Union of Concerned Scientists

HOW-TO GUIDE

Legislative Language for Equitable Energy Storage

Energy storage plays an increasingly critical role in accommodating much higher levels of wind and solar generation on the electric grid. The ability to store energy and use it when most needed enables the nation's electricity grid to operate more flexibly, and it also reduces demand for electricity generated by dirty, inefficient fossil fuel power plants that harm local communities. A host of energy storage technologies is available. Historically, pumped hydroelectric storage has provided most of the US electricity storage capacity at hydroelectric powerplants, but lithium-ion batteries are increasing in popularity.

The Union of Concerned Scientists advocates for a just and equitable transition to a clean energy economy. Explicit consideration of equity when designing energy storage policies, such as when setting deployment targets and establishing financial incentives, can contribute significantly to building a clean energy economy that works for everyone. Toward that goal, this how-to policy guide explores how state legislation can encourage the deployment of energy storage in ways that directly benefit underserved communities. The guide identifies and explains key considerations for legislators and advocates by highlighting legislative language that various states and the federal government have proposed or enacted around clean energy. These examples can aid in developing state legislation designed to drive investments in energy storage in a just and equitable way.

Setting Goals for the Equitable Deployment of Energy Storage

When crafting policies around energy storage, it is important that state legislation specify goals for advancing equity and evaluate several priority areas for equity. How can the deployment of storage technology enhance access to and benefits for low-income communities and communities historically overburdened with the impacts of pollution and climate change? How can energy storage increase community resiliency to climate change? How can energy storage enable progress toward broader goals related to climate change and decarbonization?

HELPING ELIMINATE THE NEED FOR FOSSIL FUEL PEAKER PLANTS

A key benefit of energy storage is its ability to provide the grid services currently filled by fossil fuel peaker plants—or "peakers"—that only operate during limited times throughout the year at periods of peak demand for electricity. Major contributors to localized pollution, peaker plants are often sited in or near low-income communities, exacerbating already poor public health conditions. Energy storage can allow existing dirty peaker plants to be shut down, and it can eliminate the need to develop others in the future. The deployment of utility-scale or behind-the-meter energy storage in multifamily houses or community centers can meet demand during peak periods, helping ensure the reliability of the electricity grid.

PEAKER PLANT AVOIDANCE AND DECOMMISSIONING

Energy storage can improve public health outcomes if regulators require utilities to use it to replace dirty peaker plants, or at least require that the utility planning process evaluate storage as an option.

Example Legislation

- *California SB 338: Requires the Public Utilities Commission to consider energy storage and distributed energy resources for meeting peak demand *(Sects. Preamble; 1.454.52.a.1.3)*
- 117th Congress S. 1553/HR. 3139: PEAKER Act of 2021. Requires submission of an annual report on peaker plants and provides financial incentives for replacing peaker plants with technology that receives, stores, and delivers energy generated by renewable energy resources; defines "peaker plant"; requires public engagement with disadvantaged communities containing peaker plants *(Sects. Preamble; 2.4; 3.b)*

INCREASING RESILIENCY TO BENEFIT URBAN AND RURAL COMMUNITIES

Energy storage can be used alone or in addition to community solar or aggregated building-rooftop projects to create community-level microgrids or resiliency hubs. By providing localized backup power, these systems can help communities during natural disasters—for example, in meeting energy demands during floods, wildfires, and extreme weather events.

Community resiliency is essential in both urban and rural settings. Energy storage can help meet peak energy demands in densely populated cities, reducing strain on the grid and minimizing spikes in electricity costs. In rural communities,

which are often underserved for electricity, solar plus storage can fill electricity needs in areas outside the conventional grid infrastructure. Energy storage can help prevent outages during extreme heat or cold. And energy storage can be used with utility demand response programs, which balance electricity customer demand with power supply, to better align the more variable wind and solar supply with electricity demand.

COMMUNITY RESILIENCY

As the impacts of climate change reach more communities and affect them more severely, energy storage can improve community resiliency, keeping homes and essential services powered during and after natural disasters and extreme weather events.

