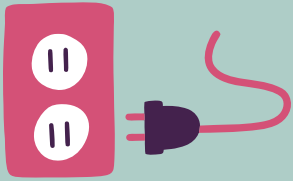


# Powering Equity

An Action Plan to Address Energy Burden and Structural Barriers at LADWP





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This report was prepared by **Laura Muraida** for SCOPE (Strategic Concepts in Organizing and Policy Education) in collaboration with **LEAP LA** and released in May 2026.

## About SCOPE

Strategic Concepts in Organizing and Policy Education (SCOPE) is a membership-based organization rooted in South Central Los Angeles and driven by the lived experiences of communities facing pollution, poverty, and systemic inequities. For over 30 years, SCOPE has advanced an integrated racial, economic, and environmental justice agenda, working alongside strategic partners to secure clean energy jobs, expand workforce training, and direct climate and energy investments into historically disinvested communities. Grounded in the realities of South Central, where residents confront gentrification, displacement, over-policing, environmental racism, and limited economic opportunity. SCOPE focuses on building community power to overcome structural barriers and shape a healthy, resilient future with access to resources, employment pathways, and supportive infrastructure.

## About LEAP LA

LEAP LA is a coalition of dynamic and intersectional community-based organizations united in the fight for environmental and climate justice, and the transformative power of frontline leadership. Our collective brings decades of experience mobilizing Indigenous, Black, Latino, immigrant, and low-income populations across Los Angeles to confront systemic inequities and environmental harms. The coalition partners include: Physicians for Social Responsibility Los Angeles (PSR-LA), Communities for a Better Environment (CBE), Esperanza Community Housing, Pacoima Beautiful (PB), Sacred Places Institute for Indigenous Peoples (SPI), and Strategic Concepts in Organizing and Policy Education (SCOPE)

## About Laura Muraida

Laura Muraida is a policy advisor and consultant specializing in environmental justice, clean energy, and equity-centered policy analysis. Her work integrates research, community voice, and policy strategy to advance systemic change for frontline communities in Los Angeles.

## Acknowledgements

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**Report design by theworksLA.**

# Forward

## Contextualizing the issue of energy affordability in our current political moment

By Agustin Cabrera



LADWP, the nation’s largest public utility, is embarking on an ambitious transition to 100% renewable energy. This transition will result in profound health, climate, and environmental benefits, but will also entail high costs that are likely to be disproportionately felt by low-income residents—unless the utility makes significant policy and programmatic shifts that intentionally redistribute the costs and benefits of the clean energy transition.

However, we cannot advance energy equity in Los Angeles without acknowledging our current political moment and the multiple crises Angelenos are facing. A little over a year ago, deadly, catastrophic fires, fueled by drought conditions and hurricane-force winds, tore through Los Angeles, destroying homes, livelihoods, and schools, and putting tremendous pressure on a region where over a million renters are burdened by housing costs. As many families across LA are still rebuilding what was lost, rent continues to rise, federal funding cuts threaten our dwindling social safety net, and rising authoritarianism aims to consolidate power and roll back decades of progress.

Compounding the devastation our city experienced last year were months of immigration raids targeting our neighbors and families. We witnessed kidnappings on the streets, workplace raids, and the violent separation of families by ICE and federal agents. This moment has been marked by grief and outrage—felt by everyone, but most acutely by communities of color. In addition, the loss of homes, workplaces, and household income has had a significant economic toll on the region—leading families to make difficult trade-offs between health, safety, and livelihoods.



These raids were made possible because Congress funneled money into ICE and the military while cutting essential services like healthcare and food assistance programs such as Medicaid and SNAP through the One Big Beautiful Bill Act. These decisions underscore the harm being done and the urgency of building the collective power needed not only to survive this moment, but to fight back. A different future is possible for LA—a city where everyone has access to affordable housing, safe communities, universal basic energy, guaranteed healthcare, and dignified work. Making this vision a reality requires bold leadership, creative thinking, and co-governance with community members. Our climate and affordability crises cannot be solved in isolation, but they can be solved together.

To advance systemic climate and energy justice solutions, we need a forward-looking, transformative, grassroots power-building strategy. We must develop community leaders who understand the energy system and push for equity to ensure that LADWP truly works to serve the people. At this critical moment, it is essential to strengthen our collective power to hold democratic institutions accountable and use every available lever for change. Los Angeles can show the rest of the country how government can respond to community needs and advance climate solutions that prioritize and protect the most vulnerable residents.

**Through this work, we can move toward a future grounded in affordability, collective well-being, and shared prosperity.**

Agustin Cabrera is the Deputy Director of Programs and Policy at Strategic Concepts in Organizing and Policy Education (SCOPE)

# TABLE OF CONTENTS

6	Context
8	Meeting the Moment
10	The Impacts of High electricity burden in Los Angeles
14	Barriers to Affordability: How California’s Tax Laws Constrain Public Utilities
17	Spotlight: Meaningful Equity & Affordability Advancements at LADWP
20	Action Plan to Achieve Affordable Electricity for All Comprehensive Affordable Multifamily Retrofits Program LADWP’s Disconnection Moratorium
21	<b>Tier 1: Foundations for accountability and equity</b> Institutionalizing data transparency & equity benchmarks
22	<b>Tier 2: Protecting our most vulnerable Angelenos</b> Expand a Permanent Disconnection Moratorium Explore a permanent targeted debt forgiveness program
25	<b>Tier 3: Affordable Electricity for All</b> Percentage of Income-Payment Plan (PIPP) Long-term equitable investment in energy programs Universal Basic Electricity
29	<b>Enabling Systems Change</b> State ballot measure Amending Propositions 218 / 26 Local charter amendment
31	Summary

# Context

Household access to electricity is fundamental to health, economic stability, and social connection. Whether cooling a home, powering a refrigerator, or charging a cell phone, households rely on electricity to meet basic needs. For individuals who depend on medical devices such as dialysis machines or ventilators, reliable electricity is not merely a convenience—it is lifesaving.

Yet in Los Angeles, a growing number of residents are struggling to afford this essential service. In 2024, the U.S. Census Bureau reported that over 2 million adults in the Los Angeles metro area—over 25 percent of the total adult population—were unable to pay their energy bill at least once in the previous year.<sup>1</sup> For many households, unaffordable electricity bills force impossible tradeoffs between keeping the lights on, paying rent, and putting food on the table. These burdens are not evenly distributed. They fall hardest on low-income households and communities of color, who already face compounding economic and environmental pressures.<sup>2</sup>

In the City of Los Angeles, residents receive electricity service from the municipally owned Los Angeles Department of Water and Power (LADWP). Compared to California’s investor-owned utilities, LADWP has historically maintained more stable and affordable electricity rates for residential customers.<sup>3</sup> This reflects key advantages of public ownership, which include the absence of shareholder profit obligations and greater local oversight over investment decisions. However, these advantages cannot insulate ratepayers indefinitely from rising costs.

