

INTEGRATED RESOURCE PLAN (IRP) SUPPORT PACKAGE

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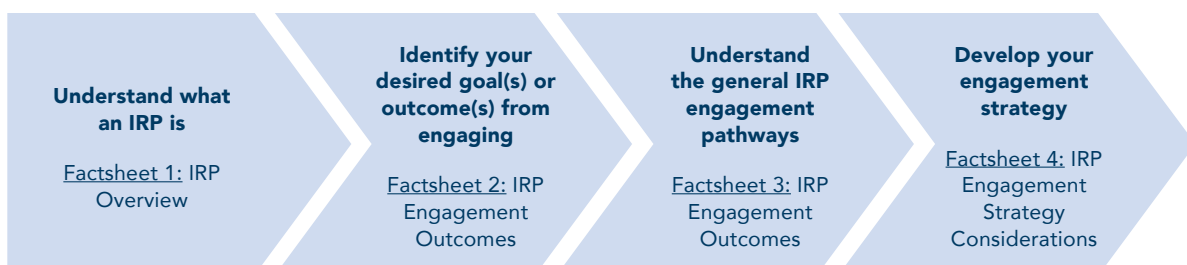
Local governments across the United States are increasingly adopting clean or renewable energy goals as a first step towards mitigating the impacts of climate change and decarbonizing the electric system. Although local governments can take a range of actions to achieve their commitments, they are increasingly pursuing engagement in utility long-term resource planning and, in particular, integrated resource plan (IRP) processes.

By engaging with electric utilities and state utility regulatory bodies on utility resource planning, such as an IRP, local governments have the opportunity to achieve their clean or renewable energy commitments more quickly. They can also increase access to clean or renewable energy more broadly for other customers within their utility's service territory. In addition, engaging in an IRP can allow local governments to address other community priorities such as energy efficiency, electrification, and issues relating to equity such as the equitable distribution of the energy system's economic benefits, equal access to resources, reduced energy burden, and overall affordability. Furthermore, engaging in an IRP process can also provide ancillary benefits such as enhancing utility and other stakeholder collaboration, improving relationships between cities and their utilities and regulators, and enhancing the local government's reputation as a leader on climate issues.

HOW DOES THIS SUPPORT PACKAGE EXPLORE AND GUIDE THE OPPORTUNITY TO ENGAGE IN IRP PROCESSES?

Through a series of factsheets outlined in the image below, this support package aims to provide a foundational understanding of IRP processes and key considerations to help local governments evaluate their engagement plans and craft an initial engagement strategy.

The diagram below presents an outline for how local governments can begin to understand IRP engagement.



This package is meant to be an introductory resource; local governments can and should continue to develop their strategy on their own or in collaboration with other partners or consultants. For more information on what other local governments have done in the past, please see the [City Renewables Accelerator's Engagement Tracker](#), which provides an overview of local government efforts to support or enable additional renewable energy development by engaging with local utilities, regulators, legislators, or independent system operators/regional transmission organizations (ISOs/RTOs).

HOW HAVE LOCAL GOVERNMENTS ENGAGED IN IRP PROCESSES TO DATE? WHY SHOULD THEY ENGAGE NOW?

Stakeholders engaged in IRP processes, especially the regulatory review process, tend to be industry trade groups, customer advocacy groups, environmental nongovernmental organizations, and, in some cases, large-scale energy users such as corporate customers. Although local governments across the United States have engaged in regulatory proceedings, including IRP processes, the presence and voice of local governments in IRP processes has not been as common or prevalent as other stakeholders. This may be for a variety of reasons: limited knowledge of the opportunity, lack of political will or concern over potential impacts on city relationships, lack of guidance on how to engage, minimal resources and capacity to engage (especially considering the wide array of tasks local governments are responsible for), and less tangible outcomes from the engagement.

However, input from local governments in IRP processes is essential for utilities to plan for city needs. IRP processes are intended to serve all, and the regulatory review process is aimed at protecting customers by ensuring safe, reliable, and affordable access to energy. In this regard, local governments are unlike any other customer being accounted for in IRP processes; they can engage in IRP processes both as an individual utility customer (in some cases the utility's largest customer) and on behalf of their communities. Given this unique voice, local governments should be a key stakeholder and help guide IRP development and review.

IRP engagement also represents a unique opportunity for impact. Given the range of content included in an IRP (and influence over subsequent utility actions) and its impact to the utility service territory writ large, IRP engagement can help local governments address several municipal and community-wide goals and priorities (further explored in Factsheet 2) and scale the outcomes from municipal action to many through one specific engagement.

Recognizing the unique voice local governments have and the need for their input into IRP processes, as well as the potential impact that can be achieved through a single engagement, this IRP support package is designed to help local governments overcome challenges to engagement.

FACTSHEET 1: INTEGRATED RESOURCE PLANNING OVERVIEW



Before engaging in an integrated resource plan (IRP) with electric utilities and the state utility regulatory body, it is important for local governments to understand what an IRP is, where they are used, how they are developed, and if and how they are reviewed. This factsheet explains the basics of IRPs and sets the baseline that local governments can build from, likely with their state- or utility-specific IRP context.

WHAT IS AN IRP?

Utilities create IRPs to establish a long-term plan to meet electricity demand.

- Most regulated, investor-owned utilities have processes for planning how to meet future energy demand, with many utilizing some form of an IRP.¹ This support package will refer to all such processes as IRPs for simplicity, although the name, development process, and content of these long-term resource plans can vary.
- The scope of IRPs varies, but the main goal is to create a long-term vision for resource development, addressing how the utility will meet future demand. IRPs are particularly important for vertically integrated utilities (i.e., utilities that own, operate, or contract for the generation resources needed to serve their customers), as they help determine the resource mix for procurement.
- IRPs typically address questions about the trade-offs between different resource options such as building new generation assets, purchasing energy from other generators, integrating distributed energy resources (DERs), investing in energy efficiency programs, and/or investing in demand response programs. These resource considerations are used to evaluate and communicate potential strategies for delivering safe, reliable supply at the lowest system-wide cost over ~10 to 20 years. Many utilities are now adding environmental performance, resilience, and consumer empowerment to their list of basic considerations—either voluntarily, or because they are required by regulation.
- Local governments can use proposed or completed IRPs to understand the utility's assumptions and perspectives on a range of issues, such as:
 - future demand, including how the utility is incorporating customer energy goals, electrification, and energy efficiency efforts;
 - the resources the utility thinks can be used to meet that need, which are impacted by the technologies available, assumptions regarding technology costs and capabilities, the cost of utilizing the resources, and retirement schedules;
 - the portfolios of future resources the utility is most interested in, and why;
 - and how future scenarios, potentially including customer programs, may impact their resource choices.

- ## WHERE ARE IRPS REQUIRED?

Depending on the state, long-term plans and IRPs must be submitted to the state's utility regulatory body every two to three years. In some cases, utilities are also required to submit updates between full IRP filings.

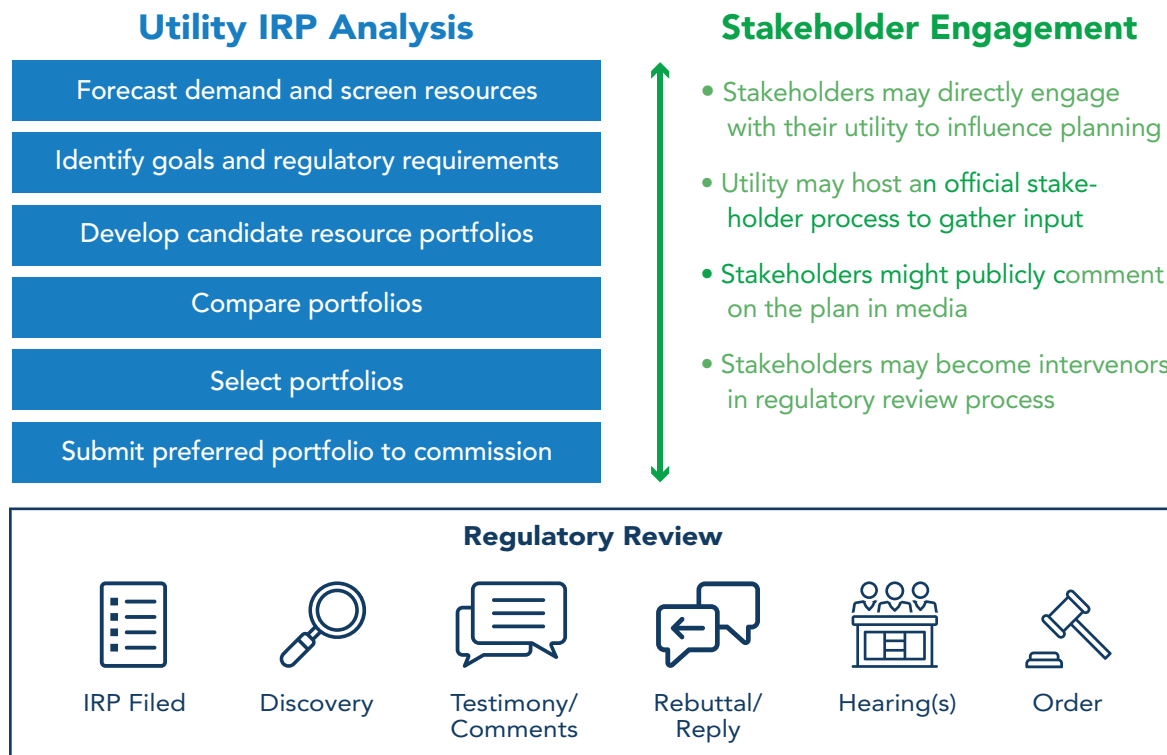
Legend:

- Has an IRP filing requirement
- Has a long-term filing requirement
- Does not have a filing requirement

HOW ARE IRPS DEVELOPED?

State legislation also typically influences what is required in an IRP. However, there is a general IRP development process most utilities follow, involving utility modeling and a comparison of potential portfolios.

Figure 2: Elements of an IRP Development Process



Note: This graphic shows a generalized example of the IRP development process. It does not capture all the variations of analysis, review, or stakeholder engagement, nor the iterations between steps. In this graphic, the regulatory review processes illustrated reflect states in which the regulator has a high level of regulatory oversight.

Many utility processes for developing an IRP are fairly similar and follow the steps outlined in the blue boxes of Figure 2.

- IRP processes typically begin with the utility developing one or more “demand forecasts,” which are projections of demand for electricity over the planning horizon (generally 10–20 years). The utility then identifies resources that could be used to meet demand; this step is sometimes referred to as a “resource screen.”
- Around the same time, the utility may establish what analyses it will perform (e.g., types of modeling used, connection to energy efficiency or transmission planning) and what internal goals (e.g., fuel diversity or carbon emissions reduction) or external requirements (e.g., energy efficiency standards or renewable portfolio standards) will be considered.
- The utility then develops options for meeting future demand by entering the resources identified in the resource screen into sophisticated simulation models, usually capacity expansion models. The generated options, which are often called “candidate resource portfolios,” present different mixes of energy resources the utility could adopt.

- Having identified candidate resource portfolios, utilities frequently then use production cost models to compare the performance of candidate resource portfolios across different future scenarios. These scenarios allow the utility to consider how changing key assumptions about the future (e.g., energy and demand forecasts, coal and natural gas costs, renewable energy technology costs, electrification projections, carbon costs) impact overall costs or other factors. In addition, the utility may also perform qualitative and strategic analyses. For example, some utilities develop a “scorecard” that examines the portfolios across metrics such as risk, resource diversity, and flexibility and may assign weights to these metrics to capture their relative importance.
- The utility will then typically select its preferred plan and may in addition identify contingency plans and/or a near-term action plan. A near-term action plan may grant the utility approval to procure or develop resources in the immediate future, such as within the next five years.

IRP development can also include stakeholder input and regulatory review.

- As represented in the green text in Figure 2, some utilities also utilize stakeholder processes prior to and/or throughout the IRP analysis process. These stakeholder processes may be voluntarily pursued by the utility and, in some cases, are required by the regulatory body. Utility stakeholder processes can include public meetings, public comment periods, listening sessions, advisory committees, or ongoing collaboration with highly engaged customers. Utility stakeholder processes can play an essential role in helping shape the IRP and are further explored in Factsheets 3 and 4.
- Where regulatory review is required, the completed utility IRP analysis is submitted to the state’s utility regulator for consideration, as illustrated in the dark blue box in Figure 2.
 - Per state requirements, the regulatory review process may occur through public, formal proceedings before the state regulator and organized through dockets or through other review processes with limited to no public review of the supporting analysis or final plan selection.
 - The level of oversight and the authority for the regulator to modify, accept, or reject an IRP varies by state. This is further explored in Table 1 below.

IRP development processes typically begin 18 to 24 months before any final selection of a plan or submittal of a proposal plan for a review process.

WHAT OTHER FACTORS MAY INFLUENCE IRP CONTENT AND DEVELOPMENT?

Utilities may have incentives that influence their IRPs. These incentives could be determined by utility business model structures, shareholder interest, and more. For example, vertically integrated utilities are structured to make a profit through a guaranteed, regulated rate of return on their investments. Therefore, they may be inherently incentivized to favor major capital investments, such as natural gas plants or pipelines, rather than demand response or customer-side, behind-the-meter projects. They may even be incentivized to overestimate demand and pad reserve margins. Identifying these additional influences is key to effective engagement.

HOW DO VARIOUS STATE REQUIREMENTS SHAPE IRP DEVELOPMENT?

IRP requirements may be minimal or more detailed and may shape the utility IRP analysis process, stakeholder engagement, and the regulatory review process. State requirements and the subsequent defined roles and responsibility of utilities, regulators, and stakeholders in developing, informing, and reviewing IRPs can have a large impact on how and why local governments may choose to engage.

Table 1 illustrates the range of potential IRP requirements, from minimal to more detailed. Specific states may or may not have these types of requirements or may have some combination or modification. Table 1 does not cover all requirements, such as how often plans should be developed, what updates may be required, and what time horizon they should cover.

Table 1: Examples of Variations in State IRP Requirements That Influence IRP Processes

IRP PROCESS COMPONENT	MINIMAL VERSUS MORE DETAILED REQUIREMENTS	EXAMPLES	IMPLICATIONS FOR LOCAL GOVERNMENTS
Utility IRP Analysis: Resource Requirements	Minimal: Some states only have broad language describing the types of resources that must be considered.	In New Mexico , statute directs the utility's review of resource options to include "all feasible supply-side, energy storage, and demand-side resources," without greater definition of demand-side categories.	Minimal or no requirements regarding what resources should be considered may result in missed opportunities, depending on whether and how resources like demand-side resources, storage, or new technologies are considered.
	More Detailed: In other states, utilities must consider specific resources such as energy efficiency, distributed energy resources (DER), or transmission.	In Delaware , utilities must consider "short- and long-term procurement from demand side management, demand response and customer sited generation; resources that utilize new or innovative baseload technologies." Indiana , Montana , and North Carolina have similar requirements.	Depending on the resource requirements, there may be a role for stakeholders to influence or request the consideration of a broader scope of resources.
Stakeholder Engagement: Requirements for Outreach ²	Minimal: Some states do not require any stakeholder engagement within the IRP process.	In Nebraska , a state with only publicly owned utilities, statute requires IRP development but does not require stakeholder input. Kentucky , Oklahoma , Minnesota , Virginia , and West Virginia also do not require stakeholder input.	Requirements for robust stakeholder engagement as part of the IRP development process, prior to submitting for approval, typically enhance transparency and provide local governments with a greater opportunity to understand and impact the draft. This offers local governments the potential to influence the IRP at a lower level of effort than would be required at the approval stage. This concept is further explored in Factsheet 2.
	More Detailed: Many states require a formal stakeholder process, which mandates engagement with customer groups, industry groups, and/or environmental groups.	In Hawaii , utilities are required to create diverse advisory groups. The Public Utilities Commission there has also approved Hawaiian Electric's new Integrated Grid Planning (IGP) process , which incorporates a stakeholder council, working groups, and a technical advisory council. Arkansas , Indiana , and Louisiana also include specific requirements for stakeholder engagement.	

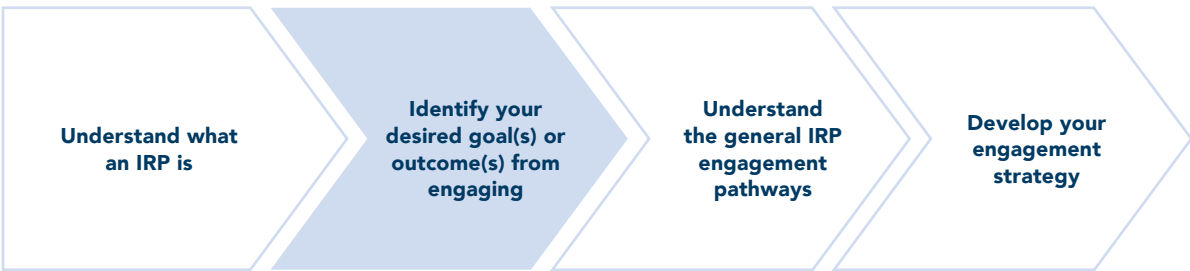
Table 1: Examples of Variations in State IRP Requirements That Influence IRP Processes (Cont.)

IRP PROCESS COMPONENT	MINIMAL VERSUS MORE DETAILED REQUIREMENTS	EXAMPLES	IMPLICATIONS FOR LOCAL GOVERNMENTS
Regulatory Review: Regulator Oversight	Minimal: In some states, the regulatory body only accepts the IRP and acknowledges certain requirements were met, without judging the quality of the plan.	In Indiana , statute does not grant the Indiana Utility Regulatory Commission (IURC) the authority to take a position on the relative merits of the plans selected by the utility. Arkansas also does not require that a commission give its approval for a plan.	The extent of the regulator's oversight and authority during the review process can influence the IRP. In states where this regulatory review process is minimal or nonexistent, local governments may want to advocate at the state level to enhance the regulator's authority and improve the transparency of the overall process.
	More Detailed: In other states, regulators have the authority to approve, request modifications to, or reject a plan based on the quality of analysis.	In Colorado, statute requires the utility, Public Utilities Commission staff, and the Office of Consumer Counsel to act as an "independent evaluator" to review all analysis so that the Commission can approve, condition, modify, or reject the Energy Resource Plan (ERP). Minnesota , Michigan , Arizona , Nevada , and Oregon also allow the commission a greater role in approval.	

WHAT SHOULD A LOCAL GOVERNMENT KNOW ABOUT ITS STATE AND ELECTRIC UTILITY TO EVALUATE IRP ENGAGEMENT?

- *What to Research:* Since resource planning processes vary across states and can vary between utilities in the same state, local governments should research their utilities' IRP processes, the stakeholder outreach offered, the regulatory review process (e.g., the relevant docket or other public review processes), the regulator's oversight (e.g., how previous IRPs have been managed by the regulatory body), relevant timelines (e.g., when the next IRP process will begin), and the history or efforts to date.
- *Where to Find the Information:* State-level requirements can often be found on the regulatory body's website. Alternatively, this information may be obtained from the local utility's website or by requesting this information directly from the utility. Local governments can also reach out to other organizations that regularly intervene in these processes (e.g., nonprofit/advocacy organizations).

FACTSHEET 2: IRP ENGAGEMENT OUTCOMES



Once local governments understand what an integrated resource plan (IRP) is broadly, they can assess their goals or desired outcomes, which will shape their engagement strategy. This factsheet identifies some of the potential outcomes from engaging in an IRP process and highlights key considerations that will help local governments decide whether to engage and which outcome(s) to pursue.

WHAT ARE THE POTENTIAL OUTCOMES FROM ENGAGING IN AN IRP PROCESS?

Local government engagement in IRP processes can result in directly influencing future energy resource plans and can also drive a range of outcomes, from addressing community priorities such as equity to enhancing key relationships and the city’s climate leadership reputation.

IRPs serve as indicators of potential future utility resource development and procurement, as previously explored in Factsheet 1. Yet engaging in IRP processes can result in a variety of outcomes beyond influencing a utility’s resource mix. Table 2 highlights some potential, non-mutually exclusive outcomes from these engagements that local governments might want to pursue.

Table 2: Potential Outcomes of Local Government Engagement in IRPs

Drive decarbonization	<p>Customer engagement in an IRP can support faster decarbonization of a utility's generation mix to serve customers. This can reduce emissions from municipal operations, a particular community, and the entire region, perhaps achieving these outcomes more efficiently than by pursuing individual procurement efforts.</p> <p>Local governments can achieve this by elevating the role of renewable energy, as well as by demonstrating alternative options to mitigate or eliminate the need for traditional fossil fuel use through the use of clean energy portfolios (including renewable generation, energy efficiency, demand response, and energy storage) within the utility's preferred resource portfolio and any potential action plan. For example, local governments could request accelerated coal plant retirements, question cost assumptions (related to both fossil generation and renewables), ensure renewable energy is valued appropriately as a capacity or energy resource, and/or ensure consideration of a wide range of resources (e.g., storage, energy efficiency, or demand-side programs). Depending on the scope of the IRP, local governments can also ask for the creation of new programs such as renewable energy green tariffs, energy efficiency incentives, or new rate structures that support electric vehicle adoption.</p>
Achieve other community priorities	<p>Local governments can use IRP engagements to pursue other community priorities related to issues such as equity, resilience, affordability, energy efficiency, electrification, economic development, local resources (e.g., distributed energy resources or community solar), and community health. Local governments can ask that such priorities be explicitly included in IRP modeling as an outcome, used as a principle to guide the utility's and regulator's decision-making and prioritization, or carried out as a by-product in resource plan implementation. For example, local governments could request that the utility explicitly prioritizes local resources in the analytical modeling or even request from the regulators that economic development in the region serve as a key consideration to guide decision-making.</p>

Table 2: Potential Outcomes of Local Government Engagement in IRPs (Cont.)

Enhance the IRP development process	By frequently engaging before and during the IRP analysis (recall this occurs 18 to 24 months before any final plan selection or review process) and sometimes during the review process, local governments and utilities can strengthen and improve on each other's efforts. For example, sharing and learning about each other's goals may unlock opportunities to better align or strengthen targets where possible and to achieve more by working together. Engaging during the IRP analysis process can also enhance a utility's assumptions around future energy consumption growth due to building or transportation electrification, distributed energy resources (DERs), and energy efficiency, all of which can influence future resource needs. More accurate forecasts and planning should lead to improved outcomes for customers by eliminating potential overspend on unnecessary resources and/or allowing the utility to more effectively incorporate anticipated customer needs into its resource plan and program design.
Identify new opportunities for collaboration with the utility	Utility collaboration is in part explored above but can also take the form of collaborating in the implementation of a desired outcome or to overcome external barriers. For example, local governments (and other customers) may offer to align their electrification efforts to aid the utility or may have assets such as land that could be utilized to host resources or as storage assets that could be used as DERs to enable the desired solution.
Develop municipal reputation and relationships with the utility, regulators, and potential partners	Local governments can use IRP engagement to develop their relationships and reputation with other key entities, such as their utility, state regulators, or state energy offices. Many local governments have not engaged in IRP processes in the past, but they have the potential to bring a unique and important voice to the proceedings as large utility customers and as representatives of their communities. By engaging in these processes, local governments can signal their interest and capability to intervene and enhance their reputation as involved, active key stakeholders. This may be valuable in and of itself, as the enhanced reputation may afford a local government more leverage or opportunities in future discussions or enable partnerships with other groups, such as state energy offices, environmental regulators, or renewable energy advocates. Moreover, by enhancing the local government presence in the processes generally, cities and counties may be able to drive changes or new approaches that allow future IRPs to better incorporate their needs and concerns.
Demonstrate public leadership	Serving as an active participant in IRP processes, as a key process that affects or influences achieving climate and energy targets, provides a means for local governments to publicly reinforce their commitment to climate action. Publicly participating in and voicing community needs, as well as securing key victories in these processes, can enhance the reputation of a city, and its civic leaders, among community members and other important stakeholders.
Increase local government awareness of utility renewable energy efforts	The content of IRPs may provide insight into utility decisions, priorities, and goals that are not often explicitly shared with customers; these insights can help local governments improve how they plan to meet their renewable energy commitments. For example, understanding how much renewable energy a utility plans to purchase by specific dates can help local governments tailor and optimize their own purchasing decisions.

FACTSHEET 3: IRP ENGAGEMENT PATHWAYS



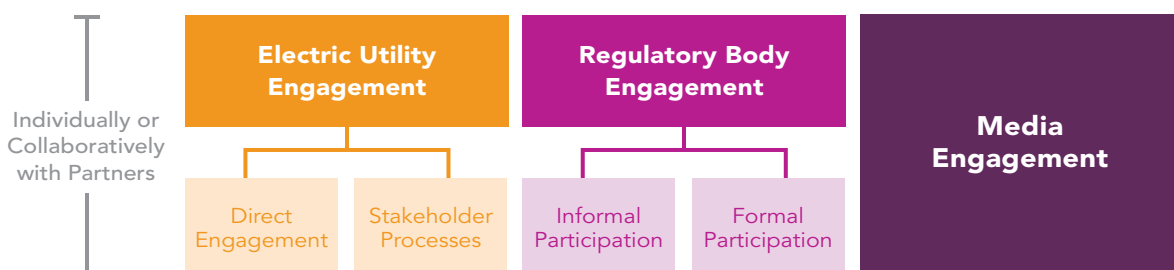
Once local government staff have a general understanding of what an integrated resource plan (IRP) is, as explored in Factsheet 1, and what outcomes they can expect from IRP engagement, explored in Factsheet 2, they can begin to consider specific engagement opportunities. This factsheet provides guidance on how local governments can engage in the IRP process and relevant considerations.

WHAT ARE THE PATHWAYS FOR ENGAGING IN AN IRP PROCESS?

IRP engagement typically occurs across three main pathways: engagement with the electric utility, regulatory engagement, and media engagement.

- Figure 3 introduces these IRP engagement pathways and Table 3 further explores each, providing a description of the pathway, how a local government could pursue the pathway, timing considerations, and some high-level pros and cons related to the level of effort required and potential impact.
- These pathways are not necessarily mutually exclusive, and local governments could decide to pursue one or more as part of their engagement strategy.
- Each of these pathways can be pursued individually or in collaboration with others.
- There may also be related actions not fully covered by this introduction. For example, direct engagement as defined below showcases how a local government may work directly with their utility, but this concept could be expanded to include engagement with elected officials who can influence utility regulation and planning.
- As discussed in Factsheet 1, not every engagement pathway is available in every state. For example, some utilities may not offer stakeholder engagement or be required to receive regulatory approval of their final plan.

Figure 3: Overview of General IRP Engagement Pathways



*These pathways are not mutually exclusive

Table 3A: IRP Engagement Pathways, Electric Utility Engagement

ELECTRIC UTILITY ENGAGEMENT		
	Direct Engagement	Stakeholder Processes
What	Direct engagement establishes a dialogue between a local government and its utility and is achieved through in-person or written engagement such as direct calls, scheduled meetings, etc. This one-on-one communication can supplement participation via other engagement pathways, help bridge information gaps where a meaningful stakeholder process does not exist, and allow local governments to coordinate with their utility to help shape the IRP and work toward securing regulatory approval.	Utility stakeholder processes typically consist of a series of public forums, which may include presentations sharing information on the planning process, conversations, and requests for feedback on the plan, as well as open question-and-answer sessions.
How	Direct engagement related to an IRP may involve a local government asking questions and clarifying details about the plan and its assumptions, ensuring the utility is aware of and incorporating local government goals, asking how the IRP plans may impact the local government's targets, or initiating other discussions that help both parties better understand each other's needs. This may be led by mayors or other leadership figures, sustainability staff, or a combination of actors in the local government, depending on what relationships exist and the tone the local government wishes to set for the interaction.	Participation can entail simply listening and learning or more actively participating by engaging in conversations. Both of these approaches can provide local governments with insights into the IRP process and the utility's preferred resource plan while also enhancing the utility-customer relationship. These public forums also provide an opportunity for local governments to learn what other stakeholders have requested or how they have engaged in the past.
When	Engagement of this sort can occur at any time and can be ongoing. However, reaching out ahead of or during the utility analysis process can result in stronger collaboration and enhanced outcomes.	The utility, at times with guidance from the regulatory body, sets the timing of these processes.
Pros	<ul style="list-style-type: none"> • The direct line of conversation with the utility allows concerns to be discussed and solutions to be identified collaboratively. • Engaging outside a formal process minimizes procedural restrictions and provides a great deal of flexibility. • The effort required can be low. 	<ul style="list-style-type: none"> • There are generally few requirements for participation. • Local governments' level of participation is up to them to decide. • These processes provide a direct conversation with the utility and a variety of other stakeholders.
Cons	<ul style="list-style-type: none"> • It may be challenging to find the right person at the utility to engage. • There is no formal requirement for the utility to respond or cooperate. • This engagement pathway is harder to publicize, which can make it difficult for local governments to highlight their efforts. • The lack of transparency can make it difficult for partners to hold each other accountable. 	<ul style="list-style-type: none"> • The scope of the stakeholder process may not align with the priorities of the municipal government.

Table 3B: IRP Engagement Pathways, Regulatory Body Engagement³

REGULATORY BODY ENGAGEMENT		
	Informal Participation	Formal Participation
What	State regulatory bodies—known as Public Utility Commission (PUC), State Corporation Commission (SCC), Public Service Commission (PSC), etc.—typically convene legal proceedings, designated as dockets, to review and/or approve IRPs as required by state legislation. These proceedings may be litigated or non-litigated, which will influence the manner in which local governments can participate.	
How	<p>Informal IRP regulatory proceedings typically allow customers, including local governments, to participate informally in public hearings and/or submit written comments to be considered in the proceeding.</p> <p>Local governments can participate in the regulatory process individually or in coordination with others. Participation allows local government staff to comment on, support, and critique elements of the proposed plan.</p> <p>Mayors or other leadership figures or sustainability staff typically lead engagement in public hearings or written comments. In deciding who should lead this engagement, consider the implied power or level of authority of each figure and the requirements for them to participate.</p>	<p>Local governments can formally participate by petitioning the regulatory body to grant them intervenor status. Acting as an official party to the case typically involves meeting legal requirements, which are usually established in the regulator's rules and guidance.</p> <p>As a formal participant a local government can more actively submit testimony, request information from other parties, participate in closed conversations, and engage in any settlement or stipulation conversations. Keep in mind that regulators must conduct their review and make a final decision based on the evidence before them; engagement as a formal party, with the opportunity to more actively influence the review process, can enhance the comments or evidence regulators must consider. In deciding who should lead this engagement, consider the implied power or level of authority of each figure and the requirements for them to participate.</p> <p>Formal engagement may require legal representation.</p>
When	Public hearings and comment periods are governed by the regulatory body. This timing is often established in the docket.	Formal proceedings commence either when a docket or case opens and a schedule is set for proceeding or when otherwise dictated by the local administrative law or regulator guidance.
Pros	<ul style="list-style-type: none"> Content submitted becomes part of the formal proceeding, making these engagements public and transparent. Depending on state requirements, submitted comments or oral testimony become evidence in the proceeding that must be considered. Effort required can be low to high, depending on the content of the engagement and whether it is done individually or in conjunction with others. 	<ul style="list-style-type: none"> Content submitted becomes part of the formal proceeding, making these engagements public, transparent, and more likely to be considered by regulators. Depending on state requirements, submissions from formal intervenors become evidence in the proceeding that must be considered. The effort required can be low to high, depending on the extent and content of the engagement and whether it is done individually or in conjunction with others: <ul style="list-style-type: none"> Low: register as a party to the proceeding but just listen in Medium: enter written or oral comments High: provide testimony or serve as a witness during hearings As a party to the case, local governments will receive official notice of new developments in the proceeding, such as deadlines and filed comments from others.

Table 3B: IRP Engagement Pathways, Regulatory Body Engagement (Cont.)

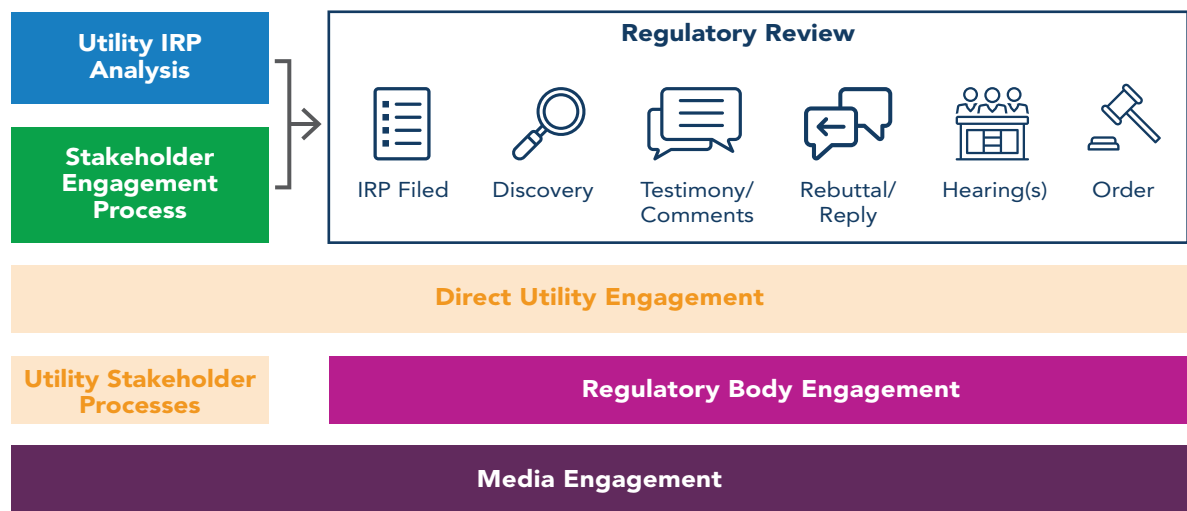
REGULATORY BODY ENGAGEMENT		
	Informal Participation	Formal Participation
Cons	<ul style="list-style-type: none"> Local government staff may need to obtain city approval before participating. Public participation opportunities are limited. Informal participants' views may be considered but are typically not given as much emphasis as formal intervenor engagement. The process is often time-bound by an established schedule or other applicable law and generally occurs after formal engagement opportunities. There is no direct, formal notice of the proceeding; local governments are responsible for staying aware of the process and requirements. 	<ul style="list-style-type: none"> Local government staff may need to obtain city approval before participating. Intervenors must meet any legal requirements to participate; these are typically established in the regulator's rules and guidance. Formal participation can be time-consuming and costly, depending on the depth of involvement (consider what may be required to do extensive analysis) and whether legal assistance is required.

Table 3C: IRP Engagement Pathways, Media Engagement

MEDIA ENGAGEMENT	
What and How	Engagement in the IRP process can occur informally in a public context. For example, a local government may choose to comment publicly on the utility IRP through an open letter or op-ed, public statements and articles, and/or blogs.
When	As this engagement occurs outside of any formal process, it can occur at any time.
Pros	<ul style="list-style-type: none"> There are no formal requirements outside of government-specific requirements. The effort required can be low. Media can reach a broad set of stakeholders and build public support.
Cons	<ul style="list-style-type: none"> Regulators may not be aware of or able to officially consider informal comments made outside of the docket.

As noted in Table 3, engagement across these pathways can occur at various times. Figure 4 illustrates how these pathways interact and align with the timing of the IRP development process.

Figure 4: Comparing the IRP Development Process with the IRP Engagement Pathways



WHAT FACTORS SHOULD LOCAL GOVERNMENTS CONSIDER WHEN DECIDING WHETHER TO ENGAGE?

In evaluating whether to engage in IRP processes, local governments should weigh a number of factors. Some questions to consider include but are not limited to:

- How feasible are your desired IRP engagement outcomes, and how do these outcomes align with local government renewable energy commitments?
- What capacity and resources are available to engage in an IRP analysis and review process versus other efforts to achieve commitments? Are there others who can support, either technically or as partners, to align your respective messages, carry the IRP engagement forward, or more?
- Is there political will to engage, and to what degree?
- What is your current utility or regulatory relationship, and how may IRP engagement strengthen, challenge, or otherwise influence it? How does this align with your desired relationships? How do your IRP engagement outcomes balance with other utility efforts and requests, e.g., a specific deal for a renewable energy resource on government property?
- What are the regulatory requirements that shape the scope or content of the IRP and the analysis or review process? What is the timing of the IRP analysis or review process (which could limit the outcome of the engagement)?

These considerations not only influence the decision of whether to engage to or not, but also the question of how to engage, which is further explored in the following Factsheet 4.

FACTSHEET 4: IRP ENGAGEMENT STRATEGY CONSIDERATIONS



With a broad understanding of IRPs and the potential outcomes from engaging in IRP processes, local governments should begin to consider their engagement strategy—both in terms of which pathway(s) should be pursued and what message should be conveyed. This factsheet provides some considerations and best practices to help craft an engagement strategy that is tailored to the local government’s needs.

HOW TO DETERMINE WHICH IRP ENGAGEMENT PATHWAY(S) TO PURSUE?

As identified in Factsheet 3, there are various engagement pathways, each with differing opportunities to achieve desired goals and differing associated requirements and considerations.

- In evaluating which pathway(s) to pursue, begin by determining which pathways are available based on the state and regulatory context (Factsheet 1) and the timing of the engagement in the overall IRP development (Factsheet 3). This information can then be balanced with an understanding of what is required to engage in each pathway and the related potential impact.
- Local governments may want to engage with others as part of the pathway selection process. First and foremost, engaging with the utility can help local governments determine which goals can be met outside of the IRP process and which should be addressed through IRP pathways. Local governments may also be able to determine which pathways to pursue by working in partnership with others. See the text box at the end of this factsheet for more.
- Keep in mind that an engagement strategy may include one or more pathways.

AFTER IDENTIFYING THE BEST PATHWAY(S) TO PURSUE, HOW CAN LOCAL GOVERNMENTS CRAFT COMPELLING CONTENT AND FRAMING FOR THEIR IRP ENGAGEMENT MESSAGE?

Engagement messages should balance the regulatory and process timing opportunity, the scope of the IRP, desired IRP engagement outcomes, the feasibility of the ask(s), desired relationships, and other relevant considerations.

Engagement messages vary. Table 4 below provides insights into the general components an engagement message can include, as well as considerations to keep in mind related to the scope, framing, formatting, and other factors to help shape the specific approach.

Table 4: Message Considerations

GENERAL COMPONENTS	<ul style="list-style-type: none"> • Local government goals and priorities. • Any appreciated elements of the IRP process or IRP itself (e.g., specific scenarios, resource considerations, or even utility considerations and priorities) as well as what is still desired. • Clarifying questions or desired additional information regarding the IRP (e.g., assumptions being made) or the development process (e.g., stakeholder engagement processes). • Requests to change the proposed IRP or adjust future actions and IRP processes, such as: <ul style="list-style-type: none"> ◦ Requests to the utility for particular actions (e.g., if the IRP is still in the development stage, ask the utility to consider local government electrification efforts to improve assumptions or accelerate coal retirement scenarios; if the IRP is in the review process, ask the utility to better engage underserved communities in future IRP stakeholder processes to improve later processes). ◦ Requests to regulators regarding their IRP review (e.g., ask regulators to question techno-economic assumptions or request that the utility place greater value on resilience and/or equity outcomes or accelerate coal retirements). <p>See Factsheet 2, Table 6, Appendix 1 and peer examples to further explore more detailed requests.</p> • References to research, data, or relevant precedents of utility or regulator actions (both utilities and regulators appreciate peer examples, especially those from similar contexts). • Offers of support or demonstrations of a willingness to work together on new solutions or alternative approaches to overcome market or regulatory challenges. 		
SCOPE LIMITATIONS	<ul style="list-style-type: none"> • State or regulatory context may influence the message. For example, in states where regulators have the authority to approve or modify utility proposals, it may be worthwhile to develop detailed content to make a stronger case for the desired action. In contrast, in states with limited regulatory influence, it may not be worthwhile to develop elaborate content. • The content and scope of the IRP may inherently influence the content of a message. If the IRP's scope is sufficiently broad, local governments may be able to comprehensively address all of their priorities, including renewable energy, energy efficiency, resilience, equity, and more. Alternatively, if the scope of the IRP is fairly limited, decisions regarding specific customer programs or other desired outcomes may be deferred to a different proceeding. • The content should reflect where the IRP is in the development process, especially whether the IRP is in the analysis or review process. As explored above, some of the engagement pathways or outcomes are best pursued at specific times in the development process. For example, feedback on utility analysis may be more impactful early in the development process. 		
FRAMING	<table border="1"> <tr> <td data-bbox="493 1373 613 1692">General</td><td data-bbox="613 1373 1425 1692"> <ul style="list-style-type: none"> • Focus on the IRP engagement outcome(s) prioritized by the local government. Refer to Factsheet 2 for more information. • Messages should balance requests for ambitious action and consideration with demonstrating awareness of market and regulatory constraints, the current motivations of the utility and state regulators, and any political implications of the ask. • Messages can be broad, specific, or both. For example, local governments can make broad statements regarding the overall direction of the utility and/or include specific comments on the methodologies, assumptions, desired programs, and so on. </td></tr> </table>	General	<ul style="list-style-type: none"> • Focus on the IRP engagement outcome(s) prioritized by the local government. Refer to Factsheet 2 for more information. • Messages should balance requests for ambitious action and consideration with demonstrating awareness of market and regulatory constraints, the current motivations of the utility and state regulators, and any political implications of the ask. • Messages can be broad, specific, or both. For example, local governments can make broad statements regarding the overall direction of the utility and/or include specific comments on the methodologies, assumptions, desired programs, and so on.
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Table 4: Message Considerations (Cont.)

FRAMING (CONT.)	Tone	<ul style="list-style-type: none"> Existing and desired relationships with the utility, regulators, and partners may influence a message's tone. A message can be framed as supportive, critical, or a blend of both. A local government's degree of political will can influence the tone of the message.
	Audience	<ul style="list-style-type: none"> The intended audience will likely depend on where the IRP is in the development process. For example, during the analysis and stakeholder engagement processes, messages will likely be aimed at the utility. During the IRP review process, the regulators are responsible for reviewing or approving the plan (e.g., reviewing the information provided or the assumptions made by the utility or even requesting that the utility take follow-up action). During the review process, messages may still be aimed at both the utility and regulators; this generally takes the form of demonstrating or reiterating specific positions to influence the current proposal or future IRPs. Messages can be drafted for singular or multiple audiences, including the electric utility, the regulators, the public, and other stakeholders. When pursuing more than one engagement pathway, local governments may wish to tailor their message to each.
FORMATTING		<ul style="list-style-type: none"> Draw clear connections between key messages, community goals, and supporting evidence/research and examples. If crafting a regulatory filing, <ul style="list-style-type: none"> Make sure any comment, formal or informal, is dated and references the IRP or related materials, including the docket or file number. Structure comments so that they are accessible and organized. Formatting best practices include use of executive summaries for longer filings, highlighting main points or requests as headers or bolded/numbered statements, and providing concluding summaries of the requested actions of the regulators or utilities. For public messages that reach a broad audience, be aware that shorter, clear messages in accessible language with specific calls to action can be appropriate.
ADDITIONAL CONSIDERATIONS		<ul style="list-style-type: none"> Local governments should consider their own capacity and resources when determining how extensive and detailed their message and analysis will be. Local governments should keep in mind any requests they have previously made to the utility and regulators, the priority of this IRP engagement message compared with these other asks, and how the IRP message may influence these other efforts. Past IRPs can be utilized as a reference point. Local governments can explore what intervenors have done in the past, what reforms state regulators have required, the reasons for previous approvals or denials, and whether the utility has made efforts to address previous requests for action from the regulators or stakeholders. Engagement from other stakeholders can be utilized as a template to not only shape content but also place a message within a broader context of customer positions or interests. Consider how the message compares to those of other parties and whether or not they are complementary. Some concerns may be better suited to alternative venues. For example, in many cases, demand-side resources are studied more fully in a demand side management (DSM) study; these DSM studies are performed prior to, and used as an input within, an IRP. Local governments do not need to be the primary voice for every component of the message. Consider who else may have similar goals and who is best suited to deliver this message to the intended audience.

HOW TO TRANSLATE DESIRED ENGAGEMENT OUTCOMES INTO A MESSAGE?

A local government's message can be further tailored to reflect and support its desired outcomes.

Table 5 below provides some examples of the messages that could be conveyed to support various outcomes that were explored in Factsheet 2.

Table 5: Examples of Translating IRP Engagement Outcomes into IRP Engagement Message(s)

POTENTIAL OUTCOMES OF LOCAL GOVERNMENT ENGAGEMENT IN IRPS	POTENTIAL MESSAGE FOR THE UTILITY OR REGULATOR (Recall the timing of the IRP will influence this content and the message audience)	CONSIDERATIONS
Drive decarbonization: Improve the role of renewable energy or mitigate the need for traditional fossil fuels <i>See Appendix 1 for more detail</i>	<ul style="list-style-type: none"> Request the increased consideration or use of renewable energy, clean energy portfolios (renewables, efficiency, demand response, and storage), and/or the accelerated retirement of fossil fuel generation assets Address whether the planning assumptions accurately assess the value and full potential of renewable energy and other clean energy resources, the appropriateness of the metrics used to compare resource scenarios, and the implications to the preferred scenario Identify whether the planning process considered customer demand for renewable energy and decarbonization—and, if not, request collaboration 	<ul style="list-style-type: none"> Deep analysis of IRP assumptions, approaches, and decisions can become highly technical and require expertise to address, all of which will likely increase the level of effort required Messages may be questioned or challenged, so intervenors should only convey points they are comfortable defending The feasibility of this request will be limited by where the IRP is in the development and regulatory oversight process
Drive decarbonization: Create new utility programs or efforts	<ul style="list-style-type: none"> Request expanded access to or additional funding for existing or new programs (e.g., the expansion of existing renewable energy programs, a new green tariff program, or improved energy efficiency programs) Request the removal of specific barriers at either the program level (e.g., customer participation requirements of new load) or regulatory level (e.g., definitions around equal treatment of all or preferential treatment of low- or moderate-income customers) 	<ul style="list-style-type: none"> This message should only be pursued in IRPs that include new programs in their scope Note that if new programs are needed, consider the opportunity to work directly with the utility to establish new offerings instead of or alongside the IRP engagement
Achieve other community priorities: For example, equity	<ul style="list-style-type: none"> Identify how equity can and should serve as a guiding principle during the analysis and review process, whether comprehensively or specific to individual resources or programs considered (e.g., that the social and economic co-benefits of renewable energy associated with the accessibility, location, and development of the resources are distributed evenly) Request programs (e.g., targeted energy efficiency or community solar efforts) that lower the electric bills and reduce the energy burden for low- or moderate-income households 	<ul style="list-style-type: none"> Community priorities related to affordability, energy efficiency, electrification, economic development, and local resources have been traditionally linked to the IRP development process, making the request more familiar for utilities and regulators; priorities around equity or health benefits, however, may be more novel concepts that require additional explanation or support

Table 5: Examples of Translating IRP Engagement Outcomes into IRP Engagement Message(s) (Cont.)

POTENTIAL OUTCOMES OF LOCAL GOVERNMENT ENGAGEMENT IN IRPS	POTENTIAL MESSAGE FOR THE UTILITY OR REGULATOR (Recall the timing of the IRP will influence this content and the message audience)	CONSIDERATIONS
Enhance the IRP development process: Accountable and transparent stakeholder engagement	<ul style="list-style-type: none"> Request a formal stakeholder process or comment on how existing processes can be improved (e.g., incorporate more stakeholder input) Support or request increased transparency of planning assumptions and the portfolio selection process 	<ul style="list-style-type: none"> Engaging partners with IRP experience elsewhere can help local governments assess how their utility's stakeholder process compares to effective processes used by other utilities Asking the regulatory body to establish new processes or standards may require a formal petition or filing Many utilities consider some data to be sensitive and may request that stakeholders sign a non-disclosure agreement to review data, so consider making this request as early as possible
Identify new opportunities for collaboration with the utility	<ul style="list-style-type: none"> Identify elements of the IRP and the process that are helpful, as well as what is still desired (e.g., require stakeholder input in the approval process) Identify inherent market or regulatory challenges that limit what the electric utility can do Offer solutions and support where feasible Request collaboration 	<ul style="list-style-type: none"> Collaboration may inherently be limited by where the IRP is in the development process
Demonstrate public leadership	<ul style="list-style-type: none"> Identify any municipal and community-wide renewable energy commitments, as well as any local government priorities Demonstrate how these goals align with the utility's or state's goals or where there are areas to improve (consider examining the IRP's stated priorities and other metrics or considerations that are guiding the utility's and regulator's efforts as well as the content itself) 	<ul style="list-style-type: none"> The extent or depth of this type of message can be high-level, detailed, or some combination of both (e.g., a high-level statement on local government commitments and priorities, general support for or desired change in the overall direction of the IRP, a more thorough review of specific assumptions, or even a request for a specific program or action of the utility)

WHEN EXECUTING AN IRP ENGAGEMENT, WHAT ADDITIONAL CONSIDERATIONS AND BEST PRACTICES WILL MAXIMIZE THE LIKELIHOOD OF SUCCESS?

Engage early and often, stay informed, and build in plenty of time for internal approval.

- When engaging directly with a utility, local governments should communicate frequently and early. Be clear about key goals and the products, services, or outcomes desired, identify where there are areas of alignment, understand their barriers, and ask where support is needed.

- If engaging during the IRP review process, local governments may wish to inform their electric utility of their plans early on to help maintain or build positive relationships. This also provides the utility with an opportunity to offer to collaborate directly on achieving key goals.
- Local governments should stay informed and aware of IRP process timing and requirements. As explored in Factsheet 3, local governments that want to engage as a formal party may need to submit paperwork or meet other requirements ahead of time and throughout the approval process.
- It's important to build in plenty of time for internal review and approval, especially if the mayor's office, city council, or attorneys will need to sign off.

SHOULD LOCAL GOVERNMENTS PARTICIPATE IN REGIONAL AND/OR MULTISTAKEHOLDER PROCESSES OR COLLABORATE WITH OTHER ORGANIZATIONS ON ENGAGEMENTS?

Neither the pathways pursued nor the messages conveyed in IRP engagement strategy should be considered as siloed local government action(s).

- Local governments can participate in regional or multi-stakeholder processes with other non-governmental clean energy purchasers or advocates through a coalition, trade association, or city network. Strategic collaboration can also occur with key partners such as other local governments, public institutions or corporations with similar goals, or renewable energy advocacy groups.
- Collaboration can bring a variety of benefits, ranging from overcoming capacity and resource barriers to scaling and strengthening the customer voice through aggregated efforts. For example, partners could combine efforts (e.g., jointly submit similar or identical comments in support of common goals to align their ask) or divide up tasks related to IRP review and submission drafting. Partners could also pool knowledge and resources by sharing their own understanding and insights or, when necessary, pool funds to hire external consultants.
- Collaboration with partners can also bring its own challenges. For example, finding group consensus may be time-consuming and challenging. Moreover, individual members may have less control of the group's content, and their specific needs may not be represented as precisely as desired or at all. In some cases, there may also be requirements to participate in group efforts.
- Local governments should consider how to maximize the value and effectiveness of partnerships. For example, it can be useful to consider:
 - Who is best suited to be a leading voice?
 - What pathway(s) or message(s) can be pursued or delivered by whom?
 - What issues should be pursued individually, outside of the collaboration?

For example, a local government may find it useful to collaborate with a coalition on analysis or to develop message content. However, the government may prefer to pursue a pathway individually or less formally, perhaps through a public letter that highlights other stakeholders' comments at a high level, or that simply states that there is general agreement with another's position. The local government may also choose to focus on articulating a specific local government challenge that is unique among other stakeholder engagement. Or a local government may participate in a utility-hosted stakeholder process with a broader group, but still choose to engage directly with their utility on key items.

- When working with partners, make sure you have a clear understanding of roles and timing.

APPENDIX 1: DECARBONIZATION DEEP DIVE

WITH THE DESIRED OUTCOME OF DRIVING DECARBONIZATION, WHAT TECHNICAL ELEMENTS SHOULD BE CONSIDERED WHEN REVIEWING AN IRP?

Some elements to review and consider drafting messages around include:

- **Consideration of Carbon Reduction or Climate Goals:** If applicable, IRPs should be designed to incorporate any renewable or emissions goals set by the state, utility, and the utility's customers.
- **Accurate Assumptions:** There are several assumptions used in IRP analysis that impact modeling results and can be examined to ensure accuracy. For example:
 - Load forecasts for IRPs should accurately reflect electricity demand, as forecasts influence resource requirement estimates and potentially allow large fossil resources to stay operational longer than needed.
 - Assumptions for the cost and generation profiles for renewable resources should also be up to date to capture recent price declines.
 - Availability of cost-effective energy efficiency and demand flexibility resources should be included in assumptions.
 - Planning to meet peak load and options for managing this demand should consider a wide range of options.
 - Availability of non-build options for meeting demand, such as purchasing energy or services from regional markets or deferring investment through "non-wires alternatives," should be considered.
 - The capacity value of renewables, which utilities sometimes discount or altogether fail to consider in capacity models, should be validated.
 - IRP assumptions should include environmental costs and constraints, such as the risk of additional costs being imposed on fossil generation in the future as a result of regulation or some form of carbon pricing (e.g., a clean energy standard).
- **Renewable Resources Are Given Equal Footing against Other Technologies:** IRP resource screens should consider the full range of technology options. In addition, models that develop potential resource portfolios should treat resources such as wind, solar, energy efficiency, demand response, and storage as options for meeting both energy demand and capacity requirements. Models can incorporate them as "selectable resources" as opposed to assuming enough of these resources are developed to only meet requirements.
- **Scenarios That Analyze Decarbonization Pathways:** When analyzing proposed portfolios to see how they perform under various future scenarios, IRPs should include sensitivities that address environmental regulatory regimes, costs, availability of demand-side management measures, high demand for renewable energy, and other factors. This analysis can illustrate how renewable energy resources perform in future scenarios.
- **Linkages to Evolving Resource Procurement:** IRP planning that assumes long-term resource contract lengths, for example greater than 20 years, can add major risk premiums to renewable energy cost projections. In addition to considering different contract lengths, IRPs can also be linked to all-source procurements, which define resource needs (as opposed to resource types) and allow a wider range of solutions to be considered in the acquisition process.

ENDNOTES

- 1 Note that IRPs are different from other traditional utility long-term planning processes because they require examination of both the supply-side resources (i.e., generating assets) and demand-side resources (e.g., energy efficiency, demand response) needed to both meet forecasted demand and protect against grid interruption. The generation supply required solely to protect grid stability is known as the “reserve margin.” Although some gas utilities file IRPs, this resource focuses on electric utility IRPs.
- 2 For additional information on how stakeholder engagement requirements vary and the associated implications, as well as additional details on how the IRP regulatory review process varies, see the “Michigan Public Service Integrated Resource Planning Stakeholder Group Meeting” by the Lawrence Berkeley National Laboratory at https://www.michigan.gov/documents/mpsc/LBNL_Session_4_Stakeholder_Engagement_597057_7.pdf.
- 3 For additional details on the role and value of local governments engaging in regulatory review, see the Institute for Market Transformation’s guide “Local Government Engagement with Public Utility Commissioners” at <https://pubs.naruc.org/pub/41BBF1F5-ED6E-79C8-CC25-14E9721A6E8B>.

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ABOUT THE BLOOMBERG AMERICAN CITIES CLIMATE CHALLENGE (ACCC) RENEWABLES ACCELERATOR

The Renewables Accelerator, a partnership between World Resources Institute and RMI, provides cutting-edge tools, resources, and technical assistance to help U.S. cities advance ambitious renewable energy goals. Our partnership supports the Bloomberg Philanthropies American Cities Climate Challenge and the Urban Sustainability Directors' Network cities with renewable energy commitments. We work with cohorts of cities grouped around key renewable procurement methods to deliver knowledge, tools, assistance, and peer learning to quickly implement and scale clean energy solutions.