

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

**Clean Heat Standard - Equity Rubric**

<b>1. Health</b> <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>	<b>Harm</b>	<b>Neutral</b>	<b>Benefit</b>
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:**

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<b>2. Affordability</b> <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>	<b>Harm</b>	<b>Neutral</b>	<b>Benefit</b>
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:**

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<b>3. Accessibility</b> <i>The proposed action should remove barriers and promote access for low- and moderate-income and historically marginalized, disadvantaged and under-served Vermonters.</i>	<b>Harm</b>	<b>Neutral</b>	<b>Benefit</b>
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:**

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<b>4. Just Transition</b> <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:**

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<b>5. Community</b> <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>	<b>Harm</b>	<b>Neutral</b>	<b>Benefit</b>
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:**

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<b>6. Accountability</b> <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>	<b>Harm</b>	<b>Neutral</b>	<b>Benefit</b>
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:**



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<b>7. Cultural Preservation</b> <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>	<b>Harm</b>	<b>Neutral</b>	<b>Benefit</b>
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:**