Since the COVID-19 pandemic, electricity costs across California have outpaced inflation, driven by growing climate vulnerabilities, increased grid demand, and substantial investment in both clean energy and fossil fuel infrastructure.<sup>4</sup> In Los Angeles, larger rate increases began in mid-2023, largely driven by transmission and distribution costs, non-renewable fuel expenses, and purchased power.<sup>5</sup> At the same time, housing, childcare, transportation, and other essential living costs have risen sharply, increasing financial strain on low- and middle-income households.<sup>6</sup> Compounding these pressures, federal-level safety net programs—including emergency utility assistance, weatherization support, and appliance upgrades—now face significant uncertainty, placing additional pressure on state and local governments—and utilities—to fill the gap.

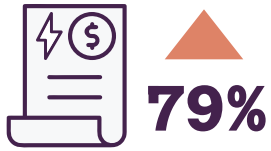
In addition to industry-wide cost pressures, electricity costs in Los Angeles are projected to rise as the utility makes the infrastructure investments required to reach 100 percent renewable energy by 2035. This transition is essential to address the climate crisis and comply with state mandates, and promises significant greenhouse gas reductions, improved air quality, and public health co-benefits. However, it will require substantial infrastructure investments, estimated at \$80 billion over the coming decade.<sup>7</sup> Much of this investment is expected to be recovered through electricity rates.

**25%**  
**Adults in  
Los Angeles  
Metro Area**

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**Unable to pay  
their energy  
bill once in  
the previous  
year**

**Under LADWP's  
current  
electricity  
rate structure  
By 2035**



**Average  
Residential  
Rate**



**Average Rate  
Low Income  
Households**

In 2023, LADWP released the LA100 Equity Strategies Report to evaluate the equity implications of the clean energy transition. The report was clear: low-income households have not received their fair share of energy investments; they are already paying a disproportionate share of energy transition costs; and these inequities will deepen in the next decade if no action is taken. Under the current electricity rate structure, average LADWP residential rates are projected to rise by 79 percent by 2035, while low-income households are projected to experience average increases of 131 percent—exacerbating already disproportionate energy burdens.<sup>8</sup> More recent presentations by LADWP staff suggest that the projected increases may be even higher.<sup>9</sup> Absent deliberate intervention, these increases threaten to push thousands more households into severe energy burden, mounting debt, and heightened risk of service disconnection.

As the nation's largest municipally-owned utility, LADWP's path to 100 percent renewable energy will serve as a roadmap for how public utilities across the country can deliver clean, affordable, and reliable energy. Yet as a public utility, LADWP operates within legal constraints rooted in California's tax laws that limit its ability to design robust affordability programs, including expanded bill assistance and income-based rate structures (discussed in Section 3). As infrastructure costs rise, these constraints present both a risk of deepening inequities and an opportunity to align the clean energy transition with equity and environmental justice outcomes.



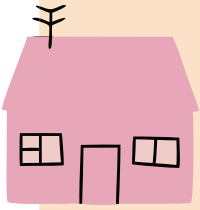
# Meeting the Moment

**Grassroots leaders and community advocates with a long history of engagement at LADWP are working to ensure the utility's clean energy transition advances—rather than undermines—equity.** These efforts build upon years of organizing for equitable energy investments, expanded career pathways, lower utility bills, and a just transition led by the RePower LA Coalition, co-convened by the Los Angeles Alliance for a New Economy (LAANE) and Strategic Concepts in Organizing & Policy Education (SCOPE). The RePower LA Coalition was critical to securing over \$1 billion in statewide utility debt relief during the early years of the COVID-19 pandemic and halting utility shutoffs for low-income ratepayers.<sup>10</sup> SCOPE, LAANE, and other Los Angeles community-based organizations also helped shape the Equity Strategies Report through participation on the project's Steering Committee and Advisory Committee. While these victories and partnerships represent significant progress for disadvantaged communities, community advocates are clear that without structural policy change, affordability protections remain incomplete.

This report was developed by SCOPE in coordination with the LEAP LA Coalition—whose members include Communities for a Better Environment, Esperanza Community Housing, Pacoima Beautiful, Physicians for Social Responsibility—Los Angeles, and Sacred Places Institute for Indigenous People, and in partnership with LAANE, which helped shape the report's scope and policy framework. Together, these organizations—whose expertise spans environmental justice, community health, affordable housing, and economic justice—reflect the breadth of communities most affected by rising electricity costs and most invested in a just and clean energy transition.

This report draws on that expertise to examine the structural barriers that limit LADWP's ability to deliver lasting affordability, centering a critical question: who will bear the greatest cost burdens of the clean energy transition? Integrating best practices, expert analysis, and community priorities, this report provides community-informed strategies to protect vulnerable households, transform rate structures, and align climate goals with equity outcomes. At its core, this report advances a clear proposition: Los Angeles can meet its clean energy commitments without deepening racial and economic inequities—but only if affordability is treated as a central pillar of the transition, not an afterthought.





## Moving toward clean and affordable electricity for all

Electricity is essential to healthcare, economic participation, education, and everyday well-being. Electricity powers our homes, workplaces, schools, and public infrastructure, enables our modern transportation systems, and supports digital connectivity. Universal access to clean and affordable electricity is foundational to equity, economic security, and quality of life.

This report holds that universal access to clean and affordable electricity is necessary and achievable. Achieving that goal requires recognizing electricity as a shared public resource—one to be managed for collective benefit rather than commodified for private gain.

Ensuring universal access requires policies that guarantee a basic level of affordable electricity to all households, regardless of income, housing type, or immigration status. It also requires rate structures, investment decisions, accountability mechanisms, and governance models that center the public good. The public power model is critical to advancing these outcomes—giving local communities direct democratic control over a shared, clean, reliable, and affordable energy future.



# The Impacts of High Electricity Burden in Los Angeles

A household is considered “energy burdened” when it spends more than 6 percent of income on energy costs, and “severely energy burdened” when it spends more than 10 percent.<sup>11</sup>

In Los Angeles, as in communities across the country, low-income households are disproportionately represented among those experiencing high and severe energy burdens. This disparity persists even though low-income households typically consume less energy per capita and spend less per square foot on energy overall.<sup>12</sup> Research drawing on benchmarking data and modeling identifies energy inefficiency—often due to aging housing stock and inefficient household appliances—as a key driver of disproportionate energy costs in low-income households.<sup>13</sup> These findings underscore that electricity unaffordability is often driven by structural housing conditions rather than individual consumption behavior.

A 2023 analysis of LADWP data found that Los Angeles residents had an average electricity burden of 3.7 percent, while low-income households (0-50 percent area median income) had an average of 7.8 percent.<sup>14</sup> More recent data shows that households living in extreme poverty—particularly those in detached single-family homes—experience average electricity burdens of 10 to 12 percent. High energy burdens also reflect entrenched racial inequities: they fall disproportionately on Black households across the city.<sup>15</sup>

While energy burden is a useful metric, access to current, localized data remains limited. Many datasets rely on multi-year estimates or modeled projections that obscure neighborhood-level variation. Moreover, energy burden alone fails to capture the sheer number of households in need. For example, Los Angeles County accounts for approximately 30 percent of all federal low-income energy assistance recipients statewide—an indicator of the region’s significant affordability challenges.<sup>16</sup>

High energy burdens also have far-reaching consequences. They force families to make difficult tradeoffs between basic needs and increase vulnerability to energy insecurity and debt. Energy insecurity refers to the inability to meet basic household energy needs or pay energy bills—often leading to accumulated debt and, ultimately, service disconnection. Energy debt represents unpaid utility balances that compound over time. Research shows that a 1 percentage point increase in energy burden correlates with a 4 to 5 percent increase in the likelihood of debt accumulation, a lagging indicator of household affordability stress.<sup>17</sup>



