

THE ENERGY DEMOCRACY ALLIANCE

PRIORITIZING EQUITY IN OUR CLEAN ENERGY FUTURE

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ABOUT THE ENERGY DEMOCRACY ALLIANCE:

The Energy Democracy Alliance advances a just and participatory transition to a resilient, localized, and democratically controlled clean energy economy in New York State. We envision a renewable energy system that is led by and prioritizes solutions for low- and moderate-income communities and communities of color who are most impacted by our current energy and economic system. We transform our communities' relationship to power through advocacy, organizing, job creation, coalition-building, policy research, and public education for an equitable, sustainable energy future.

CURRENT MEMBERS/SUPPORTERS*:

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Sustainable South Bronx
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**List in Formation*

INTRODUCTION

New York is undergoing a transformative process to reshape how we produce, consume and pay for the energy that heats our homes, powers our businesses, and builds our economy. Through two initiatives called the “Reforming the Energy Vision” (REV) and the “Clean Energy Fund” (CEF), New York is rethinking the state’s energy system as a whole, including our energy efficiency and renewable energy programs.¹

These changes have enormous *potential* to provide some solutions for the state’s ever-increasing electricity bills and aging energy infrastructure, not to mention the growing threat of climate change. For example, the REV and CEF initiatives offer the *potential* for the accelerated adoption of energy efficiency retrofits and renewable energy. They also offer the *potential* for community-owned and community-driven renewable and efficiency projects as vehicles to repair our local economies, generate wealth, and provide quality jobs.

Yet, these outcomes are far from certain. The proposals currently being promoted by the Public Service Commission and the New York State Energy Research and Development Authority (NYSERDA) lack strong policies to prioritize equitable investments, a commitment to public participation in decision-making, or a practice of full transparency and accountability in the process. These failures will only lead to the replication of the structural exclusion and disinvestment that currently plagues New York’s disenfranchised communities.

As the Public Service Commission and NYSERDA set the table for our energy and economic future, equity *must* be a centerpiece. We must ensure that New York’s publicly funded energy programs do not move wealth and resources out of New York’s most vulnerable communities. Instead, they should work to *create* economic opportunity and access to the benefits of conservation, energy efficiency, and renewable energy in communities that are most in need of this kind of development. In this way, New York can maximize the impact of its clean energy investments to achieve greenhouse-gas emissions reductions, public health improvements, and poverty reduction.

To ensure the state centers New York’s most impacted residents in its planning and decisions around our clean energy economy, we urge the Public Service Commission and NYSERDA to:

1. Develop and utilize **Race and Economic Equity Metric (REEM)** and **Energy Asset Mapping tools** to better understand the energy challenges and opportunities facing low-income neighborhoods and communities of color in New York.
2. Prioritize and devote significant resources to communities identified in this screen for Clean Energy Fund investments and program development.

¹For a more detailed information, please visit the Alliance for a Green Economy New York: <http://allianceforagreeneconomy.org/content/reclaiming-energy-vision>

I. WHY EQUITY MATTERS

When Hurricane Irene struck upstate New York in 2011 and Superstorm Sandy hit the New York City region in 2012, those disasters illustrated the devastating impacts that a changing climate has on our vulnerable energy, food and transit systems. They exposed the legacy of divestment, neglect, and exclusion in our political and economic systems, particularly among New York's most low-income communities and communities of color.

As the state of New York embarks on a reformation of its energy system, it is vital that our policy-makers understand why equity matters. It matters because we live with a legacy of policy decisions and processes that have not worked for all of us. Historically, our political system has enacted economic policies that have prioritized profit over people, housing policies that have favored developers over residents, and energy policies that promote extractive and polluting industries over sustainability and human needs. Not only have the policies led to rampant inequality and environmental destruction, but the very failure of inclusion in the policy-making processes dooms any potential for sustainable and real change. Today's energy reform process is at risk of replicating this same cycle of exclusion and unjust outcomes.

Committing ourselves to equity provides the opportunity to recognize and then reverse the structural inequality and exploitation that have led us to today's climate, economic and political crises.

The creation of a new Clean Energy Fund allows us to rethink how the state will invest in energy efficiency and renewable energy. During the formation of the Clean Energy Fund, it is critical that we explicitly tackle the ways our current energy policies reinforce and exacerbate disproportionate health, housing, employment and other impacts on low income people and people of color. And it is critical that we see the connection between those outcomes and our inability to reduce greenhouse gasses.

Our current response to our economic and climate challenges is like a scattered crew on a sinking ship with water coming through holes and over the bow. It takes an all hands-on-deck approach to stay afloat. Yet, some of us have buckets to scoop out the water while others only have the palms of their hands. Some are patching the holes with wood, hammer, and nails, while others are putting their hands over the leaks. The captain is steering us into the waves of the storm, while others on the lower decks are submerged by the waters, ignored. **We are not doing enough to hold decision-makers and polluters accountable, or to ensure that everyone can participate in shaping a transition from the energy economy of the past to the energy economy of the future.**

Opportunities to benefit from the clean energy economy remain plentiful for utilities and businesses that have a seat at the table, and for residents who own property, have high incomes, good credit scores, and a tax appetite to take on credits to pay for solar panels and energy efficient lights and appliances. Yet, access to these solutions greatly lags for low-income communities and communities of color. And it's not for lack of desire. Data consistently points to an overwhelming demand for solutions

that take on climate change and environmental justice while creating good jobs among Latino, Black, Asian, and Indigenous populations, alike.²

However, the challenge is rooted in multiple barriers to participation. Here are three examples:

- **Not everyone has a bucket to scoop out the water.** Those who rent are often unable to participate in energy efficiency retrofits or on-site renewables without landlord approval or innovative net metering technologies and policies. With 2 in 5 New Yorkers renting, that means, at least 2 in 5 New Yorkers don't have buckets at all. This lack of access is even higher among people of color, who make up over one in three New Yorkers. Three in four Latinos are renters, as are just over three in five blacks, and half of Asian Americans, compared to just one in three whites. (See Figure 1)
- **Not everyone has the tools to fix holes in the ship.** Access to renewable energy technologies is uneven. Rooftop solar, for example, requires a solid, sunny roof and high disposable income or access to financing. Yet, over half of New York's homeowners live in houses built prior to 1960. This aging housing stock has left many who live in otherwise solar-viable houses to contend with fixing leaky roofs and removing lead paint as priorities. Meanwhile, many low- and moderate-income New Yorkers lack savings, a high enough credit score, or don't pay enough taxes to take advantage of federal and state credits – leaving them financially locked out of solar investments. *Solar energy should be made available to all New Yorkers, because we all pay into funds to support solar energy and we could all benefit from the stable costs and energy savings offered.* Yet most New Yorkers cannot participate in the current solar market.
- **Too many are left submerged under the deck.** Research shows that New Yorkers at or below 50% of the poverty-level spend up to 41% of their income on energy, while those earning five times the poverty level only spend 3% of their income on energy.³ But what if residents had the power to control these costs? *By taking on ownership of clean energy and energy-efficiency efforts, New Yorkers will not have to rely on utility dictated pricing and instead can begin to reshape the relationship between power delivery and home economics.* With one in five New Yorkers living in poverty, too many are forced to choose between paying their bills or feeding their families. It is time residents have the opportunity to own and control these key decisions.

The REV and CEF processes provide a tremendous opportunity to reorganize the ship – to make sure that everyone has a voice in how the course is charted and everyone has the tools to survive and to build the clean energy economy. To take advantage of such an opportunity, **we must recognize and explicitly state that racial and economic equity are a requirement of 21st century policymaking.**

² Please see: Davenport, Coral. 2015. "Climate Change is Growing Concern for Hispanics" *New York Times*; Valentine, Katie. 2013. "The Whitewashing of the Environmental Movement" *Grist*; "The Policy Priorities and Issue Preferences of Asian Americans and Pacific Islanders. 2012. *National Asian American Survey*

³ Colton, Roger. *Home Energy Affordability in New York: The Affordability Gap* <http://www.nyserda.ny.gov/-/media/Files/EDPPP/LIFE/AffordabilityGap/Energy-Affordability-Gap.pdf>

II. HOW WE CAN PRIORITIZE EQUITY

We can't afford to achieve our climate goals on the backs of the poor. But we can build our climate future by centering those living in poverty and on the frontlines of climate change at the heart of our solutions.

REV and the CEF are touted as changing our energy system in a positive way by empowering New York's residents to exercise more control over their energy bills and dramatically increasing deployment of renewable energy and energy efficiency. To turn rhetoric into reality, New York must grapple with and overcome the imbalance of decision-making power that exists between the influential and the marginalized. We must ensure communities in NY that have historically been disadvantaged as a result of discrimination, pollution, exploitation, and inability to meaningfully participate in decision making are now provided with more democratic forums and real power to address energy and climate issues. Communities with particular vulnerabilities and challenges must be positioned to drive their own solutions.

These communities must receive their fair share of the investments and resources, so they can readily and fully participate in energy conservation and efficiency programs, as well as renewable energy. For example, using the system benefit charge (or similar Clean Energy Fund charge) to fund renewables can be regressive because people living in poverty will generally pay a larger portion of their income into the charge than those who are relatively wealthy. They also face high barriers to recapturing the benefits of those funds for themselves. This injustice can be reversed if the funds are distributed in an equitable manner. Distributed fairly, ratepayer-supported funds could spur innovation and investment in communities most in need, from Buffalo to Binghamton to Brooklyn.

We can prioritize equity by starting with a reasonable set of social goals. For example, New York should ensure the following in the Clean Energy Fund programs:

- all New Yorkers should have a right to live in safe and healthy homes where tenants do not have to face building code violations and low-income homeowners have the resources to maintain their homes;
- a basic amount of energy should be affordable for all residents, and long-term sustainability should be achieved through investment in energy conservation and efficiency to bring down costs and renewable energy for price stability;
- the flow of energy dollars out of low-income communities should be stemmed by lowering energy consumption and increasing local ownership and investments in energy resources;
- New York's public housing residents and renters should have the same opportunity to participate in clean energy programs as homeowners do;
- air and water pollution should be reduced, particularly in environmental justice communities;
- health of residents near existing power systems should be improved;
- local living-wage jobs, entrepreneurship, and community ownership should be increased, particularly in areas with high unemployment rates and low economic development investment;
- policy-makers should deliberately engage with residents in climate-vulnerable communities on issues of climate preparedness, communications, and emergency response.

Achieving these goals will be difficult unless we understand the economic and environmental landscape of the state. Currently, the state lacks any strong mechanism that can be utilized to help identify communities that need the most investment. Additionally, state policy lacks a commitment to equitable distribution of ratepayer-funded subsidies and programs based on income, race, environmental justice indicators, or any other method.

There are three ways New York State can make monumental steps in prioritizing equity within the Clean Energy Fund:

1. **Implement a Race and Economic Equity Metric (REEM) tool to identify environmental and economic inequities;**
2. **Use Energy Asset Mapping to identify opportunities for community-based solutions to economic and environmental challenges;**
3. **Direct targeted Clean Energy Funds with the intention to reverse disparities identified by the tool through community-based solutions and innovation.**

III. IMPLEMENTING A RACE AND ECONOMIC EQUITY METRIC TOOL

1. *What is a Race and Economic Equity Metric (REEM) tool?*

A Race and Economic Equity Metric (REEM) tool would use a cumulative impact assessment to identify communities (by census tract) that are socially and economically vulnerable in proximity to indoor and outdoor air, water, and other pollutants and health hazards. This tool should help identify the disparities that drive insecurity of basic needs (such as housing, energy, and food).⁴

Our vision for REEM is deeply inspired and fashioned after the exemplary Environmental Justice Screening Methodology (EJSM) developed in California by academics at USC, University of California at Berkeley, Occidental College, and UC Berkeley in concert with a wide variety of grassroots environmental justice communities, like the CA Environmental Justice Alliance (CEJA).

In California's model, the EJSM was developed with support from State regulatory agencies - the California Energy Commission, and the California Air Resources Board, which have adopted it as a research tool.⁵ The California EPA developed a similar screening tool, CalEnviroScreen, with consulting input from the EJSM team. Now in its second iteration, CalEnviroScreen v.2⁶ is used to identify disadvantaged communities in California under SB535⁷ for the purpose of redistributing funds generated from the State's greenhouse gas reduction and permits program (AB32).⁸

⁴ Hernandez, Diana. 2013. *Housing, Food and Energy: A Trifecta of Insecurity*
<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3673265/>

⁵ Please visit UCS's Program for Environment and Regional Equity at:
http://dornsife.usc.edu/assets/sites/242/docs/screening_for_justice.pdf and the Office of Environmental Health and Hazards Assessment at <http://oehha.ca.gov/ej/>

⁶ <http://oehha.ca.gov/ej/ces2.html>

⁷ <http://www.calepa.ca.gov/EnvJustice/GHGInvest/Documents/SB535DesCom.pdf>

⁸ <http://www.arb.ca.gov/cc/ab32/ab32.htm>

The EJSM and the CalEnviroScreen aggregate data from over thirty metrics that track health risk and exposure to environmental hazards and pollution, land use, and biological and social vulnerability. All of these data are in the public domain and collected by various state and federal regulatory agencies. These variables include proximity of sensitive populations to a variety of health threats and pollution sources, ambient air concentrations of key pollutants, health risk and biological hazard estimates related to pollution exposure, water quality metrics, various social determinants of health identified from the research and regulatory literature on environmental health,⁹ and indicators of impact and vulnerability from climate change.

