

Metrics Mayhem! Recent Approaches to Measure Progress Toward Equity and Environmental Justice in Clean Energy Programs

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ABSTRACT

In 2019, Energy Trust published its first Diversity, Equity, and Inclusion (DEI) Plan with a set of goals and metrics to direct organizational activities. Energy Trust also supported the creation of the Energy Equity Project as a funder and participant in early equity metrics development. Through ongoing community and stakeholder engagements, Energy Trust redesigned a new 2022 DEI Plan to focus on community engagement with an updated framework of goals, metrics, and targets to monitor and share progress both internally and with our customers.

In 2021, the Oregon state legislature passed HB 3141, modernizing Energy Trust's ratepayer funding mechanisms, and requiring the Oregon Public Utilities Commission (OPUC) to establish equity metrics for Energy Trust's work through a public process that centered feedback from environmental justice (EJ) communities. Through a series of community engagements across Oregon in 2022, the OPUC adopted equity metrics for Energy Trust to ensure clean energy programs and services benefit environmental justice communities. The metrics include direct investments, no-cost offers, and energy resilience in priority communities. These metrics are now part of the annual performance metrics OPUC requires for oversight of Energy Trust.

Ranging from minimum thresholds with regulatory teeth to aspirational targets, this broad set of metrics and targets pushes Energy Trust to better serve historically underserved customers and be accountable to regulatory and community stakeholders. This paper will discuss how these goals, metrics, and targets were created and the impacts to both procedural and distributional equity for customers and communities.

Introduction

Energy Trust is building a market infrastructure to better serve Oregonians with clean energy solutions with a focus on providing clean energy solutions to communities historically underserved by clean energy programs, including households experiencing low and moderate incomes; black, indigenous and communities of color; and rural communities. A current and evolving set of goals, focus areas, metrics, and targets collectively reflect attempts to define the organization's role in achieving the state's aggressive decarbonization goals that include equity and environmental justice. This is part of an evolving process to learn how to better serve all qualifying customers and understand how outputs relate to outcomes.

Ranging from minimum thresholds with regulatory requirements to aspirational targets, this broad set of metrics and targets pushes Energy Trust to better serve historically underserved customers and be accountable to regulatory and community stakeholders. This paper will discuss how these goals, metrics, and targets were created and the impacts to both procedural and distributional equity for customers and communities. For the purposes of this paper, we will use a few terms: "historically underserved," "environmental justice communities," and equity-focused programs that center needs of customers experiencing low and moderate incomes; black

indigenous and people of color; and rural customers.¹ Each of these terms can have distinct meanings and interpretations depending on the content, which we attempt to highlight where possible.

Metrics related to equity and environmental justice are not new concepts or disciplines but are rather new to the clean energy industry compared to decades-long precedents (e.g., least-cost planning of energy efficiency and demand-side management); there is recognition by equity and environmental justice advocates that the tools and metrics of the past (e.g., annual energy savings for the utility system, benefit-cost ratios) are not adequate reflections of investments in equity-based programs and services for environmental justice communities. It is important to know some key definitions that might not always be exactly consistent when you have parallel processes, such as what is described here for Energy Trust’s organization-wide DEI efforts and Oregon PUC’s process of oversight for Energy Trust’s impacts to environmental justice communities. We will discuss how these relate further in the paper.

Background: Energy Trust’s Diversity, Equity, and Inclusion Journey

Since 2002, Energy Trust of Oregon (Energy Trust) has helped utility customers use less energy and generate renewable energy, saving millions on energy bills and driving business for contractors while promoting a cleaner environment. Our vision that guides this work is clean and affordable energy for everyone; however, historically, Energy Trust and the energy industry have overlooked groups such as BIPOC (Black, Indigenous and people of color) customers, people experiencing low to moderate incomes, customers that live in rural areas and diverse businesses and contractors.

