

Clean Heat Standard Equity Advisory Group
 Tuesday, June 11, 12:30-3:00 PM ET
 Agenda

Meeting Link: <https://cbi-org.zoom.us/j/87383177532>

Draft Participant Agenda

12:30	Welcome & Review of agenda <ul style="list-style-type: none"> ● Initiate recording 	Mia
12:35	Review and approval of 5/28/24 meeting minutes	Mia
12:40	Updates from the PUC	Dominic Gatti, PUC
1:00	Technical Advisory Group Report and on-going collaboration <ul style="list-style-type: none"> ● Update from TAG liaison 	Emily / Matt
1:05	Report Outline Deep Dive - Low income households	Ashira
1:50	Where do you need additional support in your segment? <ul style="list-style-type: none"> ● Identify one or two issues in your segment you need additional help with ● Are there areas in your segment that could use specific input from the TAG? 	Ashira / Srini
2:00	Public Comment (10 min)	Ashira
2:10	Feedback from Credit Issues Subgroup	Ben
2:30	Public Education Tools (Public Explainers) <ul style="list-style-type: none"> ● Motion to keep going with public engagement subgroup? 	Ashira
2:45	Public Comment (10 min)	Ashira
2:55	Next Steps	Ashira
3:00	Close	Mia

Gatti, Dominic

From: Ashira Pelt <apelt@cbi.org>
Sent: Friday, June 7, 2024 7:58 AM
To: cmorris; Gatti, Dominic; Bolaski, Benjamin; matt; jmandeville@cvcoa.org; Jen Myers; Pike Porter; Emily Roscoe; Sriram Srinivasan; Christopher Trombly; Mia Watson; Wilcox, Geoff
Subject: EAG Agenda and Resources 06.11.24
Attachments: 06.11.24 VTPUC CH EAG Participant Agenda (1).pdf

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Good Morning everyone,

Please see the draft agenda for next week's EAG meeting attached.

We will spend the majority of the time next week taking a deep dive into the low-income household portion of the final report. I have included Geoff Wilcox's draft thoughts on low-income households **below** as a starting point for our conversation. Please come prepared to discuss and add!

We will also give each Report Segment Leader (from the Report Outline) a few minutes to identify places that they could use additional support thinking through their segment.

Additionally, please review the resources in the [Resource Library](#). I would like to flag the addition of Srini's [Additions to the Public Explainer](#), a series of graphs and text to help explain the Clean Heat Standard.

All the best,

Ashira

Existing Challenges / Gaps on programs: currently there are more low-income Vermonters who struggle with heating and cooling their homes, as well as ensuring a safe and dry home, than there are programs and funds to assist them. I do not know the numbers but would say that the existing programs (including ours (Wx)), provide service to a very small percentage of eligible households who need those services. Their households not only need energy efficiency improvements, they need structural repairs of varying magnitudes. We are not anywhere meeting the needs now.

LI Households have little to no potential to pay for energy efficiency work (clean heat measures) on their own or take out a loan to do so. We see this every day when clients aren't able to fix their roofs that have been leaking for years. There is a significant existing need for grant funds to provide Home Repairs for low-income Vermonters so they have a sound, dry home to live in. This also applies to 10% of existing Vermont homes that have Vermiculite insulation in their home that is considered an asbestos containing material and which needs to be abated to improve the energy efficiency of that home. This can cost from \$10k to \$20k per home just to remove the material.

Potential benefits: If the CHS creates funds that can serve more LI Vermonters that is a potential benefit. Due to workforce and contractor shortage, I see an issue of more funds available than that that can be properly used to provide services for LI Vermonters however.

Potential harms: Increased cost of clients to heat their homes. This will be significant and very harmful to LI Vermonters.

LI Vermonters will not be able pay for any CHS measures and will be stuck with higher fuel bills. Those that our Wx program will serve will be in a better position, but it remains to be seen if they will be in any better shape than they are currently.

More funds available to serve LI clients with CHS measures but not enough contractors to serve them, and as a result clients waiting many years to receive those measures and in the meantime seeing the increased costs.

Clients who can't be served by our Program or any other programs that may come along(?) will not be able to pay for heat, or pay for any CHS while they wait. IF some can, it would be a very small percentage.

Recommendations: Create a low income exemption whereas LI clients would not have to pay the increase in the fuel costs that the CHS would create. This would be a huge reprieve for them and could save some lives.

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Vermont Clean Heat Standard Equity Advisory Group Resource Library

This is meant to be a place to organize any helpful resources for the EAG. This is not meant to be a space for collaborative work. Please add the name of the resource, a brief description and the link.

This document is managed by Ashira Pelt - apel@cbi.org. Please feel free to reach out directly if you have any questions about access.

