

Defining and Measuring Equity in a C&I Context

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ABSTRACT

Many federal and state energy efficiency programs and regulators require the equitable distribution of program resources and benefits across all customers. While there are many definitions and frameworks for equity, distributive justice, and disadvantaged communities, these definitions and frameworks have traditionally focused on the residential sector. The commercial and industrial (C&I) sector has received significantly less attention in the equity conversation, and program administrators (PAs) and regulators have struggled to define what equity means for C&I programs.

This paper presents findings from recent research supporting the Massachusetts PAs into how equity and equitable distribution can be defined and measured in a C&I context. We explore strategies to identify and define equity characteristics for C&I businesses, and methods to measure PA progress against these characteristics. We also share the results of a recent literature review looking at how different jurisdictions and PAs currently address C&I equity through their program offerings, and identify commonalities, differences, and best practices in program design and delivery. We review key findings from interviews with Massachusetts business-focused community-based organizations (CBOs) that work directly with businesses in and around equity-targeted communities about how these CBOs define equity for businesses, view effective PA support and programming for businesses, and what data they use and/or could use to measure progress.

The paper concludes with insights regarding how to think about equity for C&I programs, along with recommendations for future analyses to better target and measure equity for C&I in Massachusetts and beyond.

Introduction

Many federal and state energy efficiency programs and regulators require the fair and equitable distribution of program resources and benefits across all customers. While there are many definitions and frameworks for equity, distributive justice, and disadvantaged communities, these definitions and frameworks have traditionally focused on the residential sector, leveraging Census data and other metrics to classify disadvantaged communities by income, language, minority population, and other criteria. The commercial and industrial (C&I) sector has received significantly less attention in the equity conversation, and program administrators (PAs) and regulators have struggled to define what equity means for C&I businesses.

This paper explores equity in a C&I context through recent research supporting the Massachusetts PAs, identifying strategies to identify and define equity characteristics for C&I businesses and methods to measure PA progress against these metrics. Equity is foundational to the PAs' efforts to ensure that all eligible residents and businesses in the Commonwealth can benefit from customer-funded energy efficiency and decarbonization programs. To explore equity considerations for C&I, DNV conducted a literature review and interviews with community-based organizations (CBOs) across Massachusetts. These efforts are described in more detail below.

- **Literature review.** During the spring/summer of 2024, DNV conducted a literature review to summarize recent and ongoing programs related to equity in the C&I sector. This review

explored common definitions of equity both broadly and specifically for energy equity and reviewed C&I programs in peer jurisdictions to identify equity-related aspects of program design. The results of this review helped inform the interviews with CBOs conducted in late 2024/early 2025.

- **Interviews with CBOs in Massachusetts.** Following the literature review, DNV conducted interviews with CBOs in Massachusetts. DNV focused on organizations that have expertise in and work closely with businesses in the Commonwealth and solicited information about additional CBOs and contacts from stakeholders and interviewees. Our target list included Commonwealth and municipal departments that maintain lists of qualified diverse suppliers, economic councils, chambers of commerce, small business and industry-specific growth accelerators, and other organizations that advocate for and/or support minority, women, and veteran business communities. DNV recruited interviewees throughout Q4 2024 and into Q1 2025 and completed 13 interviews in total.

Literature review

The literature review objective was to summarize recent and ongoing research and programs related to equity with a particular focus on the C&I sector, developing a common context for C&I equity.

Defining equity

This section provides some established definitions of equity broadly and energy equity specifically, and then explores ways in which energy equity can apply to the C&I sector.

Equity as a concept can mean different things to different people, and there are a variety of equity frameworks established to define the concept and outline how it can be applied to program design and development. . In general, an equitable system seeks to balance access to resources and growth opportunities while accounting for historical injustices. It is important to note a key distinction between equity and equality (defined generally as providing everyone the same resources): while circumstances might be equal, opportunities may not be equitable. The Avarna group (2016), a company providing resources and insights to organizations working on equity efforts, further describes this nuance:

Equity is an approach based in fairness to ensuring everyone has access to the same opportunities and resources. In practice, it ensures everyone is given equal opportunity to thrive; this means that resources may be divided and shared unequally to make sure that each person can access an opportunity. Equity is therefore not the same thing as equality. Equity takes into account that people have different access to resources because of systems of oppression and privilege. Equity seeks to balance that disparity.

