



Clean Energy Equity Plan

September 30, 2021

Executive Summary

Seattle City Light (City Light) developed this Clean Energy Equity Plan (CEEP/Plan) to guide the utility's integration of equity into its planning, programs, and projects. The plan's core audience is intended to be internal to support City Light in achieving an equitable transition to a 100% greenhouse gas-free, electric future in fulfillment of the objectives and intentions of the 2019 Washington Clean Energy Transformation Act (CETA).

Box 1 - Equitable Clean Energy Just Transition Principles

1. City Light is committed to racial diversity, social justice, and the equitable provision of services to all.
2. City Light recognizes past and current energy injustices and understands that taking a restorative approach should guide us to advance energy justice by conferring benefits first to communities most burdened by these injustices.
3. City Light's approach is rooted in community-centered collaboration and engagement to design equitable, inclusive solutions.
4. City Light is dedicated to reducing pollutants that impact public health where communities live, work, learn, play, and worship.
5. City Light will make decisions that are transparent to all communities and customers.

City Light developed *Equitable Clean Energy Just Transition Principles* that inform and ground City Light's decisions and processes (Box 1). These principles are intended to support the objective for all utility customers to equitably benefit from the transition to clean energy. They are explicitly designed to focus attention and efforts on Highly Impacted Communities and Vulnerable Populations as defined by CETA (Box 2). In the Seattle area, like in the rest of the country, Highly Impacted Communities and Vulnerable Populations experience a disproportionate share of environmental risk from environmental burdens and are often Black, Indigenous, and People of Color, low-income residents, people with limited English proficiency, and immigrants and refugees.

Box 2 – CETA Definitions

Highly Impacted Communities

Communities designated by the Department of Health based on cumulative impact analyses or a community located in census tract fully or partially identified as being on "Indian country."

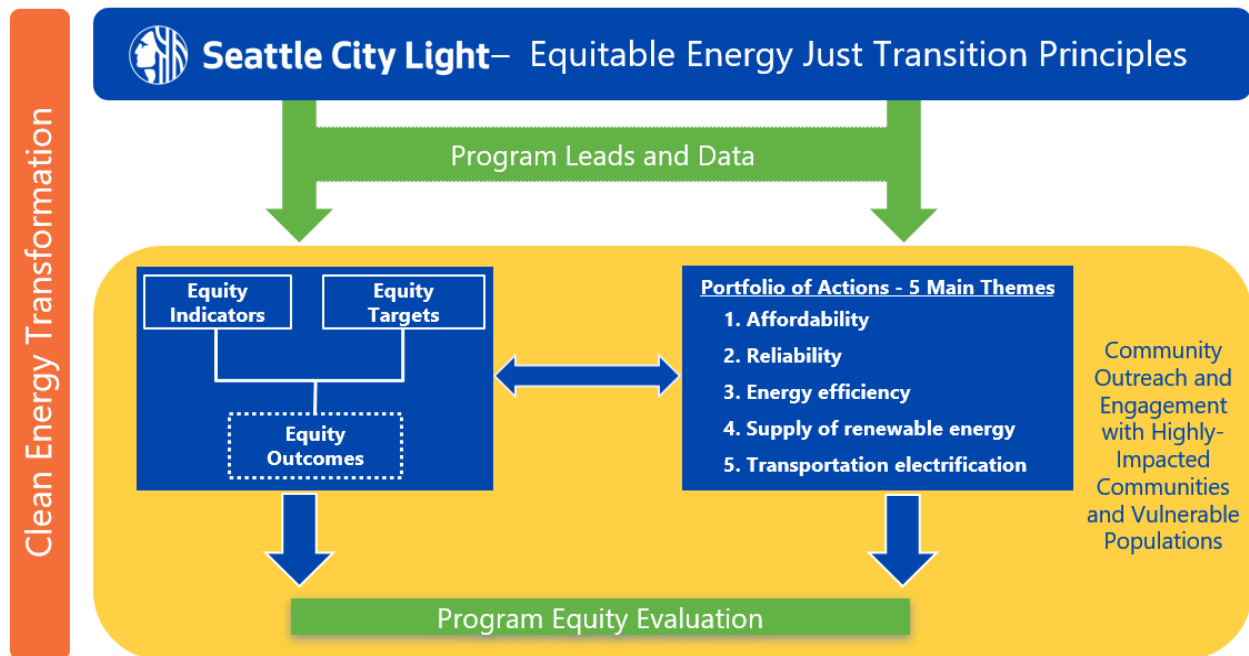
Vulnerable Populations

Communities that experience disproportionate cumulative risk from environmental burdens due to adverse socioeconomic factors and sensitivity factors.

City Light developed equity indicators to measure and track progress towards elevating equity, particularly racial equity, aligning with the vision of Seattle Race and Social

Justice Initiative. Ten preliminary indicators target the equitable distribution of energy and non-energy benefits across a range of Energy Equity Areas classified by CETA and are designed to measure progress in achieving six equity outcomes described by City Light. These outcomes relate to community assets and collaboration, economic opportunities and youth pathways, equitable access, healthy planet and healthy lives, and affordable and reliable electricity.

The CEEP describes an initial portfolio of actions representing a collection of existing programs and projects that have the greatest opportunity to influence an equitable transition. This portfolio also includes emerging programs and projects that may provide additional opportunities for equitably distributed energy and nonenergy benefits, reduced burdens, improved public health and environmental risk, and advanced energy security and resiliency. The portfolio of actions is grouped into five themes: affordability, reliability, energy efficiency, supply of renewable energy, and transportation electrification (see figure below). These actions and the indicators they address are designed to be dynamic and adaptable over time.



City Light has engaged and will continue to engage with its customers, others within the service territory, and with those located in remote locations where electricity is generated and transmitted to implement this plan. Previous engagement efforts with environmental justice community leaders and stakeholders identified three top priorities for the utility in transportation electrification: to be a leader in the environment and renewable energy, invest in technology for operational improvements, and keep cost down. Building on these engagement efforts, a community outreach plan is designed to share the overall approach to engagement for CETA, engagement objectives, collaboration with targeted audiences, and tactics and metrics to promote and advance an equitable transition.

Accountability to customers and the assurance of the equitable distribution of both energy and non-energy benefits is established through a series of protocols that follow a *City Light Equity Impacts Assessment Framework*. This framework prioritizes Highly Impacted Communities and Vulnerable Populations and provides strategies for elevating equity to increase and improve equity outcomes through the portfolio of actions. Program managers can execute these and similar strategies in their program implementation with the aid of an Equity Coordinator. An implementation plan is presented to identify responsible parties and outline schedule, budget, and reporting requirements.

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- A. City Light’s Clean Energy Transformation Act Project Data Portal
- B. Indicators Scoring Analysis
- C. Strategies to Enhance Energy, Non-Energy and Assistance Benefits
- D. Definitions

Acronyms List

| Acronym | Full Description |
|--------------|--|
| 4(8) | RCW 19.405.040(8) |
| AML | Asset Management and Large Projects Division |
| BIPOC | Black, Indigenous, People of Color |
| CBO | Community-based organization |
| CCES | Customer Care and Energy Solutions Business Unit |
| CIA | Cumulative Impact Analysis (by DOH) |
| CEIP | Clean Energy Implementation Plan |
| CEEP | Clean Energy Equity Plan |
| CHIA | Cumulative Health Impacts Analysis |
| CCES | Customer Care and Energy Solutions Business Unit |
| DOC | Department of Commerce |
| DOH | Washington State Department of Health |
| DON | Department of Neighborhoods |
| EIR | Energy Innovation & Resources Business Unit |
| EERP | Energy Equity Rate Pilot |
| ELL | Environment, Land, and Licensing Business Unit |
| EV | Electric Vehicle |
| HIC | Highly Impacted Community |
| OSE | Office of Sustainability and Environment |
| PPA | Power Purchase Agreement |
| PTA | Parent Teacher Association |
| REC | Renewable Energy Credit |
| RET | Racial Equity Toolkit |
| TESIP | Transportation Electrification Strategic Investment Plan |
| TNC | Transportation Network Company |
| VP | Vulnerable Population |
| VNM | Virtual Net Metering |
| EHD | Washington Environmental Health Disparities Map |
| WTN | Washington Tracking Network |

Acknowledgements

This plan was developed by an interdisciplinary team within City Light between January and June 2021. The team was guided by the leadership of three executive sponsors, expertly advised by five staff from internal and external departments within the City of Seattle, and included ten dedicated core team members, listed as follows:

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1 Purpose

City Light’s Clean Energy Equity Plan (CEEP) lays out a framework for operationalizing equity as the utility enables communities to transition to a clean, affordable, reliable, and equitable energy future. This framework is grounded in five equity principles focused on a portfolio of actions the utility can take to facilitate equitable outcomes centered on Highly Impacted Communities and Vulnerable Populations. The CEEP is intended to guide an equitable transition to a 100% greenhouse gas-free, electric future through actions described in the utility’s Clean Energy Implementation Plan (CEIP). The CEIP, required by the 2019 Washington Clean Energy Transformation Act, will be reviewed by the Mayor’s Office and Transportation and Utilities City Council subcommittee prior to formal submission to the Department of Commerce (DOC) in January 2022, and every four years thereafter.

2 Background

Governor Jay Inslee signed the Washington Clean Energy Transformation Act (CETA), Engrossed Second Substitute Senate Bill 5116 in 2019. The law is intended to facilitate a transition to clean energy. A clean energy transition is stipulated for utilities to:

- By 2026 – eliminate coal-fired resources from their portfolios
- By 2030 – provide 100% greenhouse gas-neutral electricity (up to 20% alternative compliance options allowed)
- By 2045 – deliver 100% electricity from renewable, non-emitting sources (no alternative compliance options allowed)

Because the transition to clean energy has the potential to increase utility costs beyond conventional operations, maintenance, and improvement projects, the law seeks to avoid rate shocks and other consequences from the transition that could have disparate impacts on vulnerable customers. Thus, the transition path must be an equitable path whereby all customers benefit from the transition of electric power to 100% clean energy. This provision of the law is captured in RCW 19.405.040(8), which mandates:

“an electric utility must... ensure that all customers are benefiting from the transition to clean energy: Through the equitable distribution of energy and nonenergy benefits and reduction of burdens to Vulnerable Populations and Highly Impacted Communities; long-term and short-term public health and environmental benefits and reduction of costs and risks; and energy security and resiliency.”

Following the passage of CETA, the DOC began a process to draft rules to guide implementation of CETA for consumer-owned utilities, such as City Light. Rulemaking was completed in 2020 and these rules went into effect January 30, 2021, as codified in WAC 194-40-200. Rulemaking provided processes for ensuring equitable distribution through identifying communities, developing indicators, and forecasting impacts of energy efficiency, renewable energy, and demand response targets. Rulemaking also required public input process in

planning WAC 194-40-220 and a summary of the public process conducted must be submitted with the CEIP.

“Our commitment must be to a just society that ensures all people have access to critical products and services, including energy services.”

~Debra Smith, Feb. 22, 2021

City Light’s vision is **to create a shared energy future by partnering with our customers to meet their energy needs in whatever way they choose**. One of City Light’s five values, which underly and support this vision, is Equitable Community Connections; it states: *“We are proud to be a local, community-owned utility. We are visible and actively involved in the communities we serve. We are rooted in our commitment to racial diversity, social justice and the equitable provision of services to all.”*

3 Equitable Clean Energy Just Transition Principles

As part of this project, City Light staff identified five principles to guide choices, decisions, and influences that the utility can make to equitably transition all customers and communities to a cleaner energy future. These just transition principles include:

1. City Light is committed to racial diversity, social justice, and the equitable provision of services to all.
2. City Light recognizes past and current energy injustices and understands that taking a restorative approach should guide us to advance energy justice by conferring benefits first to communities most burdened by these injustices.
3. City Light’s approach is rooted in community-centered collaboration and engagement to design equitable, inclusive solutions.
4. City Light is dedicated to reducing pollutants that impact public health where communities live, work, learn, play, and worship.
5. City Light will make decisions that are transparent to all communities and customers.

City Light developed these just transition principles after reviewing the following sources: City Light’s Transportation Electrification Strategic Investment Plan (TESIP); rulemaking comments from Front and Centered to the DOC; City Light’s Mission/Vision/Values; and SSE’s Just Transition Strategy.

4 Highly Impacted Communities and Vulnerable Populations

One of the main objectives of CETA is to ensure that all utility customers benefit from the transition to clean energy. The goal of designating Highly Impacted Communities and Vulnerable Populations is to highlight groups that are currently experiencing a disproportionate share of environmental risk factors and that must, according to CETA, benefit equitably from the transition to a clean energy economy.

CETA defines **Vulnerable Populations** as communities that experience a disproportionate cumulative risk from environmental burdens due to adverse socioeconomic factors (e.g., unemployment, high housing and transportation costs relative to income, access to food and health care, linguistic isolation, etc.). Also included in the definition are sensitivity factors, such as low birth weight and higher rates of hospitalization.

CETA defines **Highly Impacted Communities** as communities designated by the Department of Health (DOH) based on the cumulative impact analyses in Section 24 of this Act or a community located in census tracts that are fully or partially on “Indian country” (as defined in 18 U.S.C. Sec. 1151).¹

In order for utilities to measure and demonstrate that the transition to clean energy is equitable, City Light needs to identify Highly Impacted Communities and Vulnerable Populations.

4.1 Identifying a Highly Impacted Community

CETA did not strictly identify Highly Impacted Communities, which are geographic communities, but it did instruct the DOH to develop a cumulative impact analysis to designate the communities highly impacted by fossil fuel pollution and other environmental or socioeconomic factors in Washington state. As a result, the DOH created a tool that ranks Environmental Health Disparities (EHD) by community. This interactive tool, which is part of the Washington Tracking Network, combines the most comprehensive data available (last published December 2019) to numerically rank – on a scale of 1 (least impacted) to 10 (most impacted) – Washington communities according to the risk each faces from environmental factors that influence health outcomes. The DOH designates as a Highly Impacted Community any census tract with a 9 or 10 overall rank on the EHD map, or any census tract with tribal lands. Since City Light does not have any customers in a community located in census tracts that are fully or partially on “Indian country” (as defined in 18 U.S.C. Sec. 1151) that are not already deemed a 9 or a 10 rank on the EHD map, only the communities designated by the DOH as a Highly Impacted Community with a 9 or 10 overall rank on the EHD map will be identified.

The EHD ranking considers environmental threats from fossil fuel exposure as well as social and health vulnerability measures in four main themes:

- Environmental exposures
- Environmental effects

¹ 18 U.S.C Sec. 2251 defines Indian country as “...(a) all land within the limits of any Indian reservation under the jurisdiction of the United States Government, and, including rights-of-way running through the reservation, (b) all dependent Indian communities within the borders of the United States whether within the original or subsequently acquired territory thereof, and whether within or without the limits of a state, and (c) all Indian allotments, the Indian titles to which have not been extinguished, including rights-of-way running through the same.”

- Socioeconomic factors
- Sensitive populations

Each of these four themes contains several indicators to create the overall EHD ranking for each community. The map in Figure 1 details the EHD rankings within City Light service territory. City Light service territory is to the left of the black line drawn in the map below. The DOH EHD index places a heavier weight on areas with greater fossil fuel exposure and areas of greater social and health risks. When looking at environmental exposures alone, the areas of highest risk extend to City Light’s entire service territory and surround the I-5 corridor. The environmental effects of hazardous waste have largely impacted the southern portion of the service territory. Socioeconomic factors and sensitive populations also generally have higher risk indexes in the southern part of the service territory. Areas highly impacted (Index 9/10) in City Light’s service territory are mostly in the southern fraction and downtown, as well as a few census tracts near Shoreline and Lake City.

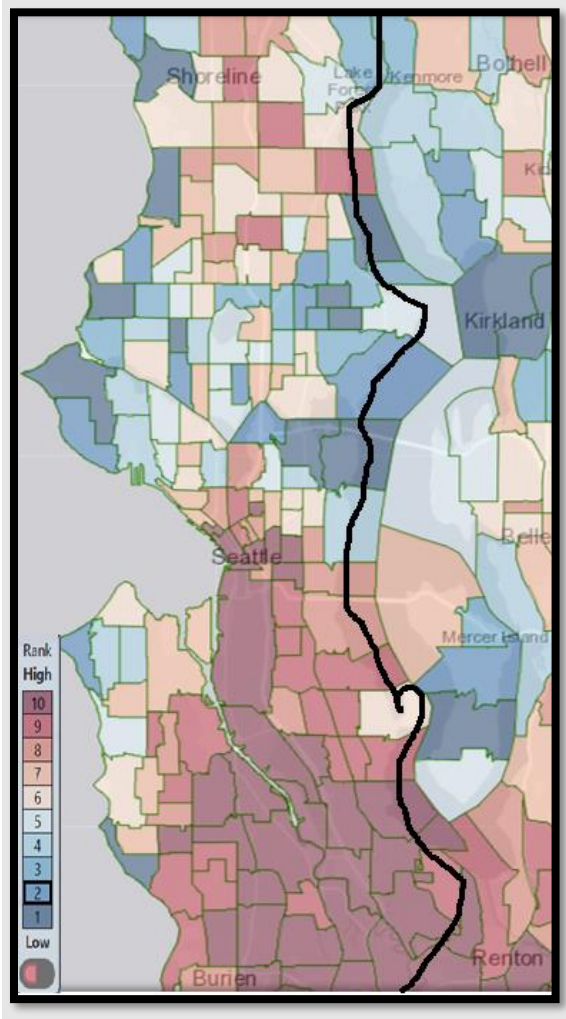


Figure 1 DOH EHD Highly Impacted Communities in City Light’s Service Territory

4.2 Identifying Vulnerable Populations

While the DOH EHD Index identifies the Highly Impacted Communities (index 9 or 10) of focus for City Light in accordance with CETA, no such index or direction exists in CETA for identifying Vulnerable Populations. As a proxy, the City of Seattle (“City”) Office of Planning & Community Development has a Racial and Social Equity Composite Index that combines information by census tract on race, ethnicity, and related demographics with data on socioeconomic and health disadvantages to identify where priority populations make up relatively large proportions of neighborhood residents.

This Composite Index is composed of three sub-indices:

1. *Race, English Language Learners, and Origins Index*: ranks census tracts by an index of three measures weighted as follows: Person of color (weight = 1), English Language Learner (weight = 0.5), and Foreign Born (weight = 0.5).
2. *Socioeconomic Disadvantage Index*: ranks census tracts by an index of two equally weighted measures: Income below 200% of poverty level and educational attainment less than a bachelor’s degree.
3. *Health Disadvantage Index*: ranks census tracts by an index of seven equally weighted measures: No leisure time physical activity, diagnosed diabetes, obesity, poor mental health, asthma, low life expectancy at birth, and disability.

The combination of these sub-indices results in the *composite index*, which establishes a level of disadvantage for the tract. For example, a tract that falls in the highest 20% of disadvantaged tracts would be considered “Highest Disadvantaged”, a tract that falls in the middle 40-60% would be considered “Middle Disadvantaged”, and a tract that falls in the lowest 20% would be “Lowest Disadvantaged”.

The map in Figure 2 below shows the City Racial & Social Equity Composite Index broken down by census tract. The toolkit can also display the map with the individual sub-indices only, by checking/unchecking them in the left pane. The map in Figure 2 shows that the downtown and south end of City Light’s service territory contains most of the highest disadvantaged communities, which is also the same area where the DOH EHD identified many Highly Impacted Communities (Fig. 1).