Resource Name	Description	Link	Name of Person Submitting
<i>12 States v. EPA</i>	<i>12 states sue the EPA over false claims of advanced wood heating systems</i>	https://stateimpaccenter.org/files/AG-Actions-Wood-Heater-Complaint.pdf	<i>Pike Porter</i>
<i>VT GHG emissions Dashboard - EAN</i>	<i>Historical emissions data for different fuel types in thermal sector</i>	https://eanvt.org/emissions-dashbord/	<i>Sriram Srinivasan</i>
<i>Small business economic profile - VT</i>	<i>Summary of small businesses in VT</i>	https://advocacy.sba.gov/wp-content/uploads/2022/08/Small-Business-Economic-Profile-VT.pdf	<i>Sriram Srinivasan</i>
<i>Fossil fuel heat use in VT - EAN</i>	<i>Trends in fossil fuel usage and CCHP installation</i>	https://eanvt.org/project/fossil-heat-ing-fuel-changes/	<i>Sriram Srinivasan</i>
<i>HousingData.org</i>	<i>Data on VT demographics, income brackets, housing stock characteristics</i>	https://www.housingdata.org/profile/	<i>Mia Watson</i>
<i>DOE Low-income Energy Affordability Data Tool</i>	<i>Cross-reference energy usage and energy burden characteristics by state/income level/building type</i>	https://www.energy.gov/scep/slsc/ead-tool	<i>Mia Watson</i>

<i>Vermont Climate Action Plan Public Engagement Fundings</i>	<i>Summary of results from public outreach process related to the Climate Action Plan process</i>	https://outside.vermont.gov/agency/anr/climatecouncil/Shared%20Documents/(8)%20Public%20Engagement%20Findings.pdf	Mia Watson
<i>Performance Indicators for the Vermont Weatherization Assistance Program</i>	<i>Report by OEO to Legislature on WAP activity</i>	https://legislature.vermont.gov/assets/Legislative-Reports/Annual-Weatherization-Leg-Report-Jan-2024.pdf	Mia Watson
<i>Vermont 2024 Annual Energy Report</i>	<i>Department of Public Service (PSD) overview of energy trends by sector, including thermal</i>	https://publicservice.vermont.gov/sites/dps/files/documents/2024%20AER%20FINAL_Updated%201.18.2024.pdf	Mia Watson
<i>Demographic Collective Worksheet</i>	<i>Worksheet filled out by EAG members during the 5.28.24 EAG meeting with rough thoughts on the benefits, detriments, and other impacts of the CHS on different demographic groups</i>	https://docs.google.com/document/d/1TluAn2rUeQ5HOQs_mrECrlqQlaftwm6HKjW4-DYY0Q/edit?usp=sharing	Ashira Pelt
<i>Additions to Public Explainer</i>	<i>Additional graphs and text to help in a public explainer of the Clean Heat Standard</i>	https://docs.google.com/document/d/1_7RrRsAVkFRuJsUN0Fb5V9oLRyFysypWwBT3m52VA1o/edit?usp=sharing	Ashira Pelt on behalf of Sriram Srinivasan

Clean Heat Standard Equity Advisory Group

Equity Rubric

Adopted April 16, 2024

Revised May 28, 2024

Preamble:

Whereas the Climate Council Just Transitions Subcommittee drafted the [Guiding Principles for a Just Transition \(Guiding Principles\)](#) in August 2021; and

Whereas the *Guiding Principles* advises that “[s]tudies continue to show that low-income communities, indigenous peoples, and black and other communities of color are among those who are particularly vulnerable to the impacts of climate change”; and

Whereas low- and moderate-income and historically marginalized, disadvantaged and under- served communities include Indigenous communities; people of color; new Americans; mobile home communities; renters, including subsidized housing renters; communities near electric plants, fuel-manufacturing plants, and fracking sites; and rural and floodplain communities; and

Whereas Vermonters have also been historically marginalized or may be marginalized due to language barriers, gender inequality, LGBTQ status, socioeconomic status, education level, employment status, disability, immigration status, religious beliefs, culture, or incarceration history; and

Whereas the *Guiding Principles* were drafted to help guide the Climate Council and its subcommittees ensure that strategies to reduce greenhouse gas emissions...benefit and support all residents of the State of Vermont fairly and equitably”; and

Whereas the *Guiding Principles* defined equity to include distributive equity which “*starts by recognizing disparities in the allocation of resources, health outcomes, the inequities in living conditions and lack of political power place frontline / impacted communities at greater risk. Distributive equity strategies target resources to adaption and mitigation affecting the communities and populations most impacted*”; and

Whereas the *Guiding Principles* defined equity to include Procedural equity; which is “*often referred to as equitable planning and implementation. Equitable planning and implementation require that communities have a meaningful opportunity to participate. Policymakers must collaborate with communities to learn about their perspectives so that solutions meet community needs. Equitable planning focuses on the local level and ensures that local communities have the opportunity to provide input on policies that directly affect them;*” and