Once the data was collected and mapped using a statewide GIS data system, it was discovered that some key databases on location of polluting facilities contained high error rates, in some cases over 25%. Researchers worked in partnership with CEJA and other community-based organizations to validate – or “ground truth” – the location and activity of point and area sources of air pollution to ensure that the final screening results are not distorted. Once validated, the tool aggregates all the measures into a single score to identify areas with the highest cumulative impacts and vulnerability within various regulatory regions of the state, as well as statewide. Scores are shown on a map, at the census tract level, and masked using land use information to focus on residential and sensitive land uses where people live, work, and play, to help identify areas with the highest need.

By using the EJSM, California’s grassroots groups had a profound impact on California policy. As the passage of greenhouse gas legislation and shared solar bills took place in California, these bills required 25% of funds and projects be directed toward communities identified by the CalEnviroScreen, with 15% to be locally owned.

In developing a similar mapping tool here in New York, we expect to bring more equity and success to New York’s energy investments.

2. *Why does New York need a REEM?*

Unfortunately, New York lacks a strong analytical tool such as the EJSM or CalEnviroScreen. While the Department of Environment Conservation (DEC) offers an Environmental Justice mapping tool, it is woefully inadequate. Though income levels strongly correlate with environmental pollution, there are more nuanced challenges, health concerns, economic issues, and racial disparities that are not captured by this tool. We need a tool that is more holistic.

Further, there is precedent for New York to lead on this work. Since the 1990’s the State Assembly has sought legislation to implement better measures and prioritize funding for environmental justice communities. In 2003, the DEC passed regulatory policies to improve public participation in environmental justice planning and permitting. But researchers have found that these efforts have not had the full effect of establishing equity or justice, as intended.¹⁰ The Clean Energy Fund and the

⁹ See Int. J. Environ. Res. Public Health 2011, 8, 1441-1459; doi:10.3390/ijerph8051441 at <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3108119/>

¹⁰ See Owley, Jessica and Lewis, Tony “Symbolic Politics for Disempowered Communities”. *Buffalo Legal Studies Research Paper Series*, 2014, Paper No – 2014 – 036. <http://ssrn.com/abstract=2425833>

Reforming the Energy Vision proceedings present yet another critical and vital avenue to pursue equity as a core component of New York's energy and financing decisions.

Having a REEM, inspired by the California EJSJ model but specific to New York, can inform how the state funds clean energy programs in order to best take advantage of the co-benefits of energy efficiency and renewable-energy investments. As in California, a New York model should be coupled with funding directed toward the most vulnerable communities to ensure that these communities are in position to lead solutions that will benefit all of us.

The New York REEM could also be used to measure the progress of both state energy programs and market-based investments to ensure that all communities are making progress and that energy reforms are not built on the backs of the poor.

For example, comparing community rankings over time could answer questions such as:

1. Has the number of living wage green jobs increased in communities with historically higher unemployment rates compared to more affluent areas?
2. Has funding for renewable energy projects been equitably distributed to prioritize areas that are more likely to be environmental justice and economically vulnerable communities?
3. Have air toxins increased or decreased as a result of policies adopted to curb air pollutions, especially in areas with historically higher concentrations of air pollutants?

These tools can help organizers and advocates work with government to better design policies that will make an impact for their communities and for the benefit of the entire state.

3. *What are some of the Measures that should be in the REEM?*

The California model offers a great foundation to build a New York REEM. Following this lead, New York's most vulnerable communities (urban and rural, Upstate and Downstate) must be part of the development process and work together to help shape the tool.

