreading, reviews, and coaching.
- Sufficient time and compensation for the advocate-in-training in a regulatory advocacy role to begin to develop relationships, navigate stakeholder politics, and become familiar with commission staff and commissioners.

These components underscore why regulatory advocacy cannot necessarily be “studied” but is an applied skill that must be learned through practice. There is no effective substitute for following and engaging in an actual regulatory proceeding in real time. While it may be useful to teach certain aspects of a process separately (e.g., building arguments, writing style, delivering testimony, etc.), it is impossible to replicate the stakeholder dynamics, timelines, detailed procedural requirements, and other experiential aspects of advocacy that are often a challenging part of the work. Also, since so much work goes into comment writing or drafting of testimony, it would be more valuable to have this work advance the perspectives of a community in a proceeding they were committed to participating in. Finally, working within an organization helps orient advocates to further define and defend the basis of their positions and perspectives through the advocacy process.

In any solution, there needs to be a mentor/sponsor advocate dedicated to the advancement of new advocates. This is, admittedly, a luxurious scenario. In many cases if a regulatory position opens at a small nonprofit organization, that position carries the entire regulatory workload among many other responsibilities. So, the organization must hire someone with experience who is already ready to navigate regulatory proceedings.

Lastly, internships, even year-long fellowships, can make it difficult to experience the full cycle of a regulatory proceeding, as rate cases and other proceedings can last many months, and won’t typically coincide with an internship’s start and end dates. A placement and opportunity to work on a proceeding for over a year would allow an advocate to begin to build their own relationships with commission staff and commissioners, map different stakeholders, experience the ups and downs of the regulatory process, and begin to stand on their own feet alongside their mentor/sponsor.

These concepts became critical factors in the author’s eventual design of an approach to address many of the barriers identified above. However, the mentorship/sponsorship component emerged in conversations as a critical aspect of this work, which requires additional intention and consideration.

## **The Role of Sponsors/Mentors**

As most advocates that the authors spoke with remarked about their “on-the-job” learning, they also consistently reported the presence of a mentor/sponsor in their career development journey. These mentors/sponsors were constant and committed resources, often with deep regulatory experience, patience to teach, time to proofread and revise and provide technical context specific to that moment’s advocacy needs. The authors’ proposed model envisions that a mentor/sponsor is available for all new advocates. It emphasizes that the mentor/sponsor role is at the center of a critical power and knowledge shift from incumbent experts to new emerging leaders and advocates.

Changing institutionalized regulatory norms using a mentoring/sponsoring approach requires this role to actively counter conventional power dynamics of a mentor/mentee relationship. By “mentoring”, the authors espouse a co-learning approach where both parties recognize the different knowledge that each commit to learning from the other. Interviews highlighted that “mentors and others as part of this program will need their own training to begin dismantling the conventional paternal nature of (conventional) mentorship.” Importantly, “mentorship needs to come from a perspective of advancing the overall cause, from a foundation of mutuality and solidarity, not a charity project.”

Mentors/sponsors would be expected to “sponsor” a new advocate’s entry into spaces and processes by using their relationship capital and contextual credibility to open doors both can walk through together. One advocate observed to the authors that “the *how* matters a lot here. The relationship capital (of commissions) is housed in white communities. Transferring those relationships of power and technical knowledge is the critical part.” Mentors/sponsors would need to use their power to support increased access for Fellows while also relinquishing their exclusive hold on that power, thus fostering a real transition.

In discussions, advocates also elevated additional training needs for new advocates and mentors/sponsors. One noted that there are many reasons to explain why there is such limited BIPOC representation in regulatory proceedings: “There needs to be a recognition and preparation for that fact that Commission spaces are not friendly to BIPOC. It could be unethical to train folks up and send them into a space where they will be further marginalized.” Any effort or initiative that seeks to make powerful changes to an institution must be trauma-aware and trauma-informed, recognizing the real harm that has been caused and could be caused by such an effort. Preparatory training and candid and open conversations between new advocates and mentors/sponsors are critical steps to building the trust necessary to enter spaces that have a record of being unwelcoming.

Considering these concepts, the authors developed the following “Regulatory Fellows Program” proposal that responds to known barriers to entry, challenges to developing regulatory advocacy skills and experience, and a desire to shift the power from incumbent advocates to a broader range of new professionals.

### **A Placement Program with Wrap-Around Support**

The program would place an emerging regulatory advocate (“Fellow”) within a community-based/frontline organization or minority-owned consultancy. The placement would be in the energy policy space for two years, giving the Fellow on-the-job (fully compensated work) experience advocating on real issues at a commission. The Fellow would learn the priorities of commissioners and staff, politics, and ecosystem of other advocates, and how to access information, develop partnerships, and successfully lead advocacy.