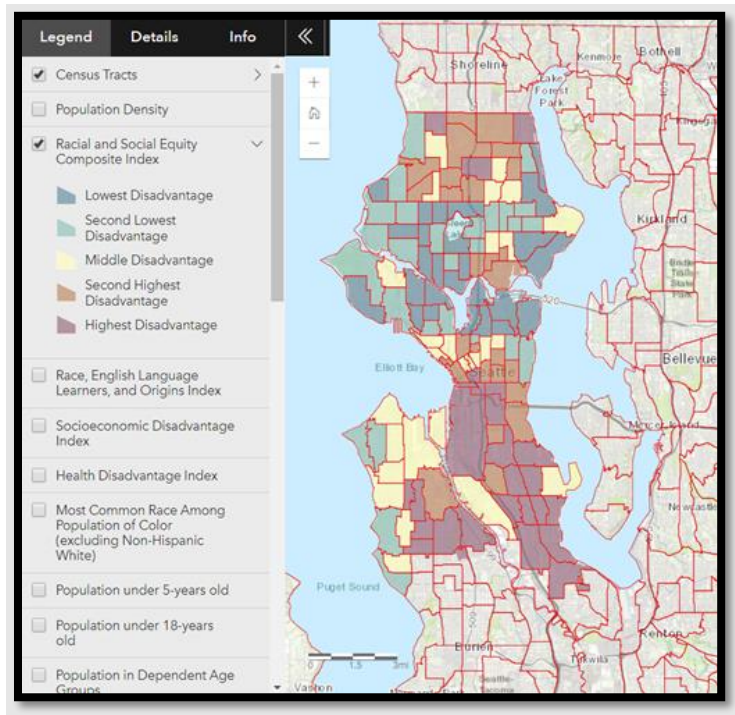


Figure 2 City Racial & Social Equity Composite Index

The Puget Sound Regional Council (PSRC) also created a *displacement index*, referenced in the Seattle 2035 Equity Analysis. Recent regional economic growth and housing market pressures have caused rapid changes in neighborhood conditions, forcing residents and businesses to move. This tool identifies which neighborhoods have higher risk of displacement. Displacement risk is a composite of indicators representing five elements of neighborhood displacement risks: socio-demographics, transportation qualities, neighborhood characteristics, housing, and civic engagement. Figure 3 shows this displacement risk for the Seattle area.



Figure 3 Puget Sound Regional Council Displacement Risk Index in Seattle area

The PSRC displacement index is listed by census tract in Table 1, which also shows how these different indexes compare with the EHD Index that will be used for CETA, where the EHD Index is a 9 or 10. The CETA EHD Index geographic classification is at the census tract level, which aligns with City Light’s internal data collection of the census tract for City Light service locations in the billing system; this measurement alignment makes it substantially easier to broadly use census tract across the utility for geographic analysis. There are 182 census tracts in City Light’s service territory (2010 census), and 60 census tracts with EHD Index values of 9 or 10. There are 34 census tracts that contain an EHD Index of 9 or 10, a Race & Social Equity Composite Index of ‘Middle’ to ‘Highest’ disadvantaged, and a PSRC Displacement Risk Index of ‘Moderate’ to ‘High’ (Fig. 4).

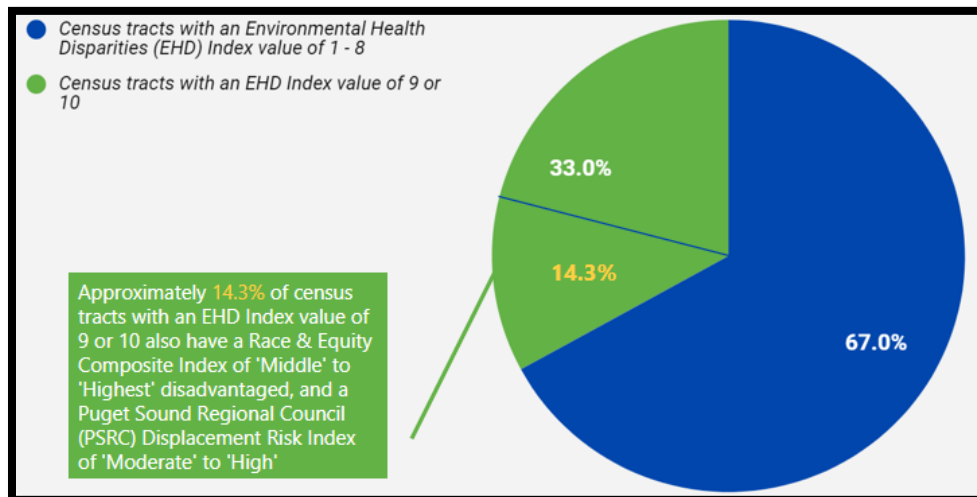


Figure 4 Percentage of City Light’s service territory census tracts out of 182 with different indices used to identify Highly Impacted Communities and Vulnerable Populations

City Light’s Transportation Electrification Strategic Implementation Plan (TESIP) identifies environmental justice neighborhoods and recognizes the Duwamish Valley as containing some of Seattle’s most underserved populations. These neighborhoods reflect City Light’s partnerships with neighborhood organizations for outreach; therefore, a cross comparison of the EHD Index with neighborhoods is shown in Table 1. Due to neighborhoods’ overlapping multiple census tracts, multiple values may be listed below. There are some areas of downtown Seattle that are not identified by a TESIP neighborhood.

Table 1 - Highly Impacted Communities (HIC) & Vulnerable Populations (VP) By Census Tract

| Census Tract | HIC DOH EHD Index | VP Race & Social Equity Index | VP PSRC Index | TESIP Neighborhood Overlap |
|--------------|----------------------|-------------------------------------|------------------|---|
| 53033000100 | 9 | Highest priority/Most disadvantaged | moderate | Lake City |
| 53033001200 | 9 | Highest priority/Most disadvantaged | high | Haller Lake |
| 53033007300 | 9 | Second highest | moderate | |
| 53033007402 | 10 | Second highest | moderate | |
| 53033008002 | 10 | Second highest | high | |
| 53033008100 | 10 | Second highest | moderate | International District |
| 53033008200 | 9 | Middle | moderate | |
| 53033008500 | 10 | Highest priority/Most disadvantaged | high | International District |
| 53033008600 | 10 | Second highest | high | Central District |
| 53033008700 | 10 | Second highest | high | Central District |
| 53033009000 | 10 | Highest priority/Most disadvantaged | high | Central District, International District, Beacon Hill |
| 53033009200 | 10 | Highest priority/Most disadvantaged | high | International District |
| 53033009300 | 10 | Highest priority/Most disadvantaged | moderate | Central District, International District, Beacon Hill |
| 53033009400 | 9 | Highest priority/Most disadvantaged | high | Beacon Hill, International District |

| Census Tract | HIC DOH EHD Index | VP Race & Social Equity Index | VP PSRC Index | TESIP Neighborhood Overlap |
|--------------|----------------------|-------------------------------------|------------------|--|
| 53033010001 | 9 | Highest priority/Most disadvantaged | high | Beacon Hill, Rainier Valley |
| 53033010002 | 9 | Second highest | high | Beacon Hill |
| 53033010100 | 9 | Highest priority/Most disadvantaged | high | Beacon Hill, Rainier Valley |
| 53033010300 | 9 | Highest priority/Most disadvantaged | high | Beacon Hill, Rainier Valley |
| 53033010401 | 9 | Highest priority/Most disadvantaged | high | Beacon Hill, Rainier Valley |
| 53033010702 | 9 | Highest priority/Most disadvantaged | high | Delridge |
| 53033010800 | 9 | Second highest | moderate | South Park, Delridge |
| 53033010900 | 10 | Middle | moderate | Beacon Hill |
| 53033011001 | 9 | Highest priority/Most disadvantaged | high | Beacon Hill, Rainier Valley |
| 53033011002 | 10 | Highest priority/Most disadvantaged | high | Rainier Valley |
| 53033011101 | 9 | Highest priority/Most disadvantaged | high | Beacon Hill, Rainier Valley |
| 53033011102 | 9 | Highest priority/Most disadvantaged | moderate | Rainier Valley |
| 53033011200 | 10 | Highest priority/Most disadvantaged | high | South Park, Delridge |
| 53033011300 | 10 | Highest priority/Most disadvantaged | moderate | South Park, Delridge, White Center |
| 53033011401 | 9 | Highest priority/Most disadvantaged | moderate | Delridge |
| 53033011700 | 10 | Highest priority/Most disadvantaged | moderate | Beacon Hill, Rainier Valley, Rainier Beach |
| 53033011800 | 10 | Highest priority/Most disadvantaged | high | Rainier Valley, Rainier Beach |
| 53033011900 | 10 | Highest priority/Most disadvantaged | moderate | Bryn Mawr, Rainier Valley, Rainier Beach |

| Census Tract | HIC DOH EHD Index | VP Race & Social Equity Index | VP PSRC Index | TESIP Neighborhood Overlap |
|--------------|----------------------|-------------------------------------|------------------|--|
| 53033026001 | 9 | Highest priority/Most disadvantaged | moderate | Bryn Mawr, Rainier Valley, Rainier Beach |
| 53033026500 | 10 | Highest priority/Most disadvantaged | high | South Park, Delridge, White Center |

Table 2 – Highly Impacted Communities (HIC) & Vulnerable Populations (VP) by Neighborhood

| Neighborhood | HIC DOH EHD Index | VP PSRC Disp. Index | VP Race & Social Equity Index | VP Duwamish Valley (98108) |
|---|----------------------|---------------------------|--|-------------------------------------|
| Chinatown- International District | 10,9 | High, Moderate | Highest, Second Highest | Yes |
| Central District | 10 | High, Moderate | Highest, Second Highest | Yes |
| Beacon Hill | 9, 10, 8 | High, Moderate | Highest | Yes |
| Rainier Valley | 9, 10 | High, Moderate | Highest | Yes |
| Rainier Beach | 10, 9 | Moderate, High | Highest | Yes |
| South Park | 10, 9 | Moderate, High | Second Highest, Highest | Yes |
| Delridge | 10, 9 | High, Moderate | Highest, Second Highest | Yes |
| Haller Lake | 9 | High | Highest | No |
| Lake City | 9 | Moderate | Highest | No |
| White Center | 10, 9 | Moderate, High | Highest, Second Highest | Yes |
| Bryn Mawr | 10, 9 | Moderate, High | Outside City Limits | No |

There can be risks of outdated information associated with certain data by census tract. However, absent better data types, the above summary can serve as a useful starting place for City Light staff working towards an equitable transition to clean energy.

Another approach, besides the geographically based indexes described above, identifies Vulnerable Populations based on demographic information. The City describes four groups

through its Equity & Environment Agenda (EEA), in no particular order, that could be considered vulnerable:

- Black, Indigenous, and People of Color (BIPOC)
- Low income²
- Limited English proficiency
- Immigrants and refugees

In addition to these four groups, the EEA also identifies youth from these communities as a priority in environmental justice-centered policymaking. The City's Racial Equity Toolkit (RET), developed by Seattle Race and Social Justice Initiative (RSJI), also confirmed the same four groups listed above. The Seattle RSJI lays out a process and a set of questions to guide the development, implementation and evaluation of policies, initiatives, programs, and budget issues to address impacts on racial equity. Information on Vulnerable Populations can be acquired from customer demographics.

US federally recognized tribes and Canadian First Nations³ have cultural or economic interests in the vicinity of City Light-owned hydroelectric projects and associated transmission infrastructure. These interests are based on their traditional tribal territories, existing ethnographic information, or self-identification. While these tribes and First Nations may not wholly fit the CETA definition of a Vulnerable Population, City Light seeks to reduce vulnerabilities to these populations and continue ongoing collaborations as described more in Section 6.3.

The ability to identify Highly Impacted Communities and Vulnerable Populations helps facilitate the planning and targeting of certain CETA-related programs. To help assess where these groups are located and map program impacts over time, City Light has developed a Clean Energy Transformation Act Project Data Portal described and demonstrated in Appendix A.

5 Indicators

5.1 Identifying Indicators

CETA Section 4(8) requires utilities to develop indicators to measure and track specific targets for equitable distribution of energy and non-energy benefits across a range of Energy Equity Areas. The DOC defines an **indicator** as it pertains to CETA as an:

“Attribute, either quantitative or qualitative, of a condition, resource, program or related distribution investment that is tracked for the purpose of evaluating change over time in CEIP; indicators associated with: energy benefits, nonenergy

² For more information about City Light low income programs and eligibility, visit

<http://www.seattle.gov/utilities/your-services/discounts-and-incentives/utility-discount-program>

³ The term “First Nation” or “Nation” is used to refer to aboriginal peoples in Canada who are not Métis or Inuit. There are several First Nations and bands with cultural interests in the Skagitj Project vicinity.

benefits, reduction of burdens, public health, environment, reduction in cost, energy security, or resiliency; develop through public process.”

City Light approached the identification of indicators as equity indicators by first considering the proposed indicators presented in *Appendix A* of the DOCs Section 4(8) Guidance Document. The table of suggested indicators within this guidance is robust and provided a solid starting point for City Light staff to brainstorm additional equity indicators based on existing data and programs that the utility already has established. Some equity indicators were developed knowing that data and programming gaps exist and will need to be addressed through future utility investments should stakeholders prioritize these equity indicators as highly important during the public process.

An initial set of 33 equity indicators was developed through a City Light staff brainstorming process and a literature review of other organizations’ research including:

- The City’s *Duwamish Valley Action Plan*
- *Duwamish Cumulative Health Impacts Analysis (CHIA)* completed by the Duwamish River Cleanup Coalition
- *Our People, Our Planet, Our Power*, a South Seattle climate justice report completed by Got Green and Puget Sound Sage
- A comprehensive review of the Washington Environmental Health Disparities Map health indicators and associated metadata for and Highly Impacted Communities and Vulnerable Populations developed through the Washington Tracking Network
- City Light’s *Transportation Electrification Strategic Investment Plan*
- A review of City Light’s energy programs

City staff narrowed the initial set of 33 equity indicators down to ten equity indicators by filtering with scoring discussed in Section 5.2 along the following attributes:

1. How well each equity indicator aligned with City Light’s Equitable Clean Energy Transition Principles (Section 3).
2. Whether the metric could measure and track change over time for a desired equity outcome from a utility action (investments in projects and programming)
3. How the metric affects City Light’s identified Highly Impacted Communities and Vulnerable Populations and in eight (8) Energy Equity Areas required by CETA, and five (5) Racial Equity Opportunity Areas, adhering to the guiding principles of the Seattle RSJI.

The eight (8) Energy Equity Areas defined by CETA and five (5) Racial Equity Opportunity Areas defined by the City are as follows:

Energy Equity Areas designated in CETA:

1. *Energy Benefits* – Equitable access to clean energy solutions (solar, other renewables, programs and projects facilitating electrification)

2. *Nonenergy Benefits* – Benefits resulting from energy investments and increased access to clean energy programs that are not directly related to energy, such as increased use of community spaces and lower crime due to path and streetlighting projects, public funding for community enhancement as a component of energy projects, etc.
3. *Reduction of Burdens* – “Energy burden” means the share of annual household income used to pay annual home energy bills. Burdens can be reduced through better jobs, efficient appliances, utility programs that provide energy cost assistance in the form of discount programs, conservation education, and localized infrastructure investments.
4. *Public Health* – Attributes related to physical, emotional, mental health, and community wellbeing.
5. *Environment* – Attributes that relate to environmental elements such as water, air, land, fish and wildlife, and forests and vegetation.
6. *Reduction of Cost* – Attributes that provide access to programs that provide cost reductions to individuals and communities that are scalable to level of impacts and need.
7. *Energy Security* – Attributes that provide reliable power with minimal disruptions.
8. *Resiliency* – Attributes that increase the ability of customers or communities to withstand and recover from disturbances or disruptions.

Racial Equity Opportunity Areas – adhering to the guiding principles of the Seattle RSJI (aligned with Duwamish Valley Action Plan Racial Equity Outcomes):

1. *Education* – Increase opportunities of communities of color, immigrants, refugees, Native peoples, people with low incomes, youth, limited English proficiency individuals, women- and minority-owned businesses, and people of color-led organizations, to have access to education and training about programs and projects that will reduce energy burdens.
2. *Community Development* – Increase opportunities to develop safe, connected, and accessible communities with amenities and physical improvements that benefit Highly Impacted Communities and Vulnerable Populations including communities of color, immigrants, refugees, Native peoples, people with low incomes, youth, limited English proficiency individuals, women- and minority-owned businesses, and people of color-led organizations.
3. *Health* – Reduce health disparities and cumulative impacts related to water quality, air quality, soil contamination, noise pollution, access to healthy food, and climate change that disproportionately affect communities of color, immigrants, refugees, Native peoples, people with low incomes, youth, and limited English proficiency individuals.
4. *Environment* – Reduce localized and regional environmental impacts related to water quality, air quality, soil contamination, noise pollution, plants and animals, and climate change that disproportionately affects communities of color, immigrants, refugees, Native peoples, people with low incomes, elder, youth, and limited English proficiency individuals.

5. *Jobs* – Increase opportunities of communities of color, immigrants, refugees, Native peoples, people with low incomes, youth, limited English proficiency individuals, women- and minority-owned businesses, and people of color-led organizations, to have economic mobility and opportunity through access to education, training, funding, and support programs, as well as pathways out of poverty through jobs and careers related to the transition to clean energy and project and program development.

During the development of the equity indicator framework, city staff acknowledged these key components:

- Equity indicators that City Light staff developed are considered preliminary and will be used as initial guiding parameters for the public input process.
- Equity indicators are not locked into a specific Energy Equity Area or Racial Equity Opportunity Area; they can serve to measure benefits across multiple Energy Equity Areas.
- The public input process will heavily weight the final selection of equity indicators based on community importance and prioritization.
- Not all equity indicators will be able to measure direct outcomes from utility investments. Partnerships with other industry contributors to impacts may be necessary to measure benefits such as health and air quality improvements.

5.2 Equity Indicator Scoring

Once the initial selection of 33 equity indicators had been developed, defined, and analyzed to determine if City Light had existing programs or data to support them, City Light staff developed a scoring criterion to narrow the selection to provide a framework for community stakeholders during the public input process. These pared-down equity indicators will serve as the “bumper rails” for public input to both encourage ideas on measurable and important equity indicators specific to how they will personally affect stakeholders.

The equity indicators were scored through an evaluation of cumulative impacts based on two weighted sliding scales for Energy Equity Areas and Racial Equity Opportunity Areas. Energy Equity Areas were assigned a score of 0 – Unsure of impact, 1- Indirect impacts, or 2 – Direct impacts. Racial Equity Opportunity Areas were given a score of either 1 – Low, 2 – Medium, or 3 – High. The purpose of the difference in scoring values was to give slightly more weight to Racial Equity Outcomes by ensuring that every indicator received a score higher than 0 in these categories. Each equity indicator was assigned a cumulative score by adding each value assigned for Energy Equity Area and Racial Equity Opportunity Area score. Additionally, to aid in understanding how influential each Energy Equity Area and Racial Equity Opportunity Area were across all equity indicators, a cumulative score was assigned by adding all values of indicators within each of these categories. Due to the qualitative subjectivity of the scoring values, the initial indicators selected through this process were not all the highest scored indicators. The CETA Equity Team recognized the importance of ensuring that the selected indicators represent

all scoring categories and therefore opted to keep some lower scoring indicators so that the community will have the opportunity to evaluate the importance to them, not just the utility.

Ten (10) equity indicators were kept as the guiding equity indicators for the public input process. Four (4) equity indicators (color-coded blue in Appendix B) had the highest cumulative score across all equity areas. Six (6) indicators (color-coded light orange in Appendix B) were selected because they could potentially be important to identified Vulnerable Populations and Highly Impacted Communities as perceived by the CETA Equity Team. These six equity indicators did not receive a high total from City Light subjective scoring under the equity area's total score but warrant input from community stakeholders. Several higher scoring equity indicators were ultimately eliminated from initial selection due to lack of data or existing program support, or concern that is difficult to measure in a meaningful way.

The sliding scale for Racial Equity Opportunity Areas was more heavily weighted than Energy Equity Areas as the City is committed to racial equity, acknowledging past harms and the need for reparations across all departments and programs. This additional layer of indicator evaluation also lends credence to the commitment of City Light to ensure that clean energy implementation does not adversely affect our most Vulnerable Populations: customers who have low English proficiency, are BIPOC, are surviving on low incomes, or are immigrants and refugees. The ten equity indicators were further refined through discussion with Integrated Resources Plan (IRP) stakeholder group, such as shifting from *awareness* indicator to *public engagement* indicator.

The descriptions of the ten (10) draft **equity indicators** are as follows:

1. *Expenditures of existing and planned community energy projects* – Total dollars expended on existing and planned community energy projects.
2. *Locations of existing and planned community energy projects* – Geographic extent of projects in targeted Highly Impacted Communities .
3. *Public outreach* – Percent change in the annual amount of public outreach focused on engaging customers and communities in building a clean energy future through a suite of engagement strategies.
4. *Public energy education* – Percent of change in education programming targeted to Highly Impacted Communities and Vulnerable Populations on energy planning, projects, personal choices, and safety.
5. *Career development* – Includes percent change in Vulnerable Population participation in City apprenticeships and jobs. Advances local, good paying jobs that have high development potential and provide career pathways for youth.
6. *Burden (cost) to program participation* – Percent change in program participant costs and rates of participation from Highly Impacted Communities and Vulnerable Populations. Address challenges to participating in programs due to cost of entry (ability to purchase energy efficient appliances, affordability of conservation programs, ability to pay bills).

7. *Accessibility to non-single-family homeowners* – Percent change of utility program dollars allocated to non-single-family homeowners for pilot projects, grants, rebates, or other incentives to provide alternative energy sources. Provides access to alternative energy sources such as solar or net metering programs that are difficult for multifamily residents and renters to implement.
8. *Outdoor air quality* (Concentration of diesel particulate matter in air and reduction of greenhouse gas emissions) – Percent change of air quality indices such as particulate matter or emissions. Track long-term air quality and emission volume, especially along heavily trafficked corridors that impact communities; however, cannot be tracked as individual City Light impacts due to multiple contributions acting as a whole and would be measured and tracked by others.
9. *Feeder outages* (causes, number, locations, average duration, average response time) by census tract – Percent change in SAIDI and SAIFI values in Highly Impacted Communities and Vulnerable Populations.
 - a. SAIDI (System Average Interruption Duration Index) – a system index of average duration of interruption in the power supply indicated in minutes per customer.
$$\text{SAIDI} = \frac{\text{total duration of interruptions for a group of customers}}{\text{Number of all customers}}$$
 - b. SAIFI (System Average Interruption Frequency Index) – a system index of average frequency of interruptions in power supply
$$\text{SAIFI} = \frac{\text{total number of interruptions for a group of customers}}{\text{Number of all customers}}$$
10. *Response time to outages* – Percent change of average response and restoration times in Highly Impacted Communities and Vulnerable Populations. Identifies how long it takes for an outage to be resolved in communities.

All thirty-three (33) of the initial equity indicators, the full scoring matrix, and the equity indicator definitions can be found in Appendix B: Indicator and Scoring Analysis.

5.3 Equity Outcomes

Equity Outcomes are the results of utility actions where it is assumed all communities and populations do not start with equal opportunities to participate in or benefit from programs and investments. Therefore, Highly Impacted Communities and Vulnerable Populations must be specifically, but not exclusively, identified and targeted for utility investments to bring all communities to a place of equal benefit.

Equitable Distribution

"A fair and just, but not necessarily equal, allocation intended to mitigate disparities in benefits and burdens, and based on current conditions, including existing legacy and cumulative impacts, which are informed by

the assessment described in RCW 19.280.030(1)(k) from the most recent integrated resource plan.”

~The Washington Utilities and Transportation Commission

To ensure that the benefits of City Light’s transition to clean energy are distributed equitably, staff identified six (6) Equity Outcomes. These outcomes build upon the five (5) guiding principles of a just transition to clean energy defined in Section 3. Equity Outcomes were developed through a process of analysis using the City’s *Racial Equity Toolkit*, public input, alignment with the Racial Equity Outcomes⁴ detailed in the City’s *Duwamish Valley Action Plan*, and the Equity Outcomes identified in City Light’s *Transportation Electrification Strategic Investment Plan*. The equity indicators will measure how City Light’s programs, projects, and investments in clean energy transformation contribute to the realization of these outcomes for Highly Impacted Communities and Vulnerable Populations.

The six (6) **Equity Outcomes** are defined below:

1. *Community Collaboration* – Highly Impacted Communities and Vulnerable Populations see their wants and needs reflected in City Light energy programs.
2. *Healthy Planet, Healthy Lives* – Reduce emissions that impact local air quality and public health where environmental justice communities live, learn, work and play. Reduce carbon emissions that have a disproportionate burden on the most Vulnerable Populations and communities.
3. *Equitable Access* – Highly Impacted Communities and Vulnerable Populations learn about our energy programs, can readily understand and access materials and resources, see themselves reflected in communications, and participate in and benefit from City Light’s energy programs.
4. *Community Assets* – City Light’s programs invest in infrastructure that are community assets so Highly Impacted Communities and Vulnerable Populations can enjoy the benefits and avoid negative impacts from energy infrastructure projects and programs in their current neighborhoods.
5. *Economic Opportunities and Youth Pathways* – City Light enables Highly Impacted Communities and Vulnerable Populations to participate in and benefit from the local energy economy through vocational program participation (internships, apprenticeships, Lighting Design Lab trainings)
6. *Affordable and Reliable Electricity* – Electrification investments increase revenue to put downward pressure on electricity prices.

Staff aligned each equity indicator with an equity outcome based on the intent of what the equity indicator is meant to track and how well it relates to and will provide data for an Equity Outcome as defined (Table 3). For example, the equity indicator *Expenditures of existing and*

⁴ A racial equity outcome names a desired increase in benefit or a decrease in disparities and detriment for specifically identified racial groups impacted by a City action, program, or service.

planned community energy projects is defined as: Total dollars expended on existing and planned community energy projects. The equity outcome *Community Assets* is characterized as: City Light's programs invest in infrastructure that are community assets so Highly Impacted Communities and Vulnerable Populations can enjoy the benefits of energy infrastructure projects and programs in their current neighborhoods. Based on a basic understanding that a utility action or program should result in progress towards achieving an equity outcome and that the equity indicator is the metric that measures the progress, it was determined that expended dollars for community projects most closely aligns with communities realizing benefits provided by such expenditures, such as street lighting projects and reliability projects. These become tangible assets that specifically benefit a community.

Table 3 – List of Equity Indicators and Associated Equity Outcomes

| No. | Equity Outcome | Equity Indicator |
|-----|---|--|
| 1 | Community Assets | <ul style="list-style-type: none"> Expenditures of existing and planned community energy projects |
| 2 | Community Collaboration | <ul style="list-style-type: none"> Locations of existing and planned community energy projects |
| 3 | Economic Opportunities and Youth Pathways | <ul style="list-style-type: none"> Career development |
| 4 | Equitable Access | <ul style="list-style-type: none"> Public outreach Public energy education Burden to program participation Accessibility to non-single-family homeowners |
| 5 | Healthy Planet, Healthy Lives | <ul style="list-style-type: none"> Outdoor air pollution |
| 6 | Affordable & Reliable Electricity | <ul style="list-style-type: none"> Feeder outages by census tract Response time to outages |

6 Portfolio of Actions

6.1 Background

Ensuring that all customers equitably benefit from the transition to clean energy is one of CETA’s central tenets. The purpose of this section is to identify **current** program offerings within City Light that can equitably distribute energy and nonenergy benefits, reduce burdens to Highly Impacted Communities and Vulnerable Populations, improve public health and environmental risks, and advance energy security and resiliency.

The programs listed below comprise City Light’s current *portfolio of actions* related to CETA and are tracked by our indicators as identified in Section 5. Potential metrics to help measure these indicators include those listed below.

- Total number of participants in 2020
- The ratio of total number of participants from Highly Impacted Communities and Vulnerable Populations vs. total number of participants per year
- Accessibility of the program (renters/language/etc...)
- 2020 budget
- Average dollar value received by a participant in 2020
- Outreach efforts to advance program awareness
- Burden and barriers to program participation
- Non-energy benefits

This portfolio is a subset of programs, current as of spring 2021. However, the portfolio is expected to evolve over time as new programs are developed, existing offerings are assessed

and recalibrated to better meet customer and utility goals, including equity, and some offerings are retired.

6.2 Utility Program Identification

City Light has a long history of developing, building, and evaluating innovative, public facing programs that promote clean energy. The next section describes City Light programs which have a strong equity link and organize them into five main themes:

1. Affordability
2. Reliability
3. Energy efficiency
4. Supply of renewable energy
5. Transportation electrification

Each offering has program-specific eligibility requirements (e.g., low income, commercial sector, etc.) and qualification processes, which means they all have the ability to demonstrate and support CETA equity outcomes. Reduced energy burden through affordability programs and energy efficiency programs available to low-income customer, renters, and multifamily housing are a key component of CETA.

6.2.1 Affordability

Utility Discount Program (UDP): The UDP is a rate assistance program, applied to a customer's bills going forward after acceptance (60% reduction in City Light bill, 50% reduction for SPU bills). This program is available for income qualifying customers, tiered by household size.

Emergency Low Income Assistance (ELIA): ELIA participants, who have received at least a 10-day shutoff notice on balances of \$250 or more, may receive assistance up to 100% of their bill, up to a maximum of \$500. For 2021, assistance is available twice in a 12-month period and the program is not conditional on shutoff notices. It applies to customers with balances of \$250 or more.

Emergency Rental Assistance (ERA) Program: The federal Coronavirus Response and Relief Supplemental Appropriations Act (CRRSA) provides state funding for the ERA program, which provides rental and utility arrears assistance for individuals and households impacted by the COVID-19 pandemic. The Washington state legislature then appropriated \$325 million of that funding for emergency rental and utility assistance. As of August 2021, Seattle City Light has received \$1 million of these federal funds to disburse as credits to income-qualified customers within the city limits of Seattle.]

Project Share: Project Share is funded by customer donations and provides a one-time per year assistance toward a customer's City Light bill. Project Share funds are used for customers currently enrolled in the UDP who have also received the ELIA benefit to help them achieve a

zero balance on their active electric account. The program provides one-time per year assistance up to \$500 toward a customer’s past due City Light bill.

Budget Billing Program: This is a monthly billing plan option that enables customers to spread energy costs evenly throughout the year. This provides certainty to each bill and assists customers in avoiding high bills during peak demand.

Energy Equity Rate Pilot (EERP): Offers a suite of wrap-around benefits for income-qualified customers with high energy burdens that reside within the city limits of Seattle: a reduced rate for electrical consumption; energy efficiency upgrades and weatherization projects (depending upon housing type and ownership or renter status); and a balance forgiveness program (balance management arrangement) upon successful completion of agreed upon payments that fit household budgets. This pilot is administered in partnership with Byrd Barr Place and is limited to the City; it has the potential for expansion to franchise cities after the pilot is evaluated. This pilot is operational through the end of 2021 but may be extended.

City Light’s affordability programs can be tracked by multiple metrics, including those listed below. Some cautions: these metrics are a starting point and are not comprehensive of all metrics that could be tracked, data – and standard definitions for what they entail- do not yet exist for all potential metrics, nor are they universally applicable to all programs. These metrics will need to be refined over time.

Table 4 – Potential Metrics for Tracking Affordability Programs

| Program | Number of 2020 participants | Percent of HIC and VC/total participants | Accessibility to non-single family homeowners [low-high] | 2020 Expenditures | Average \$ value received by a participant in 2020 | Awareness of and access to programs | Burden to program participation - a qualitative scale or describe each step to participate |
|---------------------------------|-----------------------------|--|--|-------------------|--|-------------------------------------|--|
| Utility Discount Program | 36,000 | 100% | High | \$22.2M | \$617 | <i>Need to define</i> | <i>Need to define</i> |
| Emergency Low Income Assistance | 384 | 100% | High | \$99,000 | \$257 | <i>Need to define</i> | <i>Need to define</i> |
| Project Share | 832 | 100% | High | \$200,000 | \$240 | <i>Need to define</i> | <i>Need to define</i> |
| Budget Billing | 5,800 | N/A | High | \$0 | N/A | <i>Need to define</i> | <i>Need to define</i> |

| | | | | | | | |
|--------------------------|----|------|------|--|--|-----------------------|-----------------------|
| Energy Equity Rate Pilot | 69 | 100% | High | Difficult to calculate. Customer rates were reduced by 70% | Difficult to calculate. Customer rates were reduced by 70% | <i>Need to define</i> | <i>Need to define</i> |
|--------------------------|----|------|------|--|--|-----------------------|-----------------------|

6.2.2 Reliability

Miller Community Center Microgrid: The Miller Community Center Microgrid demonstration project includes an installation of solar generation and on-site storage that provides backup power in the event of a power outage. The system includes microgrid controls that enables the system to switch between an islanded mode when there is an outage in the grid, and a grid connected mode, where generated power can be injected onto the grid and the community center can also draw power from the grid. With this microgrid the Miller Community Center can provide backup power to nearby neighborhoods during emergency events.

Demand Response Pilot: City Light is developing a demand response pilot. Scheduled to launch in 2022, the pilot is expected to last at least 18 months. Pending pilot outcomes, City Light may develop a portfolio of demand response offerings.

Table 5 – Potential Metrics for Tracking Reliability Programs

| Program | Number of 2020 participants | Percent of HIC and VC/total participants | Accessibility to non-single family homeowners [low-high] | 2020 Expenditures | Average \$ value received by a participant in 2020 | Awareness of programs (Outreach Medium/Year) | Burden to program participation - a qualitative scale or describe each step to participate |
|---|-----------------------------|--|--|-------------------|--|--|--|
| Miller Community Center Microgrid Demonstration | 1 | NA | low | \$387,500 | \$387,500 | NA | <i>Need to define</i> |
| Demand Response Pilot | NA – not yet launched | NA | NA | NA | NA | NA | <i>Need to define</i> |

6.2.3 Energy Efficiency

HomeWise: Offers weatherization services to income eligible households, with the aim of decreasing each participating household’s energy bills while also increasing comfort, health,

and safety. The program partners with the Seattle Office of Housing to replace/upgrade key areas of energy efficiency (e.g., insulation windows/doors, heating sources) to income qualifying residential and multifamily buildings. Services are provided through federal, state, and local utility funding. The HomeWise program is also an add-on component of the Energy Equity Rate Pilot described above. HomeWise was temporarily suspended in 2020 due to the pandemic.

Direct Install Services Program (Powerful Neighborhoods): Provides free energy efficiency improvements for individual units and multifamily building common areas. In 2020, due to the pandemic, this program ceased in-home installation and adapted to provide free energy saving kit to directly to customers and food pantries. These free improvements include LED light bulbs, efficient showerheads and/or faucet aerators to reduce energy burden to renters.

Small Business Program: Installs energy efficient lighting and equipment at no- and low-cost to the participating businesses to assist in lessening the affordability pressures in this high cost region. Through the Small Business Energy Solutions program, City Light aims to help small business customers impacted by COVID-19 by providing resources to lower and better manage their energy costs. Small business participation will be prioritized in Highly Impacted Communities and for Vulnerable Populations, and the program aims to promote regional economic recovery and workforce development.

Multifamily Retrofit Programs: Provides a wide range of retrofit energy efficiency solutions for capital improvement, operations & maintenance, and behavioral improvements, across existing multifamily buildings. These programs lower owner and tenant energy use, thereby reducing renter energy burdens.

Built Smart: Encourages developers of new multifamily buildings to reach beyond standard energy code and develop additional electricity savings through financial incentives. The program recruits both affordable and market-rate developments.

Multifamily Weatherization: incentivizes owners of existing multifamily properties to invest in insulation, window, and exterior door upgrades.

City Light’s energy efficiency programs can be tracked by multiple metrics, including those listed below. Some cautions: these metrics are a starting point and are not comprehensive of all metrics that could be tracked, data – and standard definitions for what they entail- do not yet exist for all potential metrics, nor are they universally applicable to all programs. These metrics will be refined over time.

Table 6 – Potential Metrics for Tracking Energy Efficiency Programs

| Program | Number of 2020 | Percent of HIC and | Accessibility to non-single family | 2020 Expenditures | Average \$ spent per | Awareness of programs | Burden to program participa- |
|---------|----------------|--------------------|------------------------------------|-------------------|----------------------|-----------------------|------------------------------|
|---------|----------------|--------------------|------------------------------------|-------------------|----------------------|-----------------------|------------------------------|

| | partici- pants | VC/total partici- pants | home- owners [low-high] | | participa nt in 2020 | (Outreach Medium/ Year) | tion - a qualitative scale or describe each step to participate |
|------------------------------------|--|-------------------------------|-------------------------------|---------------|----------------------------|-------------------------------|---|
| HomeWise | 233* This program was suspended due to COVID | 100% | high | \$1,100,000 | \$4650 | <i>Need to define</i> | <i>Need to define</i> |
| Powerful Neighborhoods | 2020 is not a representative year due to COVID | Above average | 100% | \$381,200 | | <i>Need to define</i> | Super-easy to participate |
| Small Business Support | 194 | 55% | N/A | \$129k | \$630 | <i>Need to define</i> | <i>Need to define</i> |
| Commercial and Industrial Retrofit | 220 sites | Unknown | N/A | \$6.1 million | \$27,700 | <i>Need to define</i> | <i>Need to define</i> |
| Built Smart | 59 projects | Unknown | 100% | \$1.1 million | \$18,600 | <i>Need to define</i> | <i>Need to define</i> |
| Multifamily Weatherization | 20 projects | Unknown | 100% | \$193,000 | \$9,600 | <i>Need to define</i> | <i>Need to define</i> |

6.2.4 Renewable Energy

Green Up Community: Incentivizes new solar arrays hosted by affordable housing and other low-income service providers through the purchase of renewable energy credits (RECs) acquired by Green Up participants.

Green Up: Green Up is Seattle City Light’s voluntary green power program that allows any utility customer to purchase renewable energy through a self-selected additional charge on their utility bill. The program is based in RECs and customers may either match their billed electricity consumption or purchase 100 kWh blocks.

Existing Renewable Hydroelectric Resources: The utility owns two major power sources: The Boundary Hydroelectric Project, and the Skagit Hydroelectric Project, (which includes the Ross, Diablo and Gorge hydroelectric plants). These sources, combined with three small hydroelectric

facilities, the Newhalem Creek Hydroelectric Project, the Cedar Falls Hydroelectric Project, and the South Fork Tolt River Hydroelectric Project, generated approximately 6.4 million megawatt hours (“MWh”) of electrical energy in 2018, which was about 46% of City Light’s total resources.

Renewable Power Purchase Agreements: City Light has three main renewable energy purchased power agreements: Columbia Ridge Landfill Gas, Stateline Wind, and King County Wastewater Treatment Plant; and various smaller contracts for RECs. Columbia Ridge is a landfill gas-to-energy resource located in Arlington, Oregon; Stateline is a wind project near Walla Walla, Washington; and the King County Wastewater Treatment Plant is a local digester gas plant. All of these contracts come with either renewable energy or RECs, and offer compliance options for I-937, which is the Washington Portfolio Standard legislation introduced in 2006.

Renewable Plus Program: Seattle City Light intends to launch a program offering a new renewable energy product that allows large commercial customers to offset a portion of their energy with renewable energy sourced from a newly-constructed renewable energy resource. As part of this offering, City Light will sign a 15+ year power purchase agreement (PPA) with a resource developer for the new resource, likely located in eastern WA and with transmission secured to deliver the energy back to City Light’s load. Participating customers will enroll accounts into the program and will pay a per kWh adder on top of their retail bill for this “bundled energy”. Customers will receive quarterly and annual reports from City Light verifying that their enrolled load is covered by renewable energy certificates (RECs) retired by City Light towards that load.