Whereas the *Guiding Principles* defined equity to include Contextual equity which “*ensures that mitigation and adaption strategies take into account that low-income communities, black communities, indigenous communities and people of color, and people with disabilities, amongst others, are often more vulnerable to climate change. Contextual equity ensures that the development of mitigation and adaption strategies at statewide and local levels take these disparities into account;*” and

Whereas the *Guiding Principles* defined equity to include Corrective Equity which “*ensures that mitigation and adaption strategies provide communities with clear processes to hold the state accountable to its commitments to pursue equity;*” and

Whereas the Clean Heat Standard was enacted in May, 2023; in order to help “meet the greenhouse gas emission reductions required by the GSWA”; and

Whereas the Clean Heat Standard established the Equity Advisory Group to assist the Public Utility Commission “in developing and implementing the Clean Heat Standard in a manner that ensures an equitable share of actions are delivered to Vermonters with low income and moderate income”; and

Whereas the Clean Heat Standard directs the Commission to “biennially assess harmful consequences that may arise in Vermont and elsewhere from the implementation of specific types of actions and shall set standards or limits

to prevent those consequences”; and

Whereas these harmful consequences include but are not limited to “environmental burdens as defined in 3 V.S.A. § 6002, public health, deforestation or forest degradation, conversion of grasslands, increased emissions of criteria pollutants, damage to watersheds, or the creation of new methane to meet fuel demand”; and

Whereas these consequences have a disproportionate harmful consequence on low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters; and

Whereas among the duties of the Equity Advisory Group is “supporting the Commission in assessing whether customers are equitably served by actions and how to increase equity”; and

Whereas the *Guiding Principles* is meant to ensure that disenfranchised populations are not unduly impacted by emissions transformation projects including proposed actions under the Clean Heat Standard; and

Whereas the *Guiding Principles* was not drafted specifically to evaluate potential eligible actions, but the *Guiding Principles* does provide a rubric that the Equity Advisory Group can build upon; and

Whereas the EAG dissolves upon the implementation of the Clean Heat Standard, though equitable actions are needed after the dissolution of the Equity Advisory Group;

Therefore, the Equity Advisory Group offers this rubric to:

1. to assist the Commission in developing and implementing the Clean Heat Standard in a manner that ensures an equitable share of actions are delivered to Vermonters with low and moderate incomes;
2. to assist the Commission in assessing whether proposed actions will equitably serve all Vermonters;
3. for adoption by the Technical Advisory Group to assist the Technical Advisory Group to evaluate proposed actions through an equity lens.

Instructions:

Step	Action
1	Prepare Draft Policy <ul style="list-style-type: none">• Develop the draft policy that needs to be assessed.
2	Complete the Equity Rubric <ul style="list-style-type: none">• Multiple individuals with diverse perspectives should fill out the rubric independently to ensure a comprehensive evaluation.• For each section of the rubric, check the appropriate box (Harm, Neutral, Benefit) for each question.• If the box for "Harm" is checked, provide detailed justification, and suggest possible revisions to mitigate the harm.
3	Identify and Address Harmful Impacts <ul style="list-style-type: none">• Based on the completed rubrics, identify any potential harmful impacts of the proposed policy, and discuss as a group.• Modify the draft policy to eliminate or mitigate identified harms.• Ensure transparency about the potential impacts and consider steps to mitigate them if the policy is implemented.
4	Finalize Policy Recommendations with Equity Considerations <ul style="list-style-type: none">• Incorporate the equity considerations into the final policy document.• Clearly document how the equity assessment influenced the policy revisions.• Include specific measures to monitor and ensure equitable outcomes during implementation.

Clean Heat Standard - Equity Rubric

1. Health <i>The proposed action should improve health (physical and mental) outcomes for low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters. The strategy upholds the fundamental human right to safe, clean, healthy and adequate air, water, land, and housing.</i>	Harm	Neutral	Benefit
1. Does the proposed action reduce air pollution (CO2 and other greenhouse gasses, PM 2.5, Ozone, VOC, NOx, etc.) and reduce asthma and other respiratory-related hospital visits?			
2. Does the proposed action extend the expected longevity and/or quality of life for populations experiencing health disparities?			
3. Does the proposed action reduce stress, anxiety, and depression, and improve mental health?			
4. Does the proposed action help restore or protect ecosystem health (air, land, water, soil)?			