REEM should not only measure socio-economic, health, and environmental factors, but also energy insecurity and energy affordability, taking into account issues of climate vulnerability, such as communities facing rising sea levels and extreme weather. The REEM's key data measures should be developed in consultation with grassroots and community-based organizations working in a variety of health, food, housing, and energy sectors as well as environmental justice community groups. The following data measures are by no means an exhaustive list, but are instead offered to ground the conversation:

- Poverty rate is 1.5 times or more than that of the metropolitan statistical area (MSA), county, region, or state.
- Median household income is half or less than that of the MSA, county, region, or state median.
- Unemployment or underemployment rate is 1.5 times or more than that of the MSA, county, region, or state average.
- Percentage of jobs that are fossil fuel and nuclear dependent are higher than 10% of the MSA, county, region, or state average.

- Percentage of residents that are African American, Latino, Asian, Native American or Hawaiian/Pacific Islander exceeds the average for the MSA, county, region, or state.
- Percentage of Li-Heap recipients is 1.5 times or more that of the MSA, county, region, or state.
- Percentage of homes built before 1960 is 1.5 times or more than that of the MSA, county, region, or state.
- Percentage of homes that have presence of lead, leaky roofs, and rely on oil furnaces that are 1.5 times more than the county, region, or state.
- Percentage of mobile homes manufactured before 1976 is 1.5 times or more than that of the county, region, or state.
- Percentage of energy shutoffs without reconnection of service for more than 30 days is higher than the MSA or county rate;
- Percent of HEAP eligible residents is 1.5 times more than that of the MSA, county, region or state average.
- Energy Efficiency and Renewable Energy program participation (and denial) numbers per census tract.
- Air particulate matter is higher than the local average.
- Child asthma rate is higher than the local average.
- Blood levels of lead is higher than the local average.
- Level of cancer caused by environmental factors is higher than the local average.
- There are more brownfields, toxic release sites, and remediation sites in a neighborhood than the local average.
- Broadband adoption rates are lower than the MSA, county, region, or state average.

This list is meant as a starting point for the conversation, not a comprehensive list of data to be included in the REEM Tool.

IV. IMPLEMENTING ASSET MAPPING FOR SUCCESSFUL INVESTMENTS

Mapping the areas of environmental, economic, and racial injustice is a critical step to designing equitable solutions to environmental and economic crises. While many communities in New York face structural economic and environmental challenges, they are often rich in leadership capacity and physical assets to contribute to the success of a renewable energy economy. Communities have schools and public spaces that can host solar panels or small businesses that can be leveraged for community-owned business development. In addition to a REEM, we need a tool that will highlight opportunities for creating solutions.

Successful asset-mapping tools have been used at the neighborhood level to help community residents identify opportunities. Asset-mapping models can be found in Oakland, CA, utilized by the Hope Collaborative, or in the Rockaways, NY, used by Rockaway Waterfront Alliance, which used asset mapping to design post-Sandy recovery planning practices. As the REEM requires “groundtruthing,” asset mapping also requires that community residents ensure that the right assets are identified and collected.

An energy asset mapping tool can be utilized to measure potential for energy efficiency and renewables, such as areas where there are:

- high numbers of homes or buildings that have not yet been weatherized or had energy efficient lighting or appliances installed, creating a high potential for energy savings;
- significant community assets (churches, nonprofits, schools, public space, abandoned property) that could be utilized in developing renewable resources;
- significant solar, wind, or geothermal potential as measured by the US Department of Energy;
- availability of public housing rooftops with strong solar potential;
- availability of warehouse or light industrial zoning that could house living wage jobs for renewable-energy-related industry;
- the presence of civil society organizations that can drive community engagement and participation in energy projects and programs;
- job training or workforce development programs or centers that can help match local residents with employment opportunities.

This is not meant to be a comprehensive list of energy assets, but some ideas for the types of assets and opportunities that should be mapped.

After the data is collected, the energy asset tool should help identify areas where investment in energy conservation programs, efficiency technologies, and renewables will have the greatest potential impact for low-income and environmental justice communities. The tool can also help identify areas that need assistance building capacity and assets so as to be in a position to participate in the clean energy economy.

V. OTHER APPLICATIONS OF THESE TOOLS

In addition to influencing the distribution of ratepayer-funded programs, the REEM can contribute to the cost-benefit analyses proposed in the REV proceeding. For example, the REV proposes to take into account social impacts and co-benefits of energy efficiency and renewables (such as public health) when pricing different energy options. A REEM can inform pricing in the market to ensure siting of distributed energy resources in areas that will result in maximum economic and social benefits.