Virtual Net Metering: City Light is currently developing virtual net metering functionality. Virtual net metering will enable eligible customers with solar installations to virtually distribute excess solar generation to multiple customer meters. For example, a multifamily affordable housing site with a solar installation would first be able to offset the load of the house meter, then share the excess generation with the residential units, reducing their energy burden through net metering. Virtual Net Metering will help facilitate more equitable benefits to tenants of multifamily buildings and may enable future community solar programs.

City Light’s renewables offerings can be tracked by multiple metrics, including those listed below. Some cautions: these metrics are a starting point and are not comprehensive of all metrics that could be tracked, data – and standard definitions for what they entail- do not yet exist for all potential metrics, nor are they universally applicable to all programs. These metrics will be refined over time.

Table 7 – Potential Metrics for Tracking Renewables Programs

| Program | Number of 2020 participants | Percent of HIC and VC/total participants | Accessibility to non-single family homeowners [low-high] | 2020 Expenditures | Average \$ value received by a participant in 2020 | Awareness of programs (Outreach Medium/Year) | Burden to program participation - a qualitative scale or describe each step to participate |
|-------------------------------------|-----------------------------|--|--|-------------------|--|--|--|
| Green Up Community | 0 | NA | low | NA | NA | Direct outreach to eligible participants, webinar | Eligibility and application |
| Green Up | 10,700 | unknown | high | \$800,000 | NA | Bill inserts, website | Any City Light customer may participate |
| Renewable Purchase Power Agreements | NA | NA | NA | | NA | NA | NA |
| Virtual Net Metering | NA | NA | NA | NA | NA | Direct conversation with 3 exemplary bldg projects | NA |

6.2.5 Transportation Electrification

In 2020, City Light released the *Transportation Electrification Strategic Investment Plan (TESIP)* in response to the Washington state legislature’s 2019 passage of House Bill 1512, which enabled electric utilities to incorporate transportation electrification into utility modernization.

The Plan outlined three broad areas – public transit, fleets, and personal mobility – where City Light will invest to deliver the types of programs identified by more than 35 community stakeholder groups. Significantly, the Plan also identified key equity outcomes to incorporate accountability to communities. In 2021, City Light is embarking on a second phase of community and stakeholder engagement that will continue to refine these priorities and uphold our commitment to community collaboration in program design and delivery.

In 2021, City Light in partnership with the Office of Sustainability, the Department of Transportation and the Office of Economic Development, released Seattle’s Transportation *Sept. 2021 - Clean Energy Equity Plan*

Electrification Blueprint, setting out how to plan for an equitable future where vehicles that move people, goods and services are electric, and setting ambitious goals for the transportation and electricity sector to see results by 2030, including:

- 100 Percent of Shared Mobility is Zero Emissions - As shared mobility services like bikes, scooters, taxis, Uber, Lyft, carshare services and others continue to expand in Seattle, the city will ensure those options will be electric and emissions free.
- 90 Percent of All Personal Trips are Zero Emission - By 2030, nine out of 10 trips must be walking, biking, electric transit or in an electric vehicle (or avoided all together).
- 30 Percent of Goods Delivery is Zero Emissions - Goods movement is a growing cause of congestion and emissions on our roads, as more and more of the goods we buy and the food we eat are purchased online and delivered.
- 100 Percent City Fleet is fossil-fuel free (Executive Order 2018-02) - Continuing to lead by example, Seattle will operate a large municipal fleet with zero fossil fuels by 2030.
- One or More 'Green & Healthy Streets' in Seattle (C40 Fossil Fuel Free Streets declaration, 2017) - A major area of our city will have zero emissions from transportation including streets or blocks that restrict cars and promote walking, biking, electrified transit, and electric goods delivery and services.
- Electrical Infrastructure Required to Stay Ahead of TE Adoption is Installed and Operational Infrastructure investments will enable a rapid transition to an electrified transportation system.

Below are City Light's initial transportation electrification public offerings. These offerings will expand and evolve with planned public engagement.

Public Transit Projects: King County Metro, Washington State Ferries, and Port of Seattle electrification projects. Public transit has been identified as high priority in TESIP. These projects also will have environmental benefits for South Seattle/Duwamish, which have been identified as Highly Impacted Communities.

Public Charging Station Pilot: Public charging stations serve populations living in multifamily building that need public charging options. The City Light public charging pilot is installing 26 DC fast chargers across the service territory to demonstrate access to charging to current/future EV owners (address DC gaps in private charging companies), establish lessons learned, and drive adoption in areas with low EV ownership in support of the mayoral *Drive Clean Seattle Initiative*. Stakeholder and community outreach has been conducted, prior to install, using neighborhood associations, with the intention of determining cost-effective, equitable, and accessible station locations.

Personal Mobility Programs: City Light is developing new program opportunities for personal mobility. Program(s) are expected to launch in 2022.

Fleets Programs: City Light is identifying new program opportunities for commercial, government, and non-profit fleets. Program(s) are expected to launch in 2022.

City Light’s transportation electrification offerings can be tracked by multiple metrics, including those listed below. Some cautions: these metrics are a starting point and are not comprehensive of all metrics that could be tracked, data – and standard definitions for what they entail- do not yet exist for all potential metrics, nor are they universally applicable to all programs. These metrics will be refined over time.

Table 8 – Potential Metrics for Tracking Transportation Electrification

| Program | Number of 2020 participants | Percent of HIC and VC/total participants | Accessibility to non-single family homeowners [low-high] | 2020 Expenditures | Average \$ value received by a participant in 2020 | Awareness of programs (Outreach Medium/Year) | Burden to program participation - a qualitative scale or describe each step to participate |
|--------------------------------|-----------------------------|--|--|-------------------|--|--|--|
| Public Transit Projects | | | NA | | | <i>Need to define</i> | <i>Need to define</i> |
| Public Charging Station Pilots | 16 sites | 37% 6 sites | <i>Need to define</i> | \$15,000 | NA | <i>Need to define</i> | <i>Need to define</i> |
| Personal Mobility Program(s) | NA – not yet launched | NA | NA | NA | NA | <i>Need to define</i> | <i>Need to define</i> |
| Fleets Program(s) | NA – not yet launched | NA | NA | NA | NA | <i>Need to define</i> | <i>Need to define</i> |

6.3 Outside Service Territory

The initial suite of programs described above as City Light’s portfolio of actions provides a starting point for elevating equity as City Light supports clean energy transformation. However, City Light recognizes that Highly Impacted Communities and Vulnerable Populations extend outside the service territory in and around Seattle. City Light owns and operates generation facilities and transmission infrastructure in and across five Washington State counties. These remote resources, some more than 500 miles outside Seattle, generate and deliver electricity to our residential, commercial, and industrial customers in Seattle and surrounding franchise cities.

Highly Impacted Communities and Vulnerable Populations may be found near City Light’s transmission corridors, generation facilities, and future renewable resource supplies. Investments

in infrastructure and maintenance in these areas supports the transition to clean energy and has the potential to impact Highly Impacted Communities and Vulnerable Populations. The approaches to addressing the needs of these groups within and adjacent to our Hydroelectric project boundaries are primarily through the Federal Energy Regulatory Commission (FERC) relicensing process. This 5-year process culminates in a project license with legally-binding expenditures on programs over the life of a 30–50-year license. During the relicensing process, many studies are undertaken that address the project’s impacts to environmental elements such as water, air, land, fish and wildlife, forests and vegetation, recreation, and cultural resources, which are of interest to tribes and first nations. City Light’s Cedar Falls Hydroelectric Project predates FERC licensing requirements and operates under a Habitat Conservation Plan (HCP) for the watershed that has expenditure program commitments, committees, and reporting similar to a FERC license and ongoing collaborations with tribes.

During a relicensing process, City Light actively engages in broad outreach to tribes and first nations to make them aware of the process and their rights to participate. Several tribes and first nations that have entered into formal agreements with City Light in previous licenses and current relicensing processes; however, for a variety of reasons, not all tribes and first nations ultimately choose to participate in the relicensing process. City Light also consults with a broader group of stakeholders that include tribes that may or may not have formal license agreements with the utility. Consultations include areas such as project permitting and salmon recovery efforts.

Investments in these area outside City Light’s service territory could provide opportunities for energy and nonenergy benefits to these groups, as well as generate unintentional burdens that CETA is trying to avoid. City Light acknowledges these connections and intends to expand the portfolio of actions over time with additional assessments of these investments, collaboration with affected groups, and through applying lessons learned from the initial portfolio of actions.

7 Community Outreach

7.1 General Approach

City Light’s outreach plan for this CETA equity report seeks to conduct inclusive and equitable outreach that is intentional and purposeful to build a clean energy future with customers. City Light will engage communities within its service territory about the benefits of clean energy and any barriers to accessing it. The outreach will approach this using a story narrative such as:

Once upon a time there was.... *Community*
Most days, they struggled because of... *a challenge*
One day.... *Seattle City Light made a plan and took actions*
The Community’s life improved because... *the actions created benefits that addressed their challenges*

Staff plan to conduct outreach and engagement in two phases:

Phase 1

- Initial community and stakeholder outreach and engagement activities
- Identify priorities for where City Light should focus efforts
- Broad customer survey
- Prioritize meeting with environmental justice community leaders and stakeholder groups

Phase 2

- More in-depth engagement with Highly Impacted Community members and Vulnerable Populations
- Work with community-based organizations to conduct outreach and engagement activities
- Develop a long-term strategy to engage with Highly Impacted Communities and Vulnerable Populations

7.1.1 Objectives

The objectives for outreach associated with developing a clean energy future include:

- Engage with community-based organizations (CBOs) to identify and develop customer benefits that will reach Highly Impacted Communities and Vulnerable Populations
- Develop communication strategies and programs that are inclusive and equitable and adapt to the changing needs of customers in City Light’s service territory
- Recognize that different people have different priorities and needs; address them accordingly
- Target and engage the groups identified above in discussions
- Develop metrics that help City Light measure equity in electric energy planning and decision-making for CETA
- Identify and mitigate barriers to customer participation
- Prepare materials to explain City Light goals and initiatives for CETA
- Determine innovative and creative ways to engage with our customers to discuss CETA
- Develop a short-term and long-term outreach plan for CETA

7.1.2 Target Audiences

Staff plan to direct outreach with state-identified targeted audiences as well as those identified through City’s Equity and Environment Agenda and City Light’s target audiences. The state-identified target audiences include Highly Impacted Communities and Vulnerable Populations as described in Section 4. Based on the data on Highly Impacted Communities, 60 out of 182 areas in City Light’s service territory rank 9-10 on the Environmental Health Disparities map.

Staff identified four demographic groups as Vulnerable Populations through the City’s Equity and Environment Agenda and City Light Target Audiences. These include:

- Black, Indigenous, People of Color (BIPOC) customers

- Low-income customers
- Limited English Speaking (LES) customers
- Immigrant and refugee communities

7.2 Tactics and Metrics

The following tactics are examples of the specific methods and channels that City Light will take to engage with community members (Table 9). City Light is in the process of hiring an Outreach Coordinator who could help with implementing these tactics.

Table 9 – List of Potential Public Engagement Tactics

| Digital | Print | Other/Community |
|---|--|---|
| <ul style="list-style-type: none"> • Email • Social Media (Facebook, Twitter, LinkedIn, Instagram) • Ethnic Media • Neighborhood blogs / community newsletters / organizations • City Blogs & newsletters (including franchise cities) • Social Media Toolkit (other City departments) • Local media | <ul style="list-style-type: none"> • Billboards • Buses (interiors/exterior) • Ethnic Media • Valpak • Direct Mail • Local media | <ul style="list-style-type: none"> • Radio • Existing community and advocacy group meetings • Focus groups (in-language) • Schools/PTAs • Racial Equity Toolkit (partially completed) • Translation and interpretation services • City commissions, advisory boards, elected officials • Events • Webinars |

Metrics are used to measure success of outreach and engagement activities. These could include:

- Participation by a certain number of CBOs
- Participation by a certain number of customers
- Pre- and Post-surveys
- Number of outreach engagements (events, collateral, etc.)
- Results of all tactics

7.3 Previous Outreach Efforts and Market Research

City Light has gained insights through past market research with customers. In 2017, City Light conducted market research to identify customer priorities when developing the 2019-2024 Strategic Plan. The research, conducted by a third-party consultant, over sampled low-income customers (UDP participants). This research found that City Light customers want the utility to plan for the future while keeping costs down.

Their top three priorities for the utility were:

- Be leaders in environment and renewable energy (51% of residential customers ranked clean energy as a top priority)
- Invest in technology for operational improvements
- Keep costs down

Customer priorities were also heard through Transportation Electrification Strategic Investment Plan (TESIP) outreach and engagement efforts. At City Light, we are redefining electricity services to meet the evolving demands of our customers and our rapidly growing metropolitan area. City Light envisions a utility of the future that is responsive to the wants and needs of community members most impacted by environmental inequities, operates a modernized grid that enables real-time smart technology interaction and provides economic opportunities through infrastructure investments and upgrades. A modernized electric grid will allow for resource optimization and prepare the region to withstand growing climate change impacts.

City Light is seizing transportation electrification as an opportunity to deliver on this vision. With our clean energy, the Pacific Northwest is in a unique position to electrify the transportation sector and deliver a triple win for our customers, the environment, and the utility.

City Light partnered with the Seattle Department of Neighborhoods (DON) to engage environmental justice communities in outreach and engagement efforts. City Light engaged with 25 environmental justice community leaders, four environmental justice organizations, eight major commercial fleets, four environmental advocacy organizations, five labor unions and labor councils, and three shared mobility transportation network companies (TNCs) and taxi companies.

The input received from these conversations informed the transportation electrification investment priorities for City Light over the next four years. The **main priorities** heard from environmental justice community leaders and stakeholder groups included:

1. *Conduct customer and stakeholder outreach and awareness on transportation electrification:* Many environmental justice community members are unfamiliar with electric vehicles (EVs). Communicating in local languages, highlighting communities of color in advertising, and focusing on multimodal transportation electrification can help increase equitable access.
2. *Prioritize buses for electrification:* This was the number one priority for both community leaders and stakeholders. Low-income communities and communities of color are more likely to depend on buses for most, if not all, of their transportation needs. Electrifying public transit will benefit communities who most rely on public transit by reducing air and noise pollution where impacts are greatest.
3. *Electrify commercial and local government fleets that run through the Duwamish Valley:* Environmental justice communities are exposed to—and concerned about—poor air

quality and suffer from geographic and social health disparities. Commercial fleet electrification can reduce harmful tailpipe emissions in the Duwamish Valley.

4. *Expand at-home and near-home charging for multifamily residents:* Currently, there is a lack of access to EV charging for multifamily units. Expanding at-home and near-home charging solutions for multifamily residents in environmental justice communities will increase equitable access to transportation electrification as 52% of City Light’s customers are renters and a majority live in multifamily properties.
5. *Electrify high-mileage ride-hailing vehicles:* High-mileage ride-hailing vehicles (e.g., TNCs and shared mobility, such as Lyft, Uber, taxis) drive three to five times more than regular passenger vehicles and electrifying them can have a large impact on tailpipe emissions. In addition, high-mileage ride-hailing vehicles are frequently driven by immigrants and members of communities of color and targeted incentives can increase equitable access to transportation electrification.

Additional resources that can inform understanding of customers desires and priorities include:

- Duwamish Valley Action Plan
- CHIA Clean Health Impact Analysis
- [Washington Environmental Health Disparities Map](#)
- City Department of Neighborhoods (DON) Seattle/Neighborhood Snapshots data
- Got Green and Puget Sound Sage publication: Our People, Our Planet, Our Power
- Puget Sound Sage publication: Powering the Transition: Community Priorities for a Renewable and Equitable Future
- Green Job Pathways
- Equity and Environmental Agenda – deep engagement with Environmental Justice Initiative – green job pathways, environmental justice communities have leverage and power, building capacity for them to influence environmental justice within the City
- TESIP ongoing efforts

7.4 Next Steps

Outreach with customers will benefit from coordination with DON, which requires building a Memorandum of Agreement (MOA) between DON and City Light. The MOA will establish terms, conditions, scope of work, community and stakeholder outreach and engagement activities, and payment information for DON to provide strategic-level communications and outreach support services. To draft a MOA, City Light staff plan to provide:

- Background information (what?)
- Term of agreement (time frame)
- Roles and responsibilities (the work to be completed and by who)

Additionally, a budget will need to be developed to support outreach efforts. Outreach will require funds to support DON’s involvement, to hire additional staff such as an Outreach Coordinator, to potentially hire consultants for engagement activities, and to foster participation by customers and CBOs.

8 Protocols

8.1 Equity Impacts Assessment Framework

CETA requires City Light to report forecasts and achievements of energy and non-energy costs and benefits for the utility’s selected Portfolio of Actions (see Section 6) on Highly Impacted Communities and Vulnerable Populations every four years. The following framework outlines how the core components of CETA should be linked for equity and program assessment (Figure 4).

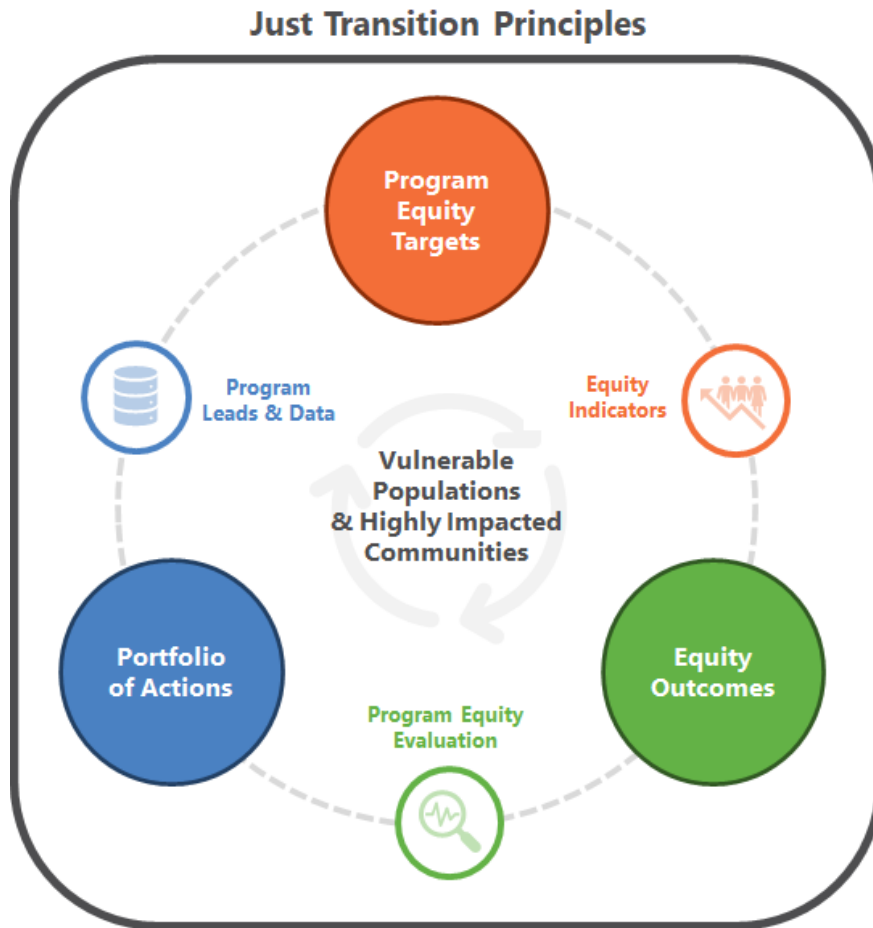


Figure 5 Equity Impacts Assessment Framework

Each component of Figure 4 is part of a continuous evaluation process as detailed below.

Equitable Clean Energy Just Transition Principles (Section 3): These are City Light’s guiding principles to ensure an equitable and just transition to a clean energy future for Highly Impacted Communities and Vulnerable Populations. The components of the equity assessment framework should support these principles.

Highly Impacted Communities and Vulnerable Populations (Section 4): CETA requires City Light to identify Highly Impacted Communities and Vulnerable Populations that are within its service territory or near transmission or generation assets. These groups experience a disproportionate share of environmental and socioeconomic risk factors.

Equity Outcomes (Section 5): Equity outcomes are characterized as a desired future state which improves the livelihood of Highly Impacted Communities and Vulnerable Populations. Equity outcomes are the results of utility actions where it is assumed all communities and populations do not start with equal opportunities to participate in or benefit from programs and investments and therefore, must specifically, but not exclusively, be identified and targeted for investments to bring all communities to a place of equal benefit.

CETA does not make any specific reference to or establish a reporting requirement for equity outcomes. City Light established this concept because it is essential to have a comprehensive set of equity goals and targets driving the assessment framework. The reporting requirements of CETA, specifically related to equity indicators, are easier to interpret and implement by including the concept of equity outcomes.

Equity Indicators (Section 5): CETA requires City Light to set metrics to track the impacts of City Light's actions on Highly Impacted Communities and Vulnerable Populations⁵. Equity indicators help determine if equity outcomes are being achieved and per CETA should be informed by a public input process.

Portfolio of Actions (Section 6): CETA requires City Light to develop a Portfolio of Actions. The Portfolio of Actions includes:

- A subset of City Light programs or projects, mostly customer-facing, that staff have identified as having a strong equity link.
- Programs or projects that directly connect to required CETA targets for Energy Efficiency, Renewable Energy or Demand Response.

The Portfolio of Actions is dynamic, and program offerings can be added or removed over time to reflect evolving policies, customer preferences, utility needs, and equity outcomes.

Program Equity Targets: These are yearly goals for individual City Light programs that enable the achievement of desired equity outcomes. The goals should be measurable and linked to equity indicators for Equity Evaluation.

Program Leads and Program Data: Portfolio Program Leads from City Light's Customer Care and Energy Solutions and other programs and projects should set annual Program Equity Targets with equity outcomes and equity indicators in mind. This can leverage two existing internal processes:

⁵ As stated in WAC 194-40-200 Section 4a and 4cii
Sept. 2021 - Clean Energy Equity Plan

1. City Light Customer Care and Energy Solutions’ Program Portfolio management structure, which sets annual programmatic goals that are tracked monthly/yearly
2. The RET process

Data from programs should be collected to align with equity indicators. For projects that are in the Portfolio of Actions but not part of the Customer Care and Energy Solutions Portfolio, targets should be developed to align with the specific project’s workplan or schedule.

Program Equity Evaluation: Programs included in the Portfolio of Actions should be holistically evaluated against their program targets and equity outcomes and indicators. If equity outcomes are not being achieved, then program targets should be adjusted, or new programs may need to be created or added to the Portfolio of Actions.

8.2 CETA Equity Cost and Benefits Reporting Requirements

The formal CETA requirements for reporting forecasts and achievements of energy and non-energy costs and benefits are unclear and subject to interpretation. CETA is not prescriptive in identifying exactly which types of utility actions are subject to the equity cost and benefits reporting requirements. We interpreted the applicable Washington Administrative Code sections which establish the equity cost and benefits reporting requirements as follows:

8.2.1 Interpretation of WAC 194-40-200(4)(c)

Per WAC 194-40-200(4)(c), City Light must report the “forecasted distribution of energy and nonenergy costs and benefits of programs identified in the Portfolio of Actions including impacts resulting from achievement of specific targets for energy efficiency, demand response and renewable energy.”

This language establishes that City Light is required to submit a report that generally identifies forecasts and achievements of equity targets for programs included in City Light’s Portfolio of Actions; however, it is unclear what distribution of energy and nonenergy costs and benefits refers to. For this reason, Section 4c does not provide sufficient detail to establish a formal reporting requirement in and of itself.

WAC 194-40-200(4)(c)(iii) provides more detail and should be viewed as the formal equity cost and benefits reporting requirement. City Light should *“identify the expected effect of specific actions on Highly Impacted Communities and Vulnerable Populations and the general location, if applicable, timing, and estimated costs of each specific action. If applicable, identify whether any resource will be located in Highly Impacted Communities or will be governed by, serve or otherwise benefit Highly Impacted Communities or Vulnerable Populations in part or in whole.”*

8.2.2 Leveraging City Light’s Existing Equity Work for CETA Cost Benefit Reporting

The equity cost and benefits reporting requirements outlined in WAC 194-40-200(4)(c) are, in part, already in place at City Light through the RET process, provided that the RET processes are

resourced and completed. City Light can meet (or exceed) the CETA reporting requirements through the Equity Impacts Assessment Framework described in Figure 4 through:

1. Setting equity targets for programs and projects included in City Light's Portfolio of Actions.
2. Tracking relevant equity data through the Program Equity Targets and the Equity Indicators processes.
3. Performing holistic Equity Evaluations where advancement in City Light's equity outcomes is measured using equity indicators and achievement of Program Equity Targets.

Coordinating this effort on an ongoing basis and for future CETA compliance will be a substantial new body of work. This will require supporting staff resources such as a CETA Equity Coordinator position and potentially additional staff support to bolster the existing RET process. The protocols for each of the three steps listed above are described in more detail in the Equity Impacts Assessment Protocols section below.

8.3 Equity Impact Assessment Protocols

The City Light programs and projects included in the Portfolio of Actions are identified in Section 6. Each program or project should establish a process for setting Equity Targets, which can be used to inform equity indicators and help drive equity outcomes.

The key parts of this process are described in more detail in the list below. These proposed protocols should be viewed as initial recommendations that can be built out and revised as the program equity evaluation framework moves into an implementation stage.

8.3.1 Setting Program Equity Targets

For programs that are included in the Portfolio of Actions, Customer Care and Energy Solutions Program Managers should work with the CETA Equity Coordinator to complete a Racial Equity Toolkit, if one has not already been performed, or is out of date. The RET will identify the important equity links that can then be tied to related CETA Equity Outcomes and Equity Indicators. Customer Care and Energy Solutions Managers and Program Managers will set annual Program Targets that will help achieve Equity Outcomes. This will require collaboration with impacted communities, the CETA Equity Coordinator, and existing City Light Portfolio Teams, which currently set program targets. Program data should be collected so that it can inform equity indicators. This will require discretion from program leads and the CETA Equity Coordinator. To the extent possible, program targets should be informed by measurable program data that can be reliably collected.

8.3.2 Tracking Data for Programs and Equity Indicators

Highly Impacted Communities and Vulnerable Populations are the central focus of CETA. To track impacts on Highly Impacted Communities and Vulnerable Populations, program and

equity data must, at a minimum, be tracked in a way that can tie back to these groups. The CETA Equity Coordinator, Customer Energy Solutions Program Managers, and other portfolio of action Program Leads should:

1. Establish a mapping process so that the geographic location of Highly Impacted Communities and Vulnerable Populations is readily available to Program Leads and well maintained.
2. The equity mapping data should be organized so that it can be applied to programs identified in the Portfolio of Actions.
3. Develop data collection framework to track demographic information of program participants.

For City Light programs to meet the minimum for CETA compliance, program data should be collected in a manner that indicates what portion of the program will serve Highly Impacted Communities and Vulnerable Populations. This data would be collected and maintained by Program Leads and provided to the CETA Equity Coordinator at least annually to inform Indicators. This data should include, at a minimum:

1. Geographic location of program participation and their mapping (i.e., connection) to Highly Impacted Community or Vulnerable Population
2. Program expenditures and their mapping to Highly Impacted Communities and Vulnerable Populations
3. Program implementation timing
4. If possible, benefits and costs for program participants in Highly Impacted Communities or Vulnerable Populations as it relates to the equity indicators. This will be program specific and could include factors like realized reduction in energy burden, improvement in living conditions, positive environmental attributes, or increased reliability of service. The measurable effects of certain programs or projects could also have a negative effect on Highly Impacted Communities or Vulnerable Populations and, if this is the case, these also should be reported. These impacts should be identified initially as part of the RET process.

For equity indicators that are only indirectly impacted by City Light programs or informed by third party data, for example Indicators related to Air Quality or Greenhouse Gas Emissions, the CETA Equity Coordinator should:

1. Establish an internal process to clearly identify the primary external data source for equity indicator tracking.
2. Establish a process to compile and archive any external data and ensure correct mapping with Highly Impacted Communities and Vulnerable Populations.
3. Work with Program Leads to collect any relevant data that might indirectly contribute to these indicators.

8.3.3 Performing Evaluations for City Light Equity Outcomes and Program Equity Targets

City Light’s equity outcomes represent the end goal of the Equity Impacts Assessment Framework; to this end, the CETA Equity Coordinator should regularly evaluate if these outcomes are being achieved and use equity indicators as outlined in Section 5 to determine if positive progress is being made to achieve equity outcomes. If progress is not being made on certain equity outcomes, the CETA Equity Coordinator should re-evaluate program targets, tweak existing actions, or recommend development of new actions.

Evaluation of Program Equity Targets should occur in tandem with Equity Outcome Evaluation. Program Leads should work with the CETA Equity Coordinator to determine if achievement or lack of achievement of equity outcomes is being driven by program performance. If program performance is limiting progress of equity outcomes, then Program Leads should work with the CETA Equity Coordinator to determine what barriers to success may be occurring and develop an action plan to adjust the program strategies accordingly.

If certain equity outcomes are not being achieved because existing programs are insufficient, then the CETA Equity Coordinator should identify this as an equity opportunity for new program development. Examples of strategies to enhance energy benefits to realize equity outcomes through existing programs can be found in Appendix C.

9 Implementation Plan

9.1 Ongoing Process Improvement

Implementation of the CEEP recognizes the living nature of the plan and the evolving understanding of fostering equity while transitioning to a clean energy future. During the development of the CEEP, several challenges were identified that will take time and effort to address. To not lose sight of these challenges while beginning to undertake equitable actions, they are captured below for continued dialog and process improvement as the plan is implemented. The Equity Coordinator will help facilitate addressing these issues as the CEIP is carried out over the next four years.

Table 10 – Challenges or issues to be worked on during CEIP implementation

| Focal Area | Challenge or Issue |
|------------|---|
| Indicators | Measurement development for indicators; aligning CETA equity metrics with (internal) annual goals, metrics, and dashboards. |
| Indicators | Burden (Cost) to Participate: Cost needs to be better defined in future iterations of the plan. Cost can mean more than just dollar such as time requirements to participate. However, the indicators were developed with dollars as the primary barrier to entry in program participation. |

| | |
|-----------|---|
| Outreach | Expanding outreach including co-creation of indicators, community priorities, what can be achieved over time and meeting expectations, building relationships |
| Reporting | Collecting the right data to report to the state and then reporting to the state |
| Staffing | Adequately staffing this effort, particularly around the equity coordinator, RET support, and outreach |
| Utilities | Aligning with PSE (shared territory_=) and neighboring utilities on equity metrics; shared/common approaches |

9.2 Scope of Implementation

In order to meet the intent of CETA, City Light program managers in Customer and Energy Solutions and other Program Leads will implement the framework described in Section 8: Protocols and implementation schedule in Figure 5. For each of the programs identified in the Portfolio of Actions (Section 6), program managers will complete a racial equity analysis using the RET and set annual equity targets that will yield benefits to Highly Impacted Communities and Vulnerable Populations. Additionally, program managers, assisted by Communications staff, will engage with Highly Impacted Communities and Vulnerable Populations to enhance City Light’s likelihood of achieving equity outcomes. Staff will endeavor to remove barriers to engagement to minimize burdens for public participation. Finally, program managers will develop strategies to address equity targets and achieve equity outcomes.

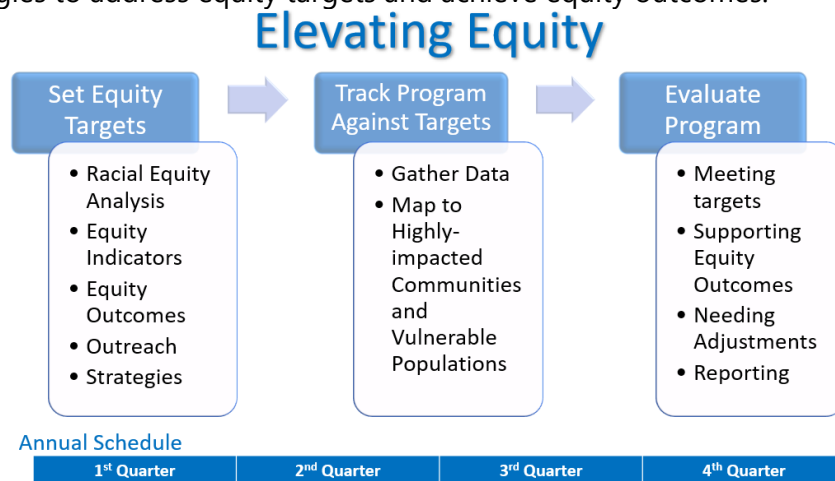


Figure 6 Implementation Schedule for Elevating Equity

As programs are carried out, program managers will gather data to track performance against the established equity targets. These data should be mapped or connected to the affected Highly Impacted Communities and Vulnerable Populations. Annually, programs will be reviewed by Customer Care and Energy Solutions managers and supervisors to see if progress is being made toward the targets and that the implemented strategies are supporting the intended equity outcomes. If progress is off target, adjustments will be made to program design and execution to elevate equity (Figure 5). Implementation for expanding the portfolios of actions to

areas outside the City Light service territory will require future work developed with the Equity Coordinator and City Light leadership.

9.3 Responsible Parties, Schedule, and Budget

Each Program Manager for the programs listed in the Portfolio of Actions (Section 6) will be responsible for implementing equity in their program following the implementation framework described in Section 10.1 and Figure 5. Equity targets will be set in the first quarter of each year with performance tracking occurring throughout the year. Regular program evaluation will occur to initiate programmatic adjustments. The Equity Coordinator (described in Section 8.2) will assist in target setting and program evaluation. Once hired, the Outreach Coordinator will be responsible for building enduring community relationships and facilitating community engagement related to the portfolio of actions and clean energy transformation.

Implementing and evaluating actions to elevate equity and engaging with customers may incur additional programmatic costs. These anticipated costs will be incorporated in each program manager's annual budget.

9.4 Reviews and Reporting

The Equity Coordinator will be responsible for performing a review of programs in the Portfolio of Actions biennially starting the first quarter of the third year following implementation. This review will focus on each program's processes for elevating equity as well as its effectiveness at meeting equity outcomes. The Equity Coordinator will provide this feedback to program managers and City Light's Executive Team. Each program's progress will be compiled by the Equity Coordinator and reported to DOC and others as required. Reporting to the DOC will be provided at end of each 4-year period (2021-2025) aligned with the CEIP, starting in 2026.

10 Resources

| Title of Resource | Brief Resource Description | Author(s) and/or Contributor(s) | Resource Date | Access |
|---|--|------------------------------------|---------------|---|
| Internal Seattle City Light Resources | | | | |
| Energy Transformation Projects (ETPs) – White Paper | This document analyzes Washington State’s Clean Energy Transformation Act (CETA) to understand its jurisdictions and limitations regarding ETPs and their use for compliance by City Light. | Trevor Lessard, Seattle City Light | 2020 | Contact Annette Pearson to obtain a copy of this document. |
| Local Resources (City, County, and/or Region) | | | | |
| Seattle City Light Transportation Electrification Strategic Investment Plan | This plan describes how the utility is using strategic investments and previous analyses to achieve an equitable, carbon-neutral, modernized, and future-enabled vision for the community. This plan is a result of the Washington legislature’s 2019 passage of House Bill 1512 which seeks to enable electric utilities to incorporate | Seattle City Light | 2020 | Document live link: TESIP.pdf (seattle.gov) |

| | | | | |
|--|---|---|-----------|---|
| | transportation electrification into utility modernization. | | | |
| Equity & Environment Agenda | The Equity & Environment Initiative was launched in 2015 and is jointly owned by the City of Seattle and the community. The Equity & Environment Agenda was created to provide goals and strategies that can serve as a roadmap for sectors to collaborate on efforts to advance environmental equity in Seattle. | Community Partners Steering Committee for the Seattle Equity & Environment Initiative, Seattle Office of Sustainability & Environment | 2015/2016 | Website link: Equity & Environment Initiative - Environment seattle.gov Document live link: SeattleEquityAgenda.pdf |
| Racial Equity Toolkit | "The Racial Equity Toolkit lays out a process and a set of questions to guide the development, implementation and evaluation of policies, initiatives, programs, and budget issues to address the impacts on racial equity." | Seattle Race and Social Justice Initiative, Seattle Office for Civil Rights | Unknown | Resource live link: Racial Equity Toolkit FINAL August 2012 with new cncl districts(0).pdf (seattle.gov) |
| Seattle Strategic Climate Action Plan (SCAP) | This plan provides a "five-year blueprint for County climate action, integrating climate change into all areas of County operations and work with King County cities, partners, communities, and residents. The SCAP outlines King County's priorities and commitments for climate action to residents and partners." | King County | 2020 | Website: 2020 Strategic Climate Action Plan (SCAP) - King County Entire plan live link: https://your.kingcounty.gov/dnrp/climate/ |

| | | | | |
|-----------------------------|--|--|---------|--|
| | Section II: Sustainable & Resilient Frontline Communities addresses those communities that are hit first and the hardest by climate change impacts. | | | documents/scap-2020-approved/2020-king-county-strategic-climate-action-plan.pdf Section II: Sustainable & Resilient frontline Communities live link: 2020-scap-sustainable-and-resilient-frontline-communities-section.pdf (kingcounty.gov) |
| Duwamish Valley Action Plan | Promotes a city-community shared vision to guide City investment and planning in the Duwamish Valley. Its objective is to identify near-, mid-, and long-term actions that the City can take to promote community health and well-being. | Office of Sustainability & Environment (OSE) and the Office of Planning & Community Development (OPCD) | 2018 | Plan live link: DuwamishValleyActionPlan_June2018.pdf (seattle.gov) |
| City of Tacoma Equity Index | The Equity Index is an interactive tool to highlight disparities in the city of Tacoma to help City staff and partners ensure they are | City of Tacoma | Unknown | Equity Index - City of Tacoma |

| | | | | |
|---|---|-----------------------------------|---------------|---|
| | making data-informed decisions that benefit their community. The site offers additional resources and presentations on the index. | | | |
| Washington State Resources | | | | |
| Clean Energy Transformation Act (CETA) SSB 5116 | Washington law passed on May 7, 2019 by Governor Jay Inslee which commits Washington to an electricity supply free of greenhouse gas emissions by 2045. | Washington State Legislature | May 2019 | <p>Brief overview: CETA Overview (wa.gov)</p> <p>Chapter 19.405 RCW: WASHINGTON CLEAN ENERGY TRANSFORMATION ACT</p> <p>Live link: https://lawfilesext.leg.wa.gov/biennium/2019-20/Pdf/Bills/Session%20Laws/Senate/5116-S2.SL.pdf</p> |
| Washington Department of Commerce Rules and | The Washington Dept. of Commerce rules apply to public and District 9 utilities. Additionally, there is draft guidance for | Washington Department of Commerce | December 2020 | CETA-Adopted-Rules-Combined-File.pdf (wa.gov) |

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| Section 4(8) Guidance | implementing RCW 19.405.040(8), the equity requirement. | | | |
| 2021 State Energy Strategy – Chapter A | A draft blueprint for eliminating the use of fossil fuels with an overarching equity focus laid out in Chapter A. | Washington Department of Commerce | 2021 | 2021 State Energy Strategy - Washington State Department of Commerce |
| Dismantle Poverty in Washington | An organization dedicated to reducing poverty and inequality in Washington state. They have identified 8 strategies and 60 recommendations for poverty reduction. They also have a 10-year Plan Action Toolkit to assist organizations. | Dismantle Poverty in Washington, Poverty Reduction Work Group | N/A | Website: Poverty Reduction Work Group Dismantle Poverty in Washington 10-Year Plan: Final10yearPlan.pdf (dismantlepovertyinwa.com) Action Toolkit: ActionToolkit.pdf (dismantlepovertyinwa.com) |

