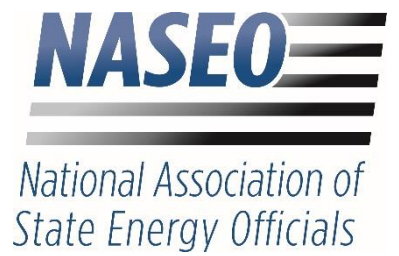


# Designing Equity-Focused Stakeholder Engagement to Inform State Energy Office Programs and Policies

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# **Designing Equity-Focused Stakeholder Engagement to Inform State Energy Office Programs and Policies**

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## **ABSTRACT**

With awareness growing about the importance of equity, inclusion, and representation in energy and climate policy, states are exploring ways to effectively engage underserved and underrepresented communities. Effective and inclusive policies and programs require direct and sustained collaboration with communities affected by pollution, economic hardship, systemic exclusion, and climate change is necessary.

State Energy Offices can play a crucial role changing the inception and design of energy policies, programs, and investments to reflect resident needs. In their roles advising governors and legislators; developing policy plans; engaging in regulatory processes; and overseeing programs, incentives, and investments, State Energy Offices are well-positioned to enhance their stakeholder engagement process in order to integrate the principles of equity, inclusion, and access into state energy policy and program design and implementation.

Designed to be a resource for State Energy Offices seeking to advance equitable policies and programs, this paper introduces and explores stakeholder engagement tools and the benefits that may follow from deeper and more inclusive stakeholder engagement. It posits an approach to engagement that uses components of several guides. Stakeholder engagement practices must elevate underrepresented voices to create the robust engagement required of equity-centered programs and policies. One tool in particular, “The Spectrum of Community Engagement to Ownership,” provides specific steps to promote stakeholder ownership of the development process and, in so doing, develop more equitable and inclusive results.

## **Introduction**

Recent state action on clean energy and climate policy highlights the impacts program and policy decisions have on various constituents, particularly those in communities disproportionately affected by racial and ethnic disparities, natural disaster, pollution and economic, health, and achievement gaps. In many states confronting environmental and social justice concerns, the State Energy Office may be positioned to help elevate and bridge the priorities of frontline and underserved communities with state-level goals and objectives. Equity-centered meaningful and comprehensive stakeholder engagement is a path to equitable programs that reach underserved communities (Facilitating Power, Movement Strategy Center, and the

National Association of Climate Resilience Planners n.d.). Equity is an active, ongoing process and prioritizing stakeholder engagement strategies that amplify the voices of communities (especially underserved communities) as sources of ideas, inspiration, and feedback is key.

## **Background**

State Energy Offices advise governors and legislators on energy issues, work to achieve energy-related goals, engage or intervene in public utility commission regulatory actions, lead their states' planning for and response to energy emergencies, operate renewable energy and energy efficiency programs, and communicate with the public on energy-related topics (NASEO n.d.-a). Some examples of State Energy Office work include conducting agricultural efficiency audits in Colorado, providing energy education kits in the tens of thousands to children in Florida, offering building energy code trainings in Utah, and funding solar projects in Virginia (NASEO n.d.-b).

State Energy Offices have increasingly expressed a need for assistance developing and implementing equitable programs and policies to their national membership association, the National Association of State Energy Officials (NASEO). State Energy Offices recognize the disproportionate burdens faced by disadvantaged communities as well as the need for responsive program and policy design and implementation.

States are exploring opportunities for engagement independently and successfully. The South Carolina Energy Office organized an energy equity and burden working group as part of an energy efficiency stakeholder process to recommend policies that would benefit marginalized communities and identified residential energy disclosure pre-rental or pre-sale as a priority.<sup>1</sup> The Michigan Office of the Environmental Justice Public Advocate was created by executive order in 2019. The office is tasked with working with communities to improve handling of concerns and enhancing community engagement. Work to date includes engaging with communities to address equitable application of environmental laws and regulations (Strong 2020). Ideally this paper can provide guidance for other states so that they do not need to recreate and reinvent the process.

