



# Energy Justice Considerations in Policy and Utility Cost Recovery (Rates)

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# Overview

- Background: Energy Justice Concepts
- Proposed Public Goods Framework for Just Rates
- System Dynamics Modeling of Energy Justice Factors
- Challenges and Conclusions

# Energy Justice Concepts

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**Definition, Metrics, Examples**



# Energy Justice Defined

## Key Concepts

### Mainstream Principles:

1. **Distributional Justice:** How are benefits/costs distributed?
2. **Recognition Justice:** Which groups bear disproportionate harms?
3. **Procedural Justice:** How are decision makers including overlooked communities?

Kirsten Jenkins, Darren McCauley, Raphael Heffron, Hannes Stephan, Robert Rehner, “Energy justice: A conceptual review”, Energy Policy, 2015

### “Frontline” Vision Principles:

1. Being place-based
2. **Addressing the root causes** and legacies of inequality
3. Shifting the balance of power in existing forms of energy governance
4. Creating new, cooperative and participatory systems of energy governance and ownership
5. **Adopting a rights-based approach**
6. Rejecting false solutions

Salma Elmallah, Tony Reames, C. Anna Sprulock, “Frontlining energy justice: Visioning principles for energy transitions from community-based organizations in the United States”, Energy Research and Social Science, 2022