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| <p>Reducing Poverty & Inequality in Washington State: 10-Year Plan for the Future</p> | <p>The Poverty Reduction Work Group (PRWG) was formed in 2017 by the departments of Commerce, Employment Security, and Social & Health Services as a result of a directive by Governor Inslee. The plan is a culmination of first-hand experiences and evidence-based solutions. They prioritize a commitment to equity, particularly racial equity.</p> | <p>Poverty Reduction Work Group</p> | <p>January 2020 (coordinating draft)</p> | <p>Informational PowerPoint: Welcome (wa.gov)</p> <p>Executive Summary: 2020 Jan 21 PRWG 10 year plan EXECUTIVE SUMMARY.pdf (dismantlepovertyinwa.com)</p> <p>Coordinating Draft live link: 2020 Jan 21 PRWG 10 year plan COORDINATING DRAFT.pdf (dismantlepovertyinwa.com)</p> |
| <p>Environmental Justice Task Force: Recommendations for Prioritizing EJ in Washington</p> | <p>The Environmental Justice Task Force (EJTF) created a blueprint for a shared vision of environmental justice in Washington state including measurable goals, model policy, environmental health disparities map, and community engagement.</p> | <p>Environmental Justice Task Force</p> | <p>November 2020</p> | <p>Document live link: COMMUNITY ENGAGEMENT PLAN GUIDANCE (wa.gov)</p> |

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| State Government | | | | |
| Community Report on Environmental Justice | Builds on the recommendations presented in the November 2020 'Environmental Justice Task Force: Recommendations for Prioritizing EJ in Washington State Government'. Explores and presents themes that went into forming the Task Force, which provides a deeper understanding of Washington's environmental health disparities and their causes. | Front and Centered | 2020/2021 | Document live link: Front and Centered - EJ TF Community Report |
| Washington Environmental Health Disparities Map | A tool to assess multiple, combined environmental risks in Washington state. A collaborative effort among University of Washington Department of Environmental & Occupational Health Sciences (DEOHS), Front and Centered, Washington State Department of Health (DOH), Washington State Department of Ecology (ECY) and the Puget Sound Clean Air Agency (PSCAA). | University of Washington Department of Environmental & Occupational Health Sciences | 2019 | WA state link: Washington Environmental Health Disparities Map :: Washington State Department of Health UW DEOHS link: Washington Environmental Health Disparities Map Project Environmental & Occupational Health Sciences |

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|---|--|--|---------|---|
| | | | | <p>Document link: Washington Environmental Health Disparities Map.pdf</p> <p>Interactive Map: Information by Location Washington Tracking Network (WTN)</p> |
| Washington Department of Health (DOH) COVID-19 Data Dashboard | Interactive COVID-19 data dashboard with maps and information about how COVID-19 has impacted Washington state. | Washington Department of Health | 2020 | COVID-19 Data Dashboard :: Washington State Department of Health |
| National Resources | | | | |
| Low-Income Energy Affordability Data (LEAD) Tool | Uses 2018 state census data to visualize energy burden and cost across different areas of the United States at the state, county, census tract, and city levels. | Department of Energy, Office of Energy Efficiency & Renewable Energy | Unknown | LEAD Tool Department of Energy |

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| Lifting the High Energy Burden in America's Largest Cities: How Energy Efficiency Can Improve Income and Underserved Communities | An analysis on energy burden in cities across the U.S. with a focus on "high home energy burdens faced by select groups in major metropolitan areas." The report analyzes data from the US Census Bureau's 2011 and 2013 American Housing Survey and discusses strategies to alleviate high energy burdens in specific households. | American Council for an Energy-Efficient Economy | April 2016 | Document live link: u1602.pdf (aceee.org) |
| A Guidebook on Equitable Clean Energy Program Design for Local Governments and Partners | A guidebook that "introduces a process and principles that local governments and their partners can use to design equitable clean energy programs in their communities." Centers equity in its clean energy design and planning. | Prepared by The Cadmus Group for the Urban Sustainability Directors Network | September 2018 | Document live link: A Guidebook on Equitable Clean Energy Program Design for Local Governments and Partners - September 2018 (cadmusgroup.com) |
| Solving the Climate Crisis: The Congressional Action Plan for a Clean Energy Economy and a Healthy, | "Provides a roadmap for Congress to build a prosperous, clean energy economy that values workers, advances environmental justice, and is prepared to meet the challenges of the climate crisis." It establishes a goal of reaching net-zero | House Select Committee on the Climate Crisis, Majority Staff Report | June 2020 | Website link: Solving the Climate Crisis: The Congressional Action Plan for a Clean Energy Economy and a Healthy and Just America Select |

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|--|--|------------------------------|--------------|--|
| Resilient, and Just America | greenhouse gas emissions in the U.S. by no later than 2050. | 116 th Congress | | Committee on Climate Crisis (house.gov) Report live link: Climate Crisis Action Plan.pdf (house.gov) One-pager live link: SCCC summary.pdf (house.gov) |
| Energy Democracy Scoreboard and Flipbook | "This flipbook offers communities a guide to find out where they are on the energy spectrum and provides an opportunity to envision what energy democracy could look like in their community. This flipbook can be used by communities to share with their elected officials what they are experiencing and what would be necessary in order to transition to energy democracy. This flipbook provides an education tool, an assessment, and an accountability mechanism." | Emerald Cities Collaborative | January 2020 | Document live link: FINAL Flipbook.indd (nnjcf.org) |

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| <p>The State of Equity Measurement: A Review for Energy-Efficiency Programs</p> | <p>This document explores current discourse around equity and provides definitions and measurement schemes for equity in service fields beyond energy-efficiency.</p> | <p>Carlos Martin, The Urban Institute Jamal Lewis, Green & Healthy Homes Initiative Metropolitan Housing and Communities Policy Center</p> | <p>September 2019</p> | <p>Document link: The State of Equity Measurement Urban Institute</p> |
| <p>Greenlink Equity Map (GEM)</p> | <p>GEM is a product of Greenlink Analytics, an energy research and consulting non-profit that offers data and industry knowledge on clean energy. GEM was created with the intention of helping communities create and visualize equity-related issues using maps and data.</p> | <p>Greenlink Analytics</p> | <p>2020</p> | <p>Home GEM (equitymap.org)</p> |
| <p>Local and Regional Government Alliance on Race & Equity (GARE)</p> | <p>A national network of governments “working to achieve racial equity and advance opportunities for all.” They have tools and resources, and host events and trainings.</p> | <p>GARE, Race Forward, Othering and Belonging Institute at UC Berkeley</p> | <p>N/A</p> | <p>Website: Government Alliance on Race and Equity (racialequityalliance.org)</p> |

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|----------------------------------|--|--|---------------|---|
| | | | | Tools and resources page: Tools & Resources Government Alliance on Race and Equity (racialequityalliance.org) |
| Other Resources | | | | |
| SEE Supporting A Just Transition | SSE plc is a UK-listed energy company that operates throughout the UK and Ireland. This document outlines SSE's strategy to support energy transition in a "socially just and fair way". | SSE: We power change SSE | November 2020 | Document link: sse-just-transition-strategy-final.pdf (ssethermal.com) |

APPENDICES

Appendix A

City Light's Clean Energy Transformation Act Project Data Portal

A City Light web-based Geographic Information System (GIS) viewer is available to support the CETA project, with analysis, communication, or reporting. The viewer combines internal City Light and City data such as transmission lines, service territories, hydroelectric dams with a variety of categorically themed data from city, local, county, regional, state, and federal sources.

The viewer is intended to compliment other GIS resources such as the [Washington Tracking Network](#) (WTN) to assist in the identification of Highly Impacted Communities (HIC). WTN data is also available in the viewer to allow program managers to interactively explore and identify the characteristics of Highly Impacted Communities within and beyond City Light's service territory by neighborhood and census tract to discover key indicators such as languages spoken, poverty rates or proximity to hazardous waste sites.

Current categorical GIS data themes include:

- **Administrative**
Includes a variety of boundary data such as zip codes, neighborhood city limits, and county boundaries.
- **Census**
Data sources includes both decennial census and [American Community Survey data](#). [King County census data](#) is also leveraged.
- **Equity Data/WA Tracking Network data**
19 indicators from The Washington Tracking Network are included in the GIS viewer to visualize City light data alongside the WTN data. ["The Washington Environmental Health Disparities Map depicts cumulative health impact as a ranking from 1 to 10, with 10 indicating the highest impact. These rankings reflect the risk each community faces from multiple environmental hazards and the degree to which a community is more vulnerable to those hazards because of sociodemographic factors."](#)
- **Equity Data/City Light Equity Matrix**

This data is based on [Table 1](#): Highly Impacted Communities (HIC) & Vulnerable Populations (VP) By Census Tract.

- **Hydrography**
Streams and water bodies for reference.
- **Property**
Assessor parcels and City Light owned properties and easements.
- **Transportation**
Roads, streets, and transportation networks for reference.
- **Utility Data**
Utility assets such as transmission towers, lines, and dams.

Types of data used in Viewer:

The viewer can consume a variety of source data from file-based formats that are published to internal City Light servers, to direct connections to rest-end services hosted and managed by external agencies.

The viewer data library will evolve as new and refreshed data becomes available. Demographic based data is primarily based on 2010 Census and American Community Survey data.

As of May 2021 (excluding base and administrative boundaries) the viewer contains over 40 layers that have an equity and or census theme. Much of the census data uses the 2010 decennial Census; however, some metadata does not provide a published date. Additional research or outreach to the agencies that host this data will be required to definitively assess these date(s). Washington Tracking Network Data published dates can be assessed from this [link](#).

List of Viewer Data:

| 3 | | | |
|----|----------------|------------------------------|--|
| 4 | Theme | Category | Name |
| 5 | Administrative | Administrative | Cities (Detailed) |
| 6 | | | City and UGA Boundaries |
| 7 | | | County Boundary |
| 8 | | | FERC Boundary (Skagit Project - G2T) |
| 9 | | | FERC Project Boundary (SCL- P2144) |
| 10 | | | Municipal Boundary (WSDOT) |
| 11 | | | SCL Service Area |
| 12 | | | State |
| 13 | | | Tribal Lands |
| 14 | | | Zip_Codes |
| 15 | Census | Census | 2018 Housing Affordability by ZIP Code |
| 16 | | | Census Tract (2010) |
| 17 | | City of Seattle | All City by Race |
| 18 | | King County Demographics | Percent American Indian or Alaskan Native |
| 19 | | | Percent Asian |
| 20 | | | Percent Black or African American |
| 21 | | | Percent Hispanic or Latino |
| 22 | | | Percent Native Hawaiian or Pacific Islander |
| 23 | | | Percent People of Color |
| 24 | | | Percent speak Chinese |
| 25 | | | Percent speak English less than very well |
| 26 | | | Percent speak Korean |
| 27 | | | Percent speak Russian |
| 28 | | | Percent speak Spanish |
| 29 | | | Percent speak Vietnamese |
| 30 | | | Percent Two or more Races |
| 31 | | | Percent White |
| 32 | Equity Data | Equity Data | Census Tracts by Displacement Risk and Access to Opportunity type |
| 33 | | | Racial and Social Equity Composite Index Current |
| 34 | | Puget Sound Regional Council | Displacement Risk |
| 35 | | | Opportunity_Region |
| 36 | | | Opportunity_UGA |
| 37 | | SCL Equity Matrix | Displacement Risk |
| 38 | | | Duwamish |
| 39 | | | EHD Rank |
| 40 | | | RSJI |
| 41 | | | TESIP (Yes/No per neighborhood) |
| 42 | | | TESIP Neighborhood Name |
| 43 | | WA Tracking Network | ACS Limited English Proficiency |
| 44 | | | Death from Cardiovascular Disease |
| 45 | | | Diesel_Emissions |
| 46 | | | Environmental Health Disparities |
| 47 | | | Heavy_Traffic |
| 48 | | | Lead_Risk_from_Housing |
| 49 | | | Low_Birth_Weight |
| 50 | | | No_High_School_Diploma |
| 51 | | | Ozone_Concentration |
| 52 | | | People_of_Color |
| 53 | | | PM25_Concentration |
| 54 | | | Population Unemployed |
| 55 | | | Population Living in Poverty |
| 56 | | | Proximity to Hazardous Waste Treatment Storage and Disposal Facilities (TSDFs) |
| 57 | | | Proximity to National Priorities List Facilities (Superfund Sites) |
| 58 | | | Proximity to Risk Management Plan (RMP) Facilities |
| 59 | | | Socioeconomic Factors Ranking |
| 60 | | | Toxic Releases from Facilities (RSEI Model) |
| 61 | | | Transportation Expense |
| 62 | | | Tribal |
| 63 | | | Unaffordable Housing (>30% of Income) |
| 64 | | | Wastewater Discharge |
| 65 | Hydrography | Hydro | River/Stream (Principal) |
| 66 | | | Water Bodies (Principal) |
| 67 | Property | King County Assesor | King Co Assessor Parcels (Service Area) |
| 68 | | SCL - Real Property | SCL Current Easement Property Rights |
| 69 | | | SCL Current Fee Property Rights |
| 70 | Transportation | Census | Primary Roads |
| 71 | | | Primary Roads Labels |
| 72 | | | Secondary Roads |
| 73 | | | Secondary Roads Labels |
| 74 | | Transportation | Freight Network |
| 75 | | | Heavy Haul Network |
| 76 | | | Transit Classification |
| 77 | Utility Assets | Utility Assets | Dams |
| 78 | | | SCL Hydro Projects |
| 79 | | | Transmission - Support Structures |
| 80 | | | Transmission Lines |

Viewer Access:

Viewer access can be shared with City Light (not accessible by other city departments or general public) by forwarding a URL to desired recipients. The recipient must be connected to City Light’s network on premise or via VPN.

The URL is unique in that it reflects the extent of the map and the GIS layers that are added to the table of contents. This can be a particularly useful functionality to focus the user’s attention on a particular geography and theme.

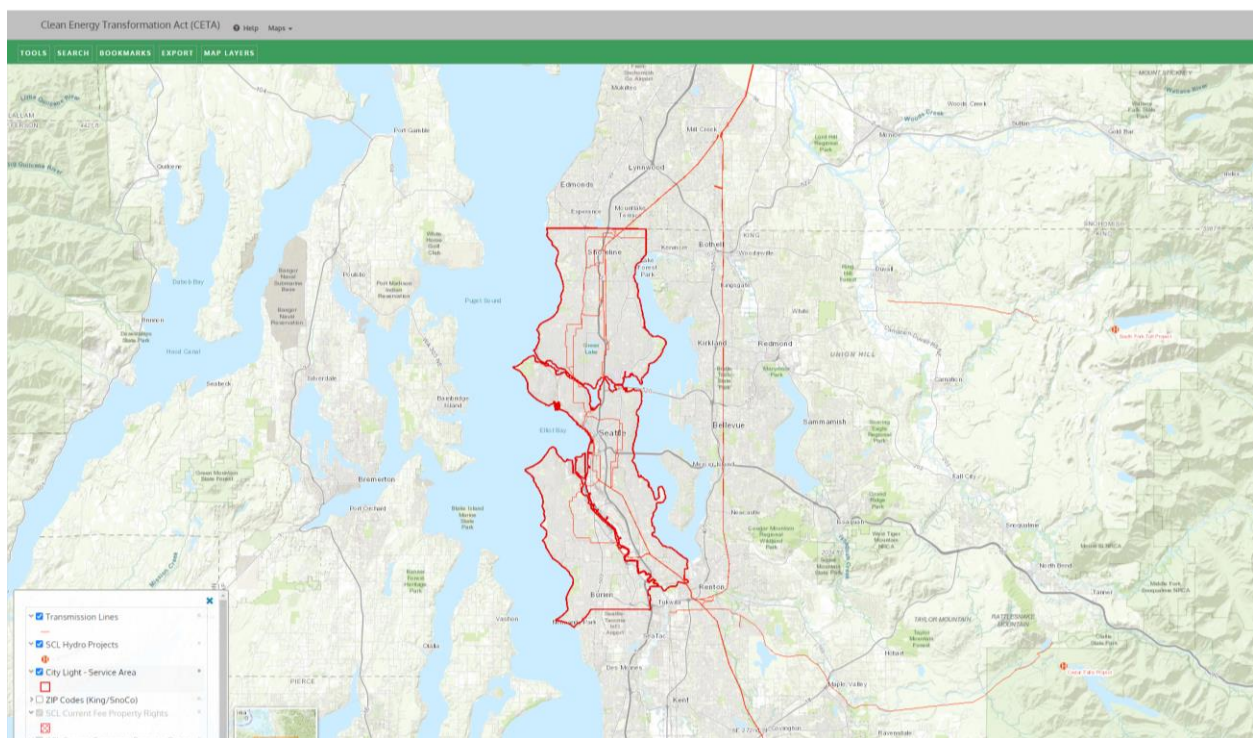
This viewer is compatible with many web browsers provisioned by Seattle IT with the exception of Internet Explorer.

Examples of custom URLs:

Each URL below opens the CETA viewer in a specific geographical areas with custom data in the legend.

- http://scllglisd/ELL_CETA/#11/47.6008/-122.1844/fc93a5ef9419e78fd48aa440d4f9
- http://scllglisd/ELL_CETA/#18/47.53312/-122.31910/fc93a5ef9419d4f9
- http://scllglisd/ELL_CETA/#15/47.5371/-122.2974/

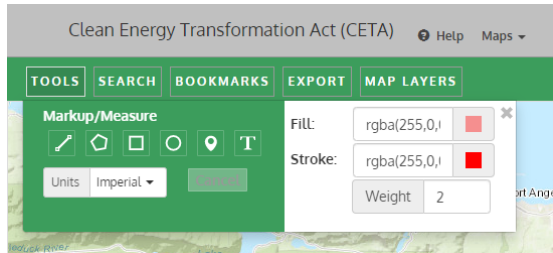
This image shows City Lights service territory.



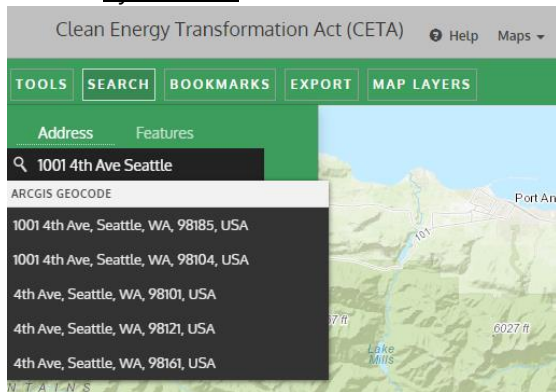
Functionality:

Some examples of the functionality of the tool are demonstrated below.

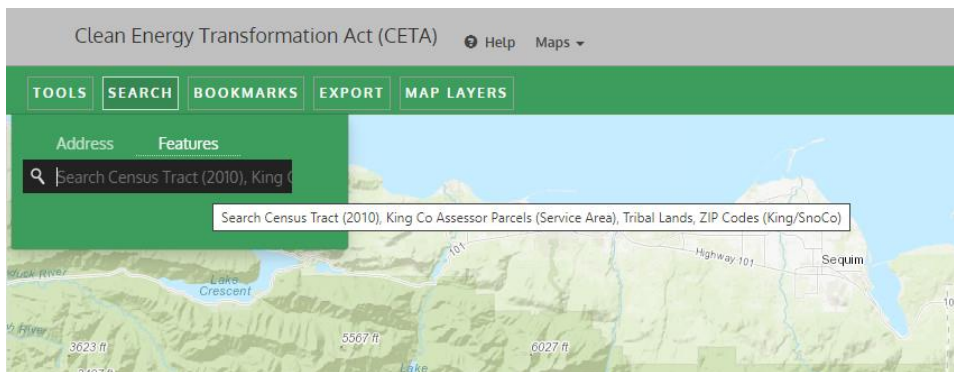
- **Tools** – Includes common measurement and annotation tools

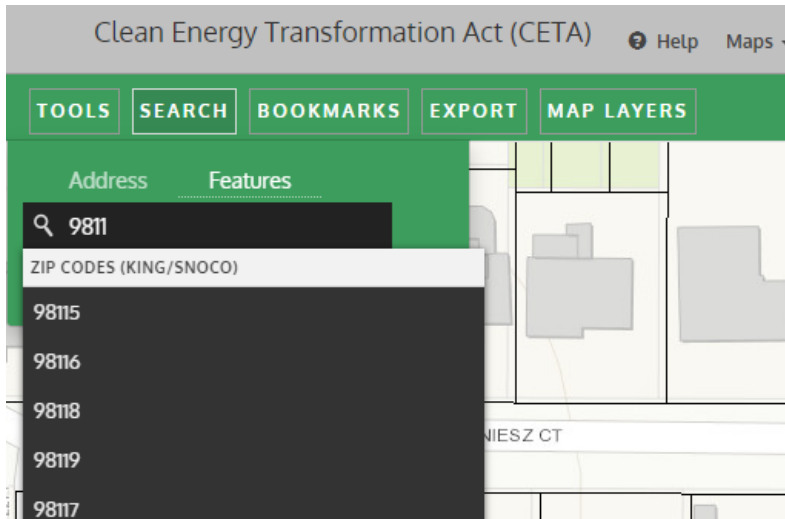


- **Search** – There are two search options:
By Address.

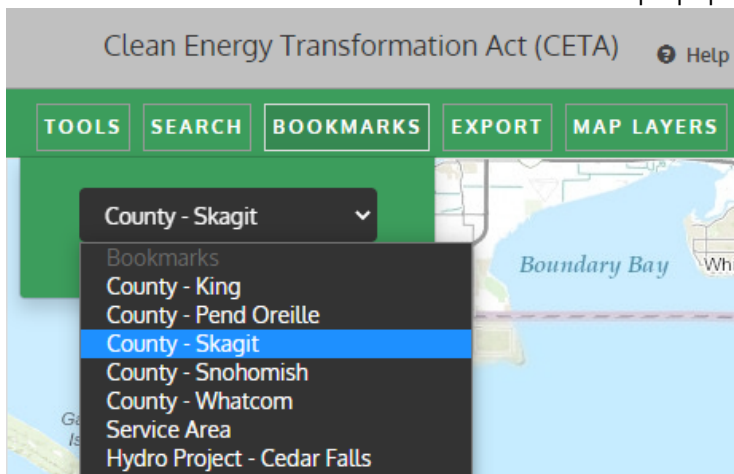


By Feature. Most GIS layers can be made searchable by specific attributes, i.e., ZIP Code, Census Tract or Parcel number. The comma separated popup displays the currently searchable features.

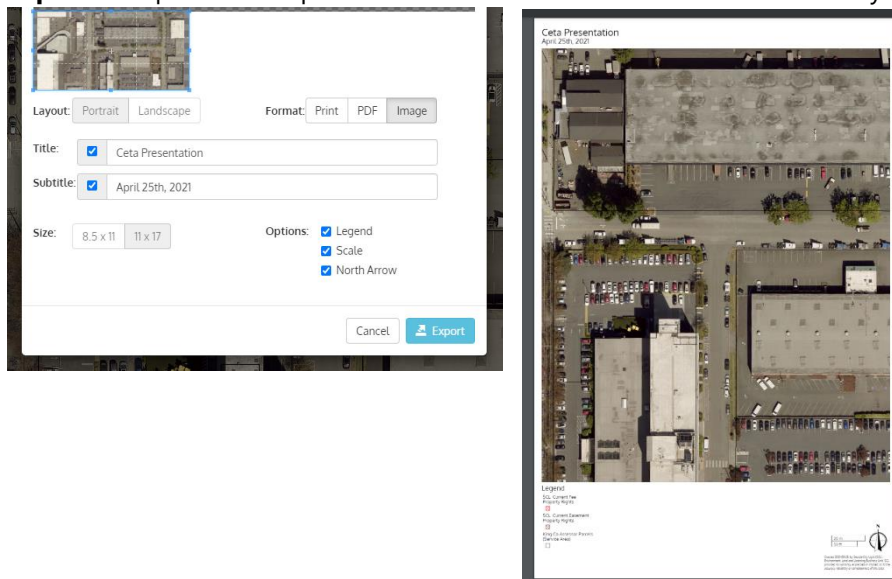




- **Bookmarks** – Some common bookmarks are prepopulated in the dropdown menu.

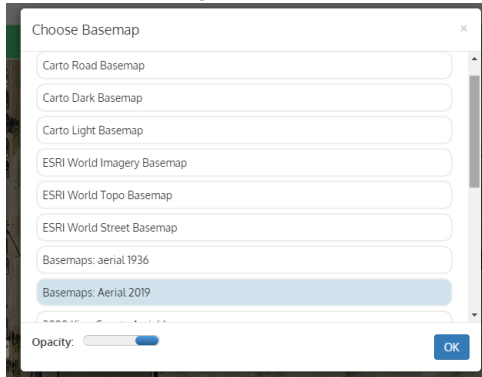


- **Export** – Maps can be exported to PDF or JPEG file formats or sent directly to printer.

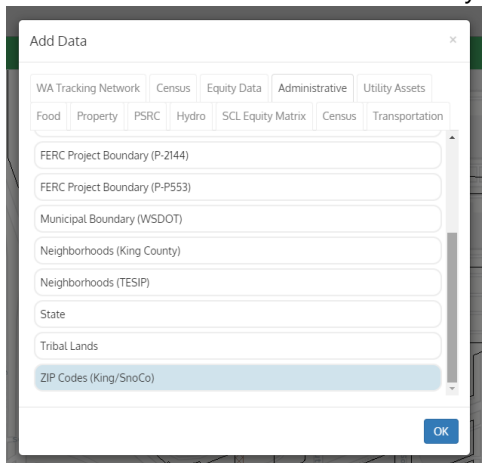


- **Map Layers** – This menu allows the user to change the default basemap and add GIS data to the map.

Basemap – Select from over a dozen base maps including aerial photography.



GIS Data – Select from a variety of categorically themed data.



GIS data can be explored interactively by clicking on a map feature. The intersected layers will display the feature attributes via a 'pop-up' table.

- **Help** – An extensive help menu is available at the URL below.
http://scllglisd/VIEWER_APPLICATION_CORE_CODE/help.htm

Appendix B Indicators Scoring Analysis

Table B-1 - Ten (10) Selected Indicators Scoring Matrix

| Indicator | | Equity Area (0=unsure, 1=indirect, 2=direct) | | | | | | | Racial Equity Opportunities (L=1, M=2, H=3) | | | | | Total | |
|--------------|---|--|---------------------|-----------------------------|---------------|-------------|-------------------|-----------------|---|-----------|-----------------------|--------|-------------|-------|------|
| | | Energy Benefits | Non-energy Benefits | Reduction of Energy Burdens | Public Health | Environment | Reduction of Cost | Energy Security | Resilience | Education | Community Development | Health | Environment | | Jobs |
| 1 | Expenditures of existing and planned community energy projects | 2 | 1 | 0 | 1 | | 1 | 2 | 2 | 1 | 3 | 1 | 1 | 1 | 16 |
| 2 | Locations of existing and planned community energy projects | 2 | 1 | | 1 | | 1 | 2 | 2 | 1 | 3 | 1 | 1 | 1 | 16 |
| 3 | Awareness of programs | 1 | 1 | 2 | | | 2 | 1 | 1 | 3 | 2 | 1 | 1 | 1 | 16 |
| 4 | Public energy education | 1 | 1 | 1 | 2 | 1 | 1 | 2 | 2 | 3 | 2 | 2 | 1 | 1 | 20 |
| 5 | Jobs | | 1 | 0 | | | 1 | | 1 | 1 | 1 | 2 | 1 | 3 | 11 |
| 6 | Burden (cost) to program participation | 2 | | 2 | | | 2 | 1 | | 2 | 2 | 1 | 1 | 1 | 14 |
| 7 | Accessibility to multi-family residents | 2 | 1 | 1 | | | 2 | 2 | 2 | 1 | 3 | 1 | 1 | 1 | 17 |
| 8 | Outdoor air quality (Concentration of diesel particulate matter in air and reduction of greenhouse gas emissions) | | 1 | 1 | 2 | 2 | 0 | | | 1 | 2 | 3 | 2 | 1 | 15 |
| 9 | Feeder outages (causes, number, locations, average duration, average response time) by census tract | 2 | 1 | 1 | 1 | | 1 | 2 | 2 | 1 | 3 | 1 | 1 | 2 | 18 |
| 10 | Response time to outages | 2 | 1 | 1 | 1 | | 1 | 2 | 2 | 1 | 3 | 1 | 1 | 2 | 18 |
| Total | | 27 | 36 | 23 | 28 | 13 | 26 | 26 | 29 | 36 | 65 | 47 | 39 | 37 | |

The ten (10) indicators that were selected to serve as the baseline metrics and will further evaluated through the public input process. Blue indicators represent the highest scores in the analysis. Orange represents indicators that while not the highest scored, are important to equitable distribution of benefits over time. The full scoring analysis can be found in Table B-2: Thirty-Three (33) Indicators Scoring Matrix.

Note: Indicator No. 5: Jobs was changed to Career Development for the final selection and discussion in Section 5: *Indicators* as this is more representative of long-term equitability in economic pathways, rather than jobs which are often finite and lack opportunity for growth. Indicator No. 8: Outdoor Air Quality is a combination of No. 24: Outdoor Air Quality, and No. 26: Reduction of Greenhouse Gas Emissions in the full scoring matrix in Table B-2: Thirty-Three (33) Indicators Scoring Matrix. These indicators were similar and shared the desired outcome of Healthy Planet, Healthy Lives.

Table B-2 - Thirty-Three (33) Indicators Scoring Matrix

| Indicator | Equity Area (0= unsure, 1=indirect, 2= direct) | | | | | | | | Racial Equity Opportunities (L=1, M=2, H=3) | | | | | Total |
|--|--|---------------------|-----------------------------|---------------|-------------|-------------------|-----------------|------------|---|-----------------------|-----------|-------------|-----------|-------|
| | Energy Benefits | Non-energy Benefits | Reduction of Energy Burdens | Public Health | Environment | Reduction of Cost | Energy Security | Resilience | Education | Community Development | Health | Environment | Jobs | |
| 1 Expenditures of existing and planned community energy projects | 2 | 1 | 0 | 1 | | 1 | 2 | 2 | 1 | 3 | 1 | 1 | 1 | 16 |
| 2 Locations of existing and planned community energy projects | 2 | 1 | | 1 | | 1 | 2 | 2 | 1 | 3 | 1 | 1 | 1 | 16 |
| 3 Renewables in portfolio | 1 | 1 | | 1 | 2 | | 0 | 0 | 1 | 2 | 1 | 2 | 1 | 12 |
| 4 Conservation programs in portfolio | 2 | 1 | 2 | 1 | 1 | 1 | 2 | 1 | 1 | 2 | 1 | 2 | 1 | 18 |
| 5 Amount of investment financed | 2 | 1 | 2 | | | 2 | 1 | 1 | 1 | 2 | 1 | 1 | 1 | 15 |
| 6 Awareness of programs | 1 | 1 | 2 | | | 2 | 1 | 1 | 3 | 2 | 1 | 1 | 1 | 16 |
| 7 Public energy education | 1 | 1 | 1 | 2 | 1 | 1 | 2 | 2 | 3 | 2 | 2 | 1 | 1 | 20 |
| 8 Public participation in planning | 1 | 1 | 1 | 1 | | 1 | 2 | 2 | 1 | 3 | 1 | 1 | 1 | 16 |
| 9 Avoided displacement | | 2 | | 1 | | | | 1 | 1 | 3 | 1 | 1 | 1 | 11 |
| 10 1% for Art | | 2 | | 1 | | | | | 1 | 2 | 1 | 1 | 1 | 9 |
| 11 Improved housing stock | | 1 | 1 | | | 1 | 1 | 1 | 1 | 2 | 1 | 1 | 1 | 11 |
| 12 Economic development activity | 1 | 2 | | 1 | | | 1 | 1 | 1 | 2 | 1 | 1 | 2 | 13 |
| 13 Jobs | | 1 | 0 | | | 1 | | 1 | 1 | 1 | 2 | 1 | 3 | 11 |
| 14 Burden (cost) to program participation | 2 | | 2 | | | 2 | 1 | | 2 | 2 | 1 | 1 | 1 | 14 |
| 15 Accessibility to multi-family residents | 2 | 1 | 1 | | | 2 | 2 | 2 | 1 | 3 | 1 | 1 | 1 | 17 |
| 16 Household factors | | | | | | | | | | | | | | 0 |
| 17 Affordable and healthy food | | 1 | | 2 | | | | 1 | 1 | 2 | 3 | 1 | 1 | 12 |
| 18 Incidents of accidents caused by energy infrastructure or appliances | | 2 | | 2 | | | | | 1 | 2 | 3 | 1 | 1 | 12 |
| 19 Reduced flood exposure | | 1 | | 1 | 2 | 0 | 1 | 1 | 1 | 1 | 2 | 2 | 1 | 13 |
| 20 Heart Disease Rate per 100,000 | | 1 | | 1 | 1 | | | | 1 | 1 | 2 | 2 | 1 | 10 |
| 21 Lung Cancer Death Rate Per 100,000 | | 1 | | 1 | 1 | | | | 1 | 1 | 2 | 2 | 1 | 10 |
| 22 Childhood (0-17) Asthma Hospitalization Rate per 100,000 | | 1 | | 1 | 1 | | | | 1 | 1 | 2 | 2 | 1 | 10 |
| 23 Reduction in noise (think freight electrification) | | 1 | | 1 | 1 | | | | 1 | 2 | 1 | 1 | 1 | 9 |
| 24 Outdoor air quality (Concentration of diesel particulate matter in air and reduction of greenhouse gas emissions) | | 1 | 1 | 2 | 2 | 0 | | | 1 | 2 | 3 | 2 | 1 | 15 |
| 25 Indoor air quality | 0 | 1 | 1 | 2 | 1 | 1 | 0 | | 1 | 2 | 3 | 2 | 1 | 15 |
| 26 Reduced greenhouse gas emissions | 1 | 2 | 0 | 2 | 2 | | | | 1 | 2 | 3 | 3 | 1 | 17 |
| 27 Energy and cost savings for customers in aggregate | 2 | 2 | 2 | 1 | | 2 | | 1 | 1 | 2 | 1 | 1 | 1 | 16 |
| 28 Participation and attrition rate of programs, locations and monetary benefits received | | 1 | 1 | | | 2 | | 1 | 1 | 2 | 2 | 1 | 1 | 12 |
| 29 Feeder outages (causes, number, locations, average duration, average response time) by census tract | 2 | 1 | 1 | 1 | | 1 | 2 | 2 | 1 | 3 | 1 | 1 | 2 | 18 |
| 30 Redundant energy sources | 2 | 1 | 1 | 1 | | 1 | 2 | 2 | 1 | 3 | 1 | 1 | 2 | 18 |
| 31 Response time to outages | 2 | 1 | 1 | 1 | | 1 | 2 | 2 | 1 | 3 | 1 | 1 | 2 | 18 |
| 32 End-user focused strategies | 2 | 2 | 2 | 1 | | 2 | 1 | 1 | 1 | 2 | 2 | 1 | 1 | 18 |
| 33 Geographic or demographic distribution of customer service complaints | | 1 | 1 | | | 1 | 1 | 1 | 1 | 2 | 1 | 1 | 1 | 11 |
| Total | 28 | 38 | 23 | 30 | 15 | 26 | 26 | 29 | 37 | 67 | 50 | 42 | 38 | |

Table B-3 - Thirty-Three (33) Indicator Descriptions, Data Sources and Needs

| No. | INDICATOR | DESCRIPTION | DATA SOURCES (NEEDS AND CURRENT PROGRAMS) |
|-----|--|---|---|
| 1 | Expenditures of existing and planned community energy projects | Amount of money expended on existing and planned community energy projects. | |
| 2 | Locations of existing and planned community energy projects | Location of money expended on existing and planned community energy projects. | |
| 3 | Renewables in portfolio | The fraction of renewables in a utilities portfolio of energy supply, as compared to fossil fuel sources. | |
| 4 | Conservation programs in portfolio | The fraction of a utilities portfolio of energy resources covered by conservations (i.e., not using energy) | |
| 5 | Amount of investment financed | Amount of money in energy investments that is financed | |
| 6 | Awareness of programs | Awareness of programs provided by City (e.g., utility discount program) | JD Power corporate citizenship indicators "Aware of utility effort to impact environment" "Aware of utility programs" |
| 7 | Public energy education | Providing education to public on energy: planning, projects, personal choices, safety. | Determine what education to track, # of info campaigns, website views, etc.. |
| 8 | Public participation in planning | Amount of public participation in planning by the utility, such as IRP | |
| 9 | Avoided displacement | Avoided displacement of people from their communities - supporting thriving in place | |
| 10 | 1% for Art | Funding from projects that support art | |
| 11 | Improved housing stock | Providing housing stock for diversity of needs, such as low income | KC Assessor/Bldg Condition, SDCI |
| 12 | Economic development activity | Amount of economic development occurring in neighborhoods | |
| 13 | Career development | Advances local, good paying jobs. | |
| 14 | Burden (cost) to program participation | Challenges to participating in programs - how easy is it? | This requires customer feedback, no one source of data, J.D Power survey has awareness of programs could monitor % of "yes-but not participating" |
| 15 | Accessibility to non-single-family homeowners | Accessibility to alternative energy sources such as solar or net metering programs that are difficult for non-single-family households to implement | CCES Salesforce Platform (Powerpath), CCB, Solar generation lists, type of renewable programs |

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| 16 | Household factors | Factors tied to households, such as income, marital status, heating type, race. | Washington Tracking Network |
| 17 | Affordable and healthy food | Access to affordable and healthy food | Potentially leverage KC assessor data for land use to identify supermarkets. Food delivery is going to complicate this. Washington Tracking Network has Indicator of Limited Access to Healthy Food mRFEI, https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas.aspx |
| 18 | Incidents of accidents caused by energy infrastructure or appliances | Incidents such as power surges, carbon monoxide poisoning from using BBQs, gas stoves, generators indoors during weather events, oil heating issues, lack of air conditioning during warm weather events. | https://lni.wa.gov/safety-health/preventing-injuries-illnesses/workplace-injuries-fatalities/ |
| 19 | Reduced flood exposure | Investments and related projects that mitigate flood hazard threats to energy infrastructure (such as relocating distribution lines out of flood zones). | https://msc.fema.gov/portal/home |
| 20 | Heart Disease Rate per 100,000 | identifies trends and patterns in the occurrence of heart disease in populations. Normalized by 100,000 population. | Washington Tracking Network-Cardiovascular Disease Mortality - Age Adjusted Rate per 100,000 (census tract, data lagged back to 2018) |
| 21 | Lung Cancer Death Rate Per 100,000 | identifies trends and patterns in the occurrence of asthma hospitalization in populations. Normalized by 100,000 population. | Washington Tracking Network-Lung Cancer Rate (zipcode data, data reflects 10 yr increments, lagged to 2010) |
| 22 | Childhood (0-17) Asthma Hospitalization Rate per 100,000 | This indicator can be used to identify trends and patterns in the occurrence of asthma hospitalizations across time and space. Asthma is one of the most common long-term diseases of children, but adults can have asthma, too. Asthma affects all races, ages, and genders. Asthma attacks can happen when you are exposed to asthma triggers. We don't know all the things that can cause asthma, but we do know that genetic, environmental, and occupational factors have been linked to developing asthma. | Washington Tracking Network-Asthma Hospitalization Age-Adjusted Rate per 10,000 (zipcode data, data is lagged too many years to see current values) |
| 23 | Reduction in noise (think freight electrification) | This indicator can be used to measure overall noise volume in impacted communities due to traffic congestion. | Noise (dBA)- https://maps.dot.gov/BTS/NationalTransportationNoiseMap/ (Flight travel overwhelms noise map) |

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| 24 | Outdoor air quality (Concentration of diesel particulate matter in air) | To track long-term air quality, especially along heavily trafficked corridors that impact communities. Cannot be tracked as individual City Light impacts due to multiple contributions acting as a whole. | Washington Tracking Network, https://www.epa.gov/outdoor-air-quality-data/air-data-daily-air-quality-tracker , https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=5f239fd3e72f424f98ef3d5def547eb5&extent=-146.2334,13.1913,-46.3896,56.5319 |
| 25 | Indoor air quality | Indicator used to track particulate concentration that might be reduced through use of better HVAC for homes. (air conditioning, central air, purifiers) | Residential estimates based on property characteristics, fuel sources. |
| 26 | Reduced greenhouse gas emissions | To track long-term emission volume, especially along heavily trafficked corridors or industrialized areas that impact communities. Cannot be tracked as individual City Light impacts due to multiple contributions acting as a whole. | Greenhouse Gas Reporting by City Light (Kiyomi Morris). Can be used to measure Utility's performance in reducing emissions. OSE tracks EUI for large buildings (sqft) and fossil fuel consumption. |
| 27 | Energy and cost savings for customers in aggregate | Indicator to track energy usage and associated costs in aggregated communities. | Energy Burden Calculation (GEM). Will account for non-electric fuel costs. |
| 28 | Participation and attrition rate of programs, locations and monetary benefits received | Indicator to track internal program participation (green power, rebate programs, etc). | CCES Salesforce Platform (Powerpath) and CCB |
| 29 | Feeder outages (causes, number, locations, average duration, average response time) by census tract | Resiliency indicator that can be tracked using SAIDI and SAIFI metrics, worst performing feeder analyses over time. | Outage Management System (OMS)/Dispatcher Logging System General Log |
| 30 | Redundant energy sources | Resiliency indicator to track City Light investments in providing redundant energy feeds into communities (additional feeders, distributed energy, localized solar, generator programs, etc) | |
| 31 | Response time to outages | Identifies how long it takes for an outage to be resolved in communities. | Outage Management System (OMS)/Dispatcher Logging System General Log |
| 32 | End-user focused strategies | Indicator to track customer based programs . | |
| 33 | Geographic or demographic distribution of customer service complaints | Tracks customer complaints in communities/populations to determine response effectiveness of customer programs. | CCB Customer Contact data. Customer Escalations data. |

Appendix C
Strategies to Enhance Energy, Non-Energy
and Assistance Benefits

| Coding Key for Opportunities & Strategies | | Color |
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| Energy Benefit | | Green |
| Non-Energy Benefit | | Blue |
| Assistance Benefit (Rates or Credits) | | Orange |
| Program | Brief Description | Equity Opportunities/Strategies |
| Affordability | | |
| Utility Discount Program (<70% SMI) | Rate assistance program, applied to a customer's bills going forward (60% reduction in City Light bill, 50% reduction for SPU bills). This program is available for income qualifying customers, tiered by household size. | <ul style="list-style-type: none"> • Improve consistency in income eligibility • Incorporate age of children eligibility. Should meet the criteria: consistent, updated annually, and include additional considerations for geographic region, family composition, and age of children • Expand outreach and education about programs • Reach out to community action agency to inform and help with outreach • Streamline eligibility and signup with other programs – make it easier (cross programs) • Create simpler pathways to participate. There are many families that qualify but don't participate due to bureaucracy, language barriers, distrust of government • Make it easier to requalify |

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| <p>Emergency Low Income Assistance (ELIA) and Project Share (<80% SMI)</p> | <p><u>ELIA</u>-- Customers who have past due balances of \$250 or more, may receive assistance up to 100% of their bill, up to a maximum of \$500. For 2021, assistance is available twice in a 12-month period. <u>Project Share</u>--Funds which are entirely donations from the public, are used for customers currently enrolled in the UDP and have also received the ELIA benefit to help them achieve a zero balance on their active electric account. The program provides one-time per year assistance pledges up to \$500 (with a match required above \$250) towards a customer’s City Light bill.</p> | <ul style="list-style-type: none"> • Enhance contributions to Project Share (credit) • Increase the funding thresholds (Project Share) • Assess the effectiveness of the use of languages and improve • Map and target ELIA and Project Share to Highly Impacted Communities and Vulnerable Populations by leveraging outreach and qualification • Leverage City influence and power to elevate ELIA and Project Share through both donating and applying Highlight positive stories, for example: campaign to donate your federal tax return, assist local community members. • Create a program matrix to assist community members in identifying programs for which they qualify • Complete an equity analysis on ELIA and Project Share. Tell the equity story as part of outreach campaigns |
| <p>Budget Billing Program</p> | <p>Billing plan that allows customers to spread energy costs evenly throughout the year. This provides certainty to each bill and assists customers in avoiding high bills during peak demand.</p> | <ul style="list-style-type: none"> • Assess Budget Billing Program effectiveness and adjust to help community members avoid surprises • Complete a survey of participants to help evaluate program effectiveness • Make budget billing an opt out. Require everyone to participate |
| <p>Energy Equity Rate Pilot (<70% SMI)</p> | <p>Suite of wrap-around benefits for a maximum of 300 income-qualified customers with high energy burdens that reside within the city</p> | <ul style="list-style-type: none"> • This pilot is time limited and may be exited. Due to COVID restrictions, there have been only limited opportunities for energy efficiency upgrades and/or weatherization • NOTE – this pilot might be exiting |

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| | limits of Seattle: a reduced rate for electrical consumption; energy efficiency upgrades and weatherization projects (depending upon housing type and ownership or renter status); and a balance forgiveness program (balance management arrangement) upon successful completion of agreed upon payments that fit household budgets. | |
| Reliability | | |
| Demand Response | This new pilot is scheduled to launch in 2022 and is expected to last at least 18 months. Pending pilot outcomes, City Light may develop a portfolio of demand response offerings. | <ul style="list-style-type: none"> Invest in DR pilots in Highly Impacted Communities |
| Miller Community Center microgrid | City Light partnered with Seattle Parks and Recreation to implement a microgrid project at Miller Community Center, located in the Capitol Hill neighborhood. The project includes installation of a battery energy storage system, solar panels and microgrid controls. | <ul style="list-style-type: none"> Invest in portfolio of microgrid projects in Highly Impacted Communities |
| Energy Efficiency | | |
| HomeWise | Weatherization services to income eligible households, by decreasing their energy bills and increasing | <ul style="list-style-type: none"> Streamline eligibility and signup with other programs Use existing income data to bypass red-tape in qualifying; increase convenience |

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| | <p>their comfort and safety. Administered by Seattle Office of Housing. Funding provided by federal, state, and utility sources.</p> | <ul style="list-style-type: none"> • Develop robust social media marketing campaign • Complete a racial equity analysis for HomeWise. Identify what Highly Impacted Communities and Vulnerable Populations are missing? Evaluate how these communities overlap with our equity and program maps • HomeWise should be provided in multiple language and outreach should be completed through trusted community groups • Develop a HomeWise campaign to target renters |
| <p>Direct Install Services Program (Powerful Neighborhoods)</p> | <p>Provides free energy efficiency improvements for individual units and multifamily building common areas. Items include complimentary installation of LED light bulbs and efficient showerheads and/or faucet aerators.</p> | <ul style="list-style-type: none"> • Assess what opportunities are left in multi-family sector and transition move to other customers within Highly Impacted Communities and Vulnerable Populations • Utilize the success of this program as model for other programs. Develop a roadshow to highlight the success and demonstrate the strategies that worked for this program • Overhaul Direct Install to go beyond Energy Efficiency. Develop innovative program to include alternative local energy generation such as renewables, batteries, demand response, etc.) • Ensure Direct Install is completed by crews that speak different languages and coordinate the appropriate crew to the community language need for each project |
| <p>Commercial and Industrial (C&I) Retrofit Programs</p> | <p>Provides retrofits measures for HVAC, weatherization, and lighting in existing commercial, industrial, and multifamily buildings.</p> | <ul style="list-style-type: none"> • For commercial buildings, ensure the upgrades improve the environment for the workforce (health) • Play up health benefits of all the programs <ul style="list-style-type: none"> ○ Higher comfort, lower asthma. |

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| Built Smart | Encourages developers of new multifamily buildings to surpass the standard energy code and develop additional electricity savings through financial incentives. | <ul style="list-style-type: none"> Leverage the program goals that include a target of 50% signed agreements with affordable housing projects. Develop outreach campaign to target Highly Impacted Communities and Vulnerable Populations |
| Renewable Energy | | |
| Green Up Community | Incentivizes new solar development hosted by affordable housing and other low-income service providers through the purchase of renewable energy credits (RECs) acquired by Green Up participants. | <ul style="list-style-type: none"> Develop innovative marketing campaign to incorporate outreach to more low income providers Invest in Green Up projects in Highly Impacted Communities and Vulnerable Populations areas shown on the maps |
| Renewable Purchased Power Agreements | City Light has three main renewable energy purchased power agreements: Columbia Ridge Landfill Gas, Stateline Wind, and King County Wastewater Treatment Plant; and various smaller contracts for renewable energy credits (RECs). | <ul style="list-style-type: none"> All of these contracts come with either renewable energy, RECs, or both, and offer compliance options for I-937, which is the Washington Portfolio Standard legislation introduced in 2006 |
| | | <ul style="list-style-type: none"> Develop pathway to purchase from Women- and Minority-owned Business Enterprises (WMBE) Evaluate and report on how these developments have impacted their local Highly Impacted Communities and Vulnerable Populations Analyze the racial makeup of the LOCAL communities impacted by Renewable Purchased Power Agreements Require Power Purchase Agreement bidders to have diverse workforce |

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| Virtual Net Metering | Net metering allows our customers, with solar installations, to “bank” their generated electricity to be used when needed instead of during the period it was generated, which encourages on-site generation and distributed generation. | <ul style="list-style-type: none"> • Leverage current development of Virtual Net Metering in at City Light to help facilitate more equitable benefits to tenants of multifamily buildings. This provides the ability to share excess generation across multiple accounts, allowing excess generation at multifamily buildings to be credited to the tenant accounts • Develop portfolio of projects and commit to investment to implement |
| Transportation Electrification | | |
| Public Charging Stations | Public charging stations serve populations living in multifamily building that need public charging options. The City Light public charging pilot will distribute 26 DC fast chargers across the service territory to demonstrate access to charging to current and future EV owners. | <ul style="list-style-type: none"> • Stakeholder and community outreach has been conducted, prior to install, using neighborhood associations, with the intention of determining cost-effective, equitable, and accessible station locations • Focused effort for the ‘last mile’ • Take advantage of the Climate Commitment Act, Low Carbon Fuels Standards and similar legislation for flexibility in spending/projects • Develop near- and at- home charging solutions <ul style="list-style-type: none"> ○ Partner with Seattle organizations to develop policy to leverage changes in building codes for new construction • Develop data collection program to analyze demographic usage data • Leverage ongoing opportunity study on personal mobility - including multifamily |
| Large Transit Projects | King County Metro, Washington State Ferries, and Port of Seattle electrification projects. Public transit has been identified as high priority in TESIP. | <ul style="list-style-type: none"> • Invest in power reliability projects in Highly Impacted Communities to reduce risks from outages that impact large scale transit • Invest in large scale transit projects that will have environmental benefits for South Seattle and Duwamish communities • Locate projects where health benefits are maximized such as along highly trafficked corridors that have high localized diesel emissions |

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| | | <ul style="list-style-type: none">• Facilitate more thorough awareness |
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Appendix D

Definitions

General

Clean Energy Transformation Act (CETA): Washington law that applies to all electric utilities serving retail customers in Washington and sets specific milestones to reach the required 100% clean electricity supply. CETA includes safeguards to protect consumers from excessive rates or unreliable service.

Equitable Clean Energy Just Transition Principles: City Light's guiding principles to ensure an equitable and just transition to a clean energy future for Highly Impacted Communities and Vulnerable Populations. The components of the equity assessment framework should support these principles.

Racial Equity Toolkit (RET): Toolkit to assess policies, initiatives, services, programs, and budget issues and help set outcomes and weigh potential impacts on racial inequity.

Section 4 – Highly Impacted Communities and Vulnerable Populations

Highly Impacted Communities: Communities designated by the DOH based on the cumulative impact analyses in Section 24 of CETA or a community located in census tracts that are fully or partially on "Indian country" (as defined in 18 U.S.C. Sec. 1151).

Vulnerable Populations: Populations that experience a disproportionate cumulative risk from environmental burdens due to adverse socioeconomic factors.

Washington Tracking Network: Program implemented by the Washington State Department of DOH to develop tools to make public health data accessible.

Environmental Health Disparities Index (EHD): Index created for CETA by the Washington State DOH. A Highly Impacted Community is defined as any census tract with a EHD index value of 9 or 10 or any census tract with tribal lands.

Racial and Social Equity Composite Index: Index created by the City which combines information on race, ethnicity, and related demographics with data on socioeconomic and health disadvantages to identify census tract where priority populations make up relatively large proportions of neighborhood residents.

PSRC Displacement Risk Index: Index created by the Puget Sound Regional Council to measure the conditions that force residents to move and measure displacement risk by census tract.

Section 5 - Indicators

Equity Outcomes: Equity Outcomes are the results of utility actions where it is assumed all communities and populations do not start with equal opportunities to participate in or benefit from programs and investments. Therefore Highly Impacted Communities and Vulnerable Populations must be specifically, but not exclusively, identified and targeted for utility investments to bring all communities to a place of equal benefit.

Equity Indicator: Indicator is an attribute, either quantitative or qualitative, of a condition, resource, program, or related distribution investment that is tracked for the purpose of evaluating change over time in the CEIP; indicators associated with: energy benefits, nonenergy benefits, reduction of burdens, public health, environment, reduction in cost, energy security, or resiliency; develop through public process. CETA requires City Light to set metrics to track the impacts of City Light's actions on Highly Impacted Communities and Vulnerable Populations. Indicators help determine if equity outcomes are being achieved and per CETA should be informed by a public input process.

Energy Equity Areas: Eight Energy Equity Areas are required by CETA for the purpose of developing measurable indicators that track the equitable distribution of utility action outcomes. These areas include the following: energy benefits, non-energy benefits, reduction of burdens, public health, environment, reduction of cost, energy security, and resiliency.

Racial Equity Opportunity Areas: Five Racial Equity Opportunity Areas are provisions for enhancing the benefits provided by projects in which investments are made and to address historical racism and make reparations towards disparities in the distribution of those benefits. The opportunity areas include the following: education, community development, health, environment, and jobs.

System Average Interruption Duration Index (SAIDI): Index of average duration of interruption in the power supply, in minutes per customer.

System Average Interruption Frequency Index (SAIFI): Index of average frequency of interruptions in power supply, in number of interruptions per customer.

Equitable Distribution - A fair and just, but not necessarily equal, allocation intended to mitigate disparities in benefits and burdens, and based on current conditions, including existing legacy and cumulative impacts, which are informed by the assessment described in RCW 19.280.030(1)(k) from the most recent integrated resource plan (The Washington Utilities and Transportation Commission).

Section 6 - Portfolio of Actions

Portfolio of Actions: As require by CETA, City Light identified a portfolio of actions as a subset of City Light offerings, mostly customer-facing, which staff have identified as having the strongest links to CETA-defined equity. This portfolio is dynamic, and program offerings can be added or removed over time to reflect evolving policies, customer preferences, utility needs, and Equity Outcomes.

Utility Discount Program (UDP): A rate assistance program applied to a customer's bills going forward (60% reduction in City Light bill, 50% reduction for SPU bills). This program is available for income qualifying customers, tiered by household size.

Emergency Low Income Assistance (ELIA): ELIA participants, who have received at least a 10-day shutoff notice on balances of \$250 or more, may receive assistance up to 100% of their bill, up to a maximum of \$500. For 2021, assistance is available twice in a 12-month period and the program is not conditional on shutoff notices, it applies to customers with balances of \$250 or more.

Project Share: Funded by customer donations, this one-time per year assistance up to \$500 towards a customer's City Light bill.

Budget Billing: A monthly billing plan option that enables customers to spread energy costs evenly throughout the year. This provides certainty to each bill and assists customers in avoiding high bills during peak demand.

Energy Equity Rate Pilot (EERP): A rate pilot offering a suite of wrap-around benefits for income-qualified customers with high energy burdens that reside within the city limits of Seattle.

HomeWise: Energy efficiency program which offers weatherization services to income eligible households, with the aim of decreasing each participating household's energy bills while also increasing comfort and safety.

Powerful Neighborhoods: City Light's direct install program providing free energy efficiency improvements for individual units and multifamily building common areas. These free improvements include LED light bulbs, efficient showerheads and/or faucet aerators.

Commercial and Industrial (C&I) Retrofit: Provides a wide range of retrofit energy efficiency solutions for capital improvement, operations & maintenance, and behavioral improvements, across existing commercial, industrial, and multifamily buildings.

Built Smart: Energy efficiency program encouraging developers of new multifamily buildings to reach beyond standard energy code and develop additional electricity savings through financial incentives.

Green Up: City Light's voluntary green power program that allows utility customers to commit to a small dollar amount (as low as \$1 per month or a percentage-based match of consumption) to purchase Renewable Energy Credits from renewable resources both regionally and within City Light's service territory.

Renewable Purchased Power Agreements: A contractual agreement to source renewable electricity from a qualified third-party facility. These are generally large, utility scale renewable electricity purchases.

Renewable Energy Credits (RECs): A tradable certificate of proof of one megawatt-hour of an eligible renewable resource. The certificate includes all of the nonpower attributes associated with that one megawatt-hour of electricity and the certificate is verified by a renewable energy credit tracking system per RCW 19.285.030.

I-937: The Energy Independence Act (EIA), or Initiative 937 (I-937), requires electric utilities serving at least 25,000 retail customers to use certain amounts of renewable energy and energy conservation.

Virtual Net Metering: Virtual net metering will enable customers with solar installations to "bank" their generated electricity, and then apply that bank of generated electricity to the billing period needed instead of during the period it was generated, which encourages on-site generation and distributed generation.

Transportation Electrification Strategic Investment Plan (TESIP): A plan describing how the utility is using strategic investments and building upon previous analyses shaped by a values framework to achieve a vision of the healthy future that the region depends on: equitable, carbon-neutral, modernized, and future-enabled. The Plan is a result of the Washington state legislature's 2019 passage of House Bill 1512, which enables electric utilities to incorporate transportation electrification into utility modernization.

Section 7 - Protocols

Program Equity Targets: Yearly goals for individual City Light programs that enable the achievement of desired Equity Outcomes. The targets should be measurable and linked to Equity Indicators for Equity Evaluation (refer to Section 5).

Program Leads and Program Data: Customer Care and Energy Solutions should set annual Program Equity Targets with Equity Outcomes and Equity Indicators in mind. This can leverage two existing internal processes: 1) City Light Customer Care and Energy Solutions' Program Portfolio management structure, which sets annual programmatic goals that are tracked monthly or yearly and 2) the City's Racial Equity Toolkit (RET) process. Data from programs should be collected to align with Equity Indicators.

Program Equity Evaluation: Programs should be holistically evaluated against their program targets and equity outcomes and indicators. If equity outcomes are not being achieved, then program targets should be adjusted, or new programs may need to be created or added to the Portfolio of Actions.