The Program would provide both 1) a dedicated mentor/sponsor, staffed and hosted by the Program (to remove this requirement from host organizations) dedicated to each Fellow and their host organization’s priorities, and 2) capacity-building opportunities from a network of accomplished regulatory experts and strategists to develop and support a cohort of early-to-mid-career energy policy professionals as regulatory advocates.

The program would provide a comprehensive curriculum and support structure for the Fellow, but also their hosting organization, as needed:

- **Onboarding orientation** - providing introductory concepts in regulatory decision-making and advocacy (who, what, where, when); general advocacy strategy development, political considerations; how the Program works; and commitments of the program staff and resources, Fellows, host organization.
- **State-specific orientation** - orientation to specific Commission processes, rules, and procedures (such as becoming a party and intervening); an ecosystem or advocates/stakeholder analysis; proceeding topics, history, and context; introduction to state-specific technical resources; advocacy practices such as writing style, formatting, structuring arguments, evaluating advocate comments, partnering strategies.

- **Individual support and mentorship/sponsorship** - providing ongoing mentorship/sponsorship support via program staff and a network of trusted and aligned external mentors/sponsors.
- **Cohort connecting opportunities** - regular cohort support, meetings, annual get-together, infrastructure to support a network for peer learning and support; cohort-wide professional development such as attendance at conferences, requested trainings around energy policy, energy equity/justice, leadership and management, and facilitation.
- **On-demand technical support** - partnership with technical advisors available to Fellows for their advocacy efforts (i.e., access to partnerships with expert networks, volunteer advocates with deep experience in a particular commission space or policy issue area.)

## Resources

**Fellow compensation.** The resources envisioned for the Program would ideally cover competitive wages and benefits for Fellows for their two-year full-time fellowship role. Due to financial constraints of the envisioned host organizations, it may be necessary to provide close to or all necessary compensation. Where possible, host organizations could contribute beyond their contribution of hiring and organizational infrastructure already required of them to host a Fellow.

Our initial thinking is that it would be most effective for Fellows to be employed by the organizations in which they are placed. This would allow them to become more fully integrated as part of the advocacy teams and assumes that the human resources aspects of employment would be the responsibility of the host organization. Ideally, the host organization would either co-fund the Fellow from the outset or commit to seeking funds to support the Fellow, either during the term of the fellowship or on an ongoing basis at its end. Alternatively, perhaps the Program would be set up such that it could employ and place Fellows, akin to the City Energy Project (Institute for Market Transformation 2021).

In situations where intervenor compensation programs exist, those programs could and should be leveraged to support Fellows or future capacity (for those intervenor compensation programs that compensate after the fact) (National Association of Regulatory Utility Commissioners 2021). In some scenarios, intervenor compensation programs could contribute to longer-term sustainability for the Fellow after their 2-year fellowship is up. Ideally, Fellows would be able to be supported and would be motivated to stay with their host organization after their fellowship.

**Program funding.** The Program would also need to provide funding for the Mentor/Sponsor role(s), as that should be a dedicated and formal capacity of the program, and not reliant upon volunteers or uncertain “extra” capacity by an individual. The Mentor/Sponsor role would be relatively senior in experience to support Fellows across a span of states and regions, sharing connections, relationships, and technical knowledge.

**Potential resources.** Based on initial conversations, it seems possible that philanthropic funds or other workforce development/career pathway funds could be aligned to support such a program. Program sustainability would likely require continued fund development work.<sup>5</sup>

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<sup>5</sup> The authors sketched out some preliminary funding needs for the further development and launch of such a program. We also discussed other funding factors to consider with colleagues in the philanthropic space. To the



## Recruitment Of Fellows

The Fellows Program can likely leverage existing networks (e.g., Clean Energy Leadership Institute, RAY Diversity Fellowship, Environmental Leadership Program, Climate Equity Policy Fellowship) of other capacity-building programs to recruit its cohorts. The Regulatory Fellows Program would focus on a relatively niche interest in regulatory advocacy, which is unlike other programs that may support entry into the clean energy or policy sector more broadly.

Based on the level of technical capability anticipated in the Regulatory Fellows Program, ideal candidates would be individuals who:

- Have at least 2 years of energy policy, advocacy, organizing or relevant adjacent and/or lived experience.
- Have a thoughtful interest in doing work within regulatory commissions and a commitment to expanding the realm of perspectives included in regulatory decision-making.
- Are committed to elevating the voices of underrepresented perspectives in regulatory decision-making by committing to represent a community-based organization (CBO) for two years in their regulatory work.
- Self-identify as a person of color, from a low-income background, or other underrepresented perspective or life experience in the energy industry.