# Energy Justice in Practice

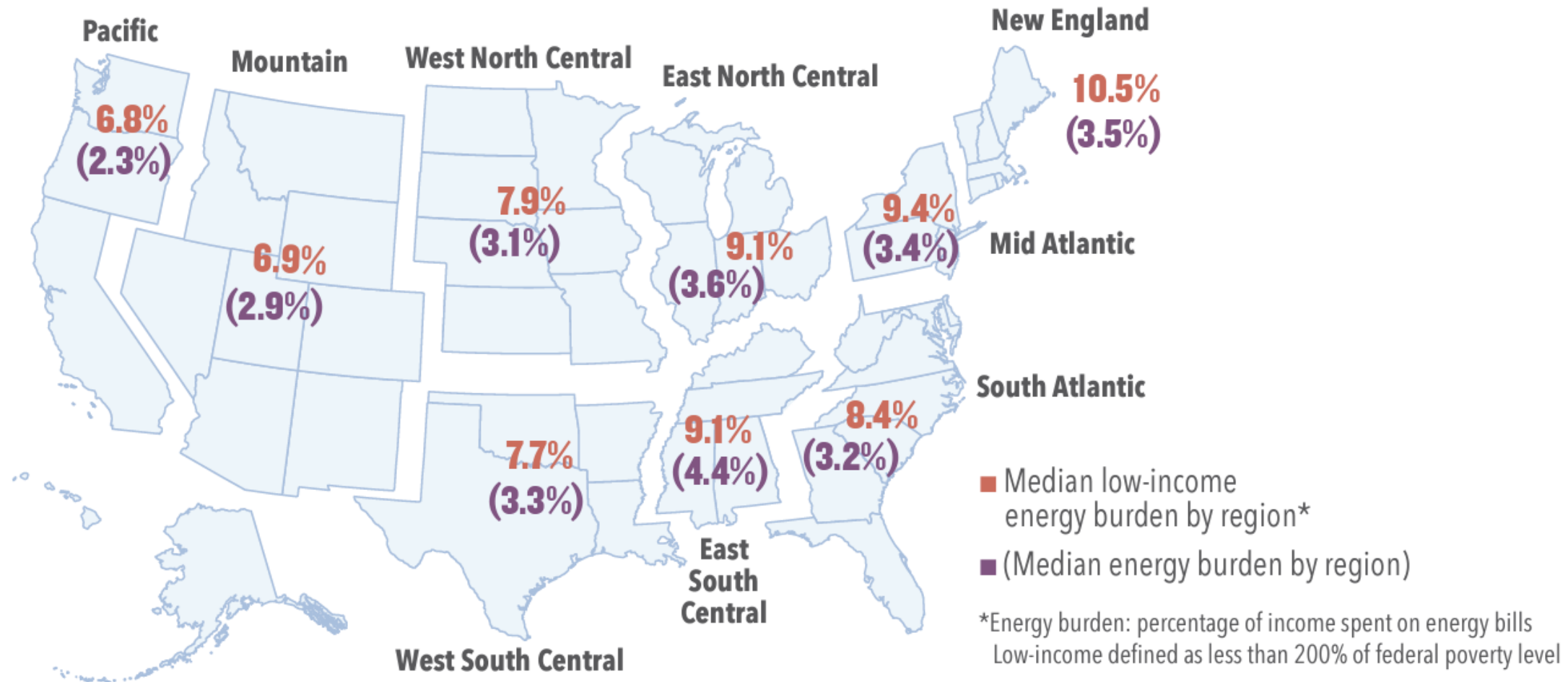
## Morongo Tribe and SCE

- ~50 years ago, the federal government approved the construction of transmission lines across the reservation
- In 2011, SCE sought to renew expiring ROW's and upgrade existing lines
- After years of persistence, Morongo Tribe negotiated joint ownership of lines
- In 2021, Morongo Tribe officially became 1<sup>st</sup> tribal transmission owner



Entrance to Morongo Reservation. Source: [www.indianz.com](http://www.indianz.com)

# Common Metric: Energy Burden (distributional/recognition justice)



# Public Goods Framework for Just Rates

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# Current Rate-Making Process

In a decarbonized & high DER future, there is a challenge of:

- a) More **fixed-cost** energy transition investments
- b) DER cost-shifting due to **volumetric rates**
- c) High “residual costs”

**Volumetric rates become less just and reasonable!**



# Rate Reforms in the Literature

## How can we make rates less regressive?

1. Income Based Fixed Charges
2. Residential "Climate Zones"
3. Moving Some Costs to State Budget



**Public Goods?**



## California AB 205

*Illustrative Proposed IGFCs*

Income Bracket	Criteria	PG&E IGFC (\$/month)	SDG&E IGFC (\$/month)	SCE IGFC (\$/month)
1	CARE (<= 100% FPL)	\$15	\$24	\$15
2	All Other CARE/FERA	\$30	\$34	\$20
3	Non-CARE/FERA <= 650% FPL	\$51	\$73	\$51
4	Non-CARE/FERA > 650% FPL	\$92	\$128	\$85

# Is the grid a public good?

**Perhaps certain aspects of the grid are public goods!**

## Non-Excludable

- Once in place, it would be costly or difficult to exclude anyone from benefiting from the good

## Non-Rivalrous

- One person's use of the good does not diminish the amount of the good available to others

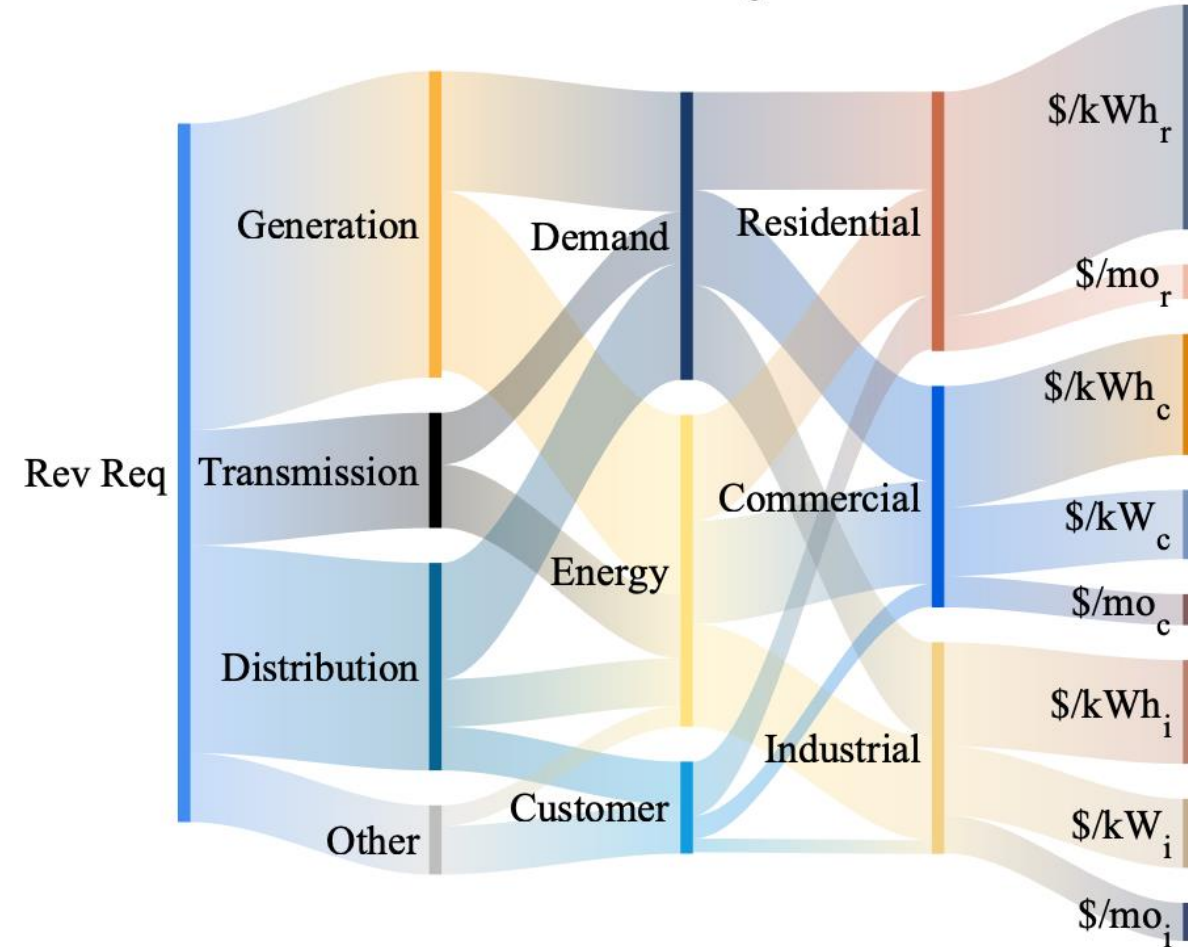


## Market Failure

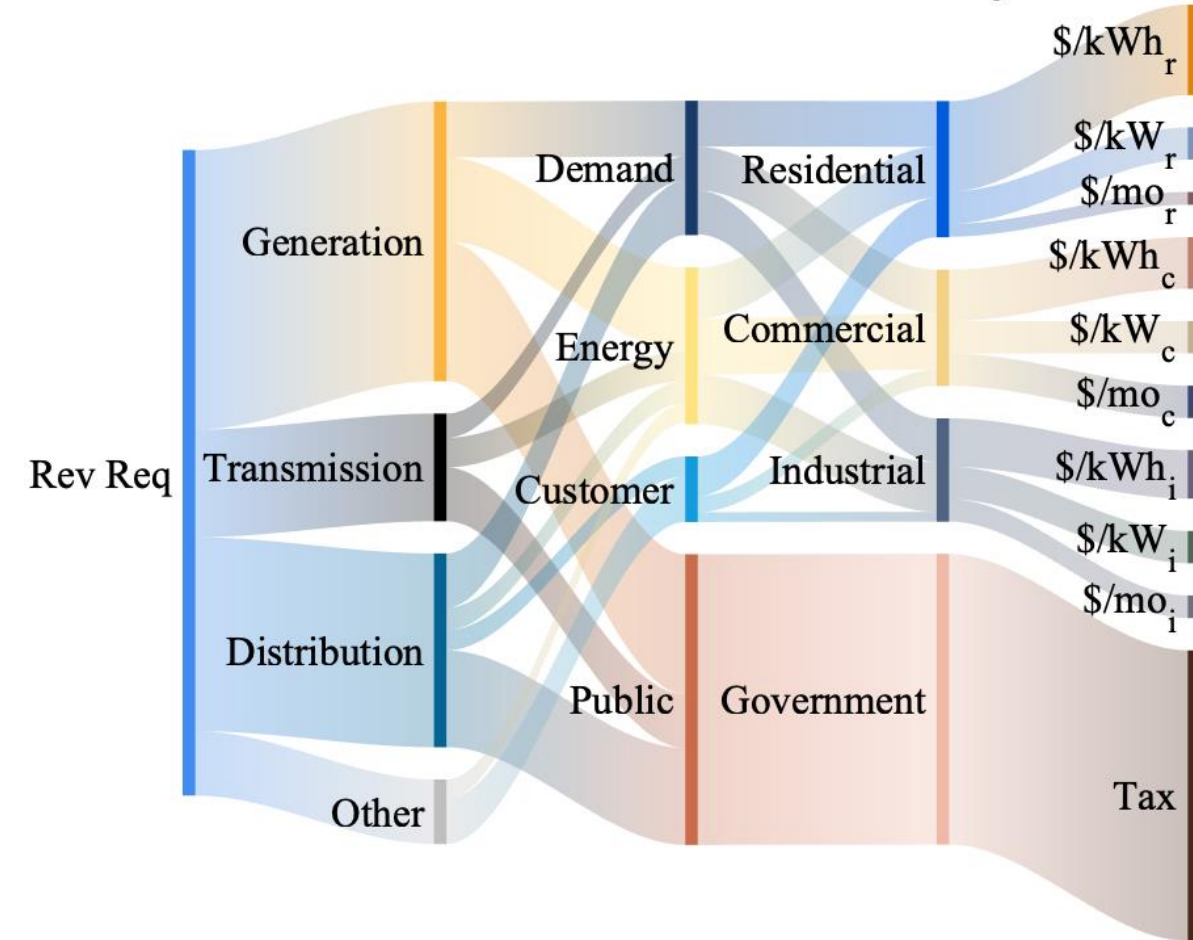
- The inability of the free market to produce the optimal amount of a good.

# Proposed Ratemaking Framework

A. Current Ratemaking Framework



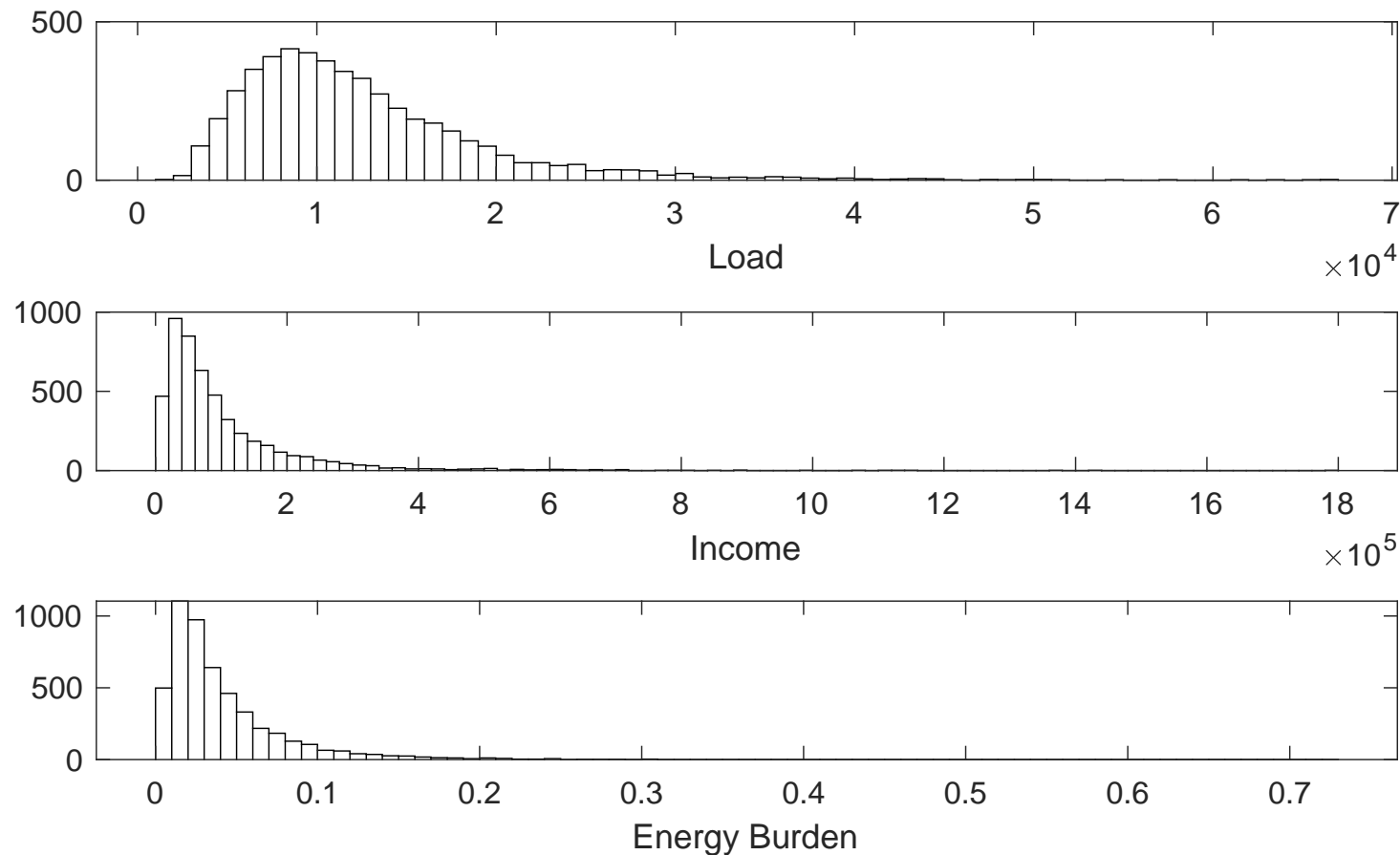
B. Public Goods Framework for Ratemaking



# Case Study: US 2020

## Simulated data

Distributions



**Median Annual  
Load:  
10,800 kWh**

**Median Annual  
Household  
Income:  
\$67,521**

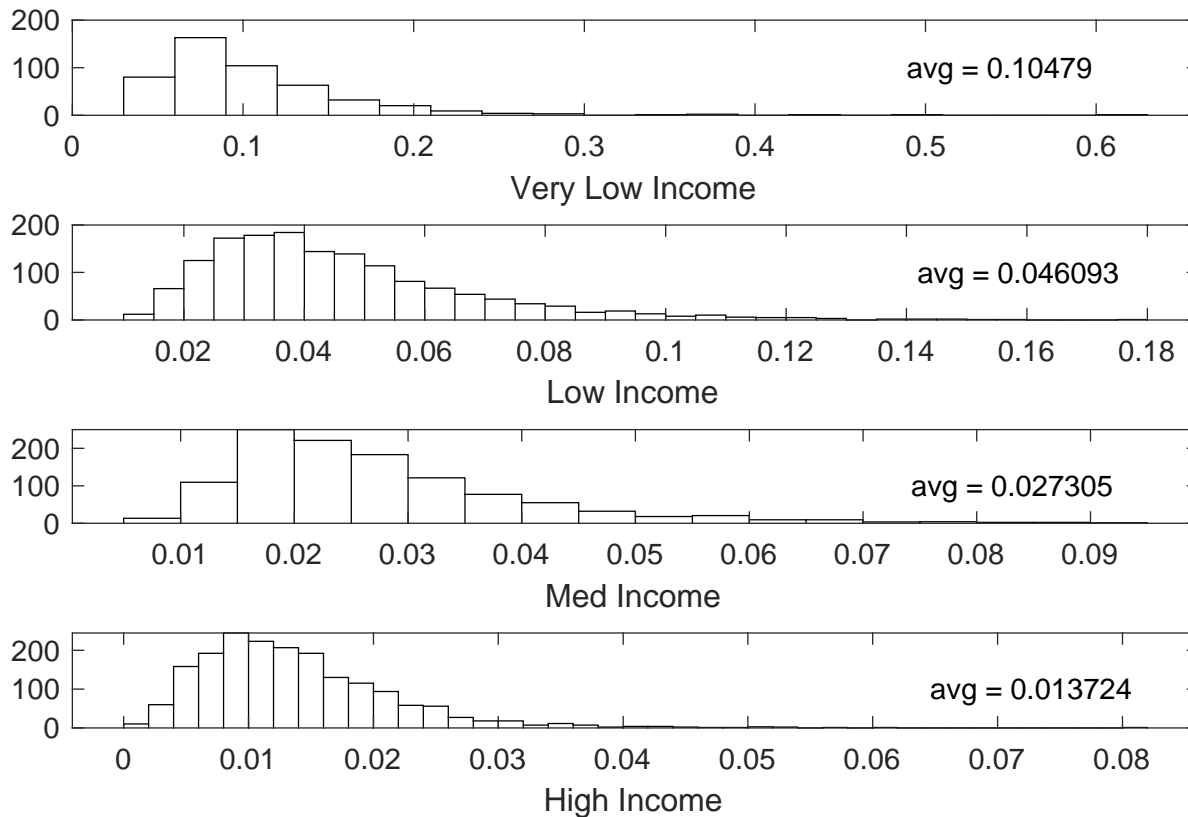
**Median Energy  
Burden:  
3%**



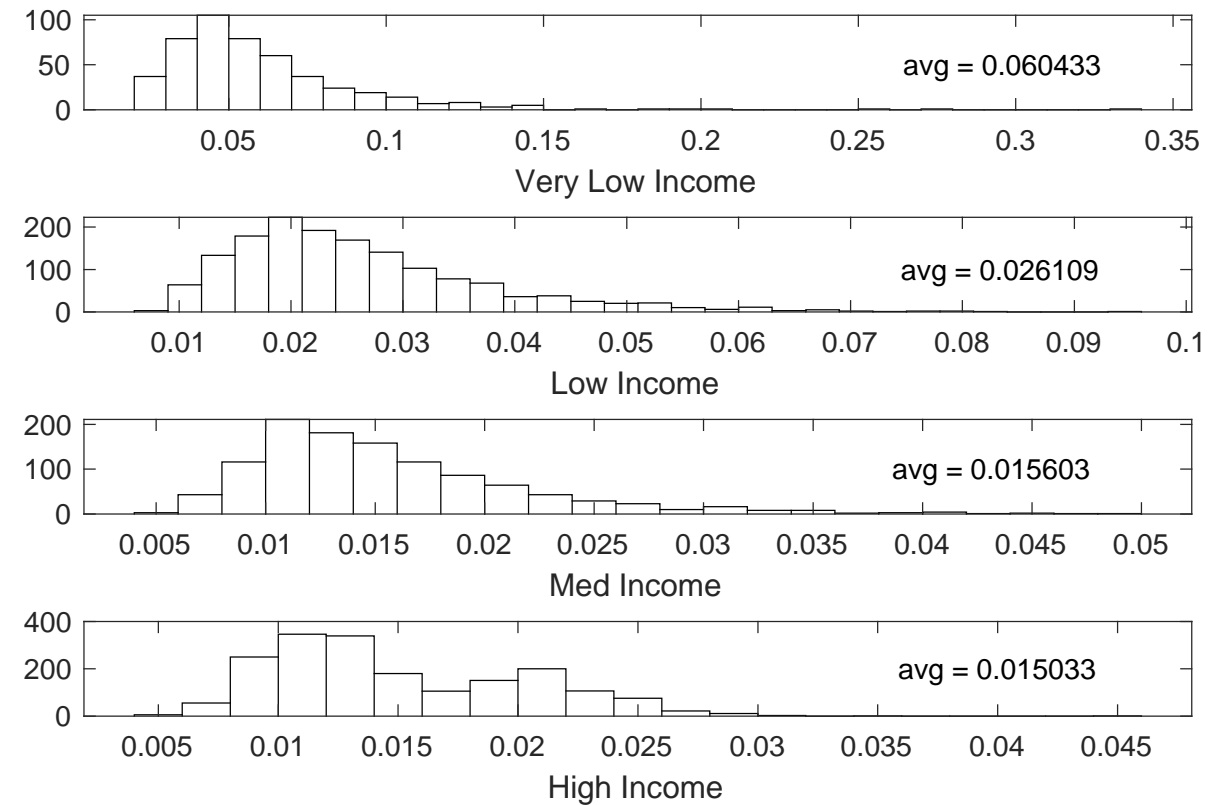
# Simulated Impact

## Energy Burden by income group

Distribution of Burden by Income



New Distribution of (Adjusted) Energy Burden by Income



# Has this been attempted?

## 1) Ontario Electricity Rebate, 2016

- 1) 11%<sup>1</sup> on-bill rebate for homes, small business, farms.