Different organizations have used pictures to illustrate the difference between equity and equality. The illustration by the Robert Wood Johnson Foundation shown in Figure 1 offers a poignant example. Equality means giving everyone the same thing—in this case, the same bicycle, regardless of differences in their individual bodies. Because of body differences, the equal distribution of this bicycle resource offers some people an advantage while disadvantaging others. Equity, by contrast, means adapting the resources given to each person to fit their individual needs so that everyone has an opportunity for a similar outcome—in this case, everyone can successfully use their bicycle as a form of transportation.

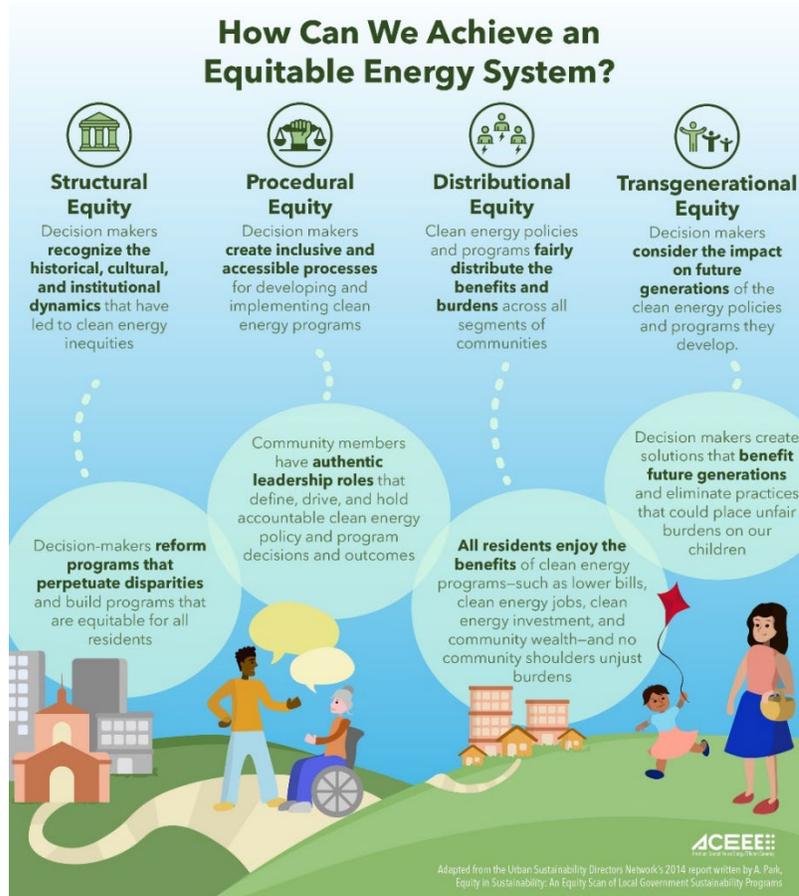


Figure 2. Four key types of energy equity. Source: ACEEE, <https://www.aceee.org/topic/energy-equity>.

Applying the frameworks

The ACEEE and other equity frameworks are general, and most of them are designed to apply to policies, the energy system as a whole, or an entire utility. Applying them to specific energy efficiency programs requires adapting and operationalizing the different concepts they embody. One must define—in a practical and measurable way—what structural, procedural, distributional, and transgenerational equity mean in the context of a specific energy efficiency program.

This adaptation requires the identification of two things: 1) the metrics or key performance indicators (KPIs) by which one will assess equity, and 2) the groups and subgroups for whom those KPIs matter. As noted above, these energy equity definitions and frameworks characterize communities as distinctly residential groups, so a key challenge for program administrators (PAs) is to define energy equity for the C&I sector.