Overall response to these questions with justification:

Clean Heat Standard - Equity Rubric

2. Affordability <i>The proposed action should lower and stabilize costs related to home heating as well as basic living needs (housing, food, utilities, healthcare, transportation, etc.) for low- and moderate- income and historically marginalized, disadvantaged and under-served Vermonters.</i>	Harm	Neutral	Benefit
1. Does the proposed action prioritize low- and moderate-income Vermonters?			
2. Is the proposed action affordable to residents, and/or does the proposed measure offer inclusive financing strategies that prioritize the most income-burdened populations? (be specific about whether you're financing through an organization or the city, etc)			
3. Does the proposed action reduce energy cost burdens and the number of families that are cost-burdened by housing including utilities?			
4. Does the proposed action generate burdens (including financial, and health costs), either directly or indirectly, onto others including communities of color or low-income populations? If yes, are there opportunities to mitigate these impacts?			
5. Are grants available for low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters to access the proposed action and/or does it offer these Vermonters inclusive financing at favorable rates?			
6. Will low- and moderate-income and historically marginalized, disadvantaged and under- served Vermonters lose fuel subsidies as a result of the proposed action?			

Overall response to these questions with justification:

Clean Heat Standard - Equity Rubric

3. Accessibility <i>The proposed action should remove barriers and promote access for low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters.</i>	Harm	Neutral	Benefit
1. Does the proposed action expand access to actions for low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters?			
2. Does the proposed action remove barriers that might prevent individuals in low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters from benefiting fully if the action were implemented as communicated?			
3. Does the proposed action increase access to eligible actions for households living in manufactured homes and/or manufactured home communities?			
4. Does the proposed action increase access to eligible actions for renter households?			
5. Is the proposal action expressed in clear language accessible to all Vermonters?			

Overall response to these questions with justification:

Clean Heat Standard - Equity Rubric

4. Just Transition <i>The proposed action should ensure economic justice so that low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters are prioritized in the benefits of the action and are protected from any potential negative consequences.</i>	Harm	Neutral	Benefit
1. Does the action support low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters through workforce development, and contracting opportunities?			
7. Does the proposed action prioritize low- and moderate-income Vermonters?			
2. Does the proposed action create local opportunities for livable wage jobs for low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters			
3. Does the proposed action place responsibility on institutions and businesses to address historical disparities in contributing to climate change?			

Overall response to these questions with justification:

Clean Heat Standard - Equity Rubric

5. Community <i>The proposed action should elevate the voices of low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters by developing and strengthening the skills, abilities, and resources that a community needs to survive, adapt, and thrive.</i>	Harm	Neutral	Benefit
1. Does the proposed action engage and continue to empower low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters in a meaningful, authentic, and culturally appropriate manner? Does it respect community- based knowledge and is it based on community identified needs and input/feedback?			
2. Does the proposed action help build community capacity through funding, educational opportunities, and/or other resources?			
3. Does the proposed action include a plan to respond comprehensively to protect impacted workers?			
4. Does the proposed action support low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters through workforce development, contracting opportunities?			
5. Does the proposed action create local opportunities for livable wage jobs for low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters?			
6. Does the proposed action help foster the building of effective, long-term relationships and trust between diverse communities and businesses and institutions?			

Overall response to these questions with justification:

Clean Heat Standard - Equity Rubric

6. Accountability <i>The proposed action should ensure that all Vermonters, including low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters can hold governments and institutions accountable for equitable implementation.</i>	Harm	Neutral	Benefit
1. Is the proposed action based on verifiable science unbiased by politics, lobbying, corporate sponsorship, or precedential decisions?			
2. Does the proposed action meet the intended thermal requirements of the building it serves?			
3. Does the proposed action have provisions to ensure ongoing collection of data (that can be disaggregated by race/ethnicity/income) and public reporting of data? Can this data be validated qualitatively by community members?			
4. Does the proposed action have clear markers of short-term and long-term success as well as timelines for meeting markers of success? If so, what are the mechanisms we will utilize to ensure that goals are met (successful implementation and enforcement)?			
5. Does the proposed action address consequences if goals are not met? Is there a process for those impacted by the action to express grievances or satisfaction and to ensure that concerns are met?			
6. Is the proposed action adequately funded to achieve its designed goals?			
7. Is the decision-making process for the proposed action clear, honest and transparent?			
8. Are potential harms of the proposed action clearly identified and disclosed?			
9. Are those that will benefit from the proposed action clearly identified and disclosed?			

Overall response to these questions with justification:

Clean Heat Standard - Equity Rubric

7. Cultural Preservation <i>The proposed action should deliberately and respectfully honor cultural relevance and history to maintain cultural heritage from the past and present for the benefit of all generations.</i>	Harm	Neutral	Benefit
1. Does the proposed action acknowledge/respect/honor the culture, historic assets, and traditions of low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters?			
2. Does the proposed action improve social cohesion (engagement and connection within/to the community) among low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters?			
3. Does the proposed action’s decision-making processes go beyond dollars and cents to address shared values and cultural differences in order to support implementation?			

Overall response to these questions with justification: