

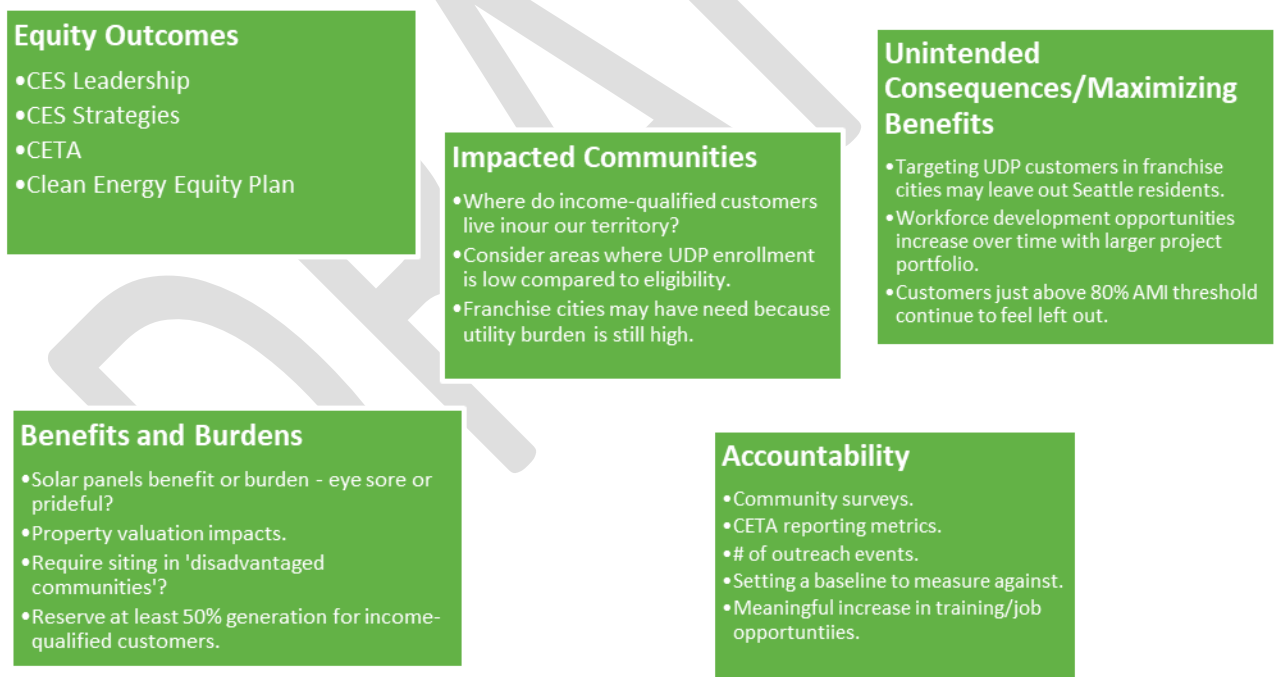


## RACIAL EQUITY ANALYSIS

This is a draft analysis and is intended to change and grow throughout program design and implementation.

During the preliminary design phase of the Community Solar program, the City Light 'core team' held a design workshop to work through the Racial Equity Toolkit (RET). After that meeting, the draft toolkit was sent to Race and Social Justice Initiative (RSJI) staff for review and discussion with the program manager. Additionally, the Department of Neighborhoods (DON) Community Liaisons (CLs) reviewed it for alignment with community priorities and needs. The draft toolkit evaluated Equity Outcomes, Impacted Communities, Benefits and Burdens, Unintended Consequences, and Accountability. The team indicated the Toolkit should be vetted with external stakeholders and be revisited by the core team at its regularly scheduled meetings to ensure we are implementing it effectively and transparently.

The graphic below summarizes some of the topics discussed but is not an exhaustive list.