Recognizing the need for additional education and action, NASEO launched an Energy Equity Taskforce. The Taskforce is an opportunity for State Energy Offices to share best practices and learn from experts.<sup>2</sup> In June 2019, NASEO hosted a convening of the Taskforce entitled "Equity and Inclusion in Energy Processes, Stakeholder Engagement, and Policy and Program Development" that featured a presentation from Movement Strategy Center on "The Spectrum of Community Engagement to Ownership," also known as the "Spectrum." This paper is a result of that audience's response to the tool and interest in how to apply it and other tools and frameworks.

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<sup>1</sup> Catherine Reed, Deputy Director, Energy Office, South Carolina Office of Regulatory Staff, in discussion with the author, April 23, 2020.

<sup>2</sup> The Energy Equity Taskforce transitioned to a standing committee following the passage of a June 2020 NASEO Board Resolution.

# Spectrum of Community Engagement to Ownership

## Introduction

The Spectrum is a 0-5 scale that gauges a government’s interaction with its stakeholders. Each number on the scale is associated with a “Stance Toward Community”: Ignore, Inform, Consult, Involve, Collaborate, and Defer To. Each of the stances correspond to resource allocation ratios, engagement activities, message communicated to community, community engagement goals, and impact. It is both a self-assessment tool and a guide for setting goals. It is an example of a stakeholder guide that is built on the belief that community engagement is essential to designing and implementing programs and policies equitably.

Table 1 provides an abbreviated version of the Spectrum. For space purposes, resource allocation ratios associated with each stance are not included.<sup>3</sup> Rosa González, author of the Spectrum, identifies four purposes for the tool: acknowledge marginalization, assert a vision for engagement, articulate a developmental process, and assess participation efforts (n.d.). Acknowledging marginalization allows for the identification of past problems to resolve or prevent repeating them. Acknowledgement does not necessarily need to be done formally or publicly, but resident needs on the subject should be assessed and addressed. The Spectrum can help identify the corresponding impact (marginalization or otherwise) of previous and current activities. Readers simply need to find their activities (or a proxy) in the “Activities” column and identify the associated result in the “Impact” column. Conversely, the Spectrum is also an aspirational and goal-setting tool: locate the closest approximation of a goal in the columns “Community Engagement Goals” or “Message to Community” and see the associated activities that will be required to meet the goal.

The Spectrum is a series of building blocks; administrators do not need to immediately jump to implementing the end goal. It can be an iterative and developmental process that moves agencies from one point on the scale to the next. The activities associated with each position on the Spectrum provide a step-by-step guide for improvement over time. To obtain maximum benefit, the Spectrum should be revisited regularly to review how practices are (or are not) changing and to understand the resulting impacts and messages.

Table 1. Abbreviated Spectrum of Community Engagement to Ownership

Stance Towards Community	Scale	Impact	Community Engagement Goals	Message to Community	Activities
Ignore	0	Marginalization	Deny access to decision-making process	Your voice, needs, and interests do not matter	Closed door meeting, misinformation

<sup>3</sup> The complete Spectrum is available at <https://movementstrategy.org/b/wp-content/uploads/2019/09/Spectrum-2-1-1.pdf>

Stance Towards Community	Scale	Impact	Community Engagement Goals	Message to Community	Activities
Inform	1	Placation	Provide the community with relevant information	We will keep you informed	Fact sheets, open houses, presentations, billboards, videos
Consult	2	Tokenization	Gather input from the community	We care what you think	Public comment, focus groups, community forums, surveys
Involve	3	Voice	Ensure community needs and assets are integrated into process and inform planning	You are making us think, (and therefore act) differently about the issue	Community organizing and advocacy, house meetings, interactive workshops, polling, community forums
Collaborate	4	Delegated Power	Ensure community capacity to play a leadership role in implementation of decisions	Your leadership and expertise are critical to how we address the issue	MOUs with community-based organizations, community organizing, citizen advisory communities, open planning forums with citizen polling
Defer To	5	Community Ownership	Foster democratic participation and equity through community driven decision-making; Bridge divide between community and governance	It is time to unlock collective power and capacity for transformative solutions	Community-driven planning, consensus building, participatory action research, participatory budgeting, cooperatives

*Source:* Adapted from R. González, n.d. “The Spectrum of Community Engagement to Ownership” San Jose, CA: Facilitating Power. <https://movementstrategy.org/b/wp-content/uploads/2019/09/Spectrum-2-1-1.pdf>.