Massachusetts context

To date, the majority of C&I equity programming in Massachusetts has focused on small businesses (as defined via consumption). While there are several classifications of disadvantaged communities in Massachusetts, and the terms and definitions have evolved over time, in this discussion we use the broad term “disadvantaged communities.” While most program offerings in Massachusetts

have not exclusively targeted disadvantaged communities, several recent and current offerings provide services to help businesses within these communities, including:

- **Small Business Turnkey program.** This program provides energy assessments and turnkey installation services for small businesses for various energy-saving electric and gas measures, including lighting, electrification, and weatherization. This program is available throughout the Commonwealth, with additional marketing efforts targeting disadvantaged communities, often using some of the other programs described below. Further, in the 2025-2027 plan, all small business program activities will be classified as equity activities (Mass Save 2024).
- **Community First Partnership.** Through Mass Save, PAs partner with organizations and local communities across Massachusetts to work with small businesses in targeted communities to implement energy efficiency upgrades. This engagement often provides training and support, best practices, and multilingual materials to help achieve savings through the Small Business Turnkey program (Mass Save 2025).
- **Main Streets.** The Main Streets program provides free energy assessments to small businesses and recommends energy efficiency improvements based on its findings, also through the Small Business Turnkey program. Main Streets engagements typically include scheduled marketing and outreach campaigns targeted at specific communities and offered in multiple languages, and target a mix of disadvantaged and non-disadvantaged communities. The intent is to have minimal impact on business owners, as many measures can be installed on-site during the assessments (Eversource 2025).
- **Workforce development activities.** The PAs have pursued several workforce development approaches, including the Clean Energy Pathways internship program that works closely with CBOs to identify and recruit participants, as well as supplier diversity initiatives to engage and encourage Mass Save participation with a growing community of diverse suppliers.

Peer jurisdiction review

This section presents the key themes from exploring 14 C&I equity and equity-related programs in jurisdictions outside of Massachusetts. While not intended to be an exhaustive list of all programs, this review provided a sample of programs that have equity-related components and/or strategies providing support for disadvantaged communities. Common themes across peer programs include:

- Identification of disadvantaged or environmental justice communities, typically using Census data for geographic characterization to select communities of focus.
- A focus on small businesses within the C&I customer base. Most programs are not explicitly equity-focused but are available to all qualifying C&I customers, and some may offer special provisions for disadvantaged communities seeking to improve participation.
- Prioritization of turnkey or direct install measures, commonly offered with complimentary energy assessments and some no-cost installations.
- Additional incentives available for businesses within disadvantaged communities. These incentives typically are structured to provide additional percentages of project cost to qualifying businesses most often based on geography.
- Creative project financing strategies to reduce overall and/or upfront costs. Common solutions include on-bill recovery, as well as strategies to reduce lender risk in cases of default.
- Customer education and support to highlight the benefits of energy upgrades in terms of savings and human health. Often this is a component offered in conjunction with other benefits, and the level and depth of education services vary.

- Workforce development to expand opportunities for diverse and minority-, women-, and veteran-owned businesses .

Best practices for the C&I sector

Several recent publications highlight some best practices for engaging and achieving equitable strategies in the C&I sector. ACEEE provides a wide variety of commercial energy efficiency recommendations with an emphasis on small business equity. ACEEE recommends direct install and turnkey programs that provide small businesses a low-cost and low-effort foundation upon which they can add more measures and establish a strong relationship with their PA in the future (Drehobl and Tanabe 2019). The National Renewable Energy Laboratory (NREL) has released several studies providing guidance on engaging underserved communities in commercial energy savings programs; for example, highlighting the importance of communicating the co-benefits to energy efficiency (such as cost savings, improved comfort and health, and satisfying green building ordinances) to increase program interest and participation (Dombrowski, McIntyre, and Jimenez 2023). These publications and others led to the following best practices for serving small businesses. Note that many of these are relevant to improving the participation of small businesses without direct applicability to equity:

- Establish partnerships with local CBOs that can serve as bridging organizations to help PAs find participants.
- Tailor and target marketing and communications to customer needs.
- Offer customized approaches by segmenting program participants by common characteristics and energy needs.
- Educate the broader community on the benefits of energy efficiency.
- Provide free or low-cost on-site assessment (energy audit) to identify potential energy efficiency opportunities.
- Offer a wide set of eligible measures to meet diverse building needs.
- Provide attractive financial incentives (e.g., rebates) for energy efficiency measures.
- Offer financing solutions to encourage comprehensive retrofits and deeper savings.
- Provide dedicated project process managers in collaboration with local organizations.
- Provide streamlined installation of lighting measures.
- Communicate co-benefits of energy efficiency, highlighting comfort, health, and cost savings.

CBO Interviews

DNV conducted 13 interviews with CBOs that support a variety of historically underserved populations throughout Massachusetts, leveraging the Commonwealth’s definitions of disadvantage communities based on income, minorities, and English speaking. The target organizations included supplier diversity offices, chambers of commerce, small business development and retailer organizations, community development corporations (CDCs), housing authorities, and organizations that provide advocacy and support based on geographic and/or cultural missions. While the scope and depth of services offered among the interviewees vary, they all regularly engage with small businesses—maintaining, for example, a network of diverse suppliers or providing tailored support, advocacy, financing, and/or other assistance to their member networks throughout the Commonwealth.

Many CBOs had some familiarity with the Massachusetts PAs and their energy efficiency programs, referred to during the interviews and throughout this discussion as Mass Save and the Sponsors of Mass Save. Overall, 12 of the 13 interviewees had some exposure to the Mass Save

programs, and many had previously worked with the Sponsors of Mass Save. These experiences included direct engagements such as hosting Sponsors as speakers at events and webinars, participating in job fairs, receiving newsletters, and receiving services in their own buildings, as well as indirect engagements where the Sponsors worked with a CBO's member organizations to identify and implement energy efficiency improvements. The interviews focused on the following three themes:

- **Defining equity and distributive justice.** DNV asked the CBO interviewees to provide their organizations' perspectives on equity and distributive justice, first broadly and then specifically as those ideas apply to energy equity. We also explored whether and/or how equity for businesses is different from residential equity considerations.
- **Identifying and serving target businesses.** DNV asked what characteristics should be used to target equity businesses and solicited strategies to best identify and serve these target businesses.
- **Measuring success.** Finally, DNV asked CBOs what metrics could assess successful activities for businesses and if they were aware of any datasets that could be used in measurement.

Considerations for defining equity and distributive justice.

DNV asked interviewees for their perspectives on equity, first broadly as a term and then as it applies to energy (that is, energy equity), and what, specifically, equity means in a business context.

- ***While individual definitions of equity varied, interviewees generally aligned around recurring themes.*** Interviewees broadly perceived equity as an effort to level the playing field, providing different support based on differing individual needs. Interviewees saw equity as providing the same opportunities for success to their target populations, jurisdictions, and communities as everyone else. These supports and opportunities include technical assistance, financial support, and additional information and resources to help communities and affected populations.
- ***Housing is a core equity need.*** When asked about equity in general, interviewees often discussed residential issues initially. Several interviewees cited housing as being the highest recurring major expense for the populations they serve. Providing affordable, stable, high-quality housing—both through home ownership and renting—to these groups can stabilize this single highest expense so the individuals and communities can build equity in other aspects of their lives.
- ***Distributive justice principles and definitions make sense on paper, and sound implementation is critical.*** Generally, most CBOs interviewed were more familiar with the term equity than the term distributive justice. Several interviewees also cited health as a primary driver for equity and distributive justice and suggested that focusing on properties that may be contributing to adverse health impacts would have a greater societal benefit. In common energy program parlance, this would be a non-energy impact (NEI). This is perhaps inferred in “negative environmental impacts” but could be more explicit.

