Shifting Power with Transformational Equity:
A Market Transformation Theory of Change

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ABSTRACT

As policymakers push to address climate change with aggressive goals for greenhouse gas reductions, the need to equitably transform the market is paramount. To be successful, market transformation efforts must address the fact that many negative impacts of climate change are felt by those who have limited power and capacity to influence decision-making. If designed unintentionally market transformation efforts risk further exacerbating the divide between those on the climate frontlines and those who are privileged with the resources to fund climate resilience themselves. Market transformation efforts can, however, produce a clean energy economy with a fair distribution of outputs that prioritizes those have been most harmed by systemic injustice if executed within a transformational equity theory of change. This paper draws on examples of people-centered design and targeted universalism already embedded in equitable program design efforts to develop a transformational equity theory of change wherein market transformation changes systems of oppression in addition to the way markets function.

Introduction

Policymakers around the country are establishing aggressive goals to decarbonize while also ensuring energy will more affordable and homes and buildings healthier for the people who live, work, and play in them. Achieving these goals requires a holistic, people-centered approach that goes beyond simple incentives, which can divert energy program resources away from more impactful activities and often only benefit those who can afford to make upgrades in the first place (Hummel & Lachman 2018). If we embrace a people-centered approach to clean energy, our priority should instead be to ensure the benefits and costs involved in the clean energy transition are distributed fairly and in a way that protects the members of society who are most vulnerable (IEA 2021).

The energy industry is at a critical junction. Energy and social justice advocates seek a clean energy transition that commits to equity and leadership from frontline communities and requires community-based decision making about critical energy needs (Energy Democracy Project 2022). Meanwhile utilities, governments, and others in the ecosphere will be dependent on community support to achieve their grid transformation needs. This paper operates within an understanding that the institution-community collaborations required to move the clean energy economy forward can only be built when institutions transform the way they conceive of energy efficiency and renewable energy (EERE) initiatives to be people-centered, not technology centered. We offer a transformational equity theory of change to inform the way we conceive of market transformation that centers people, designs for the most vulnerable in order to support the collective, and begins to shift power to communities for sustainable systems change.

Defining Market Transformation

NEEA's Market Transformation Approach defines market transformation as, "the strategic process of intervening in a market to create lasting change in market behavior by removing identified barriers and/or exploiting opportunities to accelerate the adoption of all cost-effective energy efficiency as a matter of standard practice" (NEEA 2024). Market transformation initiatives are strategic interventions to overcome market barriers that hinder practices, products, and technologies that result in increased energy efficiency from reaching market adoption, and success is often defined by market data, including customer surveys, product or service availability, sales data, and market share/penetration (York, Nadel, and Subramaniam 2022). In the context of Home Energy Rebates, the U.S. Department of Energy (DOE) considers market transformation to be strategic initiatives that intend to deliver lasting change in a market's structure or function, or to transform the way that market participants behave, and the objective is to permanently decrease barriers to the adoption of energy-efficient technologies and strategies to produce both environmental and economic benefits that are sustainable for the long term (DOE 2022). Though the intention is lasting change, it is the market—not the system—that is transformed, which means that inequitable conditions can and will arise in the future.

Despite efforts to reach diverse populations and develop equitable approaches, resource acquisition and market transformation programs disproportionately serve white, well-educated high-income homeowners (Amann, Tolentino, and York 2023). Both program types also pay most of their incentives to larger, higher-priced product models—even where the units use more energy than smaller, lower-priced models (Pigman, Deason, and Murphy 2021). When an equitably designed program doesn't produce equitable results, it calls the way success has been defined into question. While all of the market transformation definitions above to emphasize overcoming barriers to adoption—and one goes as far as to prioritize economic and environmental benefits—they miss a crucial opportunity to identify for whom barriers should be mitigated and how resources should be directed to those with the deepest need.

The Equitable Market Transformation Gap

Equity in EERE is generally accepted to mean policies and programs that are informed by community input and designed to meet the needs of all individuals (ACEEE, 2022). For example, the familiar image of three individuals watching a game behind a fence provides one example of the energy industry's concept of equity in programs, at least as it compares to equality (Fig. 1). Adding additional steps to the engagement process and investing resources in the community, as the program depicted in the panel on the right does, helps to ensure more people participate in the market. These efforts are important to ensure that more people benefit from the clean energy economy and that market participation is more equitable, but they still only benefit the people who are there when support is developed. For those who are unable to make it to the fence, or unaware a game is happening, systemic barriers still exist. An equity lens for market transformation efforts does produce lasting change that for market participation, but those changes rarely make a dent toward the systems of oppression that market transformation designed to deliver on a transformational equity theory of change.
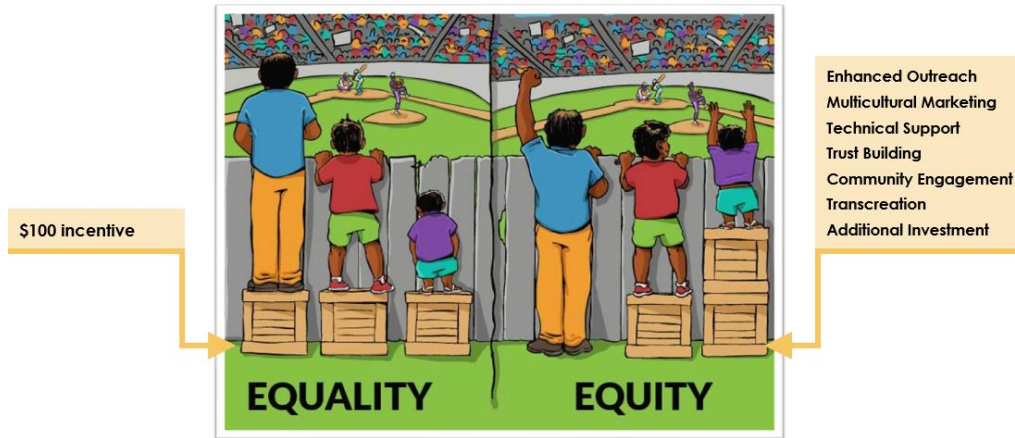
Figure 1. Equality v. Equity *Source:* IIISC *Artist:* Angus Maguire.

Transformational equity also recognizes that systemic change must be led by the people who are most impacted and intentionally elevates perspectives of Black, Brown, and Indigenous communities or other groups who are underserved and under-resourced. Programmatic design choices are often informed by what the industry perceives as most important, but to practice transformational equity means to allow our actions to be guided by the community's goals and needs (Norton et. al 2021). The modified graphic below (Fig. 2) illustrates the systemic barriers that remain when we design equitable programs *without* focusing on systems change.
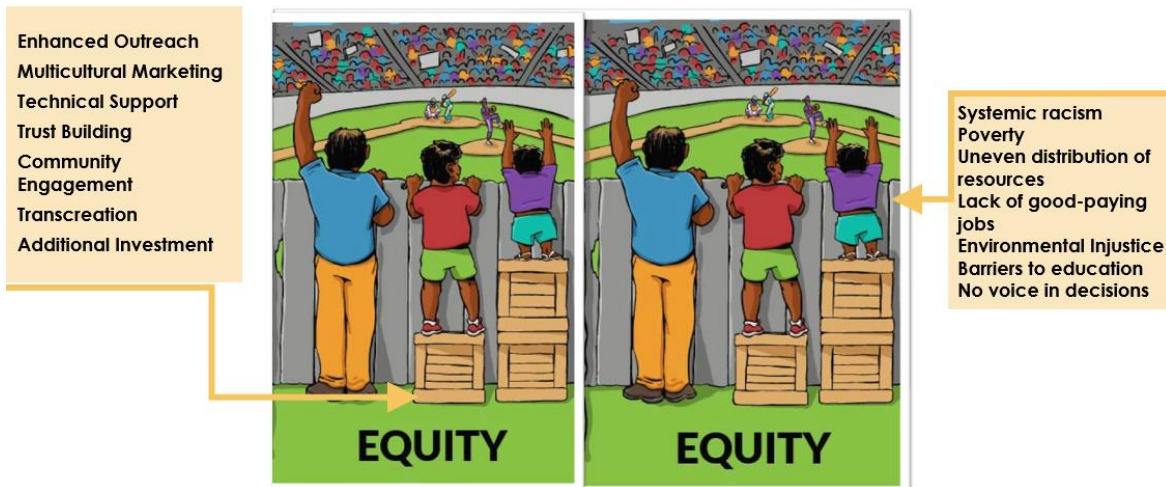