## 2) Renewable Cost Shift, 2021:

- 1) Moves 85% of RE contract costs from ratepayers to the Province
- 2) Instituted by conservatives to help businesses

## 1) Investment Tax Credit for Regionally Significant Electricity Transmission Lines (2021, USA)

- 1) 30% tax credit for 22 eligible transmission projects **not** being built today
- 2) Proposed by coalition of renewable energy industry entities
- 3) Effort shut down by conservatives in congress

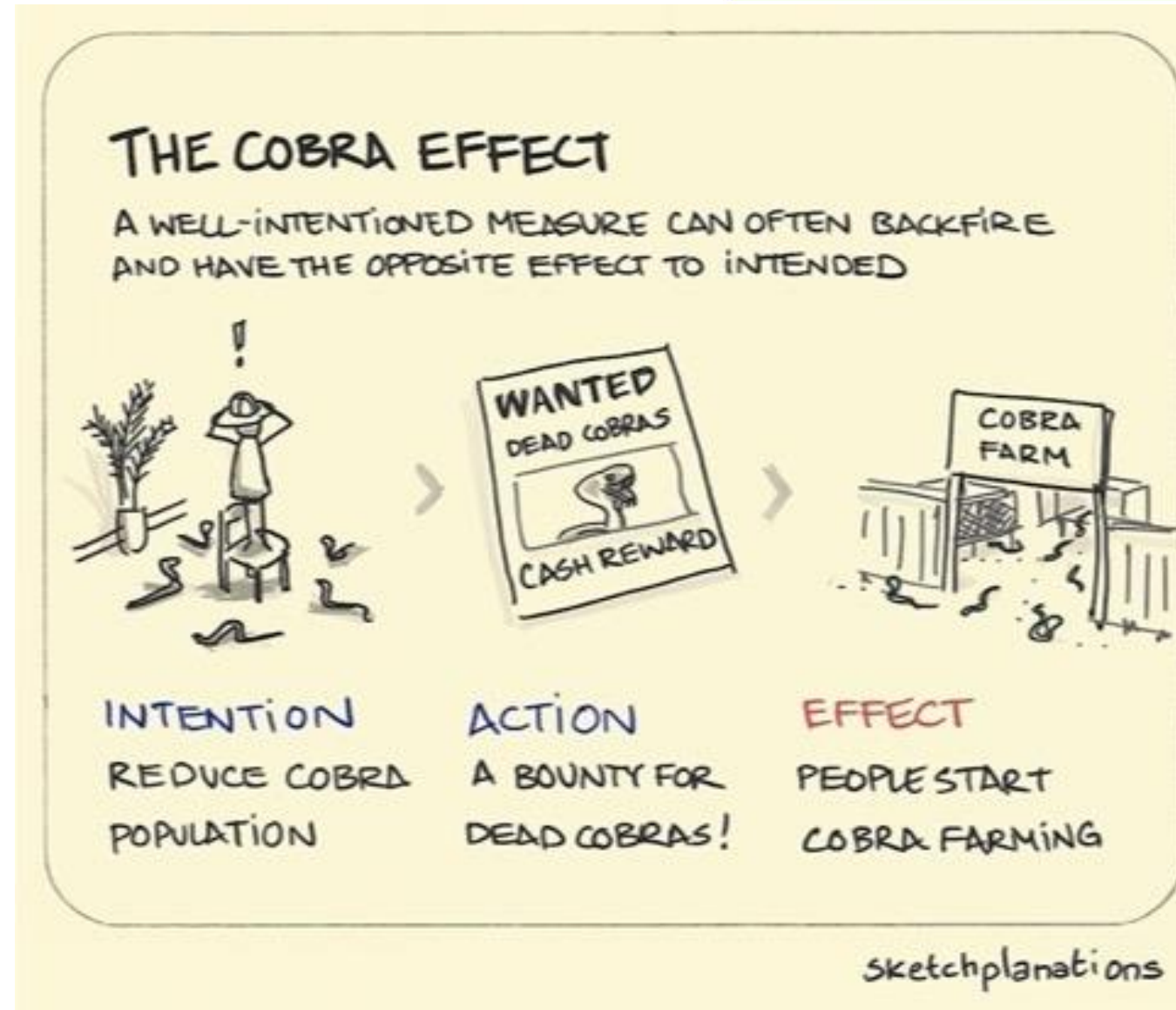
<sup>1</sup>Varies from year to year

# Conclusions

- As we transition our energy system, utilities' heavy reliance on volumetric rates become increasingly unjust.
- Applying a public goods framework to utility cost recovery and rate-making can help support a transition aligned with the decarbonization, grid edge, reliability, and justice requirements of the grid.