Example Legislation

- California AB 1001: School Disaster Resiliency Act. Declares public schools to be community centers that need to function during disasters *(Sect. 2. Ch.19.a)*
- California SB 1314: Community Energy Resilience Act. Requires local governments to create resilience plans to ensure continuous electricity during planned or unplanned service outages *(Sects. 1; 2.26451)*

COMMUNITY SOLAR, DISTRIBUTED ENERGY RESOURCES, AND MICROGRIDS

Currently, middle- and higher-income households account for much of the deployment of rooftop solar, and those households reap direct benefits through lower electricity bills. However, everyone could share in broader benefits from deploying solar and storage widely, such as the avoided cost of building new power plants and power lines.

To spread the benefits of clean energy more widely, community solar and storage should be designed to include multifamily homes and critical community centers. The Department of Energy describes distributed energy resources (DERs) as those that produce and supply electricity on a small scale and are spread out over a wide area, which includes rooftop solar panels and some battery storage. DERs can be tied into microgrids, which are localized electricity grids that can still operate even if disconnected from the main grid.

Example Legislation

- *California AB 327: Requires electricity providers to propose to the Public Utilities Commission a plan that identifies optimal locations for deploying distributed resources *(Sect. 8.769)*
- *California SB 43: Green Tariff Shared Renewables Program. Expands access to all eligible renewable energy resources to ratepayers who are currently unable to access the benefits of onsite generation; requires that some facilities be reserved for the most affected and disadvantaged communities *(Sects. 1.2831; 1.2833)*
- *California SB 1339: Requires the Public Utilities Commission to facilitate the commercialization of microgrids for distribution customers of large electrical corporations *(Sect. 2.8371)*
- *Colorado HB 10-1001: Sets renewable energy and distributed energy requirements by percentage *(Sect. 1)*
- *Illinois SB 2814: Future Energy Jobs Act—Illinois Solar for All Program. Creates incentives for low-income distributed generation and community solar projects *(Sect. 5.1-56)*
- New Jersey SB 2484: Requires the Department of Community Affairs to give preference to applications for onsite, community solar, energy storage, or other clean energy projects that are sited in overburdened communities or include minority or women-owned businesses; requires the Board of Public Utilities to establish a community solar energy pilot program *(Sects. 3; 4-5)*
- *Virginia HB 1526: Clean Economy Act. Requires utilities seeking approval to construct or purchase a generating facility that emits carbon dioxide to identify that the need cannot be met more affordably through deploying or utilizing demand-side resources or energy storage resources *(Sect. 56-585.1.A.6)*

REDUCING CLIMATE-WARMING EMISSIONS AND LOCAL AIR POLLUTANTS HARMFUL TO HUMAN HEALTH

Energy storage can facilitate greater deployment of renewable energy on the grid, helping to displace fossil fuel generation that releases climate-warming emissions. Well-designed policies can help ensure that energy is stored when solar and wind power are at their peak and discharged to users when demand for electricity is high. In this way, storage can help efforts to integrate renewable energy into the grid and avoid the need for some of the most highly polluting peaker plants. Displacement of fossil fuel generators will improve public health in fenceline communities and beyond. Grid decarbonization reduces the emissions driving climate change and advances equity by avoiding some of the worst impacts of extreme weather events, which disproportionately affect underserved communities.

PROCUREMENT TARGETS AND GRID-SCALE RENEWABLES + STORAGE

One way to help ensure the continued expansion of utility-scale and distributed renewable energy resources is to add mandatory energy storage requirements to state procurement targets (i.e., renewable electricity standards or clean energy standards). To consider equity, policymakers can include carve-outs or set-asides specifying that some portion of the target be met with projects designed to benefit underserved communities directly through reduced air pollution or improved resiliency.

Storage technology can store energy from any source, but when paired with clean energy it can meet community-benefit as well as climate-mitigation goals. Ramping up energy storage alongside clean energy means a greater ability for clean energy to benefit more people.

Example Legislation

- California AB 1720: Intended to provide the additional tools necessary to enable the timely development and deployment of long-duration energy storage in the years leading up to 2030 *(Sects. 1.d,e; 1.f,g; 1.i,j)*
- *California AB 2514: Requires the Public Utilities Commission to open a proceeding to determine appropriate targets for each load-serving entity in procuring viable, cost-effective energy storage systems, and for those entities to adopt energy storage system procurement targets *(Preamble)*
- *New Mexico SB 489: Energy Transition Act. Requires the Public Regulation Commission to approve energy storage systems that reduce costs to ratepayers, reduce fossil fuel demand during peak periods, and assist with grid reliability, among other goals *(Sects. 6.c; 25.d; 25.e)*
- *Virginia HB 1526: Clean Economy Act. Requires 35 percent of new energy storage capacity by a public utility be from energy storage facilities not owned by the utility *(Sects. 56-585.1:4.G; 56-585.5.E)*

Key Legislative Language Components for Equity

Most of the legislative language cited in this how-to guide comes from clean energy legislation rather than legislation specific to energy storage. Whether used solely for energy storage or for clean energy generally, the following legislative language components are important for building equity into the clean energy transition.

