

November 1, 2023

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06501

**Re: Docket No. 23-09-34, PURA Implementation of the Stakeholder
Group Compensation Provisions of Section 15 of Public Act 23-102**

Dear Mr. Gaudiosi:

Acadia Center appreciates the opportunity to provide written comment on the Straw Proposal for Docket No. 23-09-34, Public Utilities Regulatory Authority (PURA) Implementation of the Stakeholder Group Compensation Provisions of Section 15 of Public Act 23-103. Acadia Center supports the development of the Stakeholder Compensation Program with a specific focus on providing equitable access to non-profit organizations representing environmental justice communities, hardship customers, and small and minority-owned businesses.

Increasing Accessibility and Procedural Equity

The process of engaging with proceedings at Public Utility Commissions (PUC) across the nation is historically exclusive. Inclusive stakeholder engagement in the PUC process is critical, and providing compensation can play a significant role in ensuring diverse stakeholders are included in proceedings, specifically at PURA. There are multiple avenues to address accessibility and procedural equity challenges through the development of this program.

The application provided in this Docket is a great first step. However, there are additional ways to increase accessibility and equity from the start of this process. The application, as it exists in its present state, utilizes language that is not widely understood beyond the bubble of utility regulation. Acadia Center recommends that PURA consider consulting diversity, equity, and inclusion specialists to incorporate inclusive language and ensure enough background information is included through hyperlinks and pop-up boxes with definitions and explanations in thorough but simplified language. The application's language should also include accessible and clearly communicated timelines expected in a given proceeding, including how much time stakeholders should expect to spend engaging in the proceeding.

The education section of the application should be moved to the beginning of the document. This would ensure that those with varying levels of historical access and experience engaging with proceedings at PURA are not discouraged by technical and regulatory jargon before learning about the educational materials available to assist with the process of engaging in a proceeding. Existing education materials should be screened by diversity, equity, and inclusion specialists in collaboration with environmental justice organizations to ensure the full range of knowledge necessary to engage in a proceeding is readily available, accessible, and appropriate. Expanding the education section of the application for the program should allow applicants to indicate on a sliding scale their level of comfortability, experience, and knowledge of engaging with proceedings at PURA. From these results, PURA can utilize the educational materials from the Office of Consumer Counsel (OCC) to prescribe the appropriate videos, direct links,

and definitions necessary to ensure substantial contributions could be made from groups with different starting points of access and education prior to a proceeding.

An additional application component should allow applicants to share whether they are a non-profit organization representing environmental justice communities, hardship customers, or small and minority-owned businesses. This added section of the application should also include a text box to share specific examples of how they serve and represent environmental justice communities, how their engagement in a proceeding would advance environmental justice principles, if their organization is under-resourced, and if their organization resides in an environmental justice community as part of substantial contributions in the application. The appropriate links and pop-up boxes to the state definitions of environmental justice communities should be included in this section. To further increase accessibility and procedural equity, applications should be allowed to share if their organization is advancing diversity, equity, and inclusion internally.

Specific funding within the Stakeholder Compensation Program should be allocated to providing equitable opportunities for environmental justice organizations, communities, and representatives in PURA's proceedings. An appropriate allocation of funding would align with the Justice40 Initiative's goal of directing 40% of funding and investment flow to historically disadvantaged, underserved, and overburdened communities. By allocating at least 40% of the available funding for the Stakeholder Compensation Program specifically for environmental justice organizations, PURA would set a precedent for PUCs to address accessibility and procedural equity straight on. When considering applications, PURA should allow for joint applications, especially for stakeholders representing similar environmental justice communities in a given location. However, PURA must be cautious to not pit individual or joint applications from environmental justice organizations against one another.

Acadia Center commends PURA for issuing the Straw Proposal on the Stakeholder Compensation Program, which is a great opportunity to address procedural equity and access to PURA proceedings. Acadia Center also recommends PURA consider opening an [Energy Equity and Justice Docket](#), such as the Hawaii PUC opened, "to investigate how to better integrate equity and justice considerations across Commission proceedings and the Commission's work more broadly, including in its role overseeing and regulating the functions of public utilities." Acadia Center believes additional time should be allotted to gather and incorporate feedback from environmental justice advocates, organizations, and leaders to guide the equitable development of this program and recommends extending the timeline and outreach of Docket No. 23-09-34.

Thank you for the opportunity to submit public comments. Please do not hesitate to reach out with any questions.

Sincerely,

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