

MUD EV Charging Design Concept Condensed Racial Equity Toolkit

February 28, 2022

1. Identify a racial equity outcome as our north star goal.

What is the issue and what are we really trying to accomplish?

The Transportation Electrification Strategic Investment Plan ([TESIP](#)) outlines six racial equity outcomes to guide future TE programs:

- **Community Collaboration.** Environmental justice communities (EJCs) see their wants and needs reflected in City Light transportation electrification (TE) programs.
- **Healthy Planet, Healthy Lives.** Reduce tailpipe emissions that impact local air quality and public health where EJCs live, learn, work and play. Reduce carbon emissions that have a disproportionate burden on the most vulnerable populations and communities.
- **Equitable Access.** EJCs learn about our TE programs, can readily understand and access materials and resources, see themselves reflected in communication and participate in and benefit from City Light's TE programs.
- **Community Assets.** City Light's programs invest in infrastructure that are community assets so EJCs can enjoy the benefits of TE in their current neighborhoods.
- **Economic Opportunities and Youth Pathways.** City Light enables EJCs to participate in and benefit from the local TE economy by providing youth, apprenticeship and job pathways with good labor standards and livable wages.
- **Electricity Affordability.** Widespread TE increases revenue to put downward pressure on electricity prices.

The program is “really trying to accomplish” offering a solution that meets the wants and needs of customers living in multi-unit dwellings (“MUDs”) in Environmental Justice Communities (“EJCs”) as part of a larger (TE) program portfolio. We want customers living in MUDs to feel like when they want to drive an EV, they see a pathway to be able to do so and charge it at similar levels of cost and convenience as a customer living in a single unit dwelling. City Light wants this program to benefit EJCs even if many customers in those communities cannot afford or want to own, lease, or drive an EV today for their personal use. We do not want to add to gentrification pressures in EJCs through this program and instead will use it as opportunity to achieve equity outcomes defined in TESIP.

Regarding these outcomes, the envisioned MUD EV charging program will likely have the largest impacts on community collaboration and equitable access and secondarily on economic opportunities and youth pathways. If a MUD EV charging program scales it could also have large impacts on the other TESIP equity outcomes.

2. Gather relevant data for the problem we are attempting to solve

a) Analyze the raw data. For example: (Native Americans, Black folks, undocumented/mixed status immigrants, prisoners, insecurely housed, Queer and trans folks of color, single low-income people w/o community supports and folks in recovery).

The table below further describes issues that are foundational to the TESIP outcomes:

TESIP Equity outcome	The issue
Community collaboration	City programs have not always incorporated the voices of EJs in program design or evaluation, even for programs meant to serve those communities.
Healthy planet, healthy lives	EJs have suffered disproportionate health impacts from the pollution generated by personally owned internal combustion engine (ICE) vehicles and live in areas that are relatively susceptible to climate change impacts caused in part by these ICE vehicles.
Equitable access	Implicit and explicit biases of people in power have not always provided EJs equitable access to City-sponsored programs and services that could have improved their lives; there is a legacy of racism and discrimination in public transportation investments.
Community assets	Past investments in transportation infrastructure have disproportionately displaced Black Indigenous or People of Color (BIPOC) residents or changed the environment of neighborhoods where BIPOC people live to the point where the areas have become EJs. These communities did not experience the transportation investments in their neighborhood as assets and they were not adequately compensated for the impacts the investments had on them.
Economic opportunities and youth pathways	BIPOC customers are not equitably represented in the electrical trades that will benefit from investments made with public dollars.
Electricity affordability	Some EJs face a disproportionately high energy burden.

The personal mobility opportunity study, the MUD market characterization, and the MUD EV charging program design concept artifact gathered and analyzed primary and secondary resources from an equity perspective to populate the table above. Additional research used for this RSJ toolkit include:

- Greenlink Equity Map (<https://www.equitymap.org>)
- Seattle Jobs Initiative, Seattle’s Energy Efficient Building Operations and Construction Industries Workforce Development Report (2021)

- Seattle City Light, Contact information and audit data for more than 2,500 MUDs representing more than 90,000 units that participated in the Powerful Neighborhoods energy efficiency program for multifamily properties.

This combined research also brought up important equity-related gaps that will influence the MUD EV charging program design and goals, some of which is contained in the previously mentioned documents supporting this program:

- Environmental justice community (EJC) stakeholders view onsite MUD EV charging as a relatively low priority. The TESIP research showed providing EV charging access to MUD residents as 4th out of 5 priority items for transportation investments. Even within the TESIP feedback it was unclear if stakeholders prioritized at-home or near home charging as an investment, an important distinction to make for program design. Puget Sound Sage's *Powering the Transition* study showed a low priority for personal mobility electrification investments.
- There are inadequate EV incentives and few low-cost used EVs with desired attributes available to make EVs an affordable purchase compared to a similar ICE vehicle. City Light has not pursued providing incentives to reduce the up-front cost of EVs like other Washington municipal and investor-owned utilities.
- City Light has not yet defined how to measure if its programs are achieving TESIP equity outcomes.
- City Light has been advised against establishing a trade ally network. A trade ally network could provide a relatively simple way for City Light to support WMBE contractors outside of lengthy and cumbersome procurement pathways.
- City Light lacks data that would help inform the market potential of an equity-focused MUD EV charging program:
 - a. Lack of data on MUD structures. City Light lacks data about MUD structures, such as the availability of unused onsite parking, behind the meter electrical capacity, and in front of the meter electrical capacity. This information will impact the program cost, customer receptiveness, and market potential of a MUD EV charging offering.
 - b. Lack of data on onsite EV charging at MUDs. City Light lacks data on where EV chargers at MUDs are installed to model equity-focused success stories. EPRI's Electrification Assessment uses high level assumptions about EV charging installations (e.g., 1% of all MUDs have access to an onsite charger). Plugshare.com only lists publicly available EV chargers. SDCI permit data has not been mined to focus on equity use cases at MUDs.
 - c. Lack of equity-focused customer data. City Light lacks socioeconomic, demographic, and use case data on customers living MUDs. Census data underlying the ACS historically has underreported on people that identify as BIPOC. City Light does not gather additional demographic data on customers as a standard practice that could be classified as personally identifiable information (PII) on customers in accordance with privacy guidelines.

- i. Lack of equity-focused customer research. City Light has not sponsored equity-focused customer research for its EV programs prior to TESIP, and TESIP research only engaged representatives from community-based organizations and not customers independent from those organizations.
- ii. Lack of driver data. We lack specific information on who owns, leases, and drives EVs. We know that less than 1% of ride hail drivers own EVs and ride hail drivers servicing the airport own a Prius or similar hybrid that gets much better gas mileage and pollutes less than a conventional ICE vehicle. How much do residents typically pay for an ICE vehicle and what factors make vehicle ownership out of reach or not a priority?
- iii. Lack of driving data. City Light lacks data on the driving patterns of MUD residents to inform how much pollution benefit will accrue to an EJC if an onsite charger is installed at a MUD in an EJC vs. a MUD elsewhere.
- iv. Lack of franchise City data. Available data from the City of Seattle is not always inclusive of franchise cities served by City Light that have EJCs.
- v. Lack of established and ongoing relationships with CBOs. City Light lacks ongoing relationships with community-based organizations who can help provide access to customers in EJCs.

3. How will our most impacted benefit from our stated course of action?

And, how will our most impacted be burdened by our stated course of action?

The envisioned MUD EV charging program has the following elements:

- Tiered incentives to encourage property owners to agree to place EV-ready infrastructure and/or EV chargers at MUDs. EV-ready infrastructure can include infrastructure in front of and behind the meter.
- “Experts” such as electricians, sales consultants, and general contractors that can help all market actors involved in deciding about installing an onsite MUD charger how to select the best EV charging solutions, procure the equipment, install the equipment, and maintain the equipment.
- Various forms of outreach to educate customers, contractors and other decisionmakers about the program. This outreach can be combined with other TE-related outreach efforts (e.g., websites or awareness campaigns).

Potential program benefits for our most impacted customers:

TESIP Equity outcome	Potential equity-focused benefits
Community collaboration	<ul style="list-style-type: none"> • Opportunities for EJCs to co-design the program or be involved in its evaluation. City Light’s planned outreach activities with ECOSS and Africatown, and planned customer research with The Vida Agency, will provide opportunities for program co-design and ensure the program reflects the communities’ wants and needs. • Ensure customer research occurs throughout City Light’s territory, including in franchise cities.

