



Community Benefits Plans in DOE FOAs

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Elements of a Community Benefits Plan

The CBP must illustrate how the applicant intends to:

1. Support meaningful community and labor engagement.
2. Invest in the American workforce by creating good local jobs and supporting a skilled workforce.
3. Advance diversity, equity, inclusion, and accessibility.
4. Contribute to the Justice40 initiative (sort of: “Recipients of DOE funds should ensure that performance of project tasks within disadvantaged communities *meaningfully benefits* those communities and does not result in significant or permanent increased negative impacts to the disadvantaged community.”)



OCED's CBPs are scored at 20 percent of the overall technical merit review of proposals.

Will the criteria permit identification of best CBPs?



Some Observations

- FOA's CBPs are heterogeneous in requirements (e.g., Justice40, current and future interactions)
- Who represents the community?
- Two-way engagement, transparency, a say in decisionmaking are challenging for companies
- Missing criteria: efficiency
- Credit for “beyond compliance?”



Where We See Challenges

- Putting together a robust CBP requires a significant amount of upfront work. This seems likely to deter applicants who don't have a lot of existing capital and capacity. Get help.
- What happens if an applicant has a strong response for one or two sections of the CBP, but not the others? Are all four sections weighted equally?
- What to do about intransigence?
- Disclosure



How has DOE defined good plans?

For all: "include milestones, roles, and responsibilities for who is executing the plan, timelines, mechanisms for tracking progress, and ensuring accountability. **This includes identifying measures of success.**"

A good engagement plan for OCED will

- Identify key organizations and show understanding of their concerns
- Be prepared to modify project in response

A good workforce plan will:

- Develop temporal plans to "cohesively and holistically map the potential to create and support quality jobs and workforce development."
- Identify partners for training programs



How has DOE defined good plans (2)

A good Justice40 plan will:

- Understand impacts
- "propose methods for measurement, tracking, and reporting of those impacts" **with community input**
- Measure negative effects

A good DEIA plan will:

- Include critical partnerships to ensure disadvantaged and underrepresented workers have access to economic opportunities generated by the project



Our Speakers

- **Daniel Raimi** is a fellow at RFF and a lecturer at the Gerald R. Ford School of Public Policy at the University of Michigan. He works on a range of energy policy issues with a focus on tools to enable an equitable energy transition
- **Philip Jordan** is an attorney and the Vice President of BW Research. He has worked in research, law, and policy for nearly two decades in the private sector, government, and academia. Phil is also a Senior Fellow at the Ash Center for Democratic Governance at Harvard University's John F. Kennedy School of Government. He has worked on a number of relevant projects focused on designing and evaluating community benefits associated with clean energy.





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How has DOE defined a good workforce plan?

“...a strong IAW plan will look across short, medium, and long-term time horizons to cohesively and holistically map the potential to create and support quality jobs and workforce development. It will fully consider the benefits and impacts that the project will have on jobs and workers across every phase of the project and across dispersed geographic areas (i.e., both within and beyond the project host site). A good plan will identify key partners for training programs (e.g., relevant labor unions). Effective IAW plans will also build on, and work in concert with, the Community and Labor Engagement plan and the DEIA plan.”

- From OCED's Guidance for Creating a Community Benefits Plan for the Carbon Capture Demonstration Projects Program FEED Studies



A good engagement plan will

- specify organizations and entities representing traditionally excluded stakeholders and those most vulnerable to project impacts, including frontline communities and labor unions representing affected workers, if applicable. It will include a thorough and honest assessment of labor and community support and concerns, gathered from a representative cross-section of the community and labor groups. A good plan will clearly demonstrate an understanding of existing attitudes regarding the project, as well as delineating aspects of the project that could be modified due to stakeholder feedback.”
- – *From OCED’s Guidance for Creating a Community Benefits Plan for the Carbon Capture Demonstration Projects Program FEED Studies*



How has DOE defined a good Justice40 plan?

“A good Justice40 section will include very specific benefits and negative impacts—and display an understanding of how these impacts unfold over time—and propose methods for measurement, tracking, and reporting of those impacts, as well as opportunities for communities to engage in defining and monitoring these impacts.”

- From OCED's Guidance for Creating a Community Benefits Plan for the Carbon Capture Demonstration Projects Program FEED Studies



How has DOE defined a good DEIA plan?

“A good DEIA plan will include milestones, roles, and responsibilities for who is executing the plan, timelines, mechanisms for tracking progress, and ensuring accountability. This includes identifying measures of success.”

– From OCED’s Guidance for Creating a Community Benefits Plan for the Carbon Capture Demonstration Projects Program FEED Studies



Differences Across FOAs (1/2)

- Most FOAs include reference to all four elements, but some don't reference Justice40
- DOE's CBP FAQs notes that “Specific asks for Community Benefits Plans may vary due to the range of project types. For example, large demonstration and deployment projects will require the most robust plans.”
 - At least one FOA from the Wind Energy Technologies Office notes that CBP “plan content requirements for R&D-focused FOAs vary from the R&D Community Benefits Plan content requirements.”
- A few FOAs offer separate, more extensive guidance on developing CBPs (see here and here).



Differences Across FOAs (2/2)

- The review criteria related to CBP are different with every FOA and the number of factors considered for the score can increase double depending on the FOA.
- The more recent FOA requires applicants to describe their overall engagement action to date on top of their plans for the future. It also emphasizes the need for CBP to be integrated to the project management plan through the Go/No-Go decisions for instance.



Defining Engagement

“ ‘Engagement’ differs from a plan to hold events or listening sessions (though it may include holding these types of events) and from one-way communications; it is about relationship building leading toward partnerships.”

“Engagement should primarily focus on organizations directly representing a particular group of stakeholders, rather than individuals representing themselves, although some elements of engagement may include meeting with individuals. This can help ensure traditionally excluded stakeholders and groups are given sufficient representation.”

- From OCED’s Guidance for Creating a Community Benefits Plan for Energy Improvements in Rural or Remote Areas