In some cases, applicants may already be at an eligible host organization, or if not, could be placed at a willing host organization.

## Recruitment Of Regulatory Fellows Host Organizations

In the authors' experience, dozens of CBOs and small regulatory consultancies desire to engage in regulatory work on behalf of their communities and/or underrepresented groups but lack the capacity and mentorship capability to support the rigorous commitment of time and resources that successful regulatory advocacy often requires. Ideally, funding for the Regulatory Fellows Program would be sufficient to help create an opportunity for these organizations to (where possible) take part in Intervenor Compensation programs (where available).

Initial ideas for host requirements, solely based on anecdotal information, is that hosts would, at a minimum, need:

- To offer an opportunity to represent or advance under-represented or marginalized community perspectives in a commission venue and process. While regulation is also developed in other agencies, this program seeks to target the specific barriers associated with utility commission advocacy.
- A clear nexus or demand for engaging in regulatory work, e.g., requests from their constituencies to intervene, an understanding of relevant regulatory opportunities, a record of past engagement at a commission that was discontinued due to lack of organizational capacity, a mission that hinges upon successful advocacy at a commission.

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extent this information is relevant for anyone seeking to further develop the concept, please reach out to Michelle Vigen Ralston.

- Administrative and managerial support to ensure a smooth onboarding process, ongoing supervision within the organization, and inclusion in the organization’s team, work, and culture.
- A commitment to work in partnership with the Program, including time allowances to attend training and capacity building.
- A commitment to the values and mission of the Program (to be developed with the Program)
- A willingness to pursue fundraising or other means to provide a longer-term position if desired by the organization and Fellow at the end of the 2-year term.

## Potential Administrative Structures

We propose that the Regulatory Fellows Program could live within an existing organization doing similar and aligned work. This would allow the Program to leverage existing email lists, events, and other infrastructure to boost and support outreach, recruitment, and the effective operations of a pre-established organization.<sup>6</sup> Alternatively, the Program would need to be fiscally sponsored or housed by a new organization which requires its own set of resources and could take significant time to build.

## Next Steps

Many programmatic, administrative, and funding issues need to be further explored in developing the Regulatory Fellows Program. The final Program design will necessarily depend heavily upon the actual financial resources garnered for such a program.

The authors did some very preliminary explorations into funding and sketching out a funding prospectus. While there are many ways to consider launching such an effort, one potential approach is to launch at a focused scale, of say, supporting ten new fellows each year over the next ten years. That would lead to as many as 100 new entrants into the regulatory advocacy career space, mostly garnering their experience representing underrepresented voices, and building experience and skills advocating in utility commissions across the country. Recruitment efforts could prioritize states based on certain dockets or proceedings, where host organizations are most ready and interested, or where Fellows are already trying to do work for their own communities.

To fully develop a program to launch, apart from necessary fundraising timelines, a year or so of preparatory work may be necessary, including designing a curriculum, identifying volunteer trainers and supporters, hiring Mentor/Sponsors, and recruitment of both Fellows and hosts.

Ultimately, the Regulatory Fellowship Program concept herein is meant to serve the new advocates and their host organizations, so it would be important for the Program to hear from them about their needs, priorities, interests and challenges. In the authors’ view, any program that is developed from these concepts should truly represent the vision of new voices in the

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<sup>6</sup> The authors identified a few adjacent or potentially aligned professional development programs that could support recruitment or potential administrative infrastructure include Clean Energy Leadership Institute, The Equity Fund, Environmental Leadership Program, the Ray Diversity Fellowship. These programs have not been contacted about this paper’s concept.

regulatory space, harnessing the wisdom and experience of existing professional advocates for that purpose.

## Conclusion

The Fellows program outlined here has the potential to increase the representation of professionals from and for BIPOC and disadvantaged communities in regulatory proceedings. However, it is conceptual. It will require further time and sufficient funding to make it real. Our hope in presenting the program here is that there will be enough interest among readers and conference attendees to stimulate further discussion and refinement of the concepts. Ultimately, this would lead to solicitation of funding to support the development of a Regulatory Fellows Program and identify host organizations and fellowship candidates. Because representation in regulatory proceedings among BIPOC professionals and disadvantaged community advocates is so minimal, any change would be significant. These first steps could engender increased awareness, greater interest, and continued growth.

To the extent that entry into regulatory advocacy remains a somewhat random and varied professional development pathway that relies on access to professional networks, regulatory advocacy as a profession will remain exclusive. As such, regulatory policies will likely continue to reflect and perpetuate historic norms of exclusion. The authors propose that changing the status quo requires deliberate action on the part of current industry professionals, including a willingness to let go of their exclusive hold on power, so that those who have been underrepresented historically also have a chance to speak and take part in shaping our collective energy future.

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