

Comments of
Clean Energy Economy for the Region (CLEER)
Before the Colorado Public Utilities Commission
In PUC Equity Initiatives Proceeding (22M-0171ALL)

As the Public Utilities Commission considers equity in utility programs, CLEER, a non-profit community-focused clean energy organization based in Garfield County, appreciates the opportunity to provide comments for the Commission's consideration.

In doing so, CLEER urges the Commission to think more broadly about equity. We respectfully submit that the Commission will not achieve the imperative of meeting the needs of low-income and disproportionately impacted communities in Xcel Energy's territory without addressing a broader equity issue that is currently being overlooked in the discussion: **geographic equity.**

Why does geographic equity matter? According to the 2021 Energy Affordability in Colorado study prepared for the Colorado Energy Office, rural residents carry the highest energy burden; they have the least efficient homes; and they face the coldest winters. As stated in the report: "Energy cost burdens are unevenly distributed across the state, with many of the highest energy cost-burdened census tracts located in rural areas." Rural Colorado also is home to the energy-related industries that have been most negatively impacted by the imperative of transitioning to clean energy. Equity requires that rural residents obtain at least some of the major benefits of the clean energy economy, including energy-efficient homes that result in lower utility bills. Regrettably, these very same regions are the least well served by Xcel Energy's energy efficiency programs.

In its efforts to achieve its clean energy targets within the current framework of the Commission's requirements and metrics, Xcel Energy's energy efficiency programs are focused on serving easy-to-reach customers in population-dense urban areas. The result is that residents in Xcel Energy's rural service areas are being left behind. Low-income and disproportionately impacted customers in rural areas reap very little benefit from Xcel Energy's energy efficiency programs. Attached are two maps from a 2020 Xcel Energy filing that demonstrate the stark concentration of Xcel's energy efficiency efforts in urban areas.

Geographic equity as a required metric for measuring the performance of energy efficiency programs is a critical lens for the PUC to employ. Using it will ensure greater equity by reducing the energy cost burden in under-served rural areas and help guarantee rural residents can more fully benefit from energy efficiency programs.

To achieve the equity the Commission seeks, CLEER also urges the PUC to implement new approaches to how energy efficiency programs are delivered to rural regions. There is a distinct

need for more locally-based/locally-tailored outreach and education, financing, technical assistance and service delivery systems.

Leading national energy efficiency experts recommend this approach to overcome many of the barriers and challenges of providing energy efficiency services to rural regions. California, for instance, acknowledges that geographic isolation in rural areas makes energy efficiency service delivery more challenging, more labor intensive and more expensive than in urban areas. Accordingly, the California Public Utilities Commission has adopted innovative delivery system approaches to overcome these challenges. Rather than a one-size-fits all approach to energy efficiency services, the Commission has embraced Rural Regional Energy Networks that serve specific regions to implement energy efficiency programs.

In order to achieve geographic equity in Colorado, we strongly urge the Public Utilities Commission to initiate and fund a rural regional energy network model whereby local energy collaboratives, including local governments and nonprofits, can assume responsibility for delivery of all or some of these critically important energy efficiency services. For rural, by rural.

Bottom line, achieving equity for all residents and getting residential energy efficiency right requires much more effort, a greater level of resources and a fundamental shift in how this critical service is provided. In order to advance these critically important reforms to improve opportunities for rural residents, CLEER has intervened in the case before the Commission (Proceeding No. 23A-0589EG) that will determine how energy efficiency is deployed for the next three years. Now is the time to develop fundamentally new approaches for how energy efficiency services are delivered in rural regions.

CLEER thanks the Commission for the opportunity to comment on this important initiative and respectfully requests that it adopt the principle of geographic equity without delay to help ensure that more regions are equitably included in Colorado's critically important clean energy transition.

Respectfully submitted,

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Roger Berliner, Regulatory Affairs Advisor
Clean Energy Economy for the Region

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Attachments

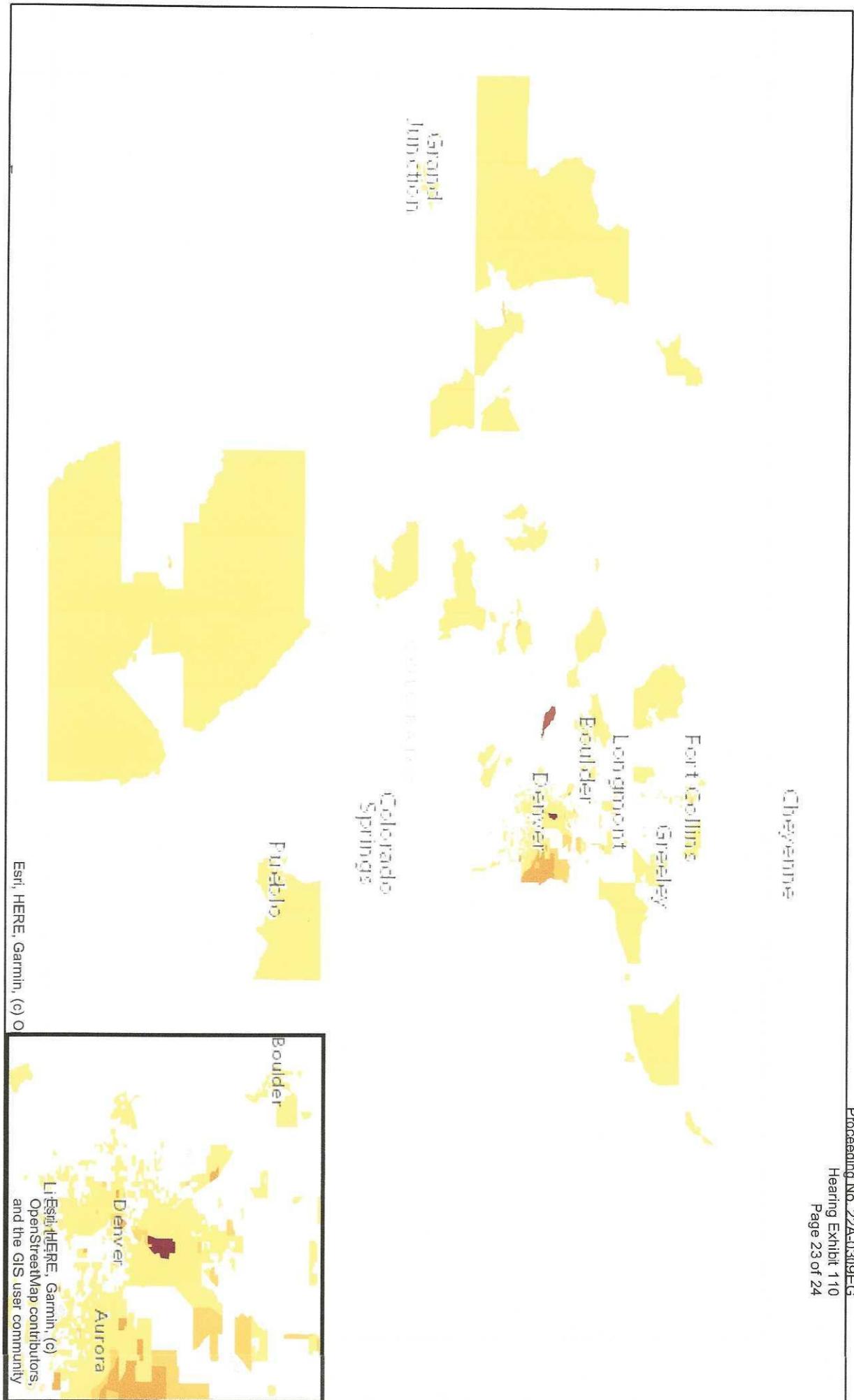
Cherry Hills



Electric Savings 2021 Disproportionately Impacted

Communities

Cherrytree



Gas Savings 2021 Disproportionately Impacted

Communities