## Integrating Equity

The Equity Toolkit provided a framework for initial discussions, and the team will continue to evaluate these topics during program design and implementation. Equity must be meaningfully integrated in program design as follows:

| Equity Component                            | What should we do?                                                                                                                                                                                                                                                             | Complete/On-going?                                                          |
|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Equity Outcomes                             | Read relevant plans, strategies, and regulations and identify how the program will align with recommendations and requirements.                                                                                                                                                | Complete – referenced in Preliminary Design Concept and Business Case       |
| Impacted Communities                        | Work with third-party to reach income-qualified customers so they can inform program design; interview Department of Neighborhoods (DON) Community Liaisons to understand community priorities; consult utility customer data including BlastPoint data (Customer Experience). | On-going; started during Preliminary Design Concept development             |
| Unintended Consequences/Maximizing Benefits | Define 'income-qualified'; assess options for income verification; determine geographic areas where need is highest; engage communities to understand siting priorities; consult workforce development partners to identify meaningful training opportunities.                 | On-going; started during Preliminary Design Concept development             |
| Benefits and Burdens                        | Engage customers to understand siting priorities; assess implications of reserving the generation for income-qualified customers and provide consistent on-bill energy credit.                                                                                                 | On-going; will be finalized in Program Design                               |
| Accountability                              | Work with Strategy, Planning, and Evaluation to develop an evaluation plan including setting a baseline to measure against and considering cumulative impacts across all renewable projects. Develop ways to report/engage communities on progress and link to Equity Toolkit. | After Program Launch, will be incorporated in Renewables Segment Evaluation |

## DON CL Feedback

CES partnered with the DON CL Program to engage priority populations across City Light's territory. CLs are existing community leaders and organizers, employed by the DON. City departments may work with them to engage specific populations and neighborhoods on a variety of topics. CES started work with the CL Program in June 2024 and it is on-going. In June, CES staff engaged with 4 Community Liaisons to discuss community solar at a high level, answer questions, and discuss possible future engagement. Beginning in August, this work was expanded to include 6 CLs focused on leveraging CLs' existing relationships through the following engagements:

- Workforce Development
- Small Businesses
- Korean customers and organizations
- White Center/South Park/Tukwila/Georgetown customers
- Various community centers and community-based organizations in Skyway, White Center, and South Park

This engagement does not represent all priority populations in City Light's service territory, and it is a starting point for identifying common themes and priorities that informed this artifact and will continue to inform program design and implementation. The following feedback was received from the community through the CL's work after the Preliminary Design Concept was signed:

- City Light must be accountable and create on-going feedback loops with communities.
- Benefits of participating in the program must be tangible and easy to understand.
- Enrollment must be easy, consider auto-enrollment.
- Participants need more education and information about solar and how community solar works. This is a top short- and long-term priority for communities.
- If financial savings are the greatest benefit, lead with that when communicating with customers.
- It is difficult to engage people early on in program design when there are not enough details to provide feedback on *and* the CLs appreciate being engaged early and wanted to make sure there would be continuous feedback opportunities and City Light would be accountable to input received.
- Some customers are concerned about the safety of solar and battery storage technology.
- Several customers asked about storing solar energy and accessing it when the power goes out.
- Several customers wanted young people to be engaged in the work.

- Benefits of community solar should be available to all customers, including income-eligible customers and undocumented or under-documented folks. Consider how these customers may be left out of workforce training opportunities.
- The community wants to be involved at every step of program development and implementation.
- Customers want access to training opportunities as part of program implementation.
- Customers care about the financial benefit and some care more about the co-benefits, e.g., education, workforce development, streetlights/safety, etc. Focusing only on monetary benefits only feels transactional and without long-term benefit.

Additionally, the CLs reviewed the program's draft RET and provided feedback. The following key themes and feedback were gathered and CES staff will continue to build on these findings in 2025 and beyond.

- Un- or under-documented customers may not be able to take advantage of workforce development opportunities – SCL should consider ways to address this unintended consequence.
- Many small businesses lease their spaces and move frequently. SCL needs to have more conversations with these businesses to explain if/how they can participate in the program.
- Education must be a key component in stakeholder engagement.
- We need to provide clearer methods for measuring impact.
- The community is interested in additional benefits beyond financial, e.g., increased streetlights for safety. How will those be addressed in this program?
- On-going O&M could be a burden to sites hosts.
- Stakeholder engagement and workforce training opportunities should be focused on the South Side of Seattle. Shoreline Community College has solar related classes, what about at South Seattle College?
- Additional financial commitment to education is needed.
- Security of solar project sites is a key concern.
- Real-time communication of project benefits is critical, e.g., dashboard with solar generation data.
- We need to celebrate with whole families, food, and other activities. We need to continue education and awareness building as part of these celebrations.