DNV asked the CBOs to apply their definitions and thinking about equity specifically to energy consumption and energy efficiency, as well as how concepts of equity, which are primarily defined based on residential criteria, apply to businesses.

- ***For businesses, equity is achieving similar impact rather than equal inputs.*** Many businesses within these communities, which are commonly led by people with low incomes, minorities, and new immigrants, face the largest hurdles in not knowing how to start, operate, and finance businesses. These challenges permeate all aspects of the businesses, including awareness of

and consideration of energy opportunities. To achieve similar impacts, these businesses need more resources and attention than those that do not face these challenges.

- **Equity is about changing the narrative for businesses and communities.** Several interviewees discussed perceptions of their communities, highlighting that their communities are often

“Talk to neighborhood-level organizations, civic organizations, churches, and charter schools because they know who’s in their neighborhoods.”

- CBO interviewee

perceived as takers living off the government rather than givers contributing to society. The interviewees’ work is focused on changing that narrative, highlighting community contributions, creating businesses to generate and leverage economic power, and advocating for more leadership participation and engagement so they can be advocates for the needs of their and other disadvantaged communities.

- **Businesses face many of the same equity challenges as residents.** The success of a business directly impacts the quality of life for both the owners and its employees. Additionally, many underserved communities face adverse health and air quality impacts, limited access to local transit, and other factors that affect both individuals and businesses. Interviewees noted that, in many cases, the energy efficiency opportunities most valuable to businesses—for example, weatherization, insulation, and system upgrades—mirror residential needs, particularly for the many small and micro businesses that are located within residential-style buildings.

- **Neighborhoods balance residential and commercial perspectives.** Several CBOs stressed that they see residential and commercial equity issues as closely intertwined. One CBO provided the example of working in a community where residents were calling for additional commercial retail spaces, but the dynamics of the neighborhood and existing foot traffic did not create sufficient demand to support more commercial retail businesses.

- **Cost of energy is a large burden for small brick and mortar stores.** Interviewees noted that the businesses they work with are typically very small or microbusinesses and thus have limited cash flows and face high costs of capital. Energy costs often represent a large expense and typically the tenant assumes utility bills without much foresight into their costs or awareness that they can take action to reduce their consumption.

“Energy equity is ensuring the benefits of energy efficiency and clean energy reach communities that have historically faced systemic barriers.”

- CBO interviewee

Strategies for identifying and serving target businesses.

The second key topic of the CBO interviews was to solicit strategies to both identify and serve businesses in the context of ensuring equitable decarbonization and energy efficiency services throughout the Mass Save programs. These discussions also explored how best to serve target businesses, and interviewees identified many of the best practices found in DNV’s literature review, as well as other similar literature reviews. The following were the key themes from this portion of the interviews:

- **Engage in deliberate, mindful, and extra effort to identify and communicate with disadvantaged businesses.** This was an overarching theme espoused by many of the CBOs and reflects a need for the Sponsors to engage with local communities, CBOs, and existing networks to leverage relationships and knowledge already in place. Interviewees espoused common ideals such as improving access and opportunity and stressed that Sponsors can do more to

increase customer awareness of the programs and make it as easy as possible to start their participation journey.

- **Addressing perception and trust is critical.** CBOs highlighted that underserved communities are disproportionately impacted by environmental issues, both currently and historically, and underserved communities often perceive environmentalism as an expensive luxury item that's not for them. This perception, while false, is powerful and difficult to overcome, and it requires repeated, targeted messaging that these opportunities are available for these communities and that the communities deserve them and have as much a right to them as anyone else. Several interviewees stressed that trust takes time. Community members see their utilities (electricity, water, gas, etc.) as entities that they have to interface with and have to pay; convincing them that there are also opportunities for beneficial engagement that are not fraudulent or capital intensive will take time and concerted effort.