## **Application**

The Minnesota (MN) State Energy Office recognized that their relations with the Tribal Nations within their state borders can and should be improved with this tool. Despite having a tribal relations position within the Department, the MN State Energy Office knew more active engagement would result in greater impact. To that end, The MN State Energy Office is now committed to: taking state relations government-to-government training; actively participating in community-driven cluster meetings of weatherization and energy assistance community action programs, tribal nations, and the state; incorporating the tribal liaison at weekly leadership collaboration meetings; partnering on equity-related presentation opportunities; and developing a year-long equity education series for staff in order to more deeply rethink policy and program development with meaningful engagement of Tribal Nations as well as other Black, Indigenous, and People of Color communities.

Other State Energy Offices can use the Spectrum to organize their relations and communications with community members, and to collaborate with local organizations. When approaching the community with these intentions, before identifying a project or concern, the Spectrum can be used to describe how engagement practices may change. Transparency in this regard – explaining how an agency intends to move from one point on the Spectrum to another – may be useful. This could look like inviting the community to track progress, share upcoming changes in stakeholder engagement protocols, or by collaborating on projects of mutual interest. Conducting follow-up and follow-through establishes that community-generated ideas can come to fruition. Community organizations can be a source of support as offices move along the Spectrum, helping to identify shared vision and priorities. This can help alleviate the often-unintended patterns of tokenization. Cultivating and investing in partnerships with community-based organizations that work within impacted communities is one strategy to achieve community engagement. Increasingly seeing community-based organizations as valued partners in the energy transition is critical to ensuring it works for impacted communities. The Spectrum is unique compared to the other tools summarized below because it is built on the premise that stakeholder voices and leadership are fundamental to developing programs and policies that benefit and are utilized by people with limited resources and members of communities underserved by programs.

## **Other Stakeholder Engagement Tools**

Below are some examples of stakeholder engagement guides with accompanying analysis of the degree to which community members are positioned at the center of the conversation. The intention is to identify strategies that states can use to build relationships with communities and

achieve on-going collaboration. It is important not only to solicit ideas but to also form trusting relationships and respect community priorities.

A common suggestion in community engagement guides is to undertake stakeholder mapping, sometimes called “power mapping.” These exercises are meant to identify groups or individuals useful to achieving goals. The Community Energy Resource Guide suggests organizing stakeholders in the categories of supporters, persuadable actors, marginal actors, and opponents (Fowler et al. 2015). The U.S. Department of Energy’s (DOE) Guide to Community Strategic Energy Planning includes a stakeholder mapping index that divides organizations into allies, leaders, and gatekeepers, among other categories. It notes that seeking input is appropriate to ask of influential stakeholders (Jenkins et al. 2013). These tasks are important to ensure that existing stakeholders can participate in the development process; however, equity-focused engagement also requires identification of voices that previously have not had participation and influence in decision making, and restructuring those processes to invite, welcome, and apply their input.

One strategy is outlined in A Guidebook on Equitable Clean Energy Program Design for Local Governments and Partners. The paper presents a matrix where stakeholders can be assigned high influence/less impacted, high influence/highly impacted, low influence/less impacted, and low influence/highly impacted and recommends prioritizing members of the low influence/highly impacted category (Curti, Andersen, and Wright 2018). Utilizing individuals with field experience during this exercise will lead to more accurate placement of stakeholders in the matrix.<sup>4</sup>

DOE also developed the Clean Energy for Low Income Communities Accelerator (CELICA). Instead of categorizing and strategizing, as power mapping does, CELICA’s stakeholder engagement guidance lists potential stakeholders along with associated expertise, contributions, and funding. It is more of a gap-analysis tool than a power mapping tool. It could also be a reference guide to the types of community groups organizers may want to engage: energy and environmental, health and human service, workforce development, and more (U.S. DOE n.d.-a). Stakeholder identification is an important opportunity to broaden the kinds of organizations and individuals that influence the policy and program development process.

## **Guide to Community Strategic Energy Planning, Step 2: Identify and Engage Stakeholders (DOE 2013)**

DOE published a multichapter guidebook for community strategic energy planning in 2013. This section focuses on Step 2: Identify and Engage Stakeholders. The paper uses a broad definition of stakeholder: “all of those individuals and organizations that may be affected by the actions that result from [decisions],” and the opening paragraph includes the reminder that organizers should not rely on the stakeholders they already know (Jenkins et al. 2013).

The guidebook identifies different kinds of stakeholder engagement: inform stakeholders of the planning process, solicit their input, earn their endorsement, and ask for contributions of

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<sup>4</sup> Ryan Freed, Director, Public Sector, Institute for Market Transformation, in discussion with the author, July 7, 2020.

time, expertise, or resources. State Energy Offices may wish to accompany this guide with the Spectrum to additional ways to elevate community input and reflect on how these activities contribute to community engagement goals. Useful specific examples of stakeholder engagement activities are included – websites, forums, workshops, interviews (Jenkins et al. 2013) - that can be further analyzed for how the community might receive them or how to pick one or more. This document provides solid approaches to stakeholder engagement and State Energy Offices can use the Spectrum or a similar tool to enhance these tactics with equity-focused stakeholder engagement strategies.

### **Resource Guide on Public Engagement (National Coalition for Dialogue & Deliberation 2010)**

In 2010, the National Coalition for Dialogue & Deliberation published their Resource Guide on Public Engagement. The goal of the paper is to provide "...techniques [that] create the space for real dialogue, so everyone who shows up can tell their story and share their perspective on the topic at hand" (Heierbacher 2010, 1). This guide is a high-level conceptual framework for engagement, and useful for those new to the topic or curious about fundamentals. It outlines "Core Principles for Public Engagement." In developing engagement plans, State Energy Offices may find it useful to codify these principles to ensure that all engagements are planned with these considerations.

National Coalition for Dialogue & Deliberation's Core Principles for Public Engagement:

- Careful Planning and Preparation
- Inclusion and Demographic Diversity
- Collaboration and Shared Purpose
- Openness and Learning
- Transparency and Trust
- Impact and Action
- Sustained Engagement and Participatory Culture (Heierbacher 2010, 3).

The Inclusion and Demographic Diversity principle is the most relevant for this discussion. It directs readers to "[e]quitably incorporate diverse people, voices, ideas, and information to lay the groundwork for quality outcomes and democratic legitimacy." The document goes on to provide useful guidelines on stakeholder meetings logistics to achieve this, such as using professional facilitators, setting ground rules, and using outcomes to inform the decision-making process (Heierbacher 2010). Heierbacher divides opportunities for engagement into four categories: exploration, conflict transformation, decision making, and collaborative action. For each "engagement stream," the framework includes primary purpose, key features, "importance when" (situations when it makes sense to apply the concept), examples of issues, organizer's strategy, appropriate processes, and key design questions for organizers (2010). These are opportunities for participants to feel fully engaged and are relevant for both in person and virtual gatherings. State Energy Offices may find this document useful for understanding the



fundamentals of diverse stakeholder engagement and can build on lessons from this document to ensuring equitable outcomes.