**Average  
Electricity  
Burden**

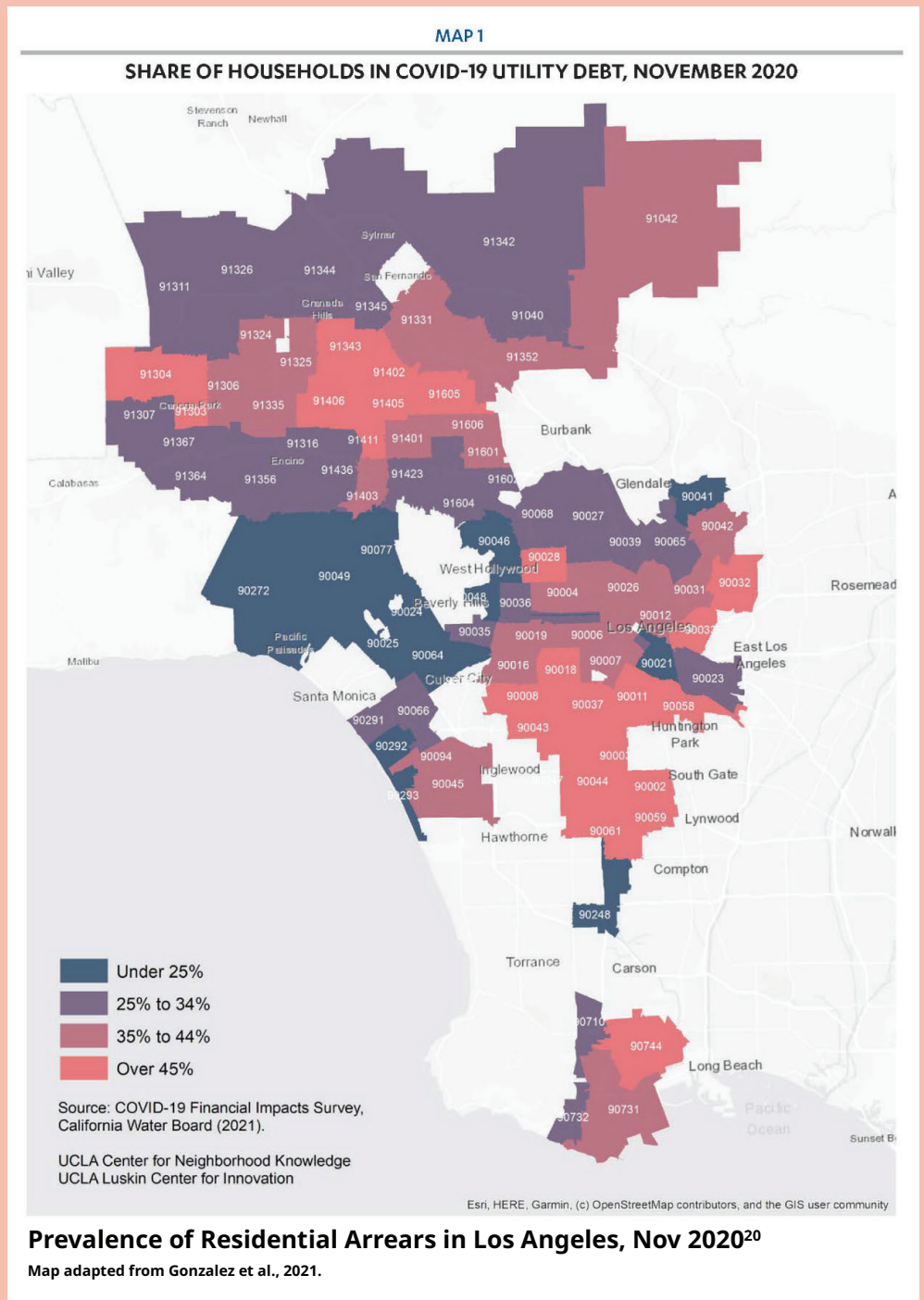
**3.7%**

**Low-income  
Household  
Electricity  
Burden**

**7.8%**

The COVID-19 pandemic undoubtedly exacerbated energy insecurity and debt. Despite broader economic recovery indicators, current data shows that many households remain in debt. Since February 2020, residential power arrears (over 60 days) have increased from \$61.8 million to a total of \$974.3 million in December 2025.<sup>18</sup>

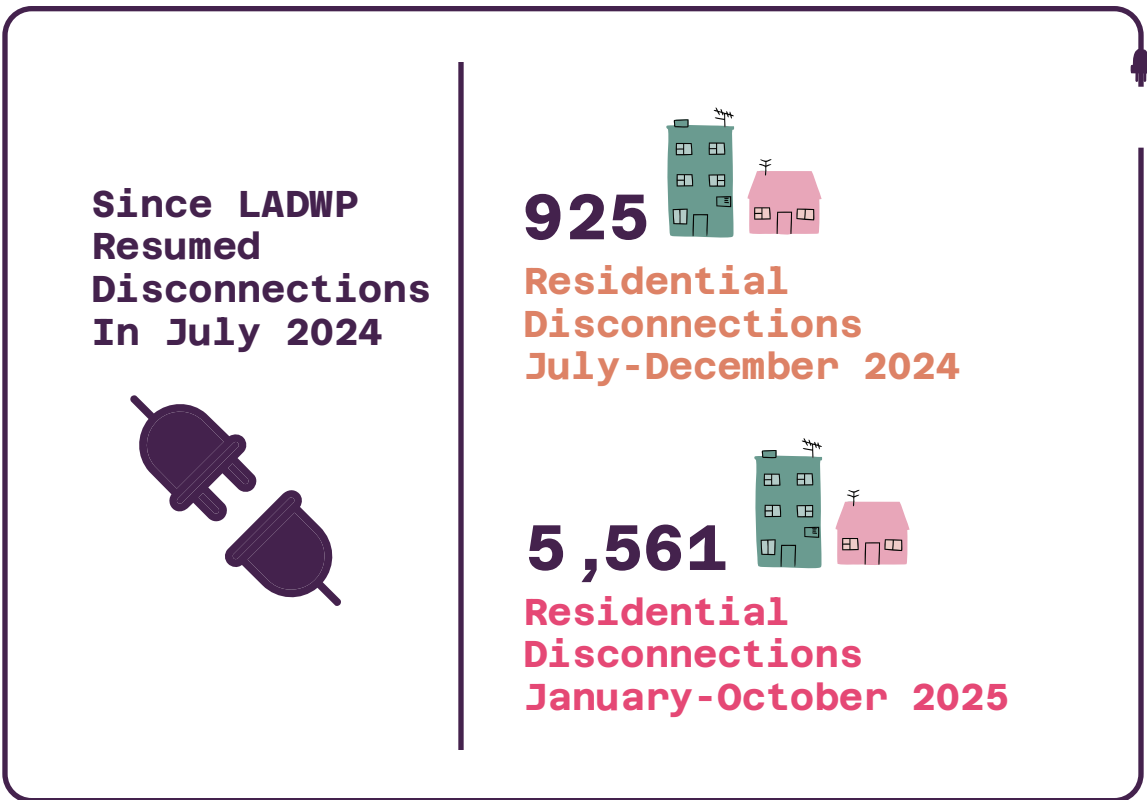
Utility debt is not evenly distributed across the city: Black, Latinx, and low-income communities have experienced disproportionate debt accumulation, concentrated in areas including Wilmington and South Los Angeles (see map below). Neighborhoods with the highest utility burdens also have larger shares of residents with limited English proficiency and lower broadband access—compounding barriers to enrollment in assistance programs.<sup>19</sup>



Disconnections represent the most acute consequence of electricity unaffordability. Even a single disconnection can destabilize a household's health, housing security, and financial stability. Prior to the COVID-19 pandemic, power shutoffs were routinely used as a debt collection tool despite documented harms, including unsafe indoor temperatures, medical device disruption, food spoilage, and increased housing instability.<sup>21</sup>

From March 2020 through March 2022, a statewide moratorium prohibited power disconnections. In November 2022, the LADWP Board of Commissioners adopted permanent protections for customers enrolled in EZ-SAVE or Lifeline programs and for all customers during extreme weather events.<sup>22</sup> Residential service disconnections for those not enrolled in discount programs resumed in July 2024. In the second half of 2024, 925 residential disconnections occurred. Between January and October 2025, as enforcement increased, 5,561 additional residential disconnections took place.<sup>23</sup> These figures represent thousands of households losing access to an essential service.

LADWP does not publish disconnection data by zip code and has declined to release such data through public records requests.<sup>24</sup> The absence of publicly available, disaggregated data on disconnections, arrearages, and energy burden limits accountability, obscures inequities, and constrains targeted policy responses.





## LADWP's Affordability Programs

LADWP operates two primary bill discount programs: EZ-SAVE, targeted to low-income households, and Lifeline, which provides income-based discounts for seniors and individuals with disabilities. EZ-SAVE is available to households earning at or below 200 percent of the federal poverty level—roughly 34 percent of Angelenos—whereas Lifeline uses 50 percent of area median income as its threshold to better reach smaller households.<sup>25</sup>

Roughly 34 percent of Angelenos live below 200 percent of federal poverty level, which equates to a household income of \$64,300 for a family of four.<sup>26</sup> As of 2023, approximately 29 percent of eligible customers were enrolled in EZ-SAVE and 62 percent in Lifeline. Analysis indicates that eligible but unenrolled households are disproportionately located in communities of color and include larger families, female-headed households, and residents with lower educational attainment levels. These households are concentrated in Central Los Angeles, the San Fernando Valley, and South LA.<sup>27</sup>

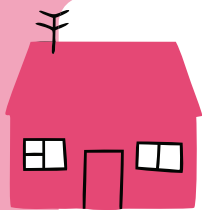
Although enrollment rates have improved in recent years due to increased outreach and changes in the enrollment process, the programs provide modest, flat monthly discounts—\$8.17 for EZ-SAVE and \$17.71 for Lifeline—that do not adjust with rising electricity rates.<sup>28</sup> LADWP's EZ-SAVE program offers the smallest discount across the state's investor-owned utilities and local municipal utilities.<sup>29</sup> Under prevailing interpretations of Propositions 26 and 218 (discussed below), LADWP cannot expand or increase these benefits without voter approval or changes to the state constitution. As a result, many households with the greatest need receive limited relief and remain vulnerable to debt accumulation and disconnection.

High levels of energy burden, insecurity, and debt are not accidental. They reflect decades of systemic racial discrimination and economic exclusion that have denied low-income communities of color access to healthy, energy-efficient housing, wealth-building opportunities, and clean energy investments. LADWP's LA100 Equity Strategies Report confirms that, outside of targeted low-income programs, the utility's solar and energy efficiency incentives have disproportionately benefited higher-income communities—shaping affordability outcomes over time.<sup>30</sup>

Meanwhile, affordability programs remain under-enrolled and under-resourced, electricity debt continues to grow, and disconnections have resumed with limited data transparency. Together, these trends demonstrate that existing affordability tools are insufficient to prevent debt accumulation or protect households from service loss. Without deliberate policy intervention, these inequities will deepen as electricity rates rise in the years ahead.

# Barriers to Affordability: How California's Tax Laws Constrain Public Utilities

The affordability crisis described above is not simply the result of rising costs—it is shaped by the legal rules that constrain how those costs can be allocated. As a publicly owned utility, LADWP operates within a complex legal framework—one that both acknowledges the importance of serving low-income customers while simultaneously constraining the tools available to do so. Specifically, Propositions 218 (1996) and 26 (2010)—both rooted in the Proposition 13 “tax revolt” of 1978—limit LADWP’s ability to use rate revenues for purposes not directly tied to the cost of providing service, unless approved by a supermajority of voters.<sup>31</sup>



## Proposition 13 and Its Lasting Equity Impacts

Nearly 50 years ago, California voters passed Proposition 13, capping property taxes and limiting future tax increases. The measure was sold to voters as a way to protect homeowners from soaring property tax bills. While supporters credit it with keeping one generation of Californians—particularly older residents on fixed incomes—in their homes, it came at a considerable cost. Prop 13 reduced property tax revenues—a primary funding source for local governments—by 60 percent.<sup>32</sup>

As a result, local jurisdictions cut services, laid off employees, and turned to other revenue sources to fill budget gaps, such as sales taxes, utility taxes, and impact fees. The overall effect was that wealthy Californians paid a smaller share of their income in taxes. Local governments also had a greater incentive to approve commercial development over housing, in order to capture sales tax and business revenues. Over time, lower property taxes encouraged long-term homeownership and reduced turnover—playing a key role in constraining housing supply and driving up housing costs for new homebuyers.<sup>33</sup>

Prop 13 also embedded ballot-box budgeting into the state’s constitution, spawning dozens of offshoots—including Props 218 and 26—that have made funding essential public programs and services both administratively and politically more difficult. Working class and low-income communities that disproportionately rely on key public services, such as public education, safety net programs, and utility bill assistance, continue to bear the consequences of these constraints. These constraints are particularly consequential for publicly owned utilities, which are expected to balance affordability, reliability, and public accountability within this limited fiscal framework.

While the two propositions are usually discussed together, there are important distinctions. Proposition 218 establishes the “cost of service” requirement for property-related fees, such as water, trash, and sewer services. Proposition 26 broadens this requirement to include municipal gas and electric rates. In practice, LADWP’s water rates explicitly fall under Prop 218, while LADWP’s electric rates fall primarily under Prop 26.<sup>34</sup>

The table below outlines the effects and implications of these propositions, which have reshaped how public utilities can raise and use revenue for essential services.

PROPOSITION	YEAR	MAIN EFFECTS	IMPLICATION FOR POU'S
<b>PROP 13</b>	<b>1978</b>	Capped ad valorem property tax at 1 percent and requires that any "special tax" imposed by a local government be approved by two-thirds of the local government's voters	Reduces the local tax base and raises the bar for new tax revenues
<b>PROP 218</b>	<b>1996</b>	Limits the ability of local governments to impose or increase property-related taxes, assessments, and fees—requiring voter approval if they exceed the cost of providing the service. Also requires voter approval for both "general" and "special" taxes.	Courts have interpreted Prop 218 to limit public utilities' ability to shift costs between customers—including subsidizing bills for low-income households—without voter approval
<b>PROP 26</b>	<b>2010</b>	Broadens the definition of a "tax" to include any charges imposed by local or state government not tied to the reasonable cost of a service provided	Extends cost-of-service limitations to municipal gas and electric rates, restricting the use of rate revenue for targeted subsidy programs absent voter approval

In this context, rate revenue-funded low-income bill discount programs—or any rate-funded programs targeted to a certain segment of ratepayers—present a significant risk of being deemed a tax, requiring voter approval. Ratepayer-funded bill discount programs that predated Prop 26—including LADWP's EZ-SAVE and Lifeline programs—are preserved as legacy programs. However, they cannot be restructured or expanded without voter approval or exposure to significant legal risk.<sup>35</sup> To date, there is no clear legal precedent in California affirming that rate-funded public utility bill discount programs qualify as a recoverable cost of service. Thus, in practice, Props 218 and 26 have made meaningful expansion of rate-funded bill discount programs both administratively and politically difficult.

Under these constitutional constraints, LADWP must demonstrate that proposed rate adjustments are reasonably related to the cost of providing electric service—or face voter approval requirements. Over time, courts have interpreted the "cost-of-service" standard through a proportionality lens—requiring that rates correspond to the cost of serving the customer or property being charged.<sup>36</sup> While this framework allows utilities to recover a range of operational and administrative expenses, it limits the ability to structure rates to achieve broader policy objectives without a clear cost justification.


LADWP's water and power rates have faced legal challenges under Props 218 and 26 with mixed outcomes—illustrating that the definition of “cost-of-service” remains contested and has evolved through litigation. The practice of transferring annual surplus power revenues to the City's General Fund—expressly authorized in the City Charter and common among municipally owned utilities—has been challenged and upheld multiple times under Prop 26.<sup>37</sup> Courts have found this transfer to be a permissible component of a LADWP's cost structure. By contrast, in *Dreher v. LADWP*, the court found that LADWP's low-income water discount program violated Prop 218, concluding that it failed to satisfy the constitutional proportionality requirement.<sup>38</sup>

These rulings suggest that courts have been willing to recognize certain fiscal obligations as recoverable through rates, while so far declining to extend that reasoning to cross-subsidized affordability programs. While there is no definitive ruling prohibiting rate-funded electric discount programs under Prop 26, the absence of a clear precedent affirming their legality creates significant legal risk.

Altogether, the growing impacts of electricity burden, insecurity, and debt—compounded by the legal constraints facing public utilities—make the case for urgent action to ensure affordable access to clean electricity for all Angelenos. While LADWP operates within a tightly constrained legal and regulatory framework, these constraints are the result of policy choices—and, as such, can be revisited through deliberate public action. Just as voters adopted these limitations through ballot measures, they retain the power to revise them.

Advancing meaningful, long-term affordability will require a combination of immediate protections for vulnerable households and structural policy changes that expand the tools available to public utilities. The following sections highlight promising affordability models at LADWP and outline policy pathways to achieve lasting change.





## **Spotlight Meaningful Equity & Affordability Advancements at LADWP**

Even within the constraints imposed by Propositions 218 and 26, LADWP is uniquely positioned to advance affordability, sustainability, and equity. As a municipally owned utility that owns and operates its own generation, transmission, and distribution infrastructure, LADWP can deliver essential public services with direct local oversight and without shareholder profit obligations.

For over a decade, community-based organizations, workforce partners, and environmental advocates have worked in coordination to advance precedent-setting policies and programs at the utility. This includes successful efforts led by the RePower LA Coalition—in partnership with IBEW Local 18—to increase the utility's energy efficiency budget, expand workforce pathways, and weatherize the homes of thousands of low-income residents, leveraging funds from the American Recovery and Reinvestment Act. The increased energy efficiency investment supported paid training opportunities through Local 18's Utility Pre-Craft Trainee (UPCT) Program. The UPCT Program targeted individuals from high-unemployment, high-poverty zip codes and provided wraparound services to help trainees prepare for civil service exams and navigate LADWP's complex permanent hiring process. Together, these investments delivered a triple benefit: lowering household energy burdens, advancing climate goals, and expanding access to family-sustaining utility careers.<sup>39</sup> This model supported the development of LADWP's Home Energy Improvement Program (HEIP), which provides free, full-service water and energy efficiency home upgrades, such as weatherization, insulation, efficient lighting, and efficient appliances, to qualifying residential customers.<sup>40</sup>

### **Comprehensive Affordable Multifamily Retrofits Program**

In 2021, in partnership with community-based coalitions, LADWP launched the Comprehensive Affordable Multifamily Retrofits (CAMR) Program to address the long-standing exclusion of low-income renters from utility energy efficiency investments. CAMR was designed to overcome the structural barriers that prevent renters from benefiting from traditional utility-funded efficiency programs: split incentives between tenants and property owners, complex eligibility requirements, and chronic underinvestment in aging housing stock.<sup>41</sup>

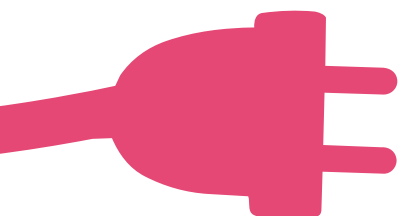
To address these barriers, CAMR provides comprehensive, whole-building energy and water efficiency upgrades to deed-restricted affordable housing properties and low-income multifamily buildings. The program directly coordinates with affordable housing owners and operators—rather than relying on individual tenant participation—to deliver upgrades at scale, including insulation, dual-pane windows, heating, ventilation, and air conditioning (HVAC) improvements, and appliance upgrades. CAMR seeks to reduce overall building energy use, invest in affordable housing properties, lower utility bills for tenants, and improve indoor comfort. While bill savings vary by building and usage patterns, these upgrades are designed to reduce overall consumption and stabilize utility costs for tenants over time.<sup>42</sup>

The CAMR model demonstrates how LADWP can align affordability, climate, and housing stability goals through targeted investment. The program leverages LADWP-administered incentive funding and is designed to prioritize low-income renters in the city’s most disadvantaged communities, demonstrating that LADWP can structure targeted efficiency investments within its existing legal and administrative framework.<sup>43</sup> LADWP’s Equity Strategies Report also points to CAMR as a promising structural energy efficiency model that can benefit from additional funding and robust evaluation to maximize bill relief.<sup>44</sup>

### **LADWP’s Disconnection Moratorium**

During the COVID-19 pandemic, households faced sudden job loss, illness, and economic instability, deepening energy insecurity and dramatically increasing the risk of disconnection. In response, Governor Newsom issued a statewide moratorium on utility shutoffs in March 2020, temporarily ending disconnections as a debt collection tool.<sup>45</sup>

Building on this precedent—and following sustained advocacy from environmental justice, housing, disability rights, and labor organizations—LADWP moved to institutionalize protections for vulnerable customers. In November 2022, the Board of Water and Power Commissioners formally ended power disconnections for customers enrolled in EZ-SAVE or Lifeline programs and established protections during extreme weather events for all ratepayers.<sup>46</sup> These protections reflected the documented reality that utility shutoffs disproportionately harm low-income households, seniors, people with disabilities, and communities of color—and that loss of electricity can trigger cascading consequences including health emergencies, housing instability, and deepening debt.



Though limited in scope, this policy represents one of the most progressive utility disconnection moratoria in the country.<sup>47</sup> The moratorium signaled an important shift toward managing utility debt through burden-reducing interventions—such as payment plans and debt relief—rather than punitive disconnection. The Equity Strategies Report asserts that extending full disconnection protections to all low-income households would have a relatively small impact on LADWP’s overall power revenues.<sup>48</sup> This finding suggests that expanding disconnection protections beyond households enrolled in bill discount programs could meaningfully improve equity outcomes without materially affecting LADWP’s overall revenue base.

Together, these examples demonstrate both the promise and the limits of equity-centered programs within LADWP’s current legal framework. Programs such as HEIP and CAMR incorporate many national utility best practices, but their reach remains modest relative to the scale of need in Los Angeles. Limited funding, the absence of a dedicated permanent revenue stream, and constitutional constraints on rate cross-subsidization restrict their expansion. As a result, thousands of energy-burdened households remain without access to deep efficiency upgrades that could reduce bills long-term.

Advocates and community partners who helped advance these programs are clear-eyed about these limitations. It is this recognition that informs the research and policy recommendations that follow. Achieving lasting, systemwide affordability will require both strengthening existing models—with clearer accountability metrics and dedicated funding—and pursuing structural changes that allow them to scale and endure.



# Action Plan to Achieve Affordable Electricity for All

As discussed throughout this report, LADWP's affordability challenges stem less from technical feasibility than from legal constraints embedded in California's constitution. Without deliberate action, rising infrastructure costs and rate increases will deepen energy burden and debt for households already struggling to pay their bills. Advancing meaningful change therefore requires a strategy that maximizes existing authority while pursuing the structural reforms necessary for lasting affordability.

**Accordingly, this action plan outlines a three-tiered approach:**

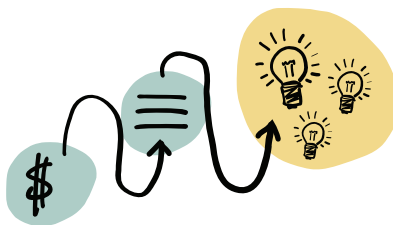
**1. Building the foundations for accountability and equity;**



**2. Protecting vulnerable households from disconnection and compounding debt;**



**3. Transforming investment and rate structures to achieve affordable electricity for all.**



Together, these tiers shift affordability from discretionary assistance programs toward a structural feature of the electricity system.

LADWP's Equity Strategies Report identified many of the long-term affordability tools available across the utility sector.<sup>49</sup> This action plan builds on that foundation by sequencing next steps for advocates and decision-makers—clarifying what can be implemented now under existing authority and outlining pathways to achieve affordable electricity for all Angelenos.



## Tier 1: Building the foundations for accountability, affordability, and equity

*Create the conditions needed to effectively design, implement, and evaluate affordability policies*

### **1.1 Institutionalizing data transparency & equity benchmarks**

As the analysis shows, low-income ratepayers have paid a disproportionate share of clean energy transition costs while not receiving their fair share of energy investments. LADWP's transition to 100 percent renewable energy will only exacerbate existing inequities without deliberate corrective action. Without consistent, disaggregated data, affordability challenges remain invisible in rate-setting, program design, and budget decisions.

Institutionalizing transparency is a prerequisite for meaningful accountability and equitable outcomes. As highlighted in LADWP's Equity Strategies Report and recommended by community advocates, this requires an updated public-facing data initiative with a robust set of energy affordability metrics.

LADWP can build upon the reporting requirements for California's investor-owned utilities, which report on the following metrics (among others) on a monthly basis to the California Public Utilities Commission: the number of customers receiving bill assistance; the number of customers enrolled in payment plans; the number of customers in arrears; arrearage amounts and lengths; disconnections; and reconnections. Breakdowns by zip code and customer class are also included.<sup>50</sup> These metrics should be publicly reported and actively used by LADWP staff, the LADWP Board of Commissioners, City Council, and community stakeholders to guide policy decisions and resource allocation.

LADWP should use these data points to set affordability targets and broader equity goals that can be evaluated on an annual basis. As recommended in the Equity Strategies report, affordability targets should include:

- Reaching 80 percent or higher enrollment in bill discount programs;
- Ensuring fewer than 1 percent of residential customer disconnected annually.<sup>51</sup>

While better data and accountability are foundational, immediate protections are necessary to prevent further harm as long-term policy change is pursued.

## Tier 2: Protecting the most vulnerable households

*Reduce harms by expanding immediate affordability protections within LADWP's existing authority*



While pursuing long-term solutions, LADWP can take meaningful steps within its existing authority to reduce the most severe consequences of electricity unaffordability: disconnection, debt, and financial instability. The measures below should be informed by disaggregated disconnection and arrearage data to ensure protections reach the most vulnerable households. These solutions reduce harm and can improve the relationship between the utility and struggling ratepayers, but do not address the underlying causes of unaffordability.



## Tier 2: Protecting the most vulnerable households

*Reduce harms by expanding immediate affordability protections within LADWP's existing authority*



### 2.1 Expand a Permanent Disconnection Moratorium

*Ensure no residential customer loses access to electricity due to inability to pay.*

#### **Why it Matters (Equity Impact)**

Electricity shutoffs pose immediate risks to health, housing stability, and economic security—particularly for low-income households, seniors, people with disabilities, and communities of color where energy debt is concentrated.<sup>52</sup> Loss of electricity can result in unsafe indoor temperatures, medical device failure, and food spoilage. While current protections exist for customers enrolled in EZ-SAVE and Lifeline, significant under-enrollment leaves many vulnerable households unprotected.<sup>53</sup>

#### **What It Does**

Builds on LADWP's existing disconnection moratorium by expanding protections to customers not currently enrolled in bill discount programs. Enhancements could include:

- Increasing enrollment for existing bill discount programs through expanded multilingual outreach efforts, further streamlining the enrollment process, and creating parallel enrollment pathways through partner agencies serving low-income households
- Expanded moratorium tied to additional high-risk criteria
- Universal residential shutoff protections, as proposed by community advocates

#### **What It Takes to Implement**

This policy can be implemented or expanded through LADWP Board approval without voter authorization.

#### **Cost & Funding Considerations**

Analysis in LADWP's Equity Strategies Report shows that low-income households represent a relatively small share of total revenue, suggesting expanded shutoff protections are unlikely to threaten the utility's financial stability.<sup>54</sup> In FY 2024–2025, LADWP's financial statements report an allowance for losses of approximately \$394 million on electricity customer receivables, representing the utility's estimate of customer debt that may ultimately prove uncollectable.<sup>55</sup>

#### **Policy Examples**

LADWP's November 2022 adoption of a permanent, limited shutoff moratorium for customers enrolled in discount programs represents one of the more progressive municipal disconnection policies in the country. As noted in the LA100 Equity Strategies Report, few utilities have established firm, long-term commitments to shutoff reduction beyond pandemic-era relief efforts. LADWP's experience demonstrates that permanent protections can be implemented within existing legal frameworks and expanded over time.

## Tier 2: Protecting the most vulnerable households

*Reduce harms by expanding immediate affordability protections within LADWP's existing authority*



### 2.2 Explore a permanent targeted debt forgiveness program

*Reduce compounding economic instability and energy insecurity for the most vulnerable households*

#### **Why it Matters (Equity Impact)**

Utility debt increases the likelihood of shutoffs, credit damage, financial instability, and housing insecurity. While recent data is limited, historical data shows that low-income communities and Black and Latinx households face disproportionate levels of debt.<sup>56</sup>

#### **What It Does**

Provides targeted debt relief mechanisms—such as arrearage forgiveness or income-based repayment caps—that reduce accumulated balances for the highest energy burdened households.

#### **What It Takes to Implement**

This type of program would require the identification of an ongoing non-ratepayer funding source and Board approval. A program can also be piloted and evaluated with a one-time funding allocation. However, program design would be strengthened by access to up-to-date electricity burden and debt data. A permanent debt forgiveness program would require careful legal analysis and may require additional legal or legislative authority (discussed in further detail below).

#### **Cost & Funding Considerations**

Using data to target low-income customers with long-term arrearages can limit fiscal exposure. Funding options could include philanthropic partnerships, state funding, or an allocation from Utility Users Tax revenues with City Council approval.

#### **Policy Examples**

California has already demonstrated that large-scale debt relief is both feasible and administratively achievable. During the COVID-19 pandemic, the State established the California Arrearage Payment Plan and California Water and Wastewater Arrearage Payment Program using federal relief funds to forgive unpaid utility balances that accumulated during the public health emergency. Recently, California's investor-owned utilities have launched Arrearage Management Plans that provide structured debt forgiveness for customers who make consistent payments, supported by strategies such as community-based case management.<sup>57</sup> Although relatively new, these models have been shown to reduce disconnections and improve utility revenue predictability.<sup>58</sup>

Harm-reduction strategies address the symptoms of rising electricity burden—but not the underlying cost structures and rate frameworks that produce it. Achieving lasting affordability requires rethinking both.

## Tier 3: Affordable Electricity for All

*Transform investment and rate structures to achieve lasting affordability for all*



### **Affordability Is Not Just a Rate Design Issue**

Electricity affordability is shaped long before rates are approved. Major infrastructure and technology investments determine the long-term cost of the system, and those costs are ultimately borne by ratepayers. Because low-income households have the least ability to absorb rate increases, affordability and equity must be considered at the point of investment decision-making—not addressed solely through downstream bill assistance. This includes evaluating cost risk, long-term rate impacts, and distributional consequences alongside traditional metrics such as reliability and emissions reductions. Without this lens, even well-intentioned clean energy investments can exacerbate existing inequities.

The LA100 Study makes clear that achieving 100 percent clean electricity by 2035 will require unprecedented levels of infrastructure investment across generation, transmission, distribution, and grid reliability. These investments—estimated at upwards of \$80 billion—are necessary to meet climate and reliability goals, but they also shape long-term affordability and equity outcomes.<sup>59</sup>

Large capital projects—including the Scattergood Modernization Project, which will convert an existing gas-fired power plant to a green hydrogen-ready system—lock in costs for decades, with those costs ultimately recovered through electricity rates.<sup>60</sup>

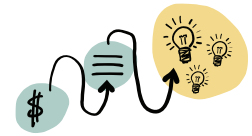
Affordability strategies that focus solely on redistributing costs—without addressing how costs are generated—will remain incomplete. Centering affordability and equity in infrastructure planning helps ensure that the costs of the clean energy transition do not fall disproportionately on those least able to absorb rising rates.

Achieving long-term electricity affordability for all Angelenos will require fundamental policy shifts in who pays, who benefits, and how costs are structured. Infrastructure decisions determine long-term system costs, but affordability ultimately depends on how those costs are reduced and allocated. The policies below address both dimensions—scaling energy efficiency investments to permanently lower household energy needs and redesigning affordability frameworks to ensure essential electricity remains within reach for all Angelenos.

Implementing these solutions at scale will require enabling actions, outlined in the subsection Enabling Systems Change. Without expanded legal authority, LADWP and other public utilities in California will remain limited to managing the consequences of rising rates rather than preventing structural unaffordability.

## Tier 3: Affordable Electricity for All

*Transform investment and rate structures to achieve lasting affordability for all*



### 3.1 Percentage of Income-Payment Plan (PIPP)

*Cap electricity bills for low-income households based on ability to pay*

#### **Why it Matters (Equity Impact)**

A PIPP directly eliminates energy burden by ensuring low-income households do not spend more than a fixed percentage of income on electricity. It protects households from rising rates associated with grid investments, climate impacts, and electrification—shifting affordability from emergency relief to prevention.

#### **What It Does**

Electricity bills are capped at a defined share of household income—typically median energy burden levels or 6 percent of household income, based on national best practice.<sup>61</sup> Costs above the cap are absorbed through the rate structure, eliminating the need for separate low-income discount programs.

#### **What It Takes to Implement**

PIPP requires systems change:

- Legislative change or voter approval under Propositions 26 and 218
- A formal rate case with approval by the LADWP Board and City Council
- New administrative systems for income verification and enrollment

Any new income-based rate structure would require careful legal analysis, particularly regarding its interaction with existing surplus power revenue transfers.

#### **Cost & Funding Considerations**

Costs are currently unknown due to lack of LADWP-specific modeling. A pilot program using non-ratepayer funding could help assess impacts before full implementation.

#### **Policy Examples**

PIPPs are widely used across the United States in both electric and water utility contexts. States including Illinois, Ohio, and Nevada—and cities such as Philadelphia—have implemented PIPP programs that cap utility bills at a fixed percentage (ranging from 2.29 to 6 percent) of household income for qualifying low-income customers.<sup>62</sup> California's largest investor-owned utilities are currently piloting PIPPs targeted to customers enrolled in low-income discount programs.<sup>63</sup> Some PIPP models also include arrearage forgiveness incentives for consistent payment as described in Section 2.2 above.

## Tier 3: Affordable Electricity for All

*Transform investment and rate structures to achieve lasting affordability for all*



### 3.2 Universal Basic Electricity

*Guarantee a minimum level of electricity as a basic public good.*

#### **Why it Matters (Equity Impact)**

Universal basic electricity establishes access as a right, eliminating high and severe energy burdens and reducing poverty. Unlike income-tested programs, it benefits all households while providing the greatest relative relief to low-income customers.

#### **What It Does**

Rates are structured to provide a base amount of electricity for free or at very low cost to meet essential needs. Consumption beyond that level is charged at progressively higher rates. This could be integrated into LADWP's tiered rate structure. Similar models have been proposed or piloted in jurisdictions seeking to treat basic energy access as a public good.

#### **What It Takes to Implement Requires:**

- Legislative change or voter approval under Props 218 and 26
- A rate case approved by the LADWP Board and City Council
- Careful design to align with energy efficiency and conservation goals

#### **Cost & Funding Considerations**

No LADWP-specific cost analysis currently exists. This model would eliminate the need for separate low-income discount programs, but would require additional modeling and deep stakeholder engagement.

#### **Policy Examples**

While a full universal basic electricity model has not yet been adopted at scale in the United States, elements of the approach exist in tiered rate structures and "lifeline tariffs" implemented internationally. In France, the government-owned Électricité de France (EDF) committed in 2021 to replace disconnections for non-payment with a guaranteed minimum amount of power at no cost to meet basic needs.<sup>64</sup>

## Tier 3: Affordable Electricity for All

*Transform investment and rate structures to achieve lasting affordability for all*



### 3.3 Long-term equitable investment in energy programs

*Reduce the amount of energy needed to meet basic household need.*

#### **Why it Matters (Equity Impact)**

Low-income households often face higher energy burdens due to older housing stock and inefficient appliances. Structural efficiency improvements permanently lower bills while improving comfort, health, and climate resilience.

#### **What It Does**

Expands programs that overcome upfront cost barriers for homeowners and renters, including rebates, direct install programs, and whole-home retrofits. Builds on existing LADWP programs such as HEIP and CAMR.

#### **What It Takes to Implement**

##### **Scaling requires:**

- Sustainable, long-term funding
- Robust data tracking and effective targeting
- Solutions tailored for renters and multifamily housing

#### **Cost & Funding Considerations**

- HEIP baseline: Between 2017 and 2020, \$3.378M was allocated to HEIP, which resulted in a total of 5,844 home upgrades.<sup>65</sup> Post-pandemic, there has been an increase in the HEIP budget, reaching a proposed \$15 million in FY 2025–2026.<sup>66</sup>
- A whole-home direct-install program that meets the scale of need in Los Angeles would require a significantly larger annual investment and precise targeting of energy-burdened households using disaggregated data.
- Potential funding sources include the federal Weatherization Assistance Program and Inflation Reduction Act HOMES funds. Federal funding could also help expand the scope of existing energy efficiency and upgrade programs, though federal funding availability has become less certain in the current administration.<sup>67</sup>

#### **Policy Examples**

Several jurisdictions have demonstrated that structural energy efficiency investments can be scaled when supported by dedicated funding and long-term planning. New York has a statewide program—supported by over \$100 million in state funding annually—that provides no-cost direct install upgrades to low-income households and whole-building retrofits for affordable multifamily housing.<sup>68</sup> Municipal utilities such as Seattle City Light have integrated deep retrofit and electrification programs as long-term climate strategies.<sup>69</sup> And in 2020, Denver voters approved a dedicated Climate Protection Fund to scale energy efficiency and electrification investments, prioritizing low-income households.<sup>70</sup>

# Enabling Systems Change: Pathways to Implement Tier 3

*Create the legal authority needed to implement meaningful affordability solutions*

As previously mentioned, lasting affordability requires changes to the underlying legal framework that LADWP operates within. This section outlines potential pathways to expand LADWP's authority to implement structural affordability policies.

## **Local Pathway: Charter amendment**

One pathway to rate reform and expanded low-income programs—while avoiding legal risk under Proposition 26—is a citywide ballot initiative. The initiative must be on the general election ballot and can be placed on the ballot by City Council or by citizens. However, in recent years, the California Supreme Court established that special taxes placed on the ballot by citizen initiative only require a simple majority—versus the supermajority required for those placed on the ballot by the governing body.<sup>71</sup>

To expand discount programs or subsidize low-income customer rates, the initiative language would specifically need to amend the City Charter to allow a voter-approved rate setting process and to codify the low-income program as part of the rate structure. Alternatively, the initiative could add language to the City Charter to require that surplus revenues from LADWP's Power Reserve Fund support a robust discount program.

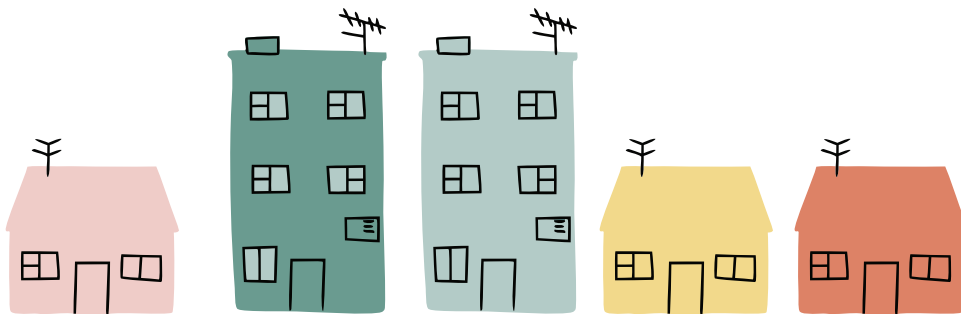
Each pathway offers distinct legal, political, and financial tradeoffs, but all would represent a significant shift in how public utilities in California address affordability. Advancing any of these options will require coordination from policymakers, community advocates, and utility leadership, as well as robust public engagement to build trust and understanding on the issue of affordability.

### State-level Pathway: Constitutional Amendment

Amending Propositions 218 and 26 requires statewide voter approval. Either or both propositions could be amended and there are strategic considerations to understand before determining a path forward.

Both propositions could also be jointly amended under California’s “single subject rule,” which requires that any constitutional amendment proposed by voters be limited to a single, reasonably unified topic. This would entail drafting a constitutional amendment that modified Articles XIII C and XIII D to explicitly authorize local public utilities to provide low-income rate assistance or affordability programs funded from rate revenues and define programs as serving a public purpose—not a tax. This action would essentially cover all public utilities.

The state legislature can place a statewide measure on the ballot if approved by a two-thirds vote in both chambers—a significant political bar.<sup>72</sup> Alternatively, a citizen initiative can be placed on the state ballot through the signature gathering process, which requires valid voter signatures equal to 8 percent of the votes cast in the last gubernatorial election.<sup>73</sup> It should be noted that ballot measure passage alone would not implement rate changes; a formal rate case with approval by the LADWP Board of Commissioners and City Council would still be required.



## Summary

Electricity is essential community infrastructure—foundational to public health, economic stability, and climate resilience. As such, all Angelenos deserve access to clean, affordable, and reliable electricity. As a publicly owned utility, the Los Angeles Department of Water and Power exists to serve the public interest and is uniquely positioned to achieve this vision.

Los Angeles is entering a decisive moment as it embarks on a transition to 100 percent renewable energy. Low-income communities in Los Angeles—who are already disproportionately paying for energy transition costs—face rising electricity bills they are least equipped to absorb. As the city advances one of the most ambitious clean energy transitions in the country, leaders must grapple with whether it will reduce inequities or deepen them. The question is not whether we transition—but who bears the cost. Without deliberate action, the costs will disproportionately fall on low-income households and communities of color.

The barriers to affordability at LADWP are not technical—they are legal and political. And because they are a product of policy choices, they can be changed. Achieving affordability requires both maximizing existing tools and expanding what is legally possible. This means: institutionalizing the use of data to make energy burden visible and measurable; using existing legal authority to protect vulnerable households from disconnection and debt; and pursuing the structural legal and policy changes needed to enable lasting, system-wide affordability.

Los Angeles has the opportunity to become a national model for how public utilities can deliver a just and affordable clean energy transition. Achieving clean, affordable, and reliable electricity for all is necessary—and with bold leadership, it is possible.



# Endnotes

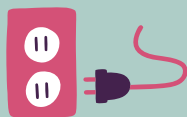
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## **Powering Equity**

An Action Plan  
to Address  
Energy Burden  
and Structural  
Barriers at  
LADWP