- **Early engagement and/or coordination across PA programs could help provide a single touchpoint to serve businesses as they grow.** Four of the CBO interviewees indicated that they often engage with small businesses that do not have brick-and-mortar facilities to help them gain access to capital, resources, and industry connections. These businesses, without their own physical facilities, are not served by existing C&I programs, but rather would either be served by residential programs for home-based businesses or C&I programs if located in incubators or other shared commercial facilities. CBOs indicated that having a single, consistent point of contact with the PAs would help these business owners by establishing trust, increasing program awareness, and identifying energy savings opportunities as their businesses grow and

"Change happens at the speed of trust. Business owners trust us because they know us."

- CBO Interviewee

potentially move into their own facilities.

- **Upfront cost remains the primary barrier once target businesses are aware of opportunities.** Low-income, minority, and otherwise underserved business owners are typically in a very tight cash position with limited access to traditional capital, so it is much more difficult to justify large-scale upgrades. They often face higher costs for financing, making it less feasible to invest in improvements if paybacks are extended over several years.
 - One CBO articulated how their member businesses experience these financial challenges: It is easier for the business to pay an extra \$20 per month on their bill than it is to pay a capital cost of \$10,000, in a space they rent, that would save \$25 per month in the future.
- **Education and outreach remain primary pathways to increasing awareness.** Many new businesses don't have a frame of reference for what typical spending should be on their utility bills for their industry, so they cannot tell if costs are higher or lower than anticipated. Additional education about typical costs, opportunities to reduce costs, and broader outreach could help these businesses identify where there may be opportunities for savings. Additional education- and outreach-related insights included:
 - Several CBOs identified case studies as a valuable tool to leverage first movers to become champions of the program who could help build trust and confidence in energy savings.
 - Providing resources and support in the native languages of the target communities is important for building awareness, and trust in program engagement and outcomes.

Measuring success of equity-focused programming.

The final component of the CBO interviews explored interviewees' perceptions about the existing metrics used to track Sponsor program activity. DNV also solicited additional ideas and recommendations regarding other datasets that could be incorporated and/or metrics that could be tracked. These discussions led to the following summarized takeaways:

- ***The existing structure of program measurement addresses many of the recommendations offered by the CBOs.*** The Sponsors focus on reporting activities within target communities (with varying and sometimes competing definitions and terms across plan years), specifically looking at small and micro business activities within and outside of these geographies. Further, the Sponsors have expanded small business turnkey offerings for equity in their 2025-2027 three-year plan.
- ***There is not an exhaustive publicly available directory of minority, women, LGBTQ, veteran-owned, or other designated businesses.*** CBOs stressed that the community organizations—local chambers of commerce, churches, advocacy organizations, and others—are excellent resources that know local businesses and how to identify the primary decision-makers. Further, the needs of communities vary greatly across culture and language, so increased uptake requires continued on-the-ground engagement.
- ***Baselines are important in measuring progress and refine program delivery.*** Interviewees stressed the importance of setting a basis against which program progress can be measured, particularly for equity-related efforts. Tracking progress against baselines can help identify which communities are responding to engagement and identify where or with whom activities are not achieving intended reach. Regular tracking can help program administrators refine and adjust program activities mid-delivery rather than assessing progress (or lack thereof) at the end of the engagement.
- ***Regular reporting on key metrics and economic impacts, complemented with case studies and success stories, together can demonstrate the outcomes of continued engagement and success.*** CBOs highlighted key metrics such as participation rates, total savings, and incentives provided as helpful communicating impact. Several interviewees also discussed keeping funding in the community, providing training for and hiring local contractors, and driving economic impact within the community. Additionally, many interviewees emphasized the power of storytelling and case studies in providing tangible examples of successful participation as a strategic motivator for additional engagement.

“The economic impact is the most exciting part of the conversation. The overall dollar amount that customers saved as a result of the programs – claim that and celebrate it, tell the vignettes of individuals.”

- CBO interviewee

Key Findings

Based on the literature review and CBO interviews, several key findings emerge regarding how to think about equity for C&I:

- ***While accepted equity frameworks focus on serving residents and are structured around residential characteristics, the equity needs of businesses are similar.*** Many interviewees perceived the commercial business challenges as interrelated with residential needs, as they often take a community-based approach rather than splitting out specific residential and commercial needs.

- From a **structural equity** perspective, program designers should think holistically about the communities and their residents throughout the design of C&I equity program components, as these individual needs often align with those of their local businesses. Integration with residential programs could help provide a single touchpoint for program engagements.
- **Many of the strategies highlighted by CBOs to effectively engage their constituent populations and build the trust needed to pursue energy efficiency opportunities align with ongoing and planned PA activities in Massachusetts, as well as industry best practices.** While the PAs are actively pursuing and/or plan to pursue many best practices for engagement, interviewees stressed an opportunity to do even more in terms of building program awareness and trust.
 - **Procedural equity** is a key focus here, as program designers should engage these populations beyond building awareness to seek their participation and leadership in the development and implementation of these programs.
- **The Massachusetts PA program approach of focusing on small and micro businesses in explicit target communities aligns with common practices in peer jurisdictions.** Current and planned programs in Massachusetts encompass most of the C&I-focused equity components our literature review found in peer jurisdictions and those metrics highlighted by CBO interviewees.
 - Most programs measure the success of their C&I equity efforts by tracking small and micro business engagement and participation. This is a common tactic to address **distributional equity**, providing opportunities for all community members by ensuring that there are opportunities for small businesses as well as large ones.
- **There is no “one size fits all” approach to classify these communities and businesses.** Interviewees were not aware of existing datasets that comprehensively classify businesses across common equity characteristics such as income, language, minority, or other needs.
 - This further stresses the importance of all four components of equity, including **transgenerational equity** that considers impacts on and benefits to future generations.
- **Local organizations are key resources that can supplement any data-based categorization**, as they are already working within the communities, know who the businesses are, have built trust, and often have existing channels for communication.

Again, there are opportunities to strengthen these relationships and have local organizations lead the way in program development and implementation (**procedural equity**).

Opportunities for future equity measurement and analysis

This research highlighted current trends in the measurement of C&I equity: a focus on providing explicit opportunities for small business populations, tracking key performance indicators such as participation and savings, as well as continued engagement and collaboration with CBOs.

Additionally, there are several opportunities for further program measurement that would provide increased data and insights regarding program achievements related to C&I equity.

- **Conduct deep-dive analyses of locationally-targeted program delivery.** Many PAs provide geographically targeted program delivery to business populations where some portion of target zip codes, municipalities, and/or neighborhoods meet disadvantaged community criteria and others do not. Additional analyses tracking progress over time for communities with repeated engagement, and comparing program outcomes both within and outside of disadvantaged communities, would help PAs refine their programs to address any disparities

that may exist. In MA, the context for this study, the Main Streets program provides a great opportunity for this type of analysis.

- **Measure from a community perspective**, incorporating both residential and commercial impacts. Often PAs establish relationships and/or contracts with individual CBOs or municipal/neighborhood organizations to provide community-targeted engagement across a variety of program offerings. While many PAs track overall progress and achievements related to these efforts, there are opportunities for additional analysis of trends over time within individual targeted communities, as well as comparative analysis of targeted and non-targeted communities to ensure that structural and distributional equity are being practiced. In MA, the Community First Partnerships (CFP) program would be a good candidate through which evaluators could explore residential and commercial successes through time and against non-CFP communities.
- **Analyze geotargeted marketing**. PA program engagement, while strengthened by CBO relationships and targeted program delivery, often is complemented by marketing collateral provided to some or all of the general population. Administrators may launch a variety of marketing campaigns targeting different populations, business types, and geographic communities. Analysis of the impacts of these campaigns, integrating program tracking data and community engagement relative to the geotargeting, can identify changes in program participation in targeted geographies, enabling further refinement of marketing collateral and/or campaigns.

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