PREAMBLE LANGUAGE

Preamble language, which establishes the legislation's intent, can emphasize equity as a goal and priority at the outset. A preamble is also an opportunity to express explicitly the idea that the direct benefits realized by the policy should place a priority on those communities burdened with the greatest cumulative impacts.

Example Legislation

- *California SB 535: Recognizes the disproportionate impacts of climate change on disadvantaged and low-income communities; requires directing investment toward those communities *(Sects. 1; 2.39711)*
- *Washington SB 5116: Finds that the equitable distribution of energy benefits, reduction of burdens to vulnerable populations and highly impacted communities, and energy security and resiliency are in the public interest *(Sect. 1.5-1.6)*

DEFINITIONS

Depending on the context, the term "underserved" can be used to mean or include one or more of the following: environmental justice, minority, low-income, disadvantaged, Indigenous, vulnerable, frontline, fenceline, economically distressed, and coal-impacted. The term can also refer to workers dislocated from their jobs in the transition away from fossil fuels. It is important that legislators be specific about the terms they use and the communities they aim to reach—or at least provide guidance to program administrators. Definitions of key terms, typically at the beginning of legislative text, help ground stakeholders in the topic of the legislation. For terms that can be used in varying ways, definitions can establish important boundaries for what a specific piece of legislation will or will not accomplish.

Example Legislation

- California AB 383: Clean Energy Financing Clearinghouse. Defines "clean energy technology" and includes energy storage systems *(Sect. 2.26100)*
- *California PUC §8282: California Public Utilities Code. Defines "LGBT business enterprise," "minority business enterprise," and "women business enterprise" *(Sects. c; d; g)*
- New Jersey SB 2484: Defines "community energy resiliency hub," "energy storage," "low-income household," and "overburdened community" *(Sect. 1.f)*
- *New York AB 08429: New York State Climate Leadership and Community Protection Act. Defines "disadvantaged communities" *(Sect. 7501-0101.5)*

** indicates enacted legislation*

- *Washington SB 5116: Supports Washington's clean energy economy and transitioning to a clean, affordable, and reliable energy future; defines "vulnerable populations" *(Sect. 2.40)*
- 115th Congress S. 1743: Coal Community Empowerment Act of 2017. Defines "coal community zone" *(Sect. 1400V-1.a)*
- 116th Congress S. 1974: Renewable Electricity Standard Act. Defines "impacted community" *(Sect. 610.a.3)*
- 116th Congress S. 4401: Environmental Justice for All Act. Defines "community of color," "environmental justice community," and "low-income community" *(Sect. 3)*

ROBUST STAKEHOLDER ENGAGEMENT PROCESS

For underserved communities to have a voice in the making of public policies, the legislature must establish transparent, inclusive, and accessible processes for public input and stakeholder engagement. These processes should include permanent advisory groups, temporary working groups or task forces, and longer periods for public input. Legislation should place a high priority on ensuring community representation in decisionmaking spaces, with a voice and vote. This will help ensure that the development and implementation of clean energy policies represent the people who will be most affected.

Example Legislation

- California SB 662: Establishes a disadvantaged community advisory group, with compensation for group members *(Sect. 2.400.g)*
- New Jersey SB 2484: Requires the development of outreach materials on this act in multiple languages; appoints a community liaison; establishes an advisory board of representatives from overburdened communities *(Sect. 1.c)*
- *New York AB 08429: New York State Climate Leadership and Community Protection Act. Establishes a climate action council, a just-transition working group, and a climate-justice working group; defines "disadvantaged communities" through public engagement *(Sects. 75-0101.15; 75-0103.8; 75-0103.10; 75-0111.2; 75-0111.1)*
- 116th Congress HR 2156: RECLAIM Act of 2019. Requires giving public notice to the local community of nearby projects *(Sect. 416.c.3.b)*

FINANCING FOR BROADER PARTICIPATION BY UNDERSERVED COMMUNITIES

Innovative financing will be critical for incentivizing the expansion of energy storage technologies alongside energy efficiency and renewable energy. New financing mechanisms should include requirements for community resiliency projects or other benefits to underserved communities. Options include green banks (public or nonprofit entities that help facilitate investment most commonly in local clean energy projects), resiliency funds, and other public-private partnerships.

Example Legislation

- California AB 383: Establishes a Clean Energy Financing Clearinghouse to coordinate all government programs that invest capital in clean energy technologies and whose purpose is to advance environmental protection and environmental justice goals *(Sect. 2.26105)*
- California AB 1001: School Disaster Resiliency Act. Creates a loan program for schools to institute clean energy generation and battery energy storage systems sufficient to provide ongoing community services during and after a disaster *(Preamble; Sect. 2. Ch.19. 17200; Ch.19. 17204; Ch.19. 17204.e)*
- *California SB 535: Requires allocating 25 percent of the available moneys in the Greenhouse Gas Reduction Fund to projects that benefit disadvantaged communities; requires allocating a minimum of 10 percent of available funds to projects located within disadvantaged communities *(Sects. 3.39713; 3.39715; 3.39721)*
- *Connecticut SB 366: Establishes the Connecticut Green Bank, which develops and supports financing for investment in clean energy sources *(Sect. 1.B)*
- Illinois HB 0804/SB 1718: Clean Energy Jobs Act. Creates an energy jobs and justice fund designed to make clean energy accessible to all through the provision of innovative financing opportunities and grants for minority business enterprises, other contractors of color, and low-income, environmental justice, and Black, Indigenous, and other people of color (BIPOC) communities and the businesses that serve those communities *(Article 10)*
- New Jersey SB 2484: Requires that no less than 10 percent of the Board of Public Utilities' (BPU's) annual clean energy budget, or at least $50 million annually, whichever is greater, be directed to its newly established Office of Clean Energy Equity *(Sect. 1.d)*

- 116th Congress HB 4447: Clean Economy Jobs and Innovation Act. Requires using no less than 40 percent of grant funds to implement covered projects in environmental justice or low-income communities *(Sect. 12701.b.C)*

LEGISLATIVE DIRECTIVES FOR REGULATORS

Legislative language should direct regulators to consider energy storage when analyzing costs and benefits to underserved communities and their energy consumers more broadly. Legislation can also direct regulators to mandate the consideration of equity or other community concerns and impacts.

Example Legislation

- California AB 383: Clean Energy Financing Clearinghouse. Directs the development of materials in multiple languages to facilitate market growth in untapped non-English sectors *(Sect. 26105.d.6)*
- *California Public Utilities Code Article 1: Requires electrical corporations, when soliciting bids for new gas-fired generating units, to actively seek bids for resources that are not gas-fired in communities that suffer from cumulative pollution burdens *(Sect. 454.5.9.D)*
- *California Public Utilities Code Article 16: Requires that each electrical corporation give preference to renewable energy projects that provide environmental and economic benefits to communities afflicted with poverty or high unemployment, or that suffer from high levels of toxic air emissions, criteria air pollutants, and heat-trapping gases *(Sects. 399.13.8; 399.13.5)*
- *Colorado SB 18-009: Establishes the right of electricity consumers to interconnect energy storage systems for use on their property *(Sect. 3)*
- Illinois HB 0804/SB 1718: Clean Energy Jobs Act. Establishes multiyear integrated grid planning *(Sect. 16-105.17)*
- *Nevada SB 204: Requires the Public Utilities Commission to investigate and potentially establish storage targets *(Sects. 7; 8; 9)*
- New Jersey SB 2484: Requires the establishment of an Office of Clean Energy Equity in the BPU and directs that office to establish onsite solar or community solar, and energy efficiency programs, as well as energy storage in overburdened communities *(Sect. 1.a-b)*
- *New York AB 08429: New York State Climate Leadership and Community Protection Act. Ensures that compliance with regulatory activities does not result in a net increase in co-pollutant emissions or disproportionately burden disadvantaged communities *(Sect. 75-0109.3)*
- *Texas SB 1012: Allows transmission and distribution facilities to own energy storage without being forced to register as power generators *(Sect. 1)*
- *Washington SB 5116: Requires an electric utility to evaluate renewable and non-renewable generating sources, including transmission and distribution; requires the integration of storage assessments and forecasting for DERs *(Sect. 14)*

FULL LIFE CYCLE BATTERY STORAGE CONSIDERATIONS

Although large-scale recycling or disposal of storage equipment and materials will not be needed for some years, clean energy legislation needs to incorporate policies for where these technologies will end up. In addition, global environmental-justice concerns related to materials extraction must be addressed, particularly for the materials in lithium-ion batteries. Toward this end, state legislation can incorporate recycling incentives or mandates around certain critical materials. Further, legislation can create incentives that promote ethical management for in-state or in-country supply chains. Another option is to encourage a move away from individual storage devices and toward shared community or grid storage, lessening individual demand for limited resources.

Example Legislation

- *California AB 2382: Requires the Secretary for Environmental Protection to convene a Lithium-ion Car Battery Recycling Advisory Group *(Sect. 1. Article 3)*
- *North Carolina HB 329: Requires the Environmental Management Commission to create rules for managing end-of-life considerations for energy storage system batteries *(Sects. 2.a; 2.b)*
- *Washington SB 5939: Establishes a manufacturer-financed photovoltaic takeback and recycling system *(Sect. 12)*
- 116th Congress S. 3356: Battery and Critical Mineral Recycling Act of 2020. Directs grants to projects that increase the reuse and recycling of batteries; convenes a task force to develop a framework for extended battery-producer responsibilities *(Sects. 3; 7)*

STUDIES, IMPACT REVIEWS, AND DATA COLLECTION

Energy storage is now in higher demand and being deployed at much larger scales than even a few years ago, and with greater support for research and development of new technologies. As with any emerging, pervasive technology, it requires that relevant legislation be adaptive, including provisions for scientific, consumer-impact, and community-impact review at designated intervals to allow for updates and course corrections based on the latest research. States should include requirements for studies and impact reviews as they develop and expand energy storage legislation. In ddition, states should require battery installers to collect and report data up front on such information as the location and size of battery storage units: this is easier than doing so retroactively and helps determine where storage is being deployed and who benefits.

Example Legislation

- New Jersey SB 2484: Requires a study to assess the equitability of the distribution of community solar's benefits and cost-savings *(Sect. 5)*
- *Washington SB 5939: Requires the administrators of community solar programs to track pertinent project information, such as location, ownership information, and rates *(Sect. 7.5)*

ENERGY CONSUMER PROTECTIONS AND NON-ENERGY BENEFITS

A priority for states and their utility commissions is to keep energy costs low for consumers. Beyond this, non-energy benefits include improved health and comfort for electricity customers, increased energy reliability, non-utility ownership of assets such as solar and storage, and economic development. It is important that legislation protect consumers and make explicit plans for advancing these non-energy benefits; at the community level, these need to be central considerations in the clean energy transition.

Example Legislation

- California AB 961: Describes participant non-energy benefits, utility non-energy benefits, and societal non-energy benefits of distributed energy resource projects *(Sect. 1)*
- *Washington SB 5116: Requires the Department of Commerce to collect data on energy burden and energy assistance needs for each electric utility *(Sect. 12)*

SITING

In deciding where to locate clean energy technologies, such as community-scale or utility-scale storage facilities, states can avoid unnecessary harm to already burdened communities if decisions are done thoughtfully and with robust community stakeholder input, such as having community representation on siting boards.

Example Legislation

- *New Jersey SB 232: Disallows the Department of Environmental Protection from granting permits for new or expanded polluting facilities located in burdened communities until the applicant prepares and submits environmental and public health impact assessments and holds public hearings *(Sects. 1; 3)*
- *Virginia HB 1675: Requires any applicant for a solar generation or storage facility to give the host locality written notice of the applicant's intent to locate a solar facility in an opportunity zone and meet, discuss, and negotiate a siting agreement with that locality *(Article 7.3. Sects. 15.2-2316.6–15.2-2316.9)*

LABOR PROTECTIONS AND LOCAL WORKFORCE DEVELOPMENT

Policies must ensure that clean energy development benefits a community's economy, improves public health, and provides new opportunities for workers. These labor and workforce protection policies should include project labor agreements, community benefit agreements, prevailing wage requirements, and local and targeted hiring provisions. For more detail on labor policies, see the BlueGreen Alliance policy toolkit.

Example Legislation

- Illinois HB 0804/SB 1718: Clean Energy Jobs Act. Creates the Clean Jobs Workforce Hubs network program; lays out the energy workforce development program and the energy community development program *(Article 5. Sect. 5-510; Article 20. Sects. 20-5, 20-50, 20-55)*
- New Jersey SB 2484: Requires the establishment of a program to provide grants that help community-based, diversity-focused nonprofits that serve overburdened communities by developing paid workforce training in solar energy or clean energy *(Sect. 2)*
- *New Mexico SB 489: Energy Transition Act. Creates an energy transition economic development assistance fund and an energy transition displaced worker assistance fund *(Sects. 4.B; 16.D; 16.I; 16.J; 16.L)*
- *Washington SB 5116: Requires the Department of Labor and Industries to set requirements for good-faith efforts to include proactive outreach to minority-owned businesses, advertising, and participation in local job fairs *(Sect. 18.2.a)*

Exemplary State-Level Equitable Energy Legislation

As policymakers integrate equity into policies on energy storage and clean energy more broadly, they confront the challenge of addressing historic and current injustices facing underserved communities. In crafting equitable clean energy legislation, policymakers in Massachusetts, New Jersey, and New York have included many of the goals and key legislative components described in this guide. These are excellent examples that can be applied to equitable energy storage as well.

MASSACHUSETTS SB 9: AN ACT CREATING A NEXT GENERATION ROADMAP FOR MASSACHUSETTS CLIMATE POLICY

This law has codified what constitutes an environmental justice (EJ) community and requires the assessment of cumulative impacts for projects proposed in or near EJ communities to prevent particular neighborhoods from being subjected to even greater industrial and environmental burdens. It mandates public hearings for setting goals for reducing heat-trapping emissions, including in regions most affected by air pollutants. It establishes a clean energy equity workforce and market-development program focused on minority- and women-owned enterprises, EJ communities, and workers transitioning out of the fossil fuel industry. The law also establishes the low-income services solar program to provide solar grants to community-supporting nonprofits. It defines "environmental benefits," "environmental burdens," "environmental justice population," and "environmental justice principles."

NEW JERSEY SB 2484: ESTABLISHES AN OFFICE OF CLEAN ENERGY EQUITY

This proposed act would create an Office of Clean Energy Equity in the BPU and require it to promote, guide, and oversee the equitable deployment of clean energy, energy efficiency, and energy storage programs and technologies in overburdened communities, as well as the equitable provision of the tangible benefits of these programs at the household and community levels. The tracked benefits to overburdened communities would include clean energy asset ownership, energy cost savings, and employment and economic opportunities. The act would task the Office of Clean Energy Equity with establishing a minimum amount of energy storage in overburdened communities sited at public facilities or as part of community energy resiliency hubs. The Office would be required to integrate workforce development training into all clean energy and energy storage programs established by the BPU. The Office would also provide outreach and recruitment campaign grants to community-based organizations.

NEW YORK AB 08429: NEW YORK STATE CLIMATE LEADERSHIP AND COMMUNITY PROTECTION ACT

This law details why climate change is a threat, explains the need for mitigation and resiliency efforts, and speaks explicitly to the needs of underserved communities. The legislation establishes a permanent Environmental Justice Advisory Group and creates a Climate Action Council, consisting of commissioners and representatives across interdisciplinary agencies, tasked with convening a working group on just transitions. Additionally, the law establishes a Climate Justice Working Group within the Department of Environmental Conservation tasked with determining criteria for identifying and aiding disadvantaged communities. Requirements throughout the Act are explicit regarding transparent and thorough public review processes.

For more information on energy storage technology, policy, and equity considerations, visit the UCS website at www.ucsusa.org/resources/energy-storage-hub.

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www.ucsusa.org/equitable-energy-storage-legislation

The Union of Concerned Scientists puts rigorous, independent science to work to solve our planet's most pressing problems. Joining with people across the country, we combine technical analysis and effective advocacy to create innovative, practical solutions for a healthy, safe, and sustainable future.

NATIONAL HEADQUARTERS
Two Brattle Square
Cambridge, MA 02138-3780
(617) 547-5552

WASHINGTON, DC, OFFICE
1825 K St. NW, Suite 800
Washington, DC 20006-1232
(202) 223-6133

WEST COAST OFFICE
500 12th St., Suite 340
Oakland, CA 94607-4087
(510) 843-1872

MIDWEST OFFICE
One N. LaSalle St., Suite 1904
Chicago, IL 60602-4064
(312) 578-1750