### **State Energy Planning Guidelines (NASEO 2018)**

NASEO released State Energy Planning Guidelines to assist State Energy Directors in developing State Energy Plans. It is a reference guide for states and territories when completing relevant analysis and goal setting. The 2018 edition was updated to recommend including results from stakeholder engagement in the plan development process and to consider better engaging and addressing underserved markets (Cramer and Powers 2018). These changes are a result of the increased awareness among NASEO and State Energy Offices of the importance of working with the community to create programs and policies that benefit all communities, especially the under-resourced. Because of the focus on equity during writing, this document includes several special considerations beyond traditional stakeholder engagement. The first is a reminder that State Energy Offices may want to prioritize those with limited financial means, residents of rentals or manufactured housing, and those in rural or remote areas because they may have received lower shares of resources in the past (Cramer and Powers 2018). Energy systems are rapidly changing, and it is possible that these groups will not be able to take advantage of new technologies and other opportunities without support from State Energy Offices. The overarching theme of stakeholder engagement for equitable outcomes – incorporating community feedback in the decision making – is clear from the best practices provided in the guidebook. It proposes that engagement begins with a straw proposal that can be updated in response to feedback. This may be necessary in the face of time constraints but, based on the framework laid out in the Spectrum, it would be ideal for goals and program ideas to be generated from the community. This document is a useful introduction to the value of prioritizing equity for State Energy Offices and could be bolstered by the Spectrum to apply additional strategies for stakeholder engagement and ownership.

### **Clean Energy for Low-Income Communities Accelerator: Stakeholder Engagement (DOE CELICA)**

DOE hosted CELICA to compile resources on how to better serve low-income communities with energy efficiency and renewable energy programs. The result is a synthesis of best practices from on-the-ground operations in low-income communities. One of the key takeaways identified is the value of engaging community members purposefully to create equitable programs and policies. It notes the value of engaging the community from the beginning of the process to understand gaps in services and needs:

One key lesson from CELICA partners is that authentic engagement of diverse low-income communities is critical to understanding important relationships, history, challenges, and needs; it leads to more effective engagement strategies. This is particularly important in communities where initiatives have been implemented previously without community input. Low-income program administrators can build trust

in the communities they are looking to serve by demonstrating genuine curiosity and engagement of communities early in the program planning and implementation process (U.S. DOE n.d.-b).

Like NASEO's stakeholder engagement recommendations for State Energy Plans, this resource explains why community engagement is important – for both building honest relationships and for encouraging creative program design. State Energy Offices can build upon both guides by exploring the different strategies and the equitable outcomes and relationship dynamics associated with each approach.

### **A Guidebook on Equitable Clean Energy Program Design for Local Governments and Partners (Urban Sustainability Directors Network 2018)**

A Guidebook on Equitable Clean Energy Program Design for Local Governments and Partners by the Urban Sustainability Directors Network (USDN) is another example of a stakeholder engagement guide that acknowledges the need to start with ideas, concerns, and barriers identified by the community *before* developing programs or policies. That is clear from the stated purpose of the document: to assist readers in "...intentionally design[ing] programs that enable current and emerging clean energy technologies to be accessed equitably" (Curti, Andersen, and Wright 2018, 8). The first step is identified as listening and responding to the communities: "Program design should be as responsive as possible to the needs expressed by community members, and local government staff should be transparent about their resources. Ideally, this would build from preexisting community connections and engagement, and help define program goals" (Curti, Andersen, and Wright 2018, 11). This guide uniquely identifies the need to hear directly from the communities before embarking on any program or policy design. The authors find that in the practice of equity, the goal is for agencies to defer decision making to community members after slowly and consistently building relationships over time (Curti, Andersen, and Wright 2018).

This guide suggests that governments can provide resources to relieve participation burdens by providing compensation for time, manageable levels of time commitment, meeting times during the evening or on a weekend, and on-site childcare and meals (Curti, Andersen, and Wright 2018). There is also a recommendation that meeting organizers provide "...transparent communication about how community input will be used...This ensures that community members can participate to the degree they wish to and at the stages they are most interested in" (Curti, Andersen, and Wright 2018, 26). Compensation recommendations, transparency, and recognition of deferential decision-making make this guide particularly equity-focused. Consulting the Spectrum will highlight the optimal activities to put these themes into practice.

## **Discussion**

State Energy Offices may consider a combination of the guides outlined above to establish their stakeholder engagement practices. One proposal for successful engagement, utilizing practices from the previous sections, follows. The order is not strict; depending on the

office, some tasks may occur at the same time or in a different order. However, State Energy Offices may find committing to improving stakeholder engagement internally before communicating with local organizations ideal.