To fulfill our core purpose of delivering cost-effective energy efficiency and small-scale renewable energy to all our customers, Energy Trust recognized the need to do a better job engaging those we have historically underserved. These engagements allow us to better understand and address customer needs and help us ensure all customers have access to meaningful opportunities to benefit from clean energy solutions. We understand the priority needs of utility customers may not be directly related to energy and may include the need for affordable housing, economic opportunity, relief from the impacts of climate change and environmental injustice, and addressing ongoing issues of systemic racism, among others. It is incumbent upon us to work with these diverse communities to help identify clean, just and responsible energy solutions. These energy solutions may help address this suite of issues.

Energy Trust’s initial DEI Operations Plan in 2018 was informed by a baseline study (2018 DEI Baseline Analysis²) along with an overall goal of increasing participation from underserved customers by 20% across all energy programs. For the purposes of this plan, “underserved” customers were defined as customers experiencing lower incomes; black, indigenous and people of color; and rural residents and businesses. While program participation remains a focus as an outcome of our DEI efforts, our previous efforts have exposed the need for more collaboration with the communities we serve. The solutions to increase participation must be informed by community members. We must work together to identify needs, develop and test solutions, reflect on results and impact, and hold ourselves and each other accountable to what we say and do. This DEI Plan was initially developed over several months in 2021 and early

¹ For this paper, the definition of “environmental justice” refers to the Oregon Public Utilities Commission (OPUC) follows the State of Oregon’s definition outlined in Oregon House Bill 3141.

² [2018 DEI Data Baseline Analysis.pdf \(energytrust.org\)](#)

2022 with input from staff, Energy Trust’s advisory councils and board members, stakeholders (e.g., advocacy groups, community leaders), utility staff, customers, contractors, and community-based partners. The Plan provides a framework for building trust and relationships with community members and community-based organizations so that we can work together toward mutually beneficial goals and outcomes.

Finally, an overarching imperative that emerged from our DEI efforts and evaluations of our impacts is the need for deep, authentic dialog, collaboration, and action between Energy Trust and the customers we have not served. The administration of Energy Trust’s programs and the development of new program offers should evolve based on collaboration, input, and accountability. We need customer and community perspectives to develop new offers that center race and consider the uniqueness of the rural experience and of being income constrained (Energy Trust 2022).

In 2022, Energy Trust revamped our DEI Operations Plan to focus on community engagement. This relied heavily on “The Spectrum of Community Engagement to Ownership” developed by Rosa González of Facilitating Power (Gonzalez 2020).

Figure 1 shows the five high-level strategic goals that were established in this plan.

Figure 1: Five Strategic Goals from Energy Trust’s 2022 DEI Plan



Figure 1. Energy Trust’s Diversity, Equity and Inclusion Plan Goals. *Source:* Energy Trust 2022.

Within each goal we identified various outcomes, or what the future might look like when we are successful, as well as specific metrics and measurements that help assess our progress, and how we will hold ourselves accountable. For this paper we highlight Goal 3: *Increased Community Capacity & Investment* to illustrate the relationship between the Energy Trust DEI Plan Goals, Outcomes, and Metrics. The plan is intended to be a living document. The DEI Plan was updated in 2023 and is in the process of being updated again for 2024.

Background: Oregon PUC’s Equity Metrics for Energy Trust

Under Energy Trust’s grant agreement with OPUC, OPUC is required to establish quantifiable performance measures that define expectations for Energy Trust’s performance. In 2019, the OPUC introduced a category of performance measures addressing diversity, equity, and inclusion to reflect the shift from traditional “least-cost planning” to achieve “...a more holistic set of outcomes...” that eventually centered on environmental justice communities with the passage of House Bill 3141 in 2021 (OPUC 2022). Oregon HB 3141 required the Oregon Public Utility Commission (OPUC) to “...establish equity metrics to assess and create accountability for “environmental justice” (EJ) in the expenditure of energy conservation funds by the OPUC’s grantee, Energy Trust. These metrics must reflect feedback through a public

process that includes, at a minimum, environmental justice communities” (OPUC 2023). The OPUC is using the State of Oregon’s definition of “environmental justice” established in ORS 756.010(5) to include:

“[C]ommunities of color, communities experiencing lower incomes, tribal communities, rural communities, coastal communities, communities with limited infrastructure and other communities traditionally underrepresented in public processes and adversely harmed by environmental and health hazards, including but not limited to seniors, youth and persons with disabilities.”