Due to the comprehensive and intersectional approach at measuring community data, these tools can also be useful in these ways:

1. They can help agencies and communities identify the policy and regulatory mechanisms that need to be changed to effectively make the biggest impact that will grow the economy in a sustainable and clean way.
2. They can be used to help New York better implement the EPA regulations of 111(d) more equitably.
3. They be utilized by municipalities and local governments across the state to help plan for and fund a variety of efforts at a local level, from environment to housing to workforce development.

VI. DEDICATING FUNDING STREAMS TO REEM COMMUNITIES

The REEM and Asset Mapping tools are only as effective as their ability to track progress and ensure that communities identified by the REEM receive the adequate and appropriate resource to build local participation in the clean energy economy. **Therefore, we urge the Public Service Commission and NYSERDA to prioritize a fair share of funding to communities identified in the REEM.** This will help the state meet its goals of outreach and engagement of low- and moderate- income households. More importantly, it will help position all of New York's residents as innovators and problem solvers in our state's greatest energy challenges. Prioritizing funds to these communities will also help low- and moderate-income communities invest in energy efficiency and distributed energy resources in ways that will improve their long-term sustainability and avoid the heart wrenching challenges of deciding between food for a family or the electric bill.

California uses its CalEnviroScreen under the SB 535 (de Leon) community and climate investments program to direct at least 25% of the Greenhouse Gas Reduction Fund to benefit environmental justice communities, 10% of which must go to projects located in environmental justice neighborhoods. As, the Clean Energy Fund seeks to use the service benefit charge and other currently appropriated funds to support renewable energy development, we argue for a similar measure. We recommend 40% of rate-payer collected funds be directed toward communities identified by the REEM and that community-based organizations and other local leaders be instrumentally involved in determining how those funds are spent. This type of earmarked funding is necessary to reverse the inequality of access that has persistently locked vulnerable ratepayers out of clean energy opportunities.

VII. RECOMMENDATIONS TO THE PUBLIC SERVICE COMMISSION

The Public Service Commission and NYSERDA have the opportunity to set the table more equitably so all can participate. That means reprioritizing people at the center of our energy system and rethinking who should receive and benefit from critical dollars to help make a clean energy future possible.

The Energy Democracy Working Group calls on the Public Service Commission to take several initiatives:

- Authorize the development of a statewide New York Race and Economic Equity Metric and Energy Asset Mapping tools.
- Provide funding to local governments, community-based organizations and universities to create and pilot the tools in vulnerable communities in different regions throughout the state.
- Encourage and support local governments to lead the implementation of programs and provide a pathway for community-driven services for energy efficiency and renewables in low-income communities, such as the Medicaid Redesign Team or the Green and Healthy Homes Initiative.
- Require that all CEF and NYSERDA decisions utilize these tools to identify where investments should be prioritized and made.
- Require that 40% of all CEF and NYSERDA dollars be invested into communities identified by the REEM as climate vulnerable, environmental justice, or economically vulnerable.
- Require that 20% of all such projects be owned by local community organizations, businesses or residents within these areas.
- Make the New York REEM and Energy Asset Mapping tools user friendly and accessible via web-based and mobile technologies, to allow residents to access the data and understand key areas for development.
- House the tool within the Department of Environmental Conservation to manage, update, and maintain.
- Require an evaluative assessment and update of the tool every two years to ensure accuracy of the data collection.
- Provide an annual report detailing all CEF and NYSERDA program dollars invested in the communities identified by the tool, and include data on the economic and environmental impacts for communities.
- Require the Public Service Commission and NYSERDA to collect and report at the census tract level historical (a) ratepayer surcharge collections and distributions, and (b) SBC-, RPS-, and EEPS-funded subsidies and investments, at the household and community levels as important baseline data.

VIII. CONCLUSION

Addressing climate change is a huge task. Thankfully, the State of New York is recognizing the challenge and seeking innovative ways to encourage energy conservation and efficiency, as well as renewable technologies. But without ensuring equity at the center of this process, we will be like the crew on the sinking ship: scattered, limited, and ultimately ineffective at solving our challenge.

We urge the Public Service Commission and NYSERDA to adopt tools to help measure and identify communities that are the most marginalized, but have key solutions to our challenges. Moreover, we urge these agencies to target CEF dollars to directly support the development and ownership of energy solutions within these communities. In so doing, we will be one step closer to ensuring that we all have the tools necessary to take on climate change, and that all New Yorkers can access the benefits of the clean energy economy.