1. *Determine stakeholder engagement goals.* Use the Spectrum of Community Engagement to Ownership to identify stakeholder engagement goals. Use any of the columns as a starting point. The associated “Activities” in the row of your goal can be the primary driving force of your engagement plans.
2. *Identify the current approach to engagement.* Catalogue ongoing stakeholder engagement efforts (and past stakeholder engagement, to the extent possible) and use the Spectrum of Community Engagement to Ownership to determine where current activities fall in the range.
3. *Identify the need for change.* Determine what needs to change to meet goals. Use the Spectrum of Community Engagement to Ownership to create an evolution plan, moving from one “Stance Towards Community” to the next.
4. *Build support in the office.* Use NASEO’s State Energy Planning Guidelines and DOE’s CELICA resources to communicate the value of stakeholder engagement in the policy- and program-development process, if needed. If an internal definition of “stakeholder” needs to be broadened, use DOE’s Guide to Community Strategic Energy Planning to establish a definition to include anyone affected by the actions that result from decisions.
5. *Establish foundations of engagement.* The principles outlined in “Resource Guide on Public Engagement” can serve as guidance for all engagement. Adapt them or other foundations to ensure respect and openness during gatherings. Identify what the State Energy Office is willing to be accountable for and create mechanism for tracking over time.
6. *Identify stakeholders.* If needed, use Low-income Stakeholder Analysis Template from DOE’s CELICA to identify organizations to engage on these issues. Community representatives should not be discounted if they are not labeled powerful in the results of traditional power mapping. Stakeholders can make meaningful contributions to policy and program development, even if they are not currently perceived to hold influence in the existing processes, structures, and systems for decision-making.
7. *Consider options for participant support.* A Guidebook on Equitable Clean Energy Program Design for Local Governments and Partners identifies some resources organizers can provide to event participants in order to relieve the burden on participation: monetary compensation, manageable time commitment, convenient meeting times and locations, on-site childcare, and meals. Consider creative equivalents of on-site childcare and meals for virtual meetings and alternatives to online participation for those without internet access.
8. *Communicate intentions with community.* Especially important for organizations that State Energy Offices have worked with in the past, communicate with community organizations intentions to improve engagement to create equitable outcomes. Transparently explain plans for change, ask for feedback, identify opportunities to build trust, and ask if/how organizations are interested in participating.
9. *Evaluate engagement activities.* The Resource Guide on Public Engagement, the Guide to Community Strategic Energy Planning, State Energy Planning Guidelines, and CELICA all

provide examples of potential stakeholder engagement activities. Use the Spectrum of Community Engagement of Ownership to determine if examples under consideration meet engagement goals. Consider attending existing activities in the community as “A Guidebook on Equitable Clean Energy Program Design for Local Governments and Partners” recommends.

10. *Execute, review, and conduct ongoing engagement.* Stakeholder engagement is an ongoing process; there is no end point at which stakeholder engagement is no longer necessary, and one size does not fit all. Continuously review stakeholder engagement practices and the resulting impact on the community to ensure that work is having the desired effect.

## Conclusion

State Energy Offices interested in designing more equitable policies or programs can consider existing stakeholder guides, or a combination of several to develop a path forward. Resources such as the “Spectrum of Community Engagement to Ownership” and “A Guidebook on Equitable Clean Energy Program Design for Local Governments and Partners” outline that community voices are necessary for equitable program and policy design. The two guides also clarify that the type of engagement implemented has an impact on how the outreach will be perceived and that the more residents can be elevated to decision-maker status, the better. The Spectrum of Community Engagement to Ownership goes a step further and identifies specific activities to create deeper trust and relationships. The principles remain relevant as State Energy Offices adapt to conducting stakeholder engagement in ways other than in-person meetings. The work does not end after the meeting; applying the perspectives and priorities of the community in day-to-day policy and program work, as well as medium- and long-term planning will result in long-term change.

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