OPUC staff engaged an equity consultant, FC Hurdle, to conduct community engagement in 2022 to inform the development of OPUC Equity Metrics for Energy Trust. OPUC staff categorized different equity dimensions adapted from the Urban Sustainability Directors Network as follows: structural, procedural, distributional, and transgenerational equity (OPUC 2022).³ OPUC staff and their equity consultant obtained feedback and perspectives “...primarily from rural Oregon, including some low-income and minority community representation, primarily Hispanic, as well as community outreach representatives from several of the utilities...” and “...direct feedback from several community-based organizations and other interested stakeholders” (OPUC 2022).⁴ This culminated in the creation of four equity metrics that were approved by OPUC Commissioners as part of OPUC compliance with HB 3141.

- Metric 1: Access to Support for Communities
- Metric 2: Access to Information
- Metric 3: Energy Burden Reduction
- Metric 4: Community Resilience

OPUC staff and their equity consultant, FC Hurdle, identified the following key themes, equity dimensions, barriers addressed, and feedback source for each of the four Equity Metrics highlighted in Table 1.

³ The OPUC adapted the four equity dimensions from Urban Sustainability Directors Network’s 2014 report written by A. Park, *Equity in Sustainability: An Equity Scan of Local Government Sustainability Programs*.

⁴ OPUC staff obtained contacts for community stakeholders via a variety of sources, including Energy Trust Outreach staff embedded in rural communities in Oregon.

Table 1. Summary of Proposed OPUC Equity Metrics for Energy Trust (2022)

Theme	Metrics Proposed	Equity Dimension	Barrier Addressed
Access to support for communities	Increased support to nonprofit organizations with a purpose to serve environmental justice communities or to support nonprofit-led initiatives serving environmental justice communities. Increased support can be incentives, training and funding for energy efficiency upgrades, solar, or solar-with-storage projects.	Structural, Distributive	Lack of capital to participate in traditional programs
Access to information	Increased funding to support targeted outreach to environmental justice communities, including funding for community ambassadors, education and workshops.	Procedural, Distributive	Connecting to trusted and reliable energy information
Energy burden reduction	New and expanded low-cost ⁵ and no-cost offers to reduce energy burden created and launched.	Structural, Distributive	Lack of capital to participate in traditional programs
Community reliability and resilience	Solar and solar-with-storage system projects supported for low and moderate income residents in areas with limited infrastructure or high energy burden.	Distributive	Limited resources and increased costs for projects in some areas

Table 1: Summary of Proposed OPUC Equity Metrics for Energy Trust. *Source:* OPUC Order No 22-478 pursuant to docket UM 1158, December 5, 2022.

With the four Equity Metrics in place, OPUC staff worked with Energy Trust in a public process to define targets for 2023. Table 2 outlines the targets for 2023, the first year OPUC had targets for Energy Trust to meet as minimum performance standards.

⁵ The definition of “low-cost” used by PUC was a customer co-pay of \$500 or less for all energy measures.