Figure 2. Equity v Equity. *Source*: adapted from IISC. *Artist:* Angus Maguire.

This requires a mindset shift wherein programs are designed with the idea that no community is "hard to reach," but rather that each community requires pathways that are customized to the specific barriers they encounter and their lived experiences. The reality is that there are many overlapping barriers that mean people do not experience the benefit of clean energy, including lack of access to program information, language barriers, split incentives, lack of choice or availability of efficiency equipment (Amann, Tolentino, and York 2023). Yet the energy industry commonly focuses on cost as the primary barrier to market participation and therefore prioritizes programs designed for people with low incomes, incentives to lower overall costs, and approaches to reduce upfront costs. The reality may be that our industry isn't designed

programs for the *people* behind the barriers. Consider the perspective of April Brown, a community leader in Rhode Island, on a program designed to install heat pumps free of cost to people who are income qualified:

> People at the top don't have relationships with the people who are most affected by these incentives. It still ends up being that the people who least deserve to have the incentives have the incentives...the people who go to community meetings and go to council meetings and go to General Assembly convenings. But not the folks who really need it because they're working very hard to get food on their table and put their kids in school. (El-Dib 2023)

It is important to recognize that communities who experience inequities aren't always communities with low incomes, even though communities with low incomes always experience inequities. When a program or initiative sees disproportionate representation, the assumption should not be that cost is the only reason. Instead, program designers, evaluators, and implementers should ask what beyond income prevents certain communities from engaging? Why do some certain communities who receive an incentive not experience the same outcomes? Why is there a lack of participation in free direct installation programs in certain communities but not others?

To truly reach the communities and households that don't access benefits, program designers, implementers, and evaluators must think beyond what people and businesses in these communities need to participate in the program and instead understand their motivations for nonparticipation. Learning why communities have not benefited is a pathway that organizations and institutions can take to build relationships that inform the strategies by which each organization and institution should lead with equity when designing market transformation programs. The following framework can help organizations achieve this.

Transformational Equity Framework for the Clean Energy Transition

A transformative equity framework for market transformation has two primary distinctions:

- Efforts must be led, not just informed, by members of the impacted community.
- Goals must be to eradicate root causes of inequity, not simply to mitigate barriers.

Listening to, learning from, and following the lead of communities on the frontlines of climate injustice is essential for any institution or organization to embrace transformative equity in clean energy market transformation initiatives. However, relationships with communities are built at the speed of trust (Priestly 2014), which often surpasses the annual program cycle of the energy industry. Understanding the value establishing relationships with communities, we propose the following transformational equity framework theory of change in market transformation:
- Practice **people-centered approaches** at every stage in the program lifecycle to ensure the activities and associated tracking protocols are representative of the communities in which the work is done, and all benefits and harms are shared fairly amongst members.
- Implement **target universalism** to ensure the activities and associated tracking protocols are representative of universal goals shared by communities and institutions.
- Shift **decision-making power** to communities who have been most impacted by an inequitable energy system.