	<ul style="list-style-type: none"> • Design programs with intentional flexibility to incorporate feedback from EJC customer research that may not be available until after the program has been slated to launch.
Healthy planet, healthy lives	<ul style="list-style-type: none"> • The program could spur EVs adoption inside or outside EJCs which will reduce the pollution impacts where that vehicle drives regardless of where the vehicle is charged.
Equitable access	<ul style="list-style-type: none"> • Improve the electrical infrastructure at MUDs so buildings are capable of supporting EV charging when there is customer demand; • Provide heightened incentives to encourage the placement of EV charging or EV charging infrastructure at MUDs that meet certain equity criteria; • Seek out car-share entities that could couple access to EVs with program-supported EV charging so that residents that would not otherwise be able to afford an EV can have access to one; • Not require parking stalls that have an EV charger be EV-dedicated to prevent the program from displacing parking for more affordable ICE vehicles yet still providing access to charging if a customer does own an EV. • Create more opportunities for all MUD residents to drive an EV and boost the EV market and make used, relatively affordable EVs more prevalent; • Provide program outreach material that is widely accessible by partnering with community-based organizations; • Improve safety and reliability of power delivered to MUD residents in older structures if the building owner adopts EV-ready infrastructure through the program. • Provide other clean transportation benefits to customers if EV charging / driving an EV does not serve their needs.
Community assets	<ul style="list-style-type: none"> • Provide heightened incentives for placing an EV charger in gentrifying areas that is available to the public only if there is proof that building tenants want one installed there.
Economic opportunities and youth pathways	<ul style="list-style-type: none"> • Provide targeted outreach and/or recruitment activities to contractors in EJCs that could serve as program experts; • Provide procurement stipulations that contractors involved with the program must meet certain workforce development criteria; • Look for community organizations to act as a “prime” on any procurement activity resulting from this program instead of as a subcontractor to a nonlocal, White-owned firm.
Electricity affordability	<ul style="list-style-type: none"> • If the program results in more people use EVs, the costs of electricity in general could decline and reduce everyone’s energy burden.

There could be a rate impacts on customers if the TE portfolio programs meet the .25% rate increase threshold set in TESIP. It could be viewed as a low impact compared to the long-term potential benefit, but for energy-burdened customers it matters. It is unclear how City Light will absorb or factor all the infrastructure improvements envisioned by the program into the rate impact calculation.

4. What are potential unintended consequences?

Are there risks we can foresee? If so, how can we minimize the risk of harm to our most impacted communities?

Risk	Risk Mitigation Strategy
The program prioritizes personally-owned vehicles at the expense of other mobility options valued by the City and increases congestion.	<ul style="list-style-type: none"> • Provide customers a full range of clean transportation options available to them to meet their mobility needs. • Couple the program with an EV car share entity.
The program incentivizes installations only in richer, Whiter communities that have a current demand for MUD EV charging assistance, yet we set goals around achieving high uptake in EJCs (overpromise/underdeliver).	<ul style="list-style-type: none"> • Offer targeted outreach, higher incentives, and program partnerships to ensure the program can be equitably accessible. • Ensure EJC feedback is reflected in the program design and have program goals attuned accordingly.
The program could remove parking for affordable ICE vehicles from MUDs and result in an asset not valued by current building residents.	<ul style="list-style-type: none"> • Do not require building owners to dedicate EV charging parking to EVs. • Provide additional incentives to cover EV chargers with extra-long charging cords to ensure an EV parked in a nearby EV-charging stall taken up by an ICE vehicle can still access the charger. • Provide heightened incentives for chargers that are in shared/common area parking.
Installation of EV chargers at MUDs in EJCs results in less pollution benefits in EJCs than if the chargers were installed elsewhere.	<ul style="list-style-type: none"> • Gather data on driving habits of drivers in MUDs to understand customers who drive the most in EJCs.
Onsite EV chargers become a maintenance problem for EJC property owners or not work reliably for tenants and deliver more problems than benefits.	<ul style="list-style-type: none"> • Offer O&M services with rapid/priority response service level agreements as part of the program design for sites that want it.
The installation of EV chargers results in rent increases which could lead to gentrification and displacement.	<ul style="list-style-type: none"> • Provide property owners with heightened incentives only if they can show current residents want the installation. • Offer infrastructure-only options that do not result in the installation of L2 chargers wanted by today's EV drivers.
Program incentivized equipment becomes quickly outdated and does not serve the needs of residents once they own an EV.	<ul style="list-style-type: none"> • Offer a range of solutions to customers, including EV-ready, L1 plugs, and L2 chargers and plugs so decisionmakers can make the best choice for their property and residents.

5. Are we developing sustainable relationships in this moment?

Are we developing mechanisms to evaluate the impact of this decision in the everyday lives of community members?

The MUD EV charging program design is not yet finalized. However, the program plans to incorporate feedback loops from community-based organizations and customers in EJC's to inform the design and understand the impact of the program. To this end, City Light is beginning TESIP Phase 2 outreach with ECOSS and Africatown and customer research with The Vida Agency. City Light also recently hired a Communications team member that is forming a strategy for City Light to engage with the Department of Neighborhoods and community-based organizations. The program manager will continue to connect with different market actors, such as the Housing Development Consortium and the regional Housing Authorities to inform the program design.

6. Continue to center relationships.

Receive feedback from community whether said decision has had individual and collective impact.

City Light can leverage the relationships listed above to receive feedback from the community on the program and include community feedback loops and program flexibility to respond to the feedback as part of the program design criteria. Since there are so many complex equity components to the MUD EV charging offering, we plan to engage a consultant with experience in equity focused program design, implementation, and evaluation to help us move forward while keeping centered on equity.