Table 2. OPUC Equity Metrics for Energy Trust with Annual Targets: 2023-2024

OPUC Equity Metric	2023 Target	2024 Target
Increased support to nonprofit organizations with a purpose to serve environmental justice communities or to support nonprofit-led initiatives serving environmental justice communities. Increased support can be incentives, training and funding for energy efficiency upgrades, solar, or solar-with-storage projects.	Increased support by \$200,000 to \$1.8 million to nonprofit organizations with a purpose to serve environmental justice communities or to support nonprofit-led initiatives serving environmental justice communities	Increase to minimum of \$4.5 million invested to support nonprofit orgs serving environmental justice communities
Increased funding to support targeted outreach to environmental justice communities, including funding for community ambassadors, education and workshops.	Increased funding to support targeted outreach to environmental justice communities, including funding for community ambassadors, education, and workshops with the addition of 10 new outreach representatives.	Add staff to a total of 35 full-time equivalent (FTE) to support targeted outreach to environmental justice communities. Describe at least ten examples of how outreach efforts have led to new projects in EJ communities
New and expanded low-cost (\leq \$500 co-pay) and no-cost offers to reduce energy burden created and launched.	Two new and expanded low-cost and no-cost offers to reduce energy burden created and launched.	In comparison with 2023, increase the number of community partners and customers receiving no-or low-cost offers. Report on demographics where possible.
Solar and solar-with-storage system projects supported for low and moderate income residents in areas with limited infrastructure or high energy burden.	Work with five community partners supporting creation of new residential battery storage offer	Increase the number of solar and solar plus storage projects in development or completed for low-and moderate-income customers.

Table 2. OPUC Equity Metrics for Energy Trust: 2023 and 2024 Targets. *Source:* Energy Trust 2024.

Progress to Date: OPUC Equity Metrics for Energy Trust

Energy Trust met or exceeded the minimum 2023 targets set by OPUC as performance measures for the organization, with the first full year of reporting completed in early 2024.⁶ The highlights from 2023 targets are in Table 3 below:

Table 3: OPUC Equity Metrics for Energy Trust: 2023 Targets and Results

OPUC Equity Metric	2023 Target	2023 Results
Metric #1: Access to support for communities	Increased support by \$200,000 to \$1.8 million to nonprofit organizations with a purpose to serve environmental justice communities or to support nonprofit-led initiatives serving environmental justice communities	In 2023, Energy Trust spent \$4.5 million to support nonprofit organizations and nonprofit-led initiatives serving environmental justice communities. This includes incentives delivered by community-based organizations, contracts to support organization's capacity building, and contracts to support workforce development.
Metric #2: Access to information	Increased funding to support targeted outreach to environmental justice communities, including funding for community ambassadors, education, and workshops with the addition of 10 new outreach representatives.	In 2023, Energy Trust added 13.25 FTE, for a total of 29.75 FTE, supporting targeted outreach to environmental justice communities. In addition, energy trust supported 28 additional community members in various roles supporting outreach to environmental justice communities.
Metric #3: Energy burden reduction	Two new and expanded low-cost and no-cost offers to reduce energy burden created and launched.	Met. In 2023, Energy Trust developed two new no-cost delivery pilots to install ducted heat pumps and heat pump water heaters in homes where customers are experiencing energy burdens. Additional
Metric #4: Community reliability and resilience (solar and storage)	Work with five community partners supporting creation of new residential battery storage offer	Exceeded. Energy Trust engaged six community-based organizations for feedback in the development and launch of the first residential battery storage incentive, including setting incentive amounts, outreach, trade ally engagement and other needs.

Table 3. OPUC Equity Metrics for Energy Trust: 2023 Targets and Results. *Source:* Energy Trust 2024.

⁶ More detail can be found in Energy Trust's 2023 Annual Report: [Energy-Trust-of-Oregon-2023-Annual-Report.pdf \(energytrust.org\)](https://energytrust.org/energy-trust-of-oregon-2023-annual-report.pdf)

In preparation for 2024 targets for the four OPUC Equity Metrics, OPUC staff held another public process to obtain stakeholder input on proposed annual targets for 2024. Early insights are as follows:

- When asked about “minimum performance thresholds” many stakeholders wanted reporting on results for more detail. This reflects the fact that we are still in the early stages in the process of measuring the impact of equity actions, and stakeholders are seeking more information to better understand the impacts and relationships of outputs to outcomes. Additional detail on program offer participation and available demographic info is now folded into Energy Trust’s future annual public reporting.
- Qualitative descriptions are often difficult to translate into a “performance standard” but is often the context needed to explain a more finite quantitative target. This additional narrative will be part of the reporting on the 2024 targets.

For 2024, OPUC added two additional performance measures related to market infrastructure investments for Energy Trust:

- Trade Ally network diversity: *In comparison with 2023, increase the number and diversity (women- and minority-owned small businesses) of active trade allies, as well as the number of projects completed and savings. Report the number of Trade Allies located in every county. Explain how Energy Trust efforts have helped customers gain access to a broader and more diverse network of qualified contractors.*
- Workforce development: *Report activities (including their location and utility service area) development and spending. Explain how Energy Trust efforts have helped customers gain access to a broader and more diverse network of qualified contractors.*

These two new performance measures were added at the request of OPUC Commissioners as outcomes-based to track the progress on these investments outlined in Energy Trust’s 2024-2025 budget and reflect the importance of contractors and overall workforce development in addressing the barriers, themes and equity dimensions outlined in the initial OPUC Equity Metrics (see Table 1) (OPUC 2024).

Progress to Date: Energy Trust’s DEI Plan Metrics

In 2023, Energy Trust made progress on the current multiyear Goals in the 2022 DEI Plan. The highlights from 2023 targets are in Table 4 below:

Table 4: Energy Trust’s DEI Plan Goals and Metrics: 2023 Progress Highlights

Energy Trust DEI Plan Goal	Metric	2023 Progress
Goal 1: Increase representation and readiness	Number of cultural awareness trainings and events attended by Energy Trust staff	In 2023, Energy Trust staff attended over a dozen DEI trainings in 2023, including anti-racism training, unconscious bias training, inclusion in the workplace, tribal community needs, social work services provided to disadvantaged communities and aging populations.

		Energy Trust outreach staff attended more than 200 events hosted by other organizations to connect with diverse groups and environmental justice communities.
Goal 2: Shift leadership and power	Number of community members who participate in Energy Trust projects, initiatives or advisory groups to provide input and influence program design.	<p>In 2023, four community members served on Energy Trust’s Tribal Working Group, which meets regularly to provide input on outreach strategies that will provide greater benefits and increased program participation for tribal customers.</p> <p>Ten people served on the Diversity Advisory Council for all or part of 2023. The Conservation Advisory Council added a representative affiliated with a local community-based organization in addition to two members affiliated with consumer advocate groups.</p>
Goal 3: Increase Community Capacity and Increase Investment in BIPOC, Low-income and Rural Communities	Percentage of expenditures to subcontractors on contracts over \$100,000 paid to businesses certified by the Certification Office for Business Inclusion and Diversity (COBID) as a Minority Business Enterprise, Women Business Enterprise, Service-Disabled Veteran Business Enterprise or Emerging Small Business.	<p>In 2023, 14% of Energy Trust expenditures on prime contracts of more than \$100,000 went to subcontractors certified as Emerging Small Businesses; 16% went to contractors certified as Minority Business Enterprises.</p> <p>Under Energy Trust’s supplier diversity policy, effective in 2023, contracts to non-COBID firms for more than \$100,000 were required to pay at least 20% of value to COBID-certified firms (including subcontractors). For 2023, 26% of the value of contracts over \$100,000 went to COBID-certified firms.</p>
Goal 4: Increase Transparency and Accountability	Energy Trust exceeds its 2023 Oregon Public Utility Commission performance measure on equity metrics.	In 2023, Energy Trust exceeded three of the equity metrics and met the remaining one.
Goal 5: Deepen Engagement in BIPOC, Low-Income and Rural Communities	Number of community engagement activities planned for 2024 and results from those completed engagements.	In 2023, Energy Trust conducted community engagements across the service area and across all customer types and offers. These were primarily focused on communities of color, rural communities, and people experiencing

		<p>lower incomes. Of the 25 engagements that were tracked in 2023, the focuses included homeowners and renters, small businesses, and community-based organizations. Many engagements are long-term efforts involving ongoing community collaborations while some where specific project, pilots, or events with a distinct beginning and end.</p>
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Table 4. Energy Trust’s DEI Plan Goals and Metrics: 2023 Progress Highlights. *Source:* Energy Trust 2024.

Energy Trust’s 2022 DEI Plan was always intended to be a living document. The DEI Plan was updated in January 2024 (Energy Trust 2024). This updated plan incorporated feedback on the Goals, Outcomes, and Metrics outlined in the 2022 Energy Trust DEI Plan and retained the five overarching Goals and focus on community engagement. We continue to track progress on the various metrics associated with the Goals and Outcomes in the plan. Through engagements with stakeholders and communities, we’ve heard that transparency and accountability are central to the advancement of the organization’s DEI efforts. This includes providing regular updates on quantitative metrics and more customer- and community-focused stories.

Discussion: A Method to the Mayhem?

Ranging from minimum thresholds with regulatory teeth to aspirational targets, this broad set of metrics and targets pushes Energy Trust to better serve historically underserved customers and be accountable to regulatory and community stakeholders.

We continue to learn through engaging customers and communities to deliver clean energy solutions and through various stakeholder forums intended to influence both Energy Trust and OPUC processes. From the Energy Trust staff perspective, we have learned a lot in the following key areas:

1. Measuring customer participation alone does not accurately capture the effects of our work to advance equity in clean energy programs.
2. We are not always talking about the same type of community, customer or demographic.
 - a. Energy Trust’s DEI efforts have focused on three key demographics: customers experiencing low and moderate incomes, communities of color, and rural communities. These often overlap.
 - b. In response to HB 3141, Oregon PUC uses “environmental justice community” as defined by the State or Oregon. This is a broader definition than Energy Trust’s current DEI Plan.
3. Ongoing community engagements that include “...deep, authentic dialog, collaboration, and action...” between Energy Trust and customers we serve is an ongoing process to develop offers that center customer and community needs, prioritizing customers historically underserved by Energy Trust’s programs and services (Energy Trust 2024).
4. Shift in industry culture and metrics is really a shift in how we talk about our work and its impacts on customers and communities through various aspects of equity –

procedural, distributional. This often prompts conversations on how we collect and analyze data. How do we use existing data and identify additional elements of interest to stakeholders? How do we prioritize updates to data systems and business intelligence resources that help can tell the story? How do we ensure we do not just fall in love with yet another quantitative metric? How can we be certain we are utilizing rate payer funds in the most responsible ways?

5. These efforts will benefit from ongoing training and application of the “Spectrum of Community Engagement” across Energy Trust’s teams and departments. This applies to roles directly interfacing with customers, program management and administration, and more internally focused teams like human resources who are supporting the organization’s overall growth in understanding and practicing equitable community engagement.
6. Stakeholders want to see details. This is spurring interest from a range of stakeholders, including utilities, regulators, climate and energy justice advocates, community-based organizations, community members. We know building trust will take time and investment of dollars and expertise from clean energy industry/programs/outreach and ultimately understand, define, and demonstrate benefits to priority customers.

Conclusion

These formative steps in defining, measuring, and tracking equity and environmental justice for Energy Trust’s clean energy investments will continue to evolve. These efforts to date have benefitted from the insight and attention of environmental justice, energy justice, and DEI advocates as well as more traditional clean energy stakeholders (e.g., program administrators, utilities, regulators, energy industry organization). This is an ongoing process, and we are encouraged and humbled by the contributions and insight from community members and stakeholders. The high level of interest is encouraging and welcome as we continue to hold ourselves accountable to both procedural and distribution aspects of equity in bringing the benefits of the clean energy economy to historically underserved customers.

The State of Oregon’s aggressive decarbonization and equity goals will require continued commitment to transparency and understanding impacts of clean energy investments for historically underserved customers and communities. Energy Trust is in the process of developing the organization’s next strategic plan for 2025-2030 that will lay out how Energy Trust will bring clean energy investments and realize customer and community benefits for all Oregon ratepayers. In addition, Energy Trust has a new internal DEI Services Team that will be guiding these efforts over the coming years and equity and environmental justice continue to be woven into all facets of Energy Trust’s work.

Citations and References

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