People-Centered Transformation

The people-centered clean energy transition aims to address environmental justice and equity issues, enabling a just transition to a low-carbon economy. These issues include legacy pollution and climate impacts that have disproportionately affected Black, Brown, and Indigenous communities, elders, people with disabilities, people with limited incomes, and other identities who have often been on the margins of program design (WRI n.d.). A people-centered clean energy transition is essential to the successful transformation of the energy system at the pace and scale require to deliver on our global commitments for climate adaptation and mitigation (IEA 2021). People-centered programming is set apart by its emphasis on the human element and how change happens. In addition to prioritizing outcomes like kilowatt hours saved or dollars saved, people-centered programmed creates conditions for shifting power in decision-making, which is a process that understands dominant systems have treated the planet—and certain people—as expendable and that decisions should be made by the impacted parties, not an elite few with expertise or learned knowledge (Sager and Marques, 2023). To shift power requires that organizations and institutions "recognize that lived experience, especially in communities that have been harmed by this system, contains the wisdom we need to create better systems" (NEGEF, 2024). See Table 1 for an overview of strategies to inform a people-centered clean energy transition from the International Energy Agency (IEA 2023).

Table 1. Principles of a People-Centered Clean Energy Transition.

Decent Jobs and Worker Protection	
1	Design transitions to maximize the creation of decent jobs
2	Develop tailored government support for communities and workers and focus on skills and training development
3	Use social dialogue, robust stakeholder engagement, and policy coordination to deliver better outcomes
Social and Economic Development	
4	Ensure that policies enhance social and economic development and improve quality of life for all
5	Prioritize universal clean energy access and the elimination of energy poverty
6	Maintain and enhance energy security, affordability, and resilience
Equity, Social Inclusion, and Fairness	
7	Incorporate gender, equality, and social inclusion considerations in all policies
8	Ensure fair distribution of clean energy benefits and avoid the risk of disproportionate negative impacts on vulnerable populations
9	Integrate the voices of younger generations in decision making
People as Active Participants	
10	Use insights from behavioral science to design effective behavior change programs and policies
11	Involve the public through participation and communication
12	Enhance impact collaboration and the exchange of best practices

Source: IEA 2023.

An equitably designed program may engage stakeholders for feedback with focus groups or interviews and develop an understanding of the workforce environment in the community to inform its activities. A people-centered program goes further to learn community goals and *then* define appropriate activities. Consider a hypothetical workforce development program designed around IEA recommended strategy "use social dialogue[1], robust stakeholder engagement, and policy coordination to deliver better outcomes." Within this framework the program designer would first need to bring together workers, employers, and government representatives in a collaborative dialogue to develop a workforce development framework that can also achieve energy industry goals. The outcome is bespoke energy programming for the community—otherwise known as targeted universalism.

Targeted Universalism

While universally implementable programs can be less time and resource intensive to implement and can be successful at reaching the mainstream market, these programs are often seen as unaffordable, overly ambitious, and inadequate at helping those in need. Targeted universalism instead sets universal goals for programs that should be pursued by processes unique to the concerns groups based on their geographies, structures, culture, and experiences (Powell, Menendian, and Ake 2022). In many ways, targeted universalism is the act of "designing from the margins." An organization or institution identifies a problem that impacts a community who has been on the margins of society, proposes solutions, and then broadens its scope to support as many people as possible. "Targeted universalism is an approach that supports the needs of the particular while reminding us that we are all part of the same social fabric" by placing the needs of those who are rarely served at the center of programmatic design to achieve our shared goals (Powell, Menendian, and Ake 2022, 5). For example, the Oregon Multifamily Energy Program (OR-MEP) developed a diversity, equity, and inclusion (DEI) Coalition that convenes twelve racially, ethnically, geographically, and experientially diverse community members, advocates, and individuals who work in housing and energy to advise the ways in which the program serves BIPOC communities. The Coalition reviews, recommends, modifies, and creates OR-MEP policies and practices to deconstruct existing systemic racism from program design and implements changes to help the communities that are on the frontline of climate change impacts, redlining communities, and communities that have historically been harmed by inequalities and injustice. The Coalition specifically supports the development of clear and measurable goals and objectives, helps facilitate relationships between the program and communities, and advises on how equity can be embedded in program selection practices. The Coalition influences the application process and its evaluation including how geography, expected demographics of the tenants, and additional services the developer provides to current or future tenants (Unrooz, Encolor, and TRC 2024).

