

**DESIGNING CONSUMER EDUCATION PROGRAMS
IN A
RESTRUCTURED ELECTRIC INDUSTRY**

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Consumer education is almost universally considered an essential component to any move toward electric restructuring by state policymakers. The need for education to help implement retail choice arises before, during and after the process of restructuring. The purpose of this paper is to consider how to design a consumer education program. The design of an electric restructuring consumer education program involves the following five steps:

1. Engage in research
2. Develop a strategic plan
3. Develop program content
4. Determine the delivery mechanisms
5. Evaluate and adjust

The discussion below further explains each of these five steps.

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STEP #1: PLANNING THE EDUCATION PROGRAM: RESEARCH

What do people know?

Who do people turn to for education?

Who are the major influencers of behavior/opinion?

Who do different information sources reach?

Long before a state begins the actual implementation of a consumer education program, an effective program must incorporate a planning component. The first step in the planning process should be a consumer research step. A consumer research section of the education plan should involve four primary inquiries:

- ∅ What do people know about restructuring (thus informing decisions about what people need to learn). Basic adult education concepts counsel that education most readily occurs when it is *learner* and *learning* focused rather than *teaching* and *teacher* focused. Education should be based on what consumers need to learn. One of the basic precepts to effective education is that an effective education program must begin with each person's needs, knowledge and experience, and decide what needs to be learned instead of what educators wants to teach.
- ∅ Who do people turn to for information and how do they get their information? Do they read it, or watch it, or listen to it? Do they get it from the media, through the mail, or from their neighbors and friends?
- ∅ Who are major influencers of behavior and opinion? From whom do people take their "cues," neighbors, fellow workers, city/government officials, social organizations? This inquiry differs in that it looks at behavior rather than at information sources.
- ∅ Who do different information sources reach? Do particular radio stations reach particular audiences? Conversely, does the local newspaper systematically "miss" some definable or discrete population? Do discrete populations rely more on one source than any other?

In engaging in each of these steps, there is a need for educators to segment its research and analysis by relevant consumer groups. Such groups may be demarcated by age, race/ethnicity, socio-economic status, or some other factor. Indeed, determining what the relevant factors are will be part of the initial inquiry.

The primary reason for the need to engage in this research step is to take into account the diversity of consumers receiving education. Time and again, consumer education research emphasizes the diversity amongst consumers. Programs that fail to account for these differences will fail their basic education function.

It is easy to conclude that a diversity exists amongst consumers. Consider, for example, participation in public benefit programs. Why low-income households do not participate in the Food Stamp program nationwide was the subject of a U.S. General Accounting Office (GAO) study in 1988. The GAO found that slightly more than half of all eligible households eligible for Food Stamps did not participate in that program. A subsequent GAO study found that the groups most likely to cite a lack of information about the Food Stamp program included most categories of households headed by single individuals.¹²¹ Finally, GAO said, the groups most likely to report problems with the Food Stamp program or access problems as their major reason for nonparticipation were households that participated in SSI or other public welfare programs; households headed by nonwhite widowed, divorced or separated individuals; nonwhite single males; and households containing nonwhite married couples.

This data about food stamps applies equally to consumer actions with respect to their energy bills. A 1996 study for the Colorado Energy Assistance Foundation (CEAF) examined nonparticipation in LIHEAP in Colorado. As with GAO's study of food stamp nonparticipants, the study found that the primary obstacle to participation in LIHEAP in Colorado is the lack of information. Based on data specific to Colorado, persons who were disproportionately represented in the populations that reported not knowing about LIHEAP included persons aged 65 and older, non-English speaking households (and particularly non-English/non-Spanish speaking households), African-Americans, and unmarried households.

Most recently, in April, 1999, GAO found that enrollment in state Medicare programs is relatively low for particular populations. According to GAO, many potential recipients do not enroll because they do not know the programs exist, believe they are only for "poor people," fear that the state will try to recover payments made to them from a surviving spouse or children, or are unwilling to accept what they think of as welfare. Moreover, GAO noted, the application process is burdensome and complex. GAO identified persons who are white,

¹²¹ These include households headed by white single men and women and those households headed by nonwhite single females.

widowed or married, or who receive Medicare coverage because of age rather than disability, as populations with particular information needs.

This data, standing together, is much more important than any particular set of data standing alone. Each example cited above tends to support the notion that different subsets of the population tend to need different education than other sub-sets. Even more important, however, is the fact that *every* study tends to support this finding. The data is more compelling, too, because the lesson is the same over a diverse range of circumstances. Policymakers should abide by its lessons in designing the electric retail choice consumer education program.

STEP #2: PLANNING THE EDUCATION PROGRAM: STRATEGIC PLANNING

Goal

Objectives

Strategies

Tactics

After completing the basic background research, the second step of a consumer education program involves setting goals, objectives, strategies and tactics. The need for consumer education is five-fold:

1. To educate consumers about restructuring generally;
2. To educate consumers about *what* they will need to do ("I need to choose");
3. To educate consumers about *how* to do it ("I will find and assess information in the following way");
4. To educate consumers about how to understand their energy consumption patterns in order to decide how best to meet their needs;
5. To motivate consumers to engage in the decisionmaking ("*not* making a choice is not okay").

In some instances, consumer education programs focus almost exclusively on steps 1 and 2.

In other instances, even when appropriate goals are determined, the electric restructuring education programs do an inadequate job of translating those goals into a plan.¹³¹

Basic planning doctrine calls for broad policy goals to be translated into objectives. Objectives are then matched with specific strategic approaches which are then implemented through specific tactics. Objectives are to be: (a) attainable; and (b) measurable. Without these attributes, it is impossible to know to what extent, if at all, program strategies and tactics are working. An adequate planning process would allow a measurement of whether the objective has been accomplished and, if not, enable the planner to trace that failure to a specific strategy or tactic that did not do what it was intended to do. The basic planning process is set forth in Appendix A to this discussion.

As a general rule, the immediate need for a company (or Task Force or a community-based organization) is to retain a competent consumer education consultant to engage in a planning process to establish goals, objectives, strategies and tactics for a consumer education campaign.

STEP #3: PLANNING THE EDUCATION PROGRAM: DEVELOP CONTENT

- Understanding restructuring
- Getting ready for retail choice
- Making a good choice
- Continuing to make good choices

The third step in the process is to decide, based on all of the above, what needs to be said. The content of a consumer education campaign should be much more narrowly focused than a broad statement about providing education "about electric industry competition." A four phase consumer education program, modeled after the program proposed in Vermont, would include:

¹³¹ This sets aside the adequacy of the goal. The goal should not be "to create a campaign." Creating a campaign is --or at least should be-- a means and not an end. The campaign should be created in *furtherance* of some goal rather than being the goal itself. Moreover, the goal of one program was somewhat pedantic at best. The company stated that the goal of its consumer education plan was to "educate the public." An adequate goal might be to convince consumers to make informed choices about their electric service provider and to empower them to do so.

- Phase 1:** Understanding Restructuring -- Phase 1 would be designed to explain to electric customers the expected changes in the electric industry resulting from restructuring. Its objective would be to raise the aided and unaided awareness of restructuring to predetermined levels by a date certain.
- Phase 2:** Getting Ready for Choice -- Phase 2 would be designed to explain to electric customers the need to make a choice and to educate consumers both about their household energy consumption and about their options in energy sources (including energy efficiency). Messages would include, for example, how to evaluate the total bills (rather than looking simply for the least expensive rates); how to evaluate green power claims; what types of consumer protections might exist; and how to consider the environment impacts of power choices.
- Phase 3:** Making a Good Choice -- Phase 3 would be designed to educate electric consumers to help them through the choice-making process. It would educate consumers on what types of offers they might expect to see, what consumers should do in response to various offers, what information to look for in particular, and who to call with questions.⁴⁾
- Phase 4:** Continuing to Make Good Choices -- Phase 4 would educate consumers on how to evaluate their home energy bill on a continuing basis. This phase would allow consumers to use their bills as feedback on what they are doing with their own household energy consumption. It would educate consumers about how to understand their consumption patterns.

A significant distinction exists between the offer of "education" materials and the offer of "marketing" materials in an electric retail choice program. The May 8, 1997 statement of Pennsylvania Public Utility Commissioner Brownell makes the distinction quite well. Commissioner Brownell stated, "the ultimate goal of marketing clearly is to promote the sale of goods and services." "Marketing can be described as the process of planning and executing the conception, pricing, promotion and distribution of ideas, goods and services to create exchanges that satisfy individual and organizational goals."

⁴⁾ Consider, also, that in Pennsylvania, the PUC consumer education order specifically contemplates the task of educating consumers about their energy consumption patterns and the role of energy efficiency. Such an approach is appropriate. A consumer education program should not focus exclusively on supply-side options. It is essential for consumers to be educated on how to assess energy efficiency as one of their energy service options. A company that offers somewhat lower rates might, in fact, not be the least cost supplier of service if a different company offers marginally higher rates along with significant energy efficiency investments.

A second distinction to make is between the provision of consumer education and the mere provision of "information." Commissioner Brownell states that "education can be distinguished from information when a customer is able to take the information and use it to make better decisions. . .information does not qualify as education. . .[C]onsumer education involves efforts to provide consumers with skills and knowledge to allocate their resources wisely in the marketplace." So, too, did Penn State University's Drew Hyman consider this issue within the context of low-income fuel assistance. The Penn State report made several findings significant for developing a consumer education program:

- Consumer knowledge of the existence of energy assistance and conservation programs "is not very extensive. . .Most consumers do not have *effective knowledge* about those programs which exist." (emphasis added).
- The low level of knowledge about the various options available to consumers raises a question as to whether some consumers are being denied access to the assistance network because their knowledge is incomplete.
- Consumer education can fill in the missing gaps in consumer knowledge and *teach consumers to use the information* available to them in an effective manner. (emphasis added).

The concept of advancing "effective knowledge" on the part of consumers is one contribution the Penn State research has made to developing appropriate consumer education in the energy context. "Effective knowledge" involves not only conveying information, but teaching consumers how to use that information as well. According to the Penn State work, consumers must know how to act upon the information they are given. Policymakers could substitute the term "competitive market" for "assistance program" and the Penn State lessons would be directly transferable.

STEP #4: PLANNING THE EDUCATION PROGRAM: DELIVERY MECHANISMS

Community Outreach

Direct Mail

Mass Media

"Tying" programs

The fourth step in developing a retail choice education program involves deciding, again based on everything that's been said above, on the *mechanisms* for delivering the content of the education program. In this respect, several specific observations should be made about any proposed consumer education plan with several different but related specific recommendations.

∅ **Community outreach:** Beware the community outreach which involves a passive effort. A consumer education effort instead should be proactive. Rather than providing a "speakers bureau," for example, a utility should commit a dedicated staff to providing training and education on customer choice. A myriad of different consumer groups can be reached through specialized targeting. It would seem, for example, that agencies providing consumer credit counseling could be trained on how to educate consumers about restructuring. Agencies that provide housing counseling (pre- and post-purchase counseling as well as work-outs for delinquencies) could be trained.

∅ **Community outreach:** Beware a proposed community outreach that demonstrates an unstated cultural and socio-economic bias. Consider a program that relies on the following four mechanisms revolving around membership in organizations: sponsoring meetings with groups; providing material for organization newsletters; making presentations to organization meetings; providing brochures for organization distribution.

Substantial research reveals that low-income households tend to join fewer organizations (*dramatically* fewer organizations) of *any* nature than persons in higher socio-economic brackets. The key to the development of effective partnerships is the *segmentation* of the consumer population into its various constituent parts. Collaborating with the state Division of Motor Vehicles, a company could provide information through vehicle registration renewal form mailings. Materials could be provided with unemployment checks or with various forms of public assistance (*e.g.*, LIHEAP, food stamps, TANF). One of the recurring themes in educating consumers about public assistance is tying the education to programs in which the consumer is already involved.

∅ **Media reliance:** Beware the proposed outreach plan that relies extensively on mass media (sometimes referred to as "external communications"). Such a plan generally includes the use of mass media, including television, radio and newspapers. Unfortunately, many companies proffer that a broad-based education effort must include predominantly television communications, as well as radio and newspaper

messages.