- But....is it a good idea? What might go wrong?

# Caution

- We use policy interventions to solve societal problems.
- When we treat problems as linear, we neglect the complexity of systems.
- Considering system dynamics, helps us avoid unintended consequences. (Cobra Effect)

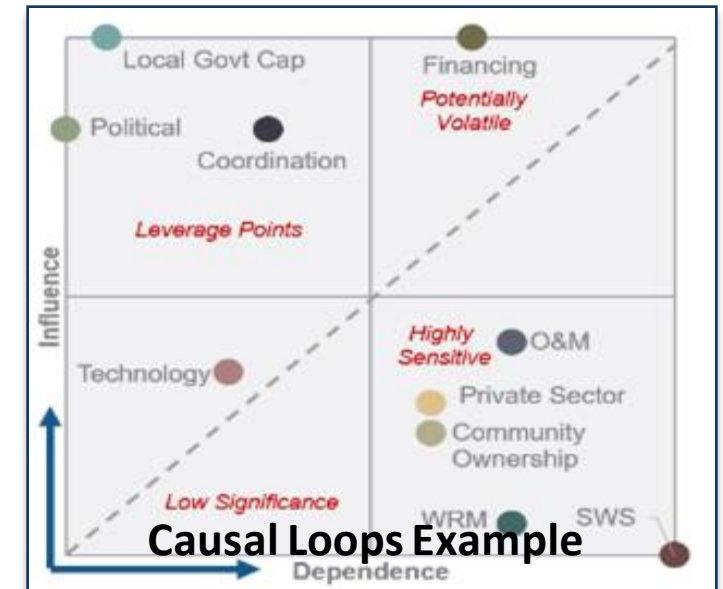




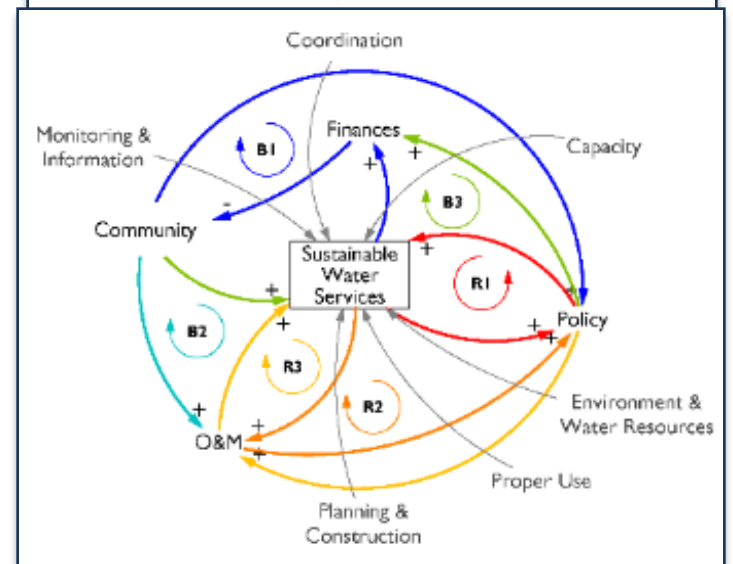
# System Dynamics

- System dynamics modeling is a way to understand complex behavior of systems using various tools including:
  - Influence maps
  - Causal loop diagrams
  - Stock and flow diagrams
- Helps identify effective policy interventions

Influence Maps Example



Causal Loops Example



# Thank you

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