Though OR-MEP provides up to ten hours a month of paid labor at an hourly rate commensurate with a consultant in the energy industry to members of the coalition, the program recognized that full participation across the state, particularly for those in rural areas or those without reliable housing or transportation, would require virtual participation, which is often cost

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[1] Social dialogue is a term for the negotiation, consultation, and information excited that happens between government representatives, employers and workers, and worker advocates (WEC, n.d.). While many think of social dialogue as limited to union negotiations, a regular cadence between these parties ensures that the policies and practices put forth are informed by laborers themselves. Social dialogue is deep engagement that is often between the same parties.

prohibitive, the program budgeted to provide technology support and equipment support as one means to mitigate barriers for participation (Fig. 3).

Coalition Meeting Logistics

Equipment & Technology

The Coalition will meet remotely via a video conferencing platform such as Zoom, Teams, or GoToMeeting. All meetings will be held online and Coalition members will need the following items to participate. If you do not have one or more of these items, OR-MEP can help. There is a question on the application where you can indicate which item(s) you need.

- High-speed internet (25 mbps or faster)
- Internet-enabled device, such as a computer or tablet
- Webcam or video camera embedded in or connected to the computer or tablet
- Headset or earbuds/headphones with a microphone – if calling from a noisy or shared space

Language

All Coalition meetings will be hosted in English for now. OR-MEP regrets that we are currently unable to offer support for Coalition members who do not speak fluent English. We are working to provide this accommodation in the future.

Figure 3 OR-MEP DEI Coalition Framework *Source:* Unrooz, Encolor, and TRC 2024

The OR-MEP team ensured applicants that the need for equipment or technology was not scored in coalition applications. Offers to provide technology and resources were extended verbally during interviews, contracting conversations, and in the meet and greet the facilitation team held with each coalition member. The program wanted to ensure that experts on the affordable housing system in Oregon—including experts with lived experience tenants and currently or formerly unhoused community members—could participate. By prioritizing the needs of the most vulnerable group, targeted universalism develops a pathway to facilitate community-led transition planning, meaning deeper trust from the community in question and greater probability of overall program success.

Shift Decision-Making Power to Communities

Acts of targeted universalism show communities who have so often been the least central to design that they are a priority. For example, a business who shovels its ramp prior to its stairs provides a pathway for every customer to enter the store and shows wheelchair users that they are a priority—not an afterthought left in the cold. While targeted universalism can foster good will and lay a foundation for trust between the institution and the community, a transformational equity approach must ultimately shift decision-making power to community to achieve its goal of producing community-led systemic change. This work, like all transformational equity work, requires regulatory change in addition to mindset change. The questions and intentions in Table 2 provide a place that program designers, planners, implementers and evaluators can start to understand where and how they might begin to shift power. Once we reframe our ways of

thinking and begin to conceive of equity in each phase of program design, we can become advocates for systems change at the regulatory level.

Table 2: Sample questions for equitable outcomes by program phase.

Phase	Questions to consider	Intention
Pre-Design	What populations are most likely to be impacted by inequities, either because of historical evidence or anecdotal experiences? Does the composition of the project team reflect or proportionally represent the communities being served?	*Understand any historical legacies that may have produced inequities through implicit past disparities, discriminatory practices and exclusion.* *Develop appropriate relationships to understand the communities being served.*
Research/ Planning	Have you included the community or community perspectives in your research plan? Have you defined the target population? *This requires collecting demographic information.*	*Understand the wants and needs of the community the program is targeting.* *Establish an approach to prove your impact to the community in ways that they value.*
Design	Have you documented feedback and noted how it was addressed in the design process? Are there any intentional design elements to correct for past inequities?	*Understand how inequities in access impact program design.* *Determine how previous harm or injustice shapes how communities engage the organization.*
Implementation	Are there differences in participation, experience, or outcomes by identity? Does the program approach include leveraging local organizations?	*Understand how outcomes may vary based on typical identity characteristics.* *Strengthen relationships with community.*
Evaluation	Does the workplan include definition of equity? Does the evaluation take into consideration value, beyond energy savings or number of EERE measures installed?	*Understand if and how inequities have impacted intended program outcomes.* *Advocate for evaluation of community outcomes.*

Source: Encolor 2024

While many utilities are mandated to consider equity in the Integrated Resource Planning (IRP) process, many who are not have still found it the best place to begin the equity conversation because it allows the utility to get approval to invest in program approaches and communities that may differ from those that typically participate and can result in changes in the depth of equity impact programs can have. "An equity agenda accounts for differences in opportunities and burdens, as well as needs, to propose and pursue just and equitable solutions to achieve systems-level change. Supporting more and diverse public participation in the full

spectrum of energy planning and decision-making can advance equity in utility regulation and broader equitable outcomes beyond utility regulatory venues" (Farley et. al 2021). For example, NV Energy recently developed a series of stakeholder engagement opportunities throughout the IRP planning process to develop strategies to increase the benefits from the utility's EERE programs accruing to historically underserved communities while collaborating with government offices, energy service providers, and other entities who support underserved communities.

As part of this process, Encolor facilitated three regularly occurring working groups and conducted several focus groups made up of English- and Spanish-speaking community stakeholders to incorporate the voices from local community organizations and small businesses into the design of the next portfolio. This included conversations around appropriate metrics to assess program savings and equity impact, how to leverage federal funding, and how to invest resources in innovative new technologies and program delivery approaches (NV Energy 2024). While this exercise did not fully shift decision-making power to the community, being incorporated into the planning process lays a foundation for long term change. Changing the regulatory process and how utilities conduct their resource planning cascades down to how programs are designed, implemented and evaluated. Program administrators, implementers, and evaluators are often constrained in how they incorporate equity by regulations and policies that are put in place during this process. If community is at the table, that change will be led by their expertise.

Utilities are also working to shift decision-making power by transforming procurement processes. They have also realized that contracting with local diverse businesses can drive economic development and strengthen business decisions—particularly in fields that experience heterogeneity, such as the trades (Brown and Huneke, 2018). For example, Ameren IL contracted Encolor to provide third-party equitable request for proposal (RFP) administration that intended to be more transparent and bring in more local and diverse businesses. The work included developing an understanding of the community, helping applicants navigate the process with technical workshops, and removing some of the barriers inherent in solicitation processes that prevent small businesses from participating (another example of targeted universalism— recognizing that simplifying the process for some could simplify the process for all). Because the intent of the procurement process was to develop stronger relationships with underrepresented communities, an output was delivering recommendations to the Ameren's Stakeholder Advisory Group (SAG) on potential pathways to remedy procurement barriers, including customized support for small and diverse vendors and developing partnership pathways in addition to successfully adding 266 new diverse vendors to Ameren IL's procurement platform in the program year (Parker, Steiner, and Lovier 2023). Efforts like this that have a mutual benefit for the community (more equitable practices informed by their feedback) and the utility (increased pool of diverse vendors to support diverse spend goals) are essential pathways for a transformational equity approach to market transformation.

Conclusions

Communities on the frontlines of climate change understand that we are at a transitional time just as we in the industry do. It is time to recognize that our industry is dependent on the experiences of the community, and we cannot achieve our goals without them. Community leadership is essential for market transformation to succeed at ushering in a just clean energy economy, and we must look to communities as leaders, partners, and champions for resilience. The approaches we have always taken, however, are designed with a lot of knowledge about energy and little knowledge about people. Existing equity-focused EERE programs generally

work to reduce barriers to market participation without addressing root causes, and market transformation efforts intend to create lasting change but often overlook the role of systemic oppression in the way people and business engage with EERE. As we work to make equity the status quo for the energy industry instead of a one-off element of some programmatic design, we must align on shared goals and a framework to achieve them. When transformational equity is applied as a theory of change to market transformation and we begin to design people-centered programs for the marginal experience rather than the dominant, we can begin to share power with communities to abolish the systems responsible for inequities in energy in the first place.

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