Excessive reliance upon a media campaign as a mechanism for consumer education is not likely to be successful. Professor Brenda Dervin⁵¹ states that one "well-established premise of public communication/education campaign design [is] that mass mediated messages are rarely effective." According to Professor Dervin, media-based campaigns tend to have low penetration levels, with a typical public service announcement campaign producing awareness rates as low as 5 - 10%. Similarly, media advertising was found to generate low consumer awareness of a low-income energy assistance program in New York state. "[T]he CSA weatherization program. . . had relatively low visibility despite extensive advertising and outreach campaigns."

Finally, a consumer education program design should recognize that different media will reach and be relied upon by different consumers. A consumer education program that fails to take this fact into account will simply fail to reach substantial portions of the population. Consider for example, what we can learn from fuel assistance outreach. A national study by the Center on Budget and Policy Priorities (CBPP) examined specifically why elderly households did not participate in the LIHEAP program. This report noted substantial barriers to participation, including a lack of program trust. A study of methods for marketing energy conservation programs to the elderly, this report noted, found that "many of the elderly did not *trust* the programs." (emphasis added). The report found that in designing outreach efforts, "the specific informational techniques used were less important than the amount of trust [that] potential participants had in the sponsoring organization."

Research in Philadelphia found that "trust" is directly correlated with income and socio-economic status. An April 1997 report by The Pew Charitable Trusts found that education and age are other important factors. Older, more educated and more affluent respondents are more trusting than the less schooled and poorer. Poorly educated young whites and young blacks are extremely distrustful. The Pew study found that few Philadelphia residents trusted the news media (either print or broadcast). Conversely, the most trusted institutions are ones that involve personal contact. Four of the five most trusted institutions in the city included family members (#1), people at church (#3), your boss (#4), and co-workers (#5).

In sum, there is a diversity of consumers both in what media they rely upon in obtaining information and in what media they trust to impart appropriate information. A consumer education program should recognize this diversity.

⁵¹ Communications Department, Ohio State University, Columbus, OH.

STEP #5: PLANNING THE EDUCATION PROGRAM: EVALUATE AND ADJUST

Articulate expected performance

Measure actual performance

Identify performance "gaps"

Identify cause of gaps

Develop and implement remedies

Start evaluation over

A final component that needs to exist in a consumer education campaign is an evaluation and adjustment component. Many programs provide no mechanism to evaluate and adjust the consumer education program as it is implemented. Granted, an evaluation mechanism is most meaningful when implemented in conjunction with the planning process laid out above. Without measurable objectives, for example, it is not possible to determine whether the education program is accomplishing what it was intended to accomplish, let alone decide whether any failure that might exist flows from a strategic miscalculation or an error in tactics. Moreover, without being able to trace a tactic back through a strategy to a measurable objective, it is impossible to determine whether a failed tactic flows from a design failure or an implementation failure.

Program monitoring should be designed to determine:

- ∅ Whether (and to what extent) the stated objectives are being met;
- ∅ If not, where the consumer education process is breaking down; and
- ∅ What should be changed in the education process to redress shortcomings.

A proposed monitoring plan is set forth in Figure 1 below.

SUMMARY AND CONCLUSIONS

Only after an institution interested in consumer education completes each of the steps outlined above is it ready to sit down and develop a consumer education program. It knows what education needs to occur. It knows what needs to be done in order to educate rather than

simply to provide information. It knows how to reach different consumers with different messages. It knows how to evaluate and modify its program if the program falls short of expected or desired outcomes. In sum, whether it is a Task Force, utility or community-based organization, an institution engaging in this process knows specifically what it is trying to accomplish and specifically how it intends to accomplish it. It can only at that point develop its consumer education program. Its program would include tasks, timelines, dates for deliverables, and resource commitments in furtherance of its planning and evaluation efforts.

An eleven step proposal is set forth in Appendix B below. Proposed legislative language is included in Appendix C.

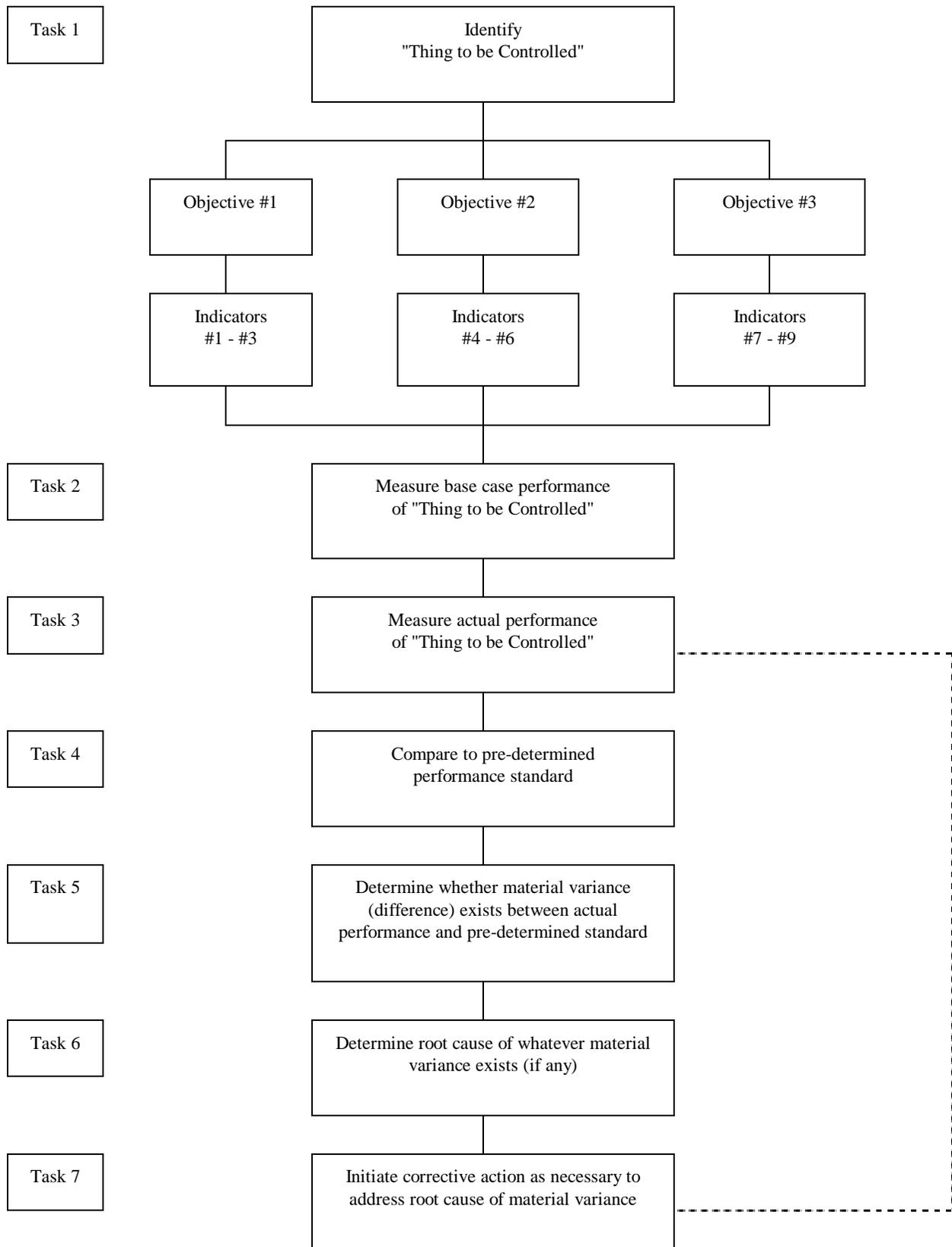


FIGURE 1: USE OF PERFORMANCE INDICATORS IN EVALUATING PROGRAM PERFORMANCE

APPENDIX A:
A CONCEPTUAL OVERVIEW OF PROGRAM PLANNING AND OUTCOME REVIEW

Consumer education is but one type of an energy programs.^{6\} Basic planning principles dictate that certain steps occur in the planning and implementation of *any* program. These planning steps are as applicable to consumer education as they are to any program of any nature. The fundamental planning principles involved in program design include the following steps:

1. **Articulating the program goal:** The program goal is the ultimate end-in-view resulting from the program. (**Illustration:** To maintain better contacts within one's family.)
2. **Establishing one or more program objective(s):** Program objectives are to be both attainable and measurable. It is against program objectives that program performance is subsequently measured. (**Illustration:** To be home for holidays.)
3. **Identifying the strategy to accomplishing the objective(s):** The "strategy" of a program is the overall direction in which the program intends to move. The strategy is important in that it is disconnected from tactics. A tactic may be effective and yet still not accomplish the program goal if the strategy is flawed with which to begin. (**Illustration:** To acquire frequent flyer miles to fund airplane tickets for holiday trips home.)
4. **Identifying one or more tactics through which to implement the strategy:** Program "tactics" are the specific action steps through which a strategy is implemented. Tactics are those program elements which would be included in a work plan. A program may, and likely will, have multiple tactics to implement the strategy. (**Illustration:** To limit all business trips solely to a single airline to increase the accumulation of frequent flyer miles.)
5. **Measuring program performance:**^{7\} Measuring a program's performance

^{6\} "A 'program' may be any activity, project, function, or policy that has an identifiable purpose or set of objectives." U.S. General Accounting Office, *Performance Measurement and Evaluation: Definitions and Relationships, Glossary*, at 1 (April 1998). Other affordability programs might involve weatherization or baseload energy efficiency, utility rate discounts, and the like.

^{7\} "Performance measures may address the type or level of program activities conducted (process), the direct products and services delivered by a program (outputs), and/or the results of those products and services

involves measuring outcomes.^{18\} Measuring outcomes is different from measuring outputs or activities. (**Illustration (outcome measure):** Was I home for New Year's Day, Labor Day, Father's Day?). (**Illustration (activity measure):** Did I fly all my business trips on one airline?). (**Illustration (output measure):** Did I accumulate sufficient frequent flyer miles to fund a trip home for the holidays?) It is important to notice that, in this illustration as is true generally, neither the output measures nor the activity measures contribute to a determination of whether the program objective is being met. Accomplishment of an objective can only be measured through an analysis of program outcomes.

6. **Evaluating program performance in light of the program objectives:** Program performance should be measured relative to the program objective.^{19\} This involves creating a feedback loop. The feedback loop provides the planner with the ability to determine if the objective was met, and if not, what changes need to be made to improve performance.^{10\}

Two important observations need to be made about this planning process. First, it is critical to distinguish between strategy and tactics. Even successful tactics fail if the strategy is flawed in the first place (*e.g.*, I flew enough business trips on one airline to accumulate sufficient miles for an airline ticket, but my home town does not have an airport; *e.g.*, I flew enough trips on one airline to accumulate sufficient miles for an airline ticket, but one cannot use frequent flyer miles for trips over holidays). If a strategy is in error, the effectiveness of the tactics becomes irrelevant, since successful tactics cannot be used within a flawed strategic framework to accomplish program objectives.

Second, an appropriate strategy can fail due to unsuccessful tactics (*e.g.*, the airline on which I took all my business trips does not fly to my home town; *e.g.*, I flew 100% of my business trips on a single airline, but I took only three business trips). Under these circumstances, the
(. . . continued)

(outcomes)." *Performance Measurement and Evaluation, supra.*

^{18\} "Performance measurement focuses on whether a program has achieved its objectives, expressed as measurable performance standards." *Performance Measurement and Evaluation, supra.* As is thus evident, it is possible to know that a program reduces energy burdens and/or energy bills, without documenting what *outcome* that program result generates.

^{19\} "Performance measurement is the ongoing monitoring and reporting of program accomplishments, particularly progress towards preestablished goals." *Performance Measurement and Evaluation, supra.*

^{10\} "A program evaluation's typically more in-depth examination of program performance and context allows for an overall assessment of whether the program works and identification of adjustments that may improve its results." *Performance Measurement and Evaluation, supra.*

appropriate planning response is to determine whether the tactics had some underlying flaw, or whether they were simply poorly implemented.

APPENDIX B
SUMMARY OF CONSUMER EDUCATION RECOMMENDATIONS

- Step 1:** Retain a consultant to do a market segmentation analysis.
- Step 2:** Engage a consultant to develop a complete, adequate and appropriate set of consumer education goals, objectives, strategies and tactics.
- Step 3:** Retain a consultant to develop a Community-Based Participation Plan consistent with the goals, objectives, strategies and tactics, and market research information. The use of community-based organizations is frequently endorsed as a part of electric restructuring consumer education.
- Step 4:** Agree to a four phase substantive consumer education message consisting of the four phases described in the text.
- Step 5:** Develop a consumer education program specifically directed at educating consumers about how energy efficiency and consumer choice operate together.
- Step 6:** Allocate the consumer education budget to the tactical programs identified in Steps 2 through 5, consistent with the market research information. This should involve: (a) a proactive plan of outreach; (b) a dedicated consumer education staff; (c) an outreach plan that is culturally appropriate.
- Step 7:** Commit funds to capitalizing a Consumer Education Trust Fund structured broadly as follows:
- a. An independent board of trustees, consisting of persons skilled in consumer education, community outreach, and community involvement, including at least two members from or representing the low-income community;
 - b. To provide funding on an application basis for specific projects that:
 - i. Demonstrably serve an identifiable population at risk of being underserved by the consumer education program;
 - ii. Present a unique approach to consumer education offering special benefits; or

- iii. Propose a new and/or innovative approach to consumer education that requires and merits testing on a pilot basis.

Step 8: Create a dedicated consumer education staff of professionals (along with necessary support staff) to provide community outreach, education and training.

Step 9: Commit funds to retain a consultant to develop and implement a monitoring, feedback and adjustment process for the Consumer Education Program.

Step 10: Create an independent Consumer Education Advisory Panel to advise the company as to its ongoing Consumer Education Program and to provide advice and consent on the selection of the recommended consultants.

Step 11: Submit any final consumer education program to state regulators for review and approval.

APPENDIX C
PROPOSED CONSUMER EDUCATION LEGISLATIVE LANGUAGE

1. Not later than January 1, _____ (insert date as appropriate), the state public utilities commission shall develop a comprehensive public education outreach program to educate customers about the implementation of retail competition among electric suppliers. The goals of the program shall be to maximize public information, minimize customer confusion and equip all customers to participate in a restructured generation market. The program shall include, but not be limited to: (1) the dissemination of information through mass media, interactive approaches and written materials with the goal of reaching every electric customer; (2) the conduct of public forums in different geographical areas of the state to foster public input and provide opportunities for an exchange of questions and answers; (3) the utilization of community-based organizations in developing messages and in devising, delivering and implementing education strategies; (4) targeted efforts to reach rural, low income, elderly, foreign language, disabled, ethnic minority and other traditionally underserved populations; and (5) periodic evaluations of the effectiveness of educational efforts. The commission shall assign one individual within the commission to coordinate the outreach program and oversee the education process. The commission shall begin to implement the outreach program not later than January 1, _____ (insert date as appropriate).

2. There shall be established a Consumer Education Advisory Council which shall advise the outreach program coordinator on the development and implementation of the outreach program until the termination of the standard offer under this act. Membership of the advisory council shall be established by the commission not later than June 1, _____ (insert date as appropriate), and shall include, but not be limited to, representatives of the commission, the Office of Consumer Counsel, the Department of Social Services, the Division of Housing, the Department of Aging, the Department of Agriculture and Consumer Services, the Department of Environmental Protection, community and business organizations, consumer groups, including, but not limited to, a group that represents low-income customers, electric distribution companies and electric suppliers. The advisory council shall determine the information to be distributed to customers as part of the education effort such as customers' rights and obligations in a restructured environment, how customers can exercise their right to participate in retail access, the types of electric suppliers expected to be licensed including the possibility of load aggregation, electric generation services options that will be available, the environmental characteristics of different types of generation facilities and other information determined by the advisory council to be necessary for customers. The advisory council shall advise the outreach program coordinator on the methods of distributing information in accordance with subsection (a) of this section and the timing of such distribution. The advisory council shall meet on a regular basis and report to the outreach program coordinator as it deems appropriate until termination of the advisory council's role upon the termination of the standard offer under this act.

3. Not later than January 1, _____ (insert date as appropriate), the commission shall submit a

report to the committees of the General Assembly having cognizance of matters relating to energy, outlining the scope of the education outreach program developed by the commission and identifying the individual acting as outreach program coordinator and the membership of the advisory council.

4. The commission may retain a consultant to assist in developing and implementing the public education outreach program, provided the authorization to retain such consultant shall expire December 31, ____ (insert date as appropriate). The reasonable and proper expenses for retaining the consultant and implementing the outreach program shall be reimbursed through the commission.