TWO-WAY SYMMETRIC COMMUNICATION BETWEEN PUBLIC UTILITIES

AND THE PUBLIC

by

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ABSTRACT

This paper presents a multi-disciplinary examination of literature from the fields of public policy and participation, media and public relations, and technical communication as it relates to two-way symmetric communication and how it applies to public utilities and the public. Differences between two-way symmetric communication and other communication/public relations methods are examined, as well as the specific merits of two-way symmetric communication, including its ethical benefits, and criticisms and constraints. Current forms of communication between public utilities and the public are examined, including whether these forms are two-way symmetric. Planning events and those that involve public participation are highlighted as ideal opportunities for two-way symmetric communication. Last, plain language is detailed as an approach for achieving effective two-way communication that not only reduces gaps in knowledge but addresses the ethical impacts and necessity of two-way symmetric communication.

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| | |
|---|---|
| ACIR | Advisory Committee on Intergovernmental Relations |
| CAA | *Clean Air Act of 1970* |
| CAP | Community Advisory Process |
| ESA | *Endangered Species Act of 1973* |
| FEMA | Federal Emergency Management Agency |
| FWEA | Florida Water Environment Association |
| IDAPA | Idaho Administrative Procedure Act |
| IPUC | Idaho Public Utilities Commission |
| IRP | Integrated Resource Plan |
| IRPAC | Integrated Resource Plan Advisory Council |
| NEPA | *National Environmental Policy Act of 1969* |
| NRDC | Natural Resources Defense Council |
| PUC | Public Utility Commission |
| PURPA | *Public Utility Regulatory Policies Act of 1978* |
| RAP | Remedial Action Plan |

CHAPTER ONE: INTRODUCTION

**Topic Overview and Relevance**

In this paper, I examine communication between public utilities and the public,

focusing on two-way symmetric communication (as defined by Grunig & Hunt, 1984).

Two-way symmetric communication is a dialogue between participants in which all are

equally likely to influence one another, to change their opinions, and to make decisions

beneficial for all. This approach is particularly suitable to analyzing communication

between public utilities and the public because it offers an ethical and democratically

necessary way to communicate about services that affect the public's vital interests.

Further, such communication can add great value to decisions affecting public interests

and can create agreement and lasting partnerships among the public and public utilities.

Public utilities hold a unique and important position within our society that affects

the general public in numerous ways. Utilities are considered a standard of living, even

basic freedoms; we rely on them for daily tasks, life-saving functions, food and water

preparation, transportation, finances, electronic/digital devices, and more (Morris, Buys

& Vine, 2014). Utility rates also have monetary impacts on society, and utilities are

primary users and stewards of our natural resources. Both rates and natural resource

issues have long been considered public issues, and natural resources are an increasing

concern. As Roberts (2004) acknowledges, complex technologies, such as utilities,

"pose substantial hazards and risks to individuals, communities, regions, or even to the

entire planet" (p. 326). For example, the largest contributor of greenhouse gases that causes global warming is the fossil fuel used to make electricity (typically by utilities). According to the Natural Resources Defense Council (NRDC), this source produces approximately two billion tons of $CO_2$ annually (MacMillan, 2016). Decisions about such environmental risks "greatly affect lives of many publics" (Simmons, 2007, p. 14). Because of utilities' numerous and far-reaching impacts on society, how they communicate such impacts and decisions with the public should be considered.

Despite public utilities' importance in the public's lives, the routine of daily living often masks the significance of such normal tasks as flipping a light switch, and so communication is not considered unless there is a problem. Simmons (2007) holds that a critical rhetorical participatory framework is necessary to reach a just environment in which publics can be involved in civic discourse and public policy making. Further, decisions that warrant two-way symmetric communication have been defined as those that will have "a substantial impact on the public" (Thomas, 2013, p. 793). To reach a just environment in which the importance of utilities and their substantial impacts on the lives of the public are discussed between all parties affected, two-way symmetric communication should be examined as a useful option.

Currently, there is a gap in existing literature regarding to what extent the public is involved in decision-making powers of these utilities. Specifically, literature that questions whether communication between the public and public utilities is and/or should be two-way symmetrical (outside of mandatory notices about rates and procedural notices) is lacking. Further, several ethical considerations arise as to what level non-expert publics should be involved, how they should receive information, and whether

they have obligations to respond. By examining these considerations in the context of two-way symmetric communication, I assert that public utilities and their decisions have substantial impacts on natural resources and the public, that the public should be involved in conversations about these impacts, and that a more participatory approach may be beneficial and ethically necessary.

## Research Method

Throughout this paper, I examine relevant literature in the areas of public policy and participation, media and public relations, and plain language and technical communication as they relate to two-way symmetric communication. I draw on this existing literature to create a framework for analyzing two-way symmetric communication between public utilities and the public and draw conclusions on this new area of analysis. Literature from these areas is particularly relevant to examining two-way symmetric between public utilities and the public for several reasons.

Literature on public policy and participation details relevant regulations requiring meaningful collaboration between public entities and the public and offers opportunities in which two-way symmetric communication may be most relevant. Literature on media and public relations highlights some of the ways in which public utilities currently communicate with customers and whether this communication is one way or two way. Last, literature on technical communication offers a potential method—plain language— for helping achieving two-way symmetric communication. Together, these areas offer a broader, more representative perspective of practices and policies affecting communication between public utilities and the public, as well as a practical means for achieving more meaningful, two-way symmetric communication.

Literature on public utilities and their regulation is extensive. However, specific literature on communication between public utilities and the public is limited. As well, research tying public participation to public utilities is also limited. As such, I apply a number of broader concepts in literature ranging from communications theory, including organizational and interpersonal communication, to public relations and media theory, depending on the purpose and context of the communication. Because communications that occur between public utilities and the public can also vary broadly, an examination of two-way symmetric communication across these disciplines is further suitable; there is no one theory that can characterize all that is involved with these interactions, nor should there be. I use a broader perspective that borrows and applies perspectives from multiple disciplines to gain a more comprehensive view of communication between public utilities and the public to fill the gap in existing literature.

## Research Questions and Chapter Overview

Through my examination of relevant literature, I draw on various communications theory and public relations theory through a two-way symmetric framework to address the following questions:

1. Is two-way symmetric communication 1) an effective and 2) a necessary method of communication between public utilities and the public?

2. How do public utilities and the public communicate and where is/can two-way symmetric communication be used?

3. Can plain language be used to achieve two-way symmetric communication?

This paper is divided into seven chapters. Chapter One presents an overview of the paper topic, the relevance of the topic, my research method, and key questions.

Chapter Two details the two groups in my study of two-way symmetric communication—public utilities and the public. Chapter Three examines various types of communications and the distinctions between them to provide a foundation for viewing two-way symmetric communication. Chapter Four examines two-way symmetric communication in detail, including its benefits, ethical necessity, and constraints. Chapter Five examines how public utilities communicate with the public and whether two-way symmetric communication is currently used. Chapter Six examines plain language as a method to achieving two-way symmetric communication, and Chapter Seven offers conclusions.

CHAPTER TWO: DEFINING PARTICIPANTS

In this chapter, I will discuss public utilities and the public, the two primary participants in the communication process I am studying. To ensure a complete and consistent understanding of these two groups, it is first necessary to define each of them as I will be referring to them, including their roles in the communicative process and larger roles in society. This will also help establish a foundation for understanding their relationship with each other.

**Public Utilities**

The term *public utilities* encompasses a broad spectrum of entities that provide a variety of services. Although this term could be used to refer solely to the infrastructure needed for these services, in this paper I refer to public utilities as those entities that provide public services. Such services include water, electricity, gas, and sewer and trash collection. Although telecommunications, postal services, and public transit may be considered public services, they are outside the scope of this document, though some of the same principles may apply to these services as well. Generally, I will not examine the specifics of each type of public utility; rather, I will examine public utilities as a single entity, making distinctions where needed.

Purpose

The primary purpose of public utilities is to provide "essential services, upon which social life and the rest of the economy depend" (Melody, 2016, p. 521). Heino and

Anttiroiko (2015) clarify that the public "does not refer to the public sector as such, but to public interest," viewing public utilities as service providers (p. 222). Public utilities can also be thought of as administrators of public services that support citizenship. There are various public administration models that define such an administrative role, ranging from steward to implementer to expert (Roberts, 2004). In terms of their role as administrator of public services, the *civil society* and *social learning administrative* models view public utilities as co-producers, co-learners, and facilitators (Roberts, 2004). Most public utilities encompass all these roles, depending on the situation, in their duty as administrator. These descriptions of not only the noun "public utilities" but their purposes as administrators to serve the public interest provide an appropriate framework for considering their role and how it affects communication needs with the public.

Ownership

Along with the type of utility, the ownership and management of public utilities can also vary broadly. The term "public" in public utilities as I refer to them does not imply public ownership, but rather a function to serve the public; public utilities may be either privately or publicly owned. Publicly owned utilities are operated or managed in some form by the government and can vary in form. For example, a publicly owned utility may be a cooperative owned by members of the utility, or it may be a municipal utility operated by a local government. Regulation of publicly owned utilities is overseen by locally elected officials or public employees, and these utilities do not operate for monetary profit (California Energy Commission, 2016).

Privately owned utilities are typically investor owned and as such have shareholders. Although their primary aim may be to provide a service, they also aim to

return a profit for their investors. However, because most public utilities have a special status as a monopoly in the area they serve, profits of privately owned public utilities are limited to a certain amount, after which the rest must be returned to customers. Privately owned public utilities are overseen and regulated by public utilities or services commissions (PUC), which vary among states.

Requirements for publicly owned versus privately owned utilities regarding communication and public involvement differ; however, because both types are public utilities that have the same primary purpose (to provide a specific public service), they can be viewed similarly in terms of the need for public involvement, the communication process, and communication constraints. In this paper, I will not focus on the merits of one type of utility versus the other, nor on one specific type of utility, but rather public utilities as a general category. To encompass the variety of communication that may occur, privately owned utilities may be highlighted, as they are often required to communicate more and in more varied ways.

Regulation and PUCs

As mentioned previously, privately owned utilities are regulated by PUCs. The original purpose of these government entities, first established in 1907, was "to protect the public interest by ensuring that universal services were provided at reasonable prices and quality" (Melody, 2016, p. 521). This is still the primary purpose of PUCs—to enforce regulations by ensuing rates are reasonable and adequate service is provided. Indeed, rate-setting is the most universal and visible function of PUCs (Gormley, 1983). However, the duties and involvement of PUCs encompass much more than rate-setting and have evolved as time has changed. For example, the Idaho Public

Utilities Commission (IPUC) states it has "quasi-legislative and quasi-judicial as well as executive powers and duties" (IPUC, n.d.). Within these duties, PUCs hear complaints, set rates, review safety concerns, and issue rules and orders that enforce state laws regarding utility operations. In short, their authority and range of duties, and subsequent power, is extensive and varies from state to state. For example, in Texas all utilities except natural gas are regulated by the Texas PUC, and certain states' PUCs approve new power plant construction while other states delegate this duty to other parties.

The effectiveness of PUCs has long been debated, as well as the regulation and deregulation of utilities. Gormley (1983) describes PUC staff as "beset by conflicting demands, urgent deadlines, and onerous requirements" (p. 60). In addition, the capture theory or model (Gormley, 1983) suggests that regulatory commissions, such as PUCs, will eventually become "captured" by the industries they regulate, such that they represent those industries' interests rather than the best interests of society. Gormley (1983) found this model does actually occur in some states, though not in others, depending on the involvement of other interested parties. Other variables that determine the effectiveness of PUCs include "administrative discretion, the quality of regulators, the professionalism of the regulatory bureaucracy, the flow of information from regulated industries, and public access" (Gormley, 1983, p. 24; Sharfman, 1914). Due to the potential influence of powerful industries and other factors on PUCs, some have theorized that a new wave of regulatory reform is needed to break monopolies and tight oligopolies from the gradual erosion of fair competition and political influence, similar to the reform of the 1960s that strengthened public utility regulation (Melody, 2016).

Despite the concerns illustrated by the capture theory and others, the necessity and overall integrity of PUCs and government involvement has also been widely recognized and long been established given public utilities' nature as monopolistic operations (Harrison, 1915; Hall, 1939; Gormley, 1983). Because of the extensive infrastructure and capital costs needed to provide public utility services, especially to all customers, natural monopolies have occurred and are viewed as necessary by some. Regarding regulation of such monopolies, Hall (1939) explains that PUCs or government control can be viewed as "a substitute for competition for the purpose of protecting the public welfare" (p. 93). Despite this, increasing concerns, particularly in the environmental arena and regarding representative democracy, have led to an increase in public involvement that extends beyond PUCs.

## The Public

Throughout this document, I will refer to the public as the general population encompassing all individuals not directly representing the operation, management, or regulation of a public utility. The public are not publicly elected officials or those paid on behalf of an organization. Examples include activist groups, environmentalists, ranchers and farmers, and businesses. However, the term *the public* does not necessarily refer to one group of people or certain groups but can be any individual who receives services from public utilities, such as customers. Simmons (2007) cautions that the public cannot be viewed as a single group but rather should be regarded as multiple individuals or groups with their own interests.

As customers, the public can also be viewed as stakeholders, which implies a more interactive relationship with the utility. Freeman, Harrison, and Wicks (2007)

define stakeholders as "any group or individual who can affect or is affected by the achievement of a corporation's purpose" (p. 6). A stakeholder role indicates direct interest, as well as a potentially more powerful role (Heino & Anttiroiko, 2015). For example, stakeholder status is evidenced by customers' ability to "increase good or bad publicity, create opposition movement, conduct private investigations, make official complaints or petitions, [and] spread the word among the local community" (Heino & Anttiroiko, 2015, p. 222–223). Thomas (2013) refers to the increased interaction as a partner role, one in which customers are thought of more as citizens interacting with public utilities as their administrators. Brown, Gaudin, and Moran (2013) also note the various roles of citizens associated with public services, emphasizing that citizens are not just customers but must have an active role in influencing products.

In their role as individuals, citizens, customers, or stakeholders, the public often has a more distant relationship with public utilities than customers might have with a typical business. This may be because public utilities are regulated monopolies, or perhaps because they provide essential services that are second-nature to daily life. As such, the public often regards public utilities as "distant players," or a separate entity in their lives (Heino & Anttiroiko, 2015, p. 224), creating a scenario in which communication may occur naturally only under certain circumstances, whether this is best for the public and public utilities or not.

CHAPTER THREE: TYPES OF COMMUNICATION

Two-way symmetric communication was first described by Grunig and Hunt (1984) as a form of public relations, but Stacks and Watson (2007) broaden the application of the two-way model to communication in general and clarify that it is often used in public relations. Public relations has been defined in numerous ways, including propaganda, manipulation, and persuasion. Miller (as cited in Botan & Hazleton, 1989b) defines public relations as "the process of attempting to exert symbolic control over the evaluative predispositions […] and subsequent behaviors of relevant publics or clienteles" (p. 47). However, other definitions encompass a broader perspective in alignment with communication as it relates to dialogue with the public. For example, Brown et al. (2013) reference public relations synonymously with a communications team, with responsibilities ranging from content strategy to brand management. Coombs and Holladay (2007) describe public relations as a vital tool in society, one that can be misused but that can also be beneficial and necessary. Grunig and Hunt (1984) refer to public relations as simply "managing communication between an organization and its publics" (p. 7).

In this chapter, I explore how such communication between an organization and its public is managed through various types of communication. Specifically, I examine public relations models—which provide context for situations in which general two-way

symmetric communication may be used—to gain a better foundation for understanding the differences between two-way symmetric communication and other forms.

## Public Relations Models

Grunig and Hunt (1984) define four models of public relations practice, including the two-way symmetric model, and conceptualize these models as frameworks for public relations theory that could lead to more effective and ethical communications:

1.  **Press agentry/publicity:** This model focuses around intuitive persuasion and propaganda used to gain the public's support, often using unsavory methods (the public be fooled).

2.  **Public information:** Developed largely through the efforts of Ivy Lee in the early 1900s in response to the publicity wars against big businesses, this model addresses the need to gain back the public's trust through an open policy (the public be informed). The public information model may be asymmetrical communication if it manipulates the public, regardless of intent (Childers, 1989; Botan & Hazleton, 1989a).

3.  **Two-way asymmetric:** This model targets the audience through scientific research but still aims to persuade them. It is asymmetric because the conversation is meant to persuade, but two-way because the audience is considered through research. Edward Bernays was one of several leading practitioners of this model, aided by the scientific opinion poll in the mid-1900s.

4.  **Two-way symmetric:** Also aided in development by Bernays, this model is more like "a dialogue than a monologue" (Grunig & Hunt, 1984, p. 23),

in which persuasion goes both ways and success is determined by whether understanding is gained by both parties, not necessarily whether opinions were changed.

Grunig (as cited in Botan & Hazleton, 1989a) describes the majority of practiced public relations to be "the manipulation of public behavior" (p. 19), often fitting the two-way asymmetrical model of communication. However, participants' roles and the types of communication they use can change from one-way to two-way to different types of symmetry throughout conversations.

<u>Symmetric vs. Asymmetric Communication</u>

Asymmetric communication, which attempts solely to influence or persuade, excludes the public from actively participating in debate and limits the sense of responsibility from both the public utility and the public. Though most public utilities do not actively intend communication to be asymmetric, the majority of their communication is. And despite intentions, according to Grunig's theory, "the long-term effects of asymmetrical communication programs frustrate an organization's socially responsible approach to public relations" (Childers, 1989, p. 90). For example, the PR firm Hill and Knowlton's campaign to promote air power on behalf of the air industry in the 1940s was an attempt to convince and influence Americans (Miller, 1996). This communication, despite its attention to public interests and coincidentally coinciding with what the public wanted, remained asymmetric because it was coercive, with the primary purpose an attempt to achieve the organization's goal. Asymmetric communication can also consist of an organization that understands the public, but a public that doesn't seek to understand the organization.

In contrast, symmetric communication put groups in conversation with one another. On a broader level, it "contribute[s] to informed debate about issues in society" (Childers, 1989, p. 91). The goal is mutual gain rather than influence. The asymmetric model is about distributing information, while the symmetric model requires exchanging information, both speaking and listening (Heino & Anttiroiko, 2015). A symmetric model is collaborative and "puts effort to creating win–win situations" (p. 223). Stacks and Watson (2007) present a visual comparison of asymmetric versus symmetric communication on a scale, whereby asymmetric communication means the scale is tipped one way and symmetric means the scale is balanced. See Figure 1 (adapted from Stacks & Watson, 2007) for an illustration of this concept as it might relate to public utilities and the public.

**Asymmetric Communication**              **Symmetric Communication**
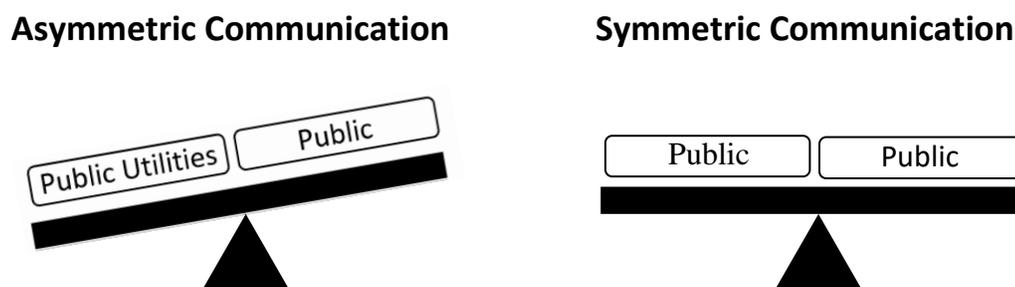


**Figure 1.**      **Comparison of asymmetric and symmetric communication**

Asymmetric communication can also be compared, as Grunig and Grunig (1992) did, to synchronic communication, in which the sender tries to synchronize the listener's view or behavior with their own. This is in contrast to diachronic communication, which matches the intent of symmetric communication in which "an organization and publics attempt to reach a state of affairs that is acceptable to all" (Childers, 1989, p. 87).

One-Way vs. Two-Way Communication

Freeman et al. (2007) describe most public relations as one way, whereby organizations inform the public about their plans, often in an attempt to create a good image of the organization (an asymmetrical goal). In contrast, two-way communication can be thought of as "boundary-spanners," wherein communication flows across an organization to the public and back (Childers, 1989, p. 90). Further, without this two-way flow, organizations are closed systems that "have no means for assessing the information needs of the public" (p. 90).

One-way communication can be compared to the traditional sender–receiver model of communication (the Shannon–Weaver or linear model), in which a sender transmits a message that the receiver supposedly receives and decodes, then the cycle ends (Figure 2). Two-way communication takes such communication a step further, with messages being sent and received from both or all parties (Figure 3); this is sometimes referred to as the transactional, interactional, or cyclical model of communication.



**Figure 2.** **One-way communication model**
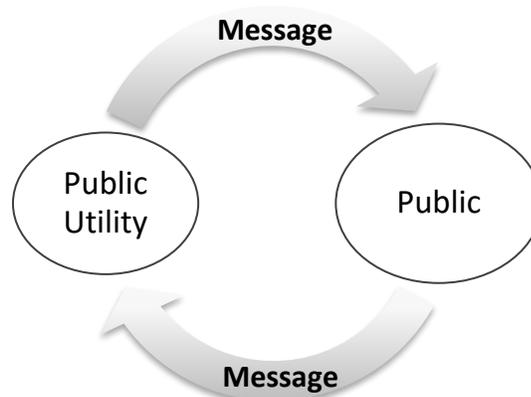
**Figure 3.**      **Two-way communication model**

An important component of two-way, or bilateral communication, is the feedback

mechanism it provides; Haney (1964) suggests that one-way, or unilateral,

communication may cause a "serious morale problem" (p. 132) because the recipient,

in this case the public, cannot verify or clarify their interpretation of information.

Being unable to verify information can cause prolonged frustration that leads to the

public becoming demoralized or disillusioned (Haney, 1964). Misinterpretation is a very

real consequence as well; in Haney's (1964) study of bilateral versus unilateral

communication, 61.7% of recipients participating in unilateral communication incorrectly

thought their interpretations of the communication they received were correct, a situation

Haney notes is "considerably more hazardous" than interpretations resulting from

two-way communication (p. 132).

CHAPTER FOUR: TWO-WAY SYMMETRIC COMMUNICATION

In this chapter I examine the two-way symmetric communication model in detail, as well as its use in public involvement. I also review the benefits two-way symmetric communication could provide to communication between public utilities and the public, criteria for its success, and barriers to its success as raised by critics. Last, I address ethical considerations associated with two-way symmetric communication, namely as a right of citizens and as a way of ensuring rational–critical debate necessary for democracy.

**Overview**

Two-way symmetric communication is a type of public relations that "use[s] bargaining, negotiating, and strategies of conflict resolution to bring about symbiotic changes in the ideas, attitudes, and behaviors of both the organization and its publics" (Grunig as cited in Botan & Hazleton, 1989a, p. 29). Its purpose is to benefit many over one (Grunig & Grunig, 1992). Two-way symmetric communication should be thought of in terms of creating "win-win" solutions for both the public and public utilities, and as a process and means of achieving solutions versus an end goal (Freeman et al., 2007, p. 129; Simmons, 2007).

Two-way symmetric communication also rejects common theories of public relations as solely a means to persuade, claiming this is not and should not be the goal. This traditional notion that public relations should "bring the public point of view in line

with that of the organization" (Childers, 1989, p. 87) is one-sided and manipulative. Although persuasion should not be the primary goal of two-way symmetric communication, if not used in a manipulative fashion, it is not prohibited; participants may each try to persuade each other but must also be willing to change their views. Stein (1976) considers persuasion a matter of "winning confidence" and views persuasion from a practical standpoint, stating "facts are the main persuader" (p. 129–130). In Grunig and Hunt's (1984) definition, persuasion should be equally likely (and ideally occur) between each party. Persuasion is often thought of as a necessary tool of strategic communication, such that organizations can meet their goals and accomplish necessary tasks.

The two-way symmetric model can help accomplish goals and is envisioned as a type of political system involving negotiation, compromise, problem-solving, and open discourse that should result in what is most beneficial for both parties and for society in general (Childers, 1989, p. 88). Freeman et al. (2007) describe the two-way symmetric communication process as engagement, dialogue, and negotiation. Lane (2007) clarifies, "the aim is to give stakeholders or publics influence in the decision-making process" (p. 4). Freeman et al. (2007) describe companies successful at creating value as those that "create a conversation, multiple channels of communication, and explicit dialogues with key stakeholder groups that are continuous" (p. 126). This relationship with stakeholders is also described in the social-learning public administration model, in which citizens and public utilities serve as co-learners; decisions are made after dialogue, deliberation, and collaboration are accomplished with respect and open listening (Roberts, 2004).

The two-way symmetric model has been considered a standard of excellence and professionalism in public relations (Grunig & Grunig, 1992). Interestingly, the-two-way model has roots in early public utility regulation (Champlin & Knoedler, 2006; Grunig & Hunt, 1984): "it is most often practiced in large firms that are regulated by government agencies—firms that must provide evidence of socially responsible behavior to their government regulators" (Grunig & Hunt, 1984, p. 26). Despite this requirement, the extent to which two-way symmetric has been practiced by public utilities today varies.

### Approaches that Use Two-Way Symmetric Communication

There are several approaches to communication that involve or could be described as two-way symmetric communication, including the mixed-motive model, collaborative model, deliberative approach, participatory approach, public participation or involvement, civic engagement, direct citizen participation, stakeholder management/involvement, risk communication, and "citizen-centered collaborative public management" (Cooper, Bryer & Meek, 2006, p. 76; Roberts, 2004; Thomas, 2013; Beierle & Konisky, 2000; Simmons, 2007). Other concepts similar to two-way symmetric communication are the "unconditionally constructive" model (developed by Fisher & Brown [1988] as cited in Plowman [2007, p. 93]), in which actions that benefit the relationship should be done instead of actions that solely benefit the individual. Additionally, Buber's *I and Thou* (1970) model (as cited in Willerton, 2015) has an I–You (or I–Thou) relationship that is reciprocal, as opposed to an I–It relationship that is similar to asymmetric communication. Using two-way symmetric communication can also be viewed as a method of content strategy to form effective, efficient content for

which content goals can "serve both our organizations and our users" (Halvorson & Rach, 2012, p. 27).

The deliberative approach is based on a high ethical citizenship model in which authority is given to many citizens who form a consensus. Cooper et al. (2006) detail that "the core components of these [deliberative] approaches to engagement are dialogue among different types of people, joint action, and shared responsibility for outcomes" (p. 82). Describing direct citizen participation, Roberts (2004) states, "It requires thoughtful examination of issues, listening to others' perspectives, and coming to a public judgment on what represents the common good" (p. 332). This public judgment is accomplished by working together in personal interactions and requires a complex understanding of the issue and potential solutions.

Although generally focused on policy implementation, public involvement is a starting point for broadening conversations and extending communication from one-way to two-way and from asymmetric to symmetric. Merkhofer, Conway, and Anderson (1997) define public participation as "the process by which parties affected by or interested in a decision play some role in decision making" (p. 831). Highlighting the history of citizen participation beginning with the War on Poverty legislation in the 1960s, Thomas (2013) notes that citizen participation has developed into a fundamental part of democratic administration; it is an integral form of power sharing in which "substantive decisions facing a community" can be solved (Roberts, 2004, p. 320). Brown et al. (2013) break down the types of public engagement into information-giving, information-gathering, consultation, involvement, and partnership. Only the latter two involve two-way symmetric communication, with decision-making powers on both sides

allowing influence. Brown et al. (2013) explain it as follows: "Engagement should inform decision making, not justify it" (p. 78). Rothstein and Jones (1993) focus on public involvement in rate increases and specifically clarify public involvement is not a type of campaign designed to sell something.

Despite their names, and although each of these types of communication can be limited to one-way and varying levels of symmetry, they are all based on an "us" approach of consensus and open discussion that is key to two-way symmetric communication. This is in contrast to approaches such as electoral voting, social movements, social organizations, and hearings, which often offer only one-way communication and minimal collaboration. Further, these approaches, specifically when used as a form of two-way symmetric communication, have many benefits both to public utilities and the public.

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**Benefits**

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Two-way symmetric communication and approaches that use it can benefit the public and public utilities in numerous ways, including creating personal relationships, preventing conflict, and solving difficult issues in a way that benefits more people and is acceptable to the general public. Merkhofer et al. (1997) deem properly conducted stakeholder involvement "an investment with considerable benefits" (p. 838). However, such benefits are currently limited as comprehensive relationships with customers are lacking, with successful communication, "one of the insufficiently addressed functions in utility management" (Heino & Anttiroiko, 2015). The need to communicate with the public at a genuine level is further increased "due to digitalization and mediatization of

society," in which information is produced, disseminated, and shared continuously by almost anyone (Heino & Anttiroiko, 2015, p. 221).

Contemporary research suggests organizations are most successful when they engage with stakeholders through open conversation (Heino & Anttiroiko, 2015). In her assessment of organizations under the Information Process Maturity Model (IPMM) model, content strategist and information design expert Hackos (2007) notes that organizations with the highest level of information maturity (Level 5) actively spend time with customers and treat them as advisors. Rothstein and Jones (1993) note the added benefit that "when groups must debate with one another rather than 'against' the utility, no one group can easily cast itself in the role of victim" (p. 49). Further, stakeholder theory argues that "organizations should establish emotional ties with stakeholders by creating environment[s] for common learning" (Heino & Anttiroiko, 2015, p. 229). By including the public in a type of social circle with the public utility, much more can be gained than at the individual level, and influence is more likely to occur in both directions (Morris et al., 2014). Partnerships focused on the human element and community engagement have demonstrated positive results, even behavior changes among customers, a difficult task to accomplish (Morris et al., 2014).

Two-way symmetric communication can also prevent issues from occurring in the future by fostering public acceptance. For example, John Giachino, former chair of the Florida Water Environment Association (FWEA), stated that "Public-acceptance issues can impede or even halt progress" (Conners, 2006). Grunig found that public support or lack of opposition was more frequent after symmetrical communication was used,

and Rothstein and Jones (1993) found utilities' images and public approval increased as a result of public involvement programs.

A lack of opposition is beneficial to public utilities, but greater value comes from the input received by the public and the greater understanding on both sides as a result of two-way symmetric communication. Thomas (2013) and Simmons (2007) cite the benefit of "ground-level knowledge" from citizens and greater public involvement, as citizens are particularly knowledgeable about local communities and the realities certain decision may have in those communities. Mutual input and understanding not only benefit specific communities but also demonstrate a sense of social responsibility by both parties. Merkhofer et al. (1997) extol the benefits of collaborative approaches, which they say "empower stakeholders to take collective responsibility for decisions" (p. 831).

Childers (1989) notes the benefits of symmetrical communication as "accuracy, understanding, and agreement" (p. 87). In general, Beierle and Konisky (2000) note two-way symmetric communication's "ability to improve the substantive and procedural quality of decisions" (p. 587), in part through "incorporating public values into decisionmaking" (p. 588). Craig Fugate, director of the Federal Emergency Management Agency (FEMA), put it well when he said, "We can adjust much quicker if we can figure out how to have this two-way conversation and if we can look at the public as a resource. The public is putting out better situational awareness than many of our own agencies" (Mergel & Greeves, 2013, p. 25). Peterson and Messmer (2010) agree, noting public involvement can help make "decisions that reflect the dynamics of the changing landscape" (p. 1593). Indeed, Simmons (2007) cites numerous costly examples of the

consequences of not involving the public, such as not realizing how communities would use roadways until after traffic plans had already been put in place (p. 92).

Such examples from Simmons (2007) demonstrate that on a practical level, two-way symmetric communication can also be cost-effective. Rothstein and Jones (1993) found that approximately 20 percent of the cost of a community relations program was consumed by public involvement, but that potential costs associated with not conducting this involvement outweighed this amount. Grunig and Grunig (1992) found that the two-way model is more effective and cost-effective than other models of public relations, particularly asymmetrical models, which have been shown to be unsuccessful in reducing conflict, especially when the public has some power. Rothstein and Jones (1993) confirm that involving the public is actually less risky than not, in which case utilities risk major public backlash and possibly litigation and associated costs. Overall, "in the long run, risk decisions that are actively designed by both technical experts and publics are not only more ethical but also more appropriate, efficient, and economical" (Simmons, 2007, p. 107).

## Criteria for Success

Two-way symmetric communication can clearly be beneficial, successful, and cost-effective, but certain criteria must exist for two-way symmetric communication to be successful. First, before communication regarding a specific topic begins, long-term good community relations should already be established so participants can trust one another and are more willing to participate. Such community relations include honest and comprehensive communication, ongoing relations with customers, and distribution of news through media (Rothstein & Jones, 1993). Hackos (2007) advises that establishing

relationships with customers as key stakeholders early in the process is essential:

"Customer knowledge and insight into the customers' real agenda are critical for the

development of excellent information products" (p. 154). Facilitators also must prepare

and be aware of group dynamics and personality types when planning public participation

(Smolko, Huberd & Tam-Davis, 2002; Simmons, 2007).

Once public participation has begun on a specific topic, such as at a community

planning meeting, then roles, expectations, ground rules, logistics, and the process must

be decided together before the process begins. Defining these components at the start of

the process is crucial to gaining acceptance of the end decision, to avoid aggressive

behavior and misinterpretation, and to ensure the overall success of the process

(Simmons, 2007; Rothstein & Jones, 1993; Roberts, 2004; Webler & Tuler, 2000).

As part of defining these components, Smolko et al. (2002) recommend sharing with

participants Tuckman's Cycle of Group Development, which outlines the natural stages

in a group process, including forming, storming (a period of tension in which the power

structure and trust are determined), norming (deciding what needs accomplished and

how), performing, and adjourning, though not all groups reach all levels.

Other recommendations for establishing expectations include admitting that not

everyone will be fully satisfied, but they will be heard and their various viewpoints

recognized. In addition, concerns of stakeholders who are not present can be at least

partially acknowledge by an exercise called "stakeholder expectations" (Smolko et al.,

2002), in which all stakeholders and their expected concerns are brainstormed and listed,

making participants "much more aware of the potential impacts their decisions may have

on others" (p. 985). In workshops held to discuss recommendations for the planning

process, Burkardt and Ponds (2006) found participants needed to learn about other stakeholders before discussions began, and they encouraged using a steering committee to represent all stakeholders and navigate the process (p. 1309).

Roberts notes that once communication has begun, to be successful there must be "power sharing and social learning among the participants" (Roberts, 2004, p. 343). Both sides must be listened to, and "any utility needs to be forthcoming with all information and treat everyone fairly" (Conners, 2006). Beierle and Konisky (2000) define the success of a "deliberative process" (p. 596) as dependent on whether participants can openly debate, overcome conflict, and arrive at a consensus.

Cooper et al. (2006) theorize that six variables are needed to ensure effective citizen-centered collaborative public management: "government trust in citizens, citizen efficacy, citizen trust in government, citizen competence, government responsiveness, and government legitimacy" (p. 79). Citizen efficacy refers to how well citizens feel they are heard and understand the issue. Further, Cooper et al. (2006) suggest that the best approach to achieving these variables, and therefore this type of management, is a deliberative approach, which uses "active listening by bureaucrats rather than a biased response to a squeaky wheel" (p. 80). Other factors that have been determined to influence the success of public involvement include whether the lead agency is committed to the process and whether the jurisdiction involved is local.

**Ethical Considerations**

As discussed, there are beneficial reasons to using two-way symmetric communication, and when certain criteria are met, it can be successful. However, in addition to the many benefits, there is also a strong ethical argument for conducting

two-way symmetric communication between the public and public utilities (Dewey, 1927; Lane, 2007). This ethical argument can be broken down into two considerations: two-way symmetric communication as a right and as a democratic necessity.

Right

Representative democracy (or indirect citizen participation) has taken the place of direct participation to solve the barriers associated with size, as well as to account for more complex, informed expertise (Roberts, 2004). However, in this age of technology and active involvement, the general public has more opportunities to participate than in the past, and Roberts (2004) argues that citizens, regardless of individual characteristics, have the right to "be engaged in the decisions that touch their lives" (p. 316) and that "all share the right to be there, to be heard, and to be part of the learning process" (p. 343).

According to Champlin and Knoedler (2006), this right may be particularly relevant to public utilities: "'When…one devotes his property to a use in which the public has an interest he, in effect, grants to the public an interest in that use, and must submit to be controlled by the public for the common good to the extent of the interest he has thus created'" (p. 136). Public utilities, by definition, provide essential services to the public and for the common good, creating a situation in which "citizens have a right to participate in public utility commission decisions because their vital interests are at stake," (Gormley, 1983, p. 183).

Democratic Necessity

In addition to two-way symmetric communication with public utilities being considered a right of citizens, it can also be viewed a democratic necessity. A decrease in

rational-critical debate, an essential element to democracy, has been found to occur in people as individuals and when forming public opinion. When the public is not involved and communicating in a two-way model, rational-critic debate at the public level is often absent. This lack of debate not only hinders society and the issues discussed, but also the larger process of democracy.

To truly and effectively have a democratic state, open channels of communication are necessary, with the public provided opportunities to voice their interest and give feedback to the management of organizations (Habermas, 1991; Grunig & Hunt, 1984). Hall (1939) states "public utilities must play their part fully in contributing to public advantage" (p. 99). According to Dewey (1927), "the essential need, in other words, is the improvement of the methods of communication of debate, discussion and persuasion" (p. 208). The two-way symmetric approach improves such communication by offering multi-stakeholder communication that creates values based on all participants, such that "a company is engaged in improving the general quality of life in society" (Freeman et al., 2007, p. 95).

Creating value based on all participants through two-way symmetric communication is a type of civic engagement that is a "central component of a vital American democracy" and that can be traced back to town meetings before established government, continuing as the interests of the public have not been adequately met by elected officials (Cooper et al., 2006, p. 76). Sharfman (1914) calls this inadequate representation "one of the fundamental problems of American democracy" that cannot be solved through legislation. Reliance on such elected officials represents indirect citizen participation, and does not necessarily include all persons affected by an issue, ensure fair

representation, or adequately address issues or public interests (Roberts, 2004;

Beierle & Konisky, 2000). Indirect citizen participation may also create situations in

which "citizens' voices are muted by manipulation and moneyed interests"

(Roberts, 2004, p. 344). Brown et al. (2013) clarify that "engagement does not replace

voting, but fulfils a role, perhaps fills a gap, in the democratic process" (p. 75).

If successful, two-way symmetric communication keeps public utilities accountable and

creates a feeling of true citizen responsibility, encouraging future participation.

Not only does the two-way model open the conversation for debate, it also brings

it to a more personal and local level where Dewey (1927) suggests democracy must

begin, for direct, in-person interaction and attachment are very powerful. Access at such a

direct level also allows greater access to facts and minimizes stereotypes. Ellul (1973)

too notes participation in more personal, local groups can reduce the effects of

propaganda, which are more likely to affect individuals in mass societies who are

more susceptible to unification. Two-way symmetric communication relies on more

direct communication, which can be "spontaneously democratic" in part because

"individuals are directly in contact with the events that demand their participation"

(Ellul, 1973, p. 100).

### Criticisms and Constraints

Despite its numerous benefits, there are also numerous critiques of two-way

symmetric communication, including ensuring an adequate representation of public

interests and involving all those affected, garnering the interest of the public to be

involved, balancing the influence of power between participants, ensuring everyone has

an equal knowledge of topics, overcoming cultural shifts associated with an uncommon

form of communication, resolving conflicts, communicating within time constraints, and overcoming natural biases.

Representation, Size, and Interest

Perhaps the largest barrier to true two-way symmetric communication is the process issue of ensuring the public is involved. This involves ensuring adequate representation of those affected—possibly the general public as a whole—with the limitations of size and interest making this difficult to accomplish. For as Simmons (2007) notes, civic discourse must be just, meaning all affected can participate in making decisions. Dewey (1927) defines the public as "all those who are affected by the indirect consequences of transactions" (p. 16). Under this definition, the audience for a public utility could be very broad, even extending past all customers of a specific public utility. Depending on the scale of the utility and its customers, it may be impractical to involve everyone, and the communication may lose the associated benefits of the local, more personal interaction that two-way symmetric communication brings. For example, it is difficult to imagine a way for all 7 million customers of Duke Energy, which has the largest customer base of any electric utility in the US, to participate in meaningful two-way symmetric communication (Duke Energy, 2015). Cooper et al. (2006) summarize that key concerns for involving the public that could apply to any utility are the "size, depth, and diversity of citizen participation" (p. 84) and that often participation is limited in one form another, such as participants who are older and already interested in other topics (Smolko et al., 2002). Another study suggests citizens become involved only when they have an unsatisfied need (Roberts, 2004).

For example, public meetings often do not represent the general public even though different participants have varied views, sometimes drastically varied, particularly about environmental issues surrounding public utilities (Beierle & Konisky, 2000). Peterson and Messmer (2010) too found that public meetings about wildlife management policy were predominantly attended by traditional stakeholders, including hunters and wildlife managers. In addition, members of public committees typically consist of major stakeholders or respected and powerful groups, rather than general citizens (Smolko et al., 2002). Beierle and Konisky (2000) found when examining citizen advisory groups that "the wider community was largely unaware that these processes were going on" (p. 595).

Thomas (2013) highlights these problems as well, noting that a specialized population typically participates versus a representative cross-section of the public. To avoid this, planners must "undertake careful and thorough advance identification of possible relevant external actors and groups and recruit those representatives aggressively," involving multiple opportunities for the public to participate, such as surveys, advisory committees, and meetings (Thomas, 2013, p. 793). While some have argued that costs impede involving the public more generally, involving the public early in the decision-making process can actually reduce costs overall (Simmons, 2007). However, financial incentives, penalties, and sanctions typically are not effective in encouraging participation (Thomas, 2013; Morris et al., 2014).

Another potential disadvantage when using the two-way symmetric model is finding a target public that is willing and interested enough to participate. Stakeholders already involved in decision-making issues generally have an interest in the topic

(Smolko et al., 2002). In contrast, the general public is often overwhelmed by competing interests in daily lives and often does not have the time or willingness to participate. They may also be desensitized to topics, suffering psychological effects of propaganda that in turn entice them to withdraw into inertia (Ellul, 1973). However, it can also be argued that publics should be more motivated to participate in two-way symmetric communication because the results are likely to affect their everyday lives. Harrison (1915) refers to the American public as indifferent, yet the public has been able to rise up in the past and has "asserted itself as master" (p. 55).

Despite such barriers to two-way symmetric communication, the benefits are worth the challenges, and some public involvement is better than none. Further, innovative solutions to these problems exist, such as "revolutionary forms of connectedness," which are "now being used to support the deliberative process" and can involve thousands of people at one time (Roberts, 2004, p. 337). For example, planning for the development of the new World Trade Center buildings in New York City was successfully achieved through a deliberative approach that involved thousands of citizens split into smaller groups. In another study, cities of up to 400,000 individuals have successfully used deliberative democracy to help prioritize budgets (Cooper et al., 2006).

More traditional methods, such as mailed surveys, can also be used to increase participation by nontraditional stakeholders (Peterson & Messmer, 2010). Admittedly, this would limit the two-way nature of the discussion and is susceptible to the usual criticisms of potential non-qualitative questionnaires, such as limited response rates and an overrepresentation of extreme views. However, Peterson and Messmer (2010) compared a survey that encompassed more nontraditional stakeholders (in this case urban

residents versus rural) to the results of a public meeting with mostly traditional stakeholders and found that the attitudes reflected were similar in both processes. Lafon, McMullin, Steffen, and Schulman (2004) also found surveys encompass broader audiences. However, these results could have been specific to the survey topic, which involved wildlife and which views may not vary as widely on. Despite identified limitations, overall surveys have proven an effective method of involving more members of the general public. For two-way symmetric communication to involve as many individuals as possible, multiple types of methods may need used.

For those who cannot participate in meetings, reading meeting materials or draft reports may offer an alternative way to participate. However, this type of passive participation is similar to surveys, which can still influence final decisions but do not have as great an effect as active participation. Nor does such passive participation gain the other benefits of two-way symmetric communication, such as "greater appreciation or tolerance of other points of view" (Lafon et al., 2004, p. 229).

Time

Even if a diverse enough public is found and is willing to participate, another problem that may arise when using the two-way model revolves around time. Communication must have constraints for the sake of time, but must not be too constrained such that the choices offered severely limit participation, which can increase public opposition rather than cooperation (Thomas, 2013). Two-way symmetric communication (or bilateral transactions), although resulting in less frustration and greater accuracy of interpretation, requires about twice as much time as one-way or unilateral communication (Haney, 1964). The public must be able to commit to learn

about, contemplate, and discuss issues with utilities (Simmons, 2007).

Further, participants may not participant to the full extent due to confidence factors, such as taking up too much time or not wanting to ask a question. Experts too can be aware of the potential time it may take to educate the public on technical issues, thereby delaying and complicating the process (Simmons, 2007). If communication lasts a long period of time, possibly months or years, the public may be subject to the issue-attention cycle, or the "gradual decline of intense public interests" (Downs, 1972, p. 40), which can prevent progress and communication. To be successful, time must be considered in planning participation against other competing interests.

<u>Power and Knowledge</u>

Another critique of two-way symmetric communication is the power discrepancies that may exist between participants, and that the "mere presence of power can work to prevent citizens from participating" (Simmons, 2007, p. 35). Indeed, Simmons (2007) reviews various environmental policy cases in which the most disturbing aspect of public participation is the attitude of experts toward public participation, in which they *allow* participation and *inform* participants, maintaining a position of superior power and decision-making authority in what Simmons deems the "technocratic model" (p. 89). Such power discrepancies can inhibit two-way symmetric communication from both the public and public utilities if not combated.

To combat these power discrepancies, a level of trust must exist between public utilities and the public, which largely depends on the relationship already in place and on individual personnel. Grunig and Grunig (1992) specifically note that power within an organization, specifically organizations with a top-down structural approach/management

or "dominant coalition," have a significant influence on power relations. To ensure two-way symmetric communication with publics is successful, communication and public relations specialist within a public utility should first be involved in making decisions within that utility, in their own display of two-way symmetric communication (Childers, 1989, p. 89). Autonomy, innovation, and decentralization of management are also considered system presuppositions needed for two-way symmetric communication to be successful (Childers, 1989).

Tension can also exist between citizens and experts from public utilities due to the varying degrees of knowledge and competency about topics under discussion. As Simmons (2007) summarizes, "The public, as a collective group, is not considered capable of contributing useful knowledge but only of approving a decision already made" (p. 53). At the start of communications, the general public are most often not experts on the technical subjects needed to fully understand the operations of public utilities and make decisions regarding those operations and outside factors that influence them. This, in turn, can make public utilities reluctant to "'embrace a consensus-based hearing process because of a fear of commitment to decisions made by nonexperts'" (Harter, 1997, as cited in Cooper et al., 2006, p. 83). As Roberts (2004) states, "Experts have the education, skills, and time to devote to policy concerns. In contrast, citizens lack the special training and resources needed to be cogent about complex policy problems, especially those involving highly sophisticated technology" (p. 331).

Many of the components of public utilities could be considered "highly sophisticated technology," or at least highly complex subjects that require a certain level of expertise. For example, subjects might include demand-side versus

supply-side management, or the operation capacities of various generation resources and how these resources are converted to power. Lippmann (1922) also raised the concern that the general masses are too limited to participate intelligibly, and as such advocated for trained experts to make the decisions then communicate them to the public. Another consideration is that whether or not the public is successfully educated on required subject matters, this does not mean whatever conclusions they reach will be the best for society. Discussion may result in "gossip, drama, and jingoistic patriotism" (Champlin & Knoedler, 2006, p. 148) instead of true two-way symmetric communication.

Although varying knowledge levels are a concern, two-way symmetric communication supports dialogue that can ensure all participants reach the same basic understanding of even the most complex topics. Participants typically become more knowledgeable about a subject after participating (Lafon et al., 2004). Further, Beierle and Konisky (2000) found that the level of scientific uncertainty involved in decision making did not influence the success or failure of the communication itself. Perhaps most powerful of all in overcoming knowledge barriers is "the fundamental wisdom of people, who, when given the chance, are able to rise to the occasion and publicly deliberate about the common good" (Roberts, 2004, p. 344). Stein (1976) too cautions to "never underestimate the reader's intelligence," for if nothing else, people have common sense (p. 130).

Cultural Shift

Rectifying differences between the public and public utility personnel, especially as they relate to power and participating in unfamiliar two-way communication processes, may require a cultural shift participants are unwilling to overcome.

Cultural acceptance among utility employees can serve as a roadblock to involving the

public in a meaningful way, with managers often dismissing the need for such

communication (Conners, 2006). Experts from the utilities may fear the potential

disruptiveness of public participants and look for ways to mitigate their reactions,

thereby retaining their cultural norms while only appearing to openly communicate

(Simmons, 2007). The shift to acceptance of two-way symmetric communication can be

complex and difficult to navigate; according to one study, "overcoming barriers to citizen

participation requires a learning process built on citizen empowerment and education,

reeducation of administrators, and enabling administrative structures and processes that

change the way citizens and administrators meet and interact" (Roberts, 2004, p. 334).

　　　　Clearly defining specific roles and boundaries may alleviate some of the cultural

changes, such as by stating the public utility "must strive to follow through with the

expectations of its constituents, who must reciprocate by attempting to understand

realities of management and resource capabilities" (Lafon et al., 2004, p. 229).

Overall, management staff typically think better of public involvement after experiencing

it. For example, Colorado Springs Utilities enforced a top-down approach, with support

from management providing crucial acceptance of public involvement. Through the

public process, the utility was able to build a water reclamation facility in a downtown

area, avoiding an estimated additional $30 million cost for construction if the public had

not approved the site. Dennis Auge, the project manager for the facility, noted that simply

addressing concerns in advance helped avoid opposition in the future (Conners, 2006).

Conflict Resolution

 While not all two-way symmetric communication surrounds conflict resolution, nor should it, participation often only occurs when there is discontent or conflict about an issue, which occurs after the issue has caused harm (Roberts, 2004, p. 343). Further, conflicts often arise during communication and must be resolved for communication to be successful and a mutually agreeable decision to be reached. Critiques of public participation have stated it does not truly resolve conflict but is merely a showpiece for meeting a requirement, and that it leads to conflict without any possible resolution (Smolko et al., 2002). Especially when conflict is a result of personalities or outside factors, such aspects of communication (deemed "context attributes" by Beierle & Konisky, 2000, p. 590), it cannot necessarily be controlled by public utilities (unlike "process attributes").

 While certain criteria are necessary for two-way symmetric communication to be successful (see Criteria for Success section of this paper), research has found that trust has actually increased and conflicts were resolved when the public was involved (Beierle & Konisky, 2000). In fact, Lafon et al. (2004) found the way to reduce conflicts *is* to bring parties together to actively discuss, and Gray (1989) (as cited in Grunig & Grunig, 1992) found the two-way model was successful in resolving environmental disputes, noting participants reached an agreement 78% of the time. In a case study analyzing the Australian property-development company Becton's dispute and resolution with the public through the PR firm Socom, Lane (2007) found the dispute was largely resolved with the aid of two-way symmetric communication.

Further, conflict can be better than no conversation at all. In fact, customer satisfaction, loyalty, trust, and positive perceptions of the provider or agency have been found to be restored or increase if companies are simply willing to address customer concerns in an effective manner (Lafon et al., 2004; Scaglione, 1988). Even if the communication results in decisions some parties are not fully satisfied with, they are more satisfied if their concerns have at least been addressed (Scaglione, 1988). The effects of two-way symmetric communication are indeed pragmatic and effective, in part because it "manages conflict rather than wages war" (Childers, 1989, p. 92).

Bias

If able to successfully navigate conflict and openly address issues, public utilities and the public still may be subject to the limitations of stereotypes, which typically frame arguments, whether intentionally or not. Further, despite attempts to be impartial, it may be impossible to communicate without influence from personal moral codes or stereotypes. Lippmann (1922) explains, "Uncritically held, the stereotype […] censors out much that needs to be taken in to account." (p. 74). Dewey (1927) too notes that "Reason comes into play only to find justification for the opinion which has been adopted" (p. 21). As a result, conclusions of both the public and public utilities may be influenced by stereotypes and cannot necessarily be considered rational-critical debate or two-way symmetric communication. Harrison (1915) too notes the fault of the "human equation," specifically referring to individuals at PUCs appointed by an individual governor who may "yield to personal influence and persuasion" (p. 57). Part of the key, then, to successful two-way symmetric communication is a constant, critical examination not only of the topics at hand but also personal preconceptions and biases.

CHAPTER FIVE: COMMUNICATION BETWEEN PUBLIC UTILITIES AND

THE PUBLIC

Despite criticisms against two-way symmetric communication, it can be

beneficial in numerous ways, as well as cost-effective and ethical. This holds promise for

two-way symmetric communication as a mechanism to be used between public utilities

and the public. In this chapter, I examine the past and current states of communications

between public utilities and the public, including whether two-way symmetric

communication is being used and opportunities where its use might be most appropriate

and beneficial given constraints identified in Chapter Four.

**Past to Present**

The public was once actively involved in the management of utilities, although

debates were typically centered around rates (Harrison, 1915). In 1915, the Mayor of

Chicago stated, "there has been an awakening on the part of the public; this has had the

tendency to relegate the utilities to their proper position of servants instead of master of

the people" (p. 54). While utilities today are not typically viewed as masters of the

people, neither is the majority of the public "awakened." Yet, public utilities still make

significant and far-reaching decisions that affect the public's standard of living,

financial stability, and natural resources. And as national-security and environmental

concerns have increased in the last few decades, regulations (e.g., the *Public Utility*

*Regulatory Policies Act of 1978* [PURPA], *Endangered Species Act of 1973* [ESA],

*Clean Air Act of 1970* [CAA], and the proposed Clean Power Plan) have been and are currently being enacted that expand the requirements of utilities to focus beyond avoiding monopolistic, monetary gains. As these matters and regulations have increased, so has public involvement and two-way symmetric communication.

In particular, there has been an increase in recent years for public involvement to help manage environmental policy issues, including natural resources (Simmons, 2007; Beierle & Konisky, 2000). Gormley (1983) and Simmons (2007) note the sharp increase in citizen group participation in the public utility regulatory process since the 1970s, though this has varied greatly among states and between issues. The New Public Administration that began in the 1960s and 70s and legislative requirements (e.g., the 1978 Advisory Committee on Intergovernmental Relations [ACIR] report) for citizen participation brought public involvement to a new level (Cooper et al., 2006). Although administrative constraints and a shift in politics stemmed active participation with the government for several years, neighborhood councils and an emerging transition to a governance approach (versus governed) still demonstrated citizen participation. Today, Katz (2002) notes "there is an expectation, and in many cases a requirement, for public agencies to involve the public in decisions that affect their lives" (p. 39).

Regulations for public utilities to involve the public in a more meaningful way are set out primarily in state statutes to be enforced by state regulatory agencies, in this case PUCs. For example, Idaho Code §67-5222 (1992) calls for public participation: "Prior to the adoption, amendment, or repeal of a rule, the agency shall afford all interested persons reasonable opportunity to submit data, views and arguments, orally or in writing." However, the extent of public involvement required by public utilities,

particularly privately owned utilities, extends beyond "the adoption, amendment, or repeal of a rule" according to the discretion of the PUC. As such, there is no consistent standard or set of requirements for public utilities to specifically involve the public, nor is the level of involvement detailed extensively. For example, in IPUC's Order No. 33441 (2015) acknowledging Idaho Power's *2015 Integrated Resource Plan*, developed in collaboration with the public, the IPUC staff stated it "appreciates the Company's collaboration with stakeholders in developing the 2015 IRP," but also "encourage[s] the Company to continue to increase stakeholder involvement in the IRP process" (p. 15). No further details or specific recommendations were provided.

Not everything is open to public participation or two-way symmetric communication; public utilities are highly regulated by state and federal governments, and therefore many of their actions must comply with such laws and regulations regardless of public input at the utility level. However, communication may extend, and is often required to extend, past one-way communication regarding certain subjects. Further, while many customers want one-way communication informing them of interruptions in service, usage, and emergency situations, they have also been found to want more meaningful communication from their utilities that aligns with two-way symmetric practices (Heino & Anttiroiko, 2015). In one study, customers "want[ed] utilities to be altruistic instructors toward a more sustainable and economical lifestyle," whereas water utilities were interested primarily in preserving their income source and communicating only as it related to supplying services (Heino & Anttiroiko, 2015, p. 226).

Despite this, most communication between public utilities and the public is primarily one-way. In a research study comparing the communication needs of customers in Finland with communication provided by water utility managers, utilities cited typical asymmetric communications as their primary focus, such as information networks, media, and official reports (Heino & Anttiroiko, 2015). In another study, stakeholder engagement and customer insight were categorized as marketing functions that, along with other marketing materials, only encompassed 13% of total communications budgetary activities (Brown et al., 2013). Simmons (2007) examined a variety of public participation in environmental policy decision-making and found that in most cases, the public had very little power. Grunig and Hunt (1984) estimate that only 15 percent of all organizations use the two-way model. It is possible that public utilities' specialized role and "limited market responsiveness" have limited them to using traditional one-way communication with customers (Heino & Anttiroiko, 2015, p. 222).

## Communication Mediums

Such one-way communication used by public utilities is delivered across many mediums and for various purposes, most of which are not to engage the public in dialogue but to inform them. Communication has traditionally occurred to meet notification requirements, improve public relations, or improve business operations. Common mediums public utilities use to communicate to or with the public include the following:

- Bill materials and marketing
- Traditional media
- Social media

- Planning events (e.g., community advisory committees, public meetings, public commenting)

Despite the majority of communications being one-way asymmetric, potential for two-way symmetric communication can be found, particularly in the social-media arena and planning events that involve the public.

Bill Materials and Marketing

Although bills and rate notices are required information, Heino and Anttiroiko (2015) suggest other information that may be included in bills, such as general, nice-to-know information from utilities, is not useful because many people already receive mass amounts of information from numerous sources. Further, this communication is limited to a one-way transaction and is typically asymmetric in nature. For example, the communication may be informational or marketing materials, which are not intended as types of public participation.

In her comparison of marketing with public participation, Katz (2002) cautions these are different types of communication. Specifically, she notes that marketing, which can be confused with and used as a replacement for public participation, is one-way communication. In her definition of marketing, Katz (2002) includes advertising, traditional media and publicity, and direct mail. These tactics help establish brand identities, raise awareness, and gain customer approval. However, these goals are influenced primarily by financial or other gains and present one viewpoint—the view of the public utility. In contrast, public participation is based on two-way symmetric communication, on "hearing and discussing all sides of an issue [to] result in better

decision-making" and ensuring "decision-makers are willing to share—to some degree—their decision-making power with the public" (Katz, 2002, p. 38).

Katz (2002) recommends utilities choose their type of communication based on their communication goals, and she cautions that marketing is not an adequate substitute for public participation. For example, if a decision has already been made internally by a company, then public meetings held to gain input are not true public participation or two-way symmetric communication because the decision has already been made. Whether informing, marketing to, or educating customers, such efforts have been found to be unsuccessful at influencing consumers to change behaviors. For example, few customers actually request things like free home energy assessments, which might tell them how much energy (and therefore money) they can save by making changes at home, although utilities frequently advertise them (Morris et al., 2014).

Traditional Media

Another type of communication from public utilities to the public is through the traditional news media. The media is an extensive source of information on which the public relies. As such, public utilities use the media as a tool to communicate with the public, such as through new stories in print and on television (traditional media). When public utilities communicate via media outlets, the consideration of public services involved doubles, for the media is often considered a public service in itself (Champlin & Knoedler, 2006). Allern (2002) focuses on the media's dual nature of serving both a societal institution representing free speech and democracy (the public sphere) and a business that creates supply for profit. Unfortunately, as the media become more monopolized and commercialized, it too is losing the effectiveness of its public-service

function, and therefore more of the ethical responsibility for this role may fall to public

utilities (Champlin & Knoedler, 2006). This is especially important, as news coverage

surrounding public utilities has been ranked higher in importance than other issues

(Weaver & Elliott, 1985).

News stories, though sometimes written by journalists about utilities, are also

written based on information from utilities. Although this information may appear

neutral, agenda setting—the aim to direct the thoughts of the general public and the

importance of issues they think about—is a common practice (McCombs & Shaw, 1972).

This is particularly true of forces outside journalism, such as public utilities, which may

not adhere to traditional journalistic standards.

Companies wishing to influence news often do so through news releases.

News releases are statements organizations write and send to news agencies for

publication. They are purposeful forms of rhetoric meant to persuade and appeal,

"a clearly embedded intention to direct attention to particular ideas and to foster

particular interpretations and conclusions" (Parker, 2006, p. 134). Kiousis, Soo-Yeon,

McDewitt, and Ostrowksi (2009) refer to news releases as a type of information subsidy

through which public relations specialists influence the media's agenda (p. 546). Blyskal

and Blyskal (1985) go so far as to claim public relations specialists are a news network of

their own behind the public media that produces "cleverly disguised advertisements"

(p. 52) to shape public opinion or stem critical questioning.

Studies specifically on news releases from public utilities are lacking, yet news

releases have been examined on a broader level extensively. Journalists strive to maintain

autonomy and professional standards yet are constrained in multiple ways, such as time

and resources. As such, they have come to depend on expert sources and news releases for content. Using expert sources, such as public utilities, is common. These experts have the resources, including money and time, as well as technical expertise, that journalists may not have. Shoemaker and Reese (2013) refer to these sources as "extra-media" and remind us they provide the "context within which all other information is evaluated" and are "powerful social actors in promoting their views" (p. 108). Public utilities, which provide expertise and resources, are considered official sources and are routinely used as sources by journalists. Companies have various motives in their production of news releases, whether providing information to shareholders or customers or promoting a positive company image (Kiousis et al., 2009, p. 546).

Public relations specialist Marken (1994) notes that news editors receive a vast amount of news releases—between 300 and 500 each month. Most research, as stated by Charles Staebler, formerly of the Wall Street Journal, indicates news releases are a significant source of story ideas for journalists (Blyskal & Blyskal, 1985). Hong (2008) state news releases are "one of the most frequently used public relations activities" (p. 297), with approximately 40 to 50 percent of newspaper stories originating from press releases (Blyskal & Blyskal, 1985, p. 47; Hong, 2008). Kiousis et al. (2009) go so far as to claim news releases are paramount in shaping the importance of issues in news content.

Further, many news releases are often printed verbatim and simply bylined by a reporter (Kiousis et al., 2009; Parker, 2006; McLaren-Hankin, 2007). In a study of news releases that were printed verbatim, the stories were found to lack critical viewpoints and were not representative of people most affected by the issues (Parker, 2006). While much

traditional media stemming from public utilities simply shares information about things like rates and outages, it is still primarily used a means of rhetoric to either influence or direct public opinion and, as such, constitutes one-way, asymmetric communication. Although the actual effects of the media on people have been debated (Staiger, 2005; McCombs & Shaw, 1972; Schudson, 2011), generally "scholars believe media educate individuals, reinforce social views, function as mediation to the social world, or are so powerful as to overwhelm viewers" (Staiger, 2005, p. 139).

Social Media

Using social media is an increasingly common method public utilities use to communicate directly with the public. Social media (e.g., Facebook, Twitter, Instagram, LinkedIn, YouTube) are tools that can support multiple communication objectives, such as providing news of outages while connecting utilities to communities. Most importantly, social media are platforms for conversation. Mergel and Greeves (2013) note that collaboration and communication are two of the properties that make social media most successful. This type of communication, though not face to face, still has many of the characteristics of two-way symmetric communication. It offers a type of "collaborative engagement" with the public and is so extensive as to constitute a new communication paradigm embedded in the current digital culture.

Not only can utilities use social media to stay relevant and engage with the public, but they can also use social media to address barriers to two-way symmetric communication, such as size. Online collaboration can be instantaneous and widespread, reaching the public in virtually any location. It can also reduce the time needed to travel to and from meeting places. Because of these advantages, Brown et al. (2013) specifically

note that public services must have means for accomplishing online engagement, such as social media, and Thomas (2013) recommends adopting mobile-device technologies, such as smart phone apps, that allow this type of communication.

Social media have a distinct advantage over bill materials, marketing, and traditional media in that they often result in engaged conservation with the public. However, this conversation can be limited by constraints (e.g., 140-character limits for Twitter posts), and misunderstanding is more likely to occur from electronic interactions than from in-person dialogue. Further, while communication via social media may be two-way, it is often only asymmetric, wherein the utility is unlikely to change its standpoint but intends to engage with customers to maintain a good image or to address immediate concerns. Last, customer interactions result most often from customers who reach out to the utility and may not represent all customer classes or people affected by issues.

<u>Planning Events</u>

As mentioned previously, there has been an increase in citizen participation in the public utility regulatory process since the 1970s, and in subsequent requirements to involve the public. As such, and perhaps for other benefits, public utilities communicate with the public on a more meaningful level regarding a number of issues surrounding regulation, particularly planning. This may include involving a community advisory committee when trying to site and gain permits for a new transmission line or other infrastructure, forming an advisory council and having public meetings to address integrated resource planning, and receiving and reviewing public comments on document filings.

Numerous other examples of public planning, particularly in healthcare and environmental fields, are highlighted as successes in citizen participation. Thomas (2013) notes that through this participation, "public managers invite citizens to contribute their ideas and share decision-making authority," a principle component of two-way symmetric communication. According to a study by Merkhofer et al. (1997), all stakeholders on a public site-planning committee "felt that their value judgments were at least as valid as those provided by technical specialists" (p. 836), indicating the public felt their values were just as important as technical criteria and necessary to the conversation. As such, planning events may be the ideal situation in which two-way symmetric communication between public utilities and the public can and does occur.

Although utilities are often required to include the public in planning events, utilities should determine the need for two-way symmetric communication between public utilities and the public based on events, not just regulatory requirements. A broad definition of situations that require two-way symmetric communication is those that have "a substantial impact on the public" (Thomas, 2013, p. 793). Roberts (2004) states direct citizen participation is most appropriate for "wicked problems," defining wicked problems (or substantive decisions) as "those that are important and critical in community life as defined by the members of the community" (p. 320). In addition, such problems require solutions based on public values and must be important enough to justify the cost of involving the public, despite the obvious benefits. Not all issues surrounding public utilities may justify the cost of two-way symmetric communication or be categorized as "wicked problems," but many of them may, particularly those associated with planning that affects communities, shared viewsheds, wildlife, use of natural resources, and

environmental concerns. Further, integrating two-way symmetric communication at the planning stage can prevent future conflict as a result of not addressing stakeholders concerns or obtaining the public's approval. For example, Colorado Springs Utilities began to integrate the public earlier in the project planning process as a proactive approach to avoid higher costs resulting from negative public perception (Conners, 2006).

There are various public participation methods and events, ranging from advisory groups to open houses (Rosener, 1978; Merkhofer et al., 1997). Burkardt and Ponds (2006) cite workshops as powerful tools for public participation "designed to promote trust and open communication as a means to develop an atmosphere of creative problem-solving" (p. 1307). While planning for a new transmission line (the Boardman to Hemingway Transmission Line Project), Idaho Power involved the public through a community advisory process (CAP) in which interested parties from the public attended public meetings, voiced concerns, and worked with Idaho Power to propose options for line routes. Idaho Power's Delivery Planning Manager, Dave Angell, referred to the win-win nature of the collaborative communication process, stating, "Feedback from prior participants indicates a successful experience for all involved" (IPC, 2009). In an evaluation of citizen advisory groups working to develop remedial action plans (RAP) for contaminated areas and assign priorities to environmental problems, Beierle and Konisky (2000) found that over 75% of cases had successful public involvement in which public values were incorporated into final decisions after good communication, fairness, and two-way continual contact. However, Simmons (2007) cautions that even in public meetings, communication that may seem two-way may actually be allowing the public to

simply "vent" their concerns or "be educated," without their comments truly affecting the decisions being made.

Another method of achieving two-way symmetric communication used by agencies and utilities in the planning process is public commenting, often required by law. According to the Environmental Law Institute (2012), "commenting is a process that allows individuals, organizations, agencies, and businesses to provide written input on proposed environmental decisions" (p. 1). Commenting allows citizen participation that public utilities consider when making final decisions and preparing final documents. While this method of communication may enhance the decision-making power of the public and contribute to authentic two-way symmetric communication, there is no guarantee such communication occurs.

A variety of factors may interrupt or diminish the public-commenting process, including poor document design, inaccurate or missing information, scientific uncertainty, legal ambiguity, language barriers, time constraints, and a gap in knowledge between writers and readers. Commenting can be a complex and specialized process, in which a thorough knowledge of the law, the issue at hand, and the ability to adequately present comments are important. Although commenting may be done with a goal toward collaboration, it is also often performed individually, which minimizes two-way symmetric communication and the potential to reach a common understanding and agreement among multiple parties. Further, utilities may or may not change documents at the urging of the majority of commenters, and individuals who disagree with this action may feel two-way communication did not occur at all. This communication is not as functional as continuous dialogue, is more linear in nature, and often involves the public

only after documents are written rather than during their formation (Simmons, 2007).

If participation occurs only after a decision has been made and is simply being presented,

this is not true two-way communication but rather a form of pseudoparticipation,

or staged participation enacted only to meet a requirement (Simmons, 2007).

Thomas (2013) notes the need for practitioners using two-way symmetric communication

to "recognize that public involvement requires sharing decision-making authority,"

which extends beyond public commenting.

Often, documentation the public can comment on can also be actively produced

with the public. Such documentation typically addresses the types of "wicked problems"

Roberts (2004) describes. Smolko et al. (2002) provide a good overview of the contents

of such a collaborative plan, such as objectives, action items, implementation, and

monitoring programs. Involving the public in making decisions and ultimately drafting

these documents can be a more comprehensive attempt at two-way symmetric

communication than mere commenting. As Burkardt and Ponds (2006) state regarding

planning for grizzly bear management, "A plan constructed without input and support

from the public and agencies was doomed to endless rounds of argument and, ultimately,

failure" (p. 1312).

Recently, successful land-management plans have involved participation from

various stakeholders learning from each other. For example, the long-time debate

whether to remove the Yellowstone population of grizzly bear from the endangered

species list involved public development of state management plans using a role-analysis

technique, which included brainstorming the best way to have public participation before

beginning the process in full (Burkardt & Ponds, 2006). This included which stakeholders

should be involved and what roles they might play, creating a more open atmosphere for discussion and stakeholder relationships. When asked, participants often mentioned the importance of involving the public, equal power and access to information, clear roles and rules, open/understanding discussion, and involving all stakeholders (Burkardt & Ponds, 2006).

For participants creating a management plan for black bears, Lafon et al. (2004) found that 13 of 15 committee members had a change of opinion about the topic at hand (bear management) after the planning process, indicating true two-way symmetric communication. As well, participants' respect for other participants grew, and they gained a greater understanding of the concepts being explored. Bear hunters also indicated that personal communication had greater influence on their opinions than "news releases, online resources, or literature" (Lafon et al., 2004, p. 224).

Another example that holds promise for two-way symmetric communication to help create planning documents is an integrated resource plan (IRP). IRPs are documents required by laws, codes, or rules that outline a utility's plans to provide service to their customers, including the resources they will use to do so and considerations for low-cost options. IRPs typically plan for 10, 15, or 20 years out and must be created every two to five years (Wilson & Biewald, 2013). Topics covered in IRPs range but generally include information such as sales and load, existing supply-side and demand-side resources, transmission needs, forecasts for load and natural gas, planning options, and environmental considerations. The benefits and importance of such plans are so great the plans must be submitted to PUCs for review (Wilson & Biewald, 2013).

Most states, but not all, require utilities to create and file IRPs, but specific requirements and the processes for meeting those requirements vary between states. For instance, most states require utilities to involve the public, but the degree of involvement varies. Some states require public review and comment of the plan after it is written, while other states, such as Oregon, specify that one of the keys for creating IRPs is "allowance for significant involvement from the public" (Wilson & Biewald, 2013, p. 13). In Oregon's case, this includes allowing the public to "contribute information and ideas" (p. 14). In Hawaii, utilities must have advisory groups in each county that represent multiple interests, including the general public.

In developing their biennial IRP, Idaho Power (serving customers in southern Idaho and eastern Oregon) works with an IRP Advisory Council (IRPAC), which consists of customers who are members of "the environmental community, major industrial customers, irrigation representatives, state legislators, public utility commission representatives and other interested parties" (IPC, 2016). One of the IRPAC's main duties is to involve the public in a meaningful way and to discuss relevant issues with Idaho Power. In the opening public meeting for the 2017 IRPAC (held in Boise, Idaho, on September 8, 2016), a representative from Idaho Power stated it was in the company's interest to hear what the public had to say, and that everyone involved, including the public, were planners. These statements are indicative of two-way symmetric communication and its collaborative, win–win nature.

Despite utilities' efforts and requirements to communicate with and involve the public, particularly in the planning arena, there is little guarantee utilities extend public involvement to the level of two-way symmetric communication, specifically granting the

public equal authority in the decision-making of elements of the plan, such as which resources will be used to meet future load. As Simmons (2007) explains, "provisions are made to ensure that the public is aware of a proposed decision, and can offer its opinions on a proposed decision but not for ensuring that those opinions are considered in the decision-making process" (p. 53). Further, municipally-owned utilities have different requirements for utility planning, and their planning documents are not required to be publicly available (Wilson & Biewald, 2013).

Regardless of whether public involvement is required and to what extent, Wilson and Biewald (2013) advocate that the public should be involved, because an IRP process is only successful if it "include[s] both a meaningful stakeholder process and oversight from an engaged public utilities commission" (p. 2). Such inclusion is especially beneficial if in the form of two-way symmetric communication, in which engaged stakeholders can "provide oversight to this process, helping to promote resource choices that lead to positive outcomes for society as a whole" (Wilson & Biewald, 2013, p. 33). Overall, planning events have the potential to incorporate a high degree of two-way symmetric communication between public utilities and the public, helping both groups determine decisions together and providing greater understanding along the way that should ultimately lead to a more informed, comprehensive decision (Brown et al., 2013).

CHAPTER SIX: ACHEIVING TWO-WAY SYMMETRIC COMMUNICATION

THROUGH PLAIN LANGUAGE

Although many techniques can be applied to achieve two-way symmetric

communication (e.g., interpersonal techniques or organizational reform), using plain

language as a tool for doing so provides a comprehensive model that can be used to

ensure audience understanding while considering ethical implications. Plain language is

particularly relevant at addressing the knowledge concerns regarding two-way symmetric

communication by helping participants reach an adequate level of understanding, feel an

equal sense of power in the relationship, and connect to one another.

**Defining Plain Language**

Stein (1976) defines plain English simply as good writing that consists of clarity,

conciseness, directness, objectivity, simplicity, and variety. Bailey (1990) differentiates

plain English from other writing by referring to it as the opposite of writing that ends

with "-ese" (e.g., academese, bureaucratese, legalese). Dale, Stephanou, and Xanthaki

(2008) refer to plain language as "another tool for clarity, precision and unambiguity"

(p. 12). It is the application of "word choice, verb selection, sentence construction, visual

design, organization, and usability testing" to communications created for specific

audiences (Willerton, 2015, p. 1). All of these characteristics of plain language add to its

overall purpose of increasing access to and comprehension of information, particularly

complex information. It also extends to the content of the information itself, aiming to

eliminate ambiguous language and present a complete and unbiased presentation of information.

The three main goals of plain language are to help users "find what they need, understand what they find; and use what they find to meet their needs" (PLAIN, 2011). Plain language does not remove complex information or "dumb it down," but rather makes information "accessible to nonexperts" (Willerton, 2015, p. 162; United States, 1998). In other words, the goal is to enable readers to make informed decisions. This is particularly important for participants involved in two-way symmetric communication. Smolko et al. (2002) specify it is important to help adults learn technical material to participate in public communication more effectively, especially because adults participate best when they feel "confident and competent" (p. 987).

**Applicability**

Plain language has a long history rooted in activism targeting confusing bureaucratic terminology, and laws advancing this cause have been in place for various purposes since the 1970s. Most recently, the *Plain Writing Act of 2010* requires federal agencies to use plain language when writing public documents (Willerton, 2015). In addition, some states have adopted laws requiring plain language by public utilities for certain communications. For example, Pennsylvania State Code §69.25 (1992) calls for utilities adopt plain language—including visual components such as headings—for all written materials given to customers. As well, it states utilities should use focus groups or customer advisory groups to help prepare such materials. Some state commissions, such as New York and Pennsylvania, require utilities to provide customer bills in plain language in efforts to encourage energy conservation and empower customers

(Kolbert, 1987). In addition, annual notices sent to customers informing them of their rights must be written in plain language, and the Edison Electric Institute (EEI) (2011) advises using plain language to explain rates to customers.

Although plain language is not required in all communication between public utilities and the public, it does have an ethical as well as utilitarian place in companies as a method for promoting two-way symmetric communication. Willerton (2015) suggests many plain-language supporters believe "people have a right to clear information" (Willerton, 2015, p. 23) and that plain language promotes social responsibility. If so, this right would be even more necessary in the larger arena of the "wicked problems" faced by public utilities and specifically public utility planning (Roberts, 2004). Just as excluding the public from important conversations can violate their democratic rights and duties, communicating in terms that are unfamiliar or incomprehensible can also exclude them and violate their rights, duty, and freedom to participate. By assessing audience, usability, and accessibility—elements of plain language—communicators can help "identify unequal power relations and intervene in issue of civic discourse in the public sphere to bring about a more democratic environment" (Simmons, 2007, p. 149).

Plain language may be particularly suitable for public utilities communicating with the general public because broader audiences such as these typically have lower literacy rates, and plain language often simplifies content to make it more understandable (Willerton, 2015, p. 81). In speaking with Willerton (2015), Dr. Christine O'Connell, a marine scientist and lecturer at the Alan Alda Center for Communicating Science, stated that to connect to the audience, "Part of that two-way communication is to be able to distill the most important parts of the information you have" (p. 171). Osborne (2005)

suggests writing health materials at a fifth to eighth grade reading level, organizing information from a reader's point of view, and providing non-text alternatives in a way people will most likely be able to understand. Using concrete instead of general terms, familiar words, and brevity are also common components of plain language (Stein, 1976; Brown et al., 2013). Simmons (2007) too notes the need for a common vocabulary when involving the public. Overall, plain language aligns closely with two-way symmetric communication through its attempt to provide clear, honest communication centered around a dialogic approach in which rhetoricians must "view the audience not merely as important, but as essential to their own being" (Willerton, 2015, p. 52).

## Effectiveness

Although the plain language movement has been around for decades, it has predominantly been used in the medical, legal, and public policy fields (Osborne, 2005; Dale et al., 2008; Stableford & Mettger, 2007). However, its successes in these areas are numerous. For example, the wording of proposed bills has been translated into plain language to help voters better understand the meaning of the bill without the legalese, and federal rules rewritten in plain language were considered easier for courts to consistently understand and apply (Willerton 2015). Willerton (2015) proposes plain language can be very useful in situations that are bureaucratic, unfamiliar, rights oriented, and critical (BUROC). Many situations involving decisions made by public utilities and the public fall into this BUROC category. Plain language has been used occasionally in the utility field, most commonly among regulatory and technical settings, such as learning proper electrical safety code. However, plain language has not specifically been

extended to communication with the public on a regular basis or involving planning decisions (Keller, 2010).

In terms of documentation, plain language helps "make complex technical documents easier for nonexpert consumers and citizens to use," (Willerton, 2015, p. 1). This not only allows citizens to "exercise their rights to understand information affecting them" (Willerton, 2015, p. 61), but can also create monetary savings. (See Kimble, 2012, for a discussion of dozens of successful plain-language projects around the world.) Such savings can be the result of people using documents more efficiently, understanding complex information, and communicating effectively about such information. Plain language can also increase the potential for the "genuine dialogue" required of two-way symmetric communication by leveling the playing field between experts and non-experts, creating a common level of understanding and addressing the power imbalance (Willerton, 2015, p. 26). As Simmons (2007) states, "only informed citizens have the literacy practices necessary to effectively participate in environmental decisions" (p. 161).

Informing citizens requires applying plain language for the practical purpose of helping them converse with understanding, as well as for ethical purposes. Katz and Rhodes (2010), Salvo (2001), and Dragga (2011) (as cited in Willerton, 2015) use Martin Buber's 1970 work *I and Thou* to "establish ethical relationships between writers and their audiences" (Willerton, 2015, p. 43). Such relationships consists of striving to achieve communication that focuses on a reciprocal I–Thou or I–You relationship with audiences instead of an I–It relationship, in which the speaker is lecturing the audience using technical terms. If an I–Thou relationship can be achieved,

both participants can stand together on what Buber terms a *narrow ridge*, "a place

between two sides of an argument where the parties can meet if they regard each other

as Thou and not It" (Willerton, 2015, p. 43).

In their studies of what makes participatory decision-making processes effective,

Simmons (2007) and Webler and Tuler (2000) examine the communicative process

according to Habermas' ideal speech situation (p. 568) and communicative competence.

Using these concepts, Webler and Tuler (2000) apply a set of "discursive standard

criteria" to achieve fairness and competence, deemed ideal for participatory decision

making. Included in these criteria, and particularly toward the goal of achieving equal

competence, are several validity claims that coincide with the goals of plain language.

For example, these claims include questions such as, "Does [the] statement make sense?

Is [the] statement factually correct?" (Webler & Tuler, 2000, p. 569). Plain language

helps meet the discursive standard criteria for competence, and even fairness, by

providing access to information and creating an equal distribution of knowledge to

facilitate a common understanding and language that can be used in discussions.

By using plain language to engage with the public in two-way symmetric discussion, trust

between the public and public utilities also increases (Brown et al., 2013). As Willerton

(2015) notes, "when companies and their consumers understand each other, they are more

likely to respect each other and have a sustainable business relationship" (p. 135).

Further, plain language has been described by professionals as empowering citizens and

reducing feelings of being overwhelmed (Willerton, 2015, p. 63). Merkhofer et al. (1997)

too remind us how important it is for the public to feel empowered by participating,

and that this empowerment includes "the transfer of technical competency to the public"

(p. 837). Regardless of whether citizens want to participate in two-way symmetric communication, many practitioners of plain language believe it is an organization's duty and ethical obligation to create content in plain language.

## Criticisms

Concerns about plain language range from the notion that it can "dumb down concepts" to the critique that it is imprecise and inaccurate. However, when plain language is applied correctly, most criticisms are assuaged (Willerton, 2015, p. 11); plain language does not limit or incorrectly convey information but rather translates it into more understandable, accessible terms. Another critique is that plain-language communicators may be subject to personal biases, the same as news professionals or anyone else. Despite this constraint, striving for plain language is more likely to produce ethical content than not.

## Accessibility and Document Design

One of the tenets of plain language is ensuring people can access the information they need. This definition can be applied more broadly as it relates to accessibility. To a certain extent, we are all limited by differences in learning styles, knowledge levels, and other attributes that may not traditionally be thought of as requiring accessibility, such as for a disability. However, the effort to make information easier to access and understand by all can be universally beneficial, and many of the techniques used to make documents accessible to people with disabilities also make them accessible to the broader public.

Willerton (2015) extends the idea of "ease of use and accessibility of broad audiences" to design ideals of plain language (p. 105). Smolko et al. (2002)

and Thomas (2013) too recognize that facilitating access and tailoring to all learning

types are important. Simmons (2007) specifically notes that technical communicators,

who are already user advocates, could be excellent advocates for access, without which

"citizens will not have the opportunity to educate themselves on the issues, much less

articulate in a persuasive manner their concerns to decision makers" (p. 161).

Such opportunities for access are necessary as prerequisites for two-way symmetric

communication to occur. Further, as requirements for accessibility in Section 508 of the

*Rehabilitation Act of 1973* extend to electronic information maintained by companies

beyond the federal government to those that are "developed, procured, maintained, or

used by the federal government," it may be possible that plain language and accessibility

will soon be required by public utilities.

In addition to accessibility, Dale et al. (2008) and Willerton (2015)

consider information design and layout components of plain language. United States

(1998) and Bailey (1990) also include good document design in their definition of plain

English. Simmons (2007) refers to this as user-centered design. Common principles of

design include contrast, alignment, proximity, size, and repetition (Tebeaux & Dragga,

2014; Williams, 2008). Concepts of document design can be extensive and include

appropriate document hierarchy (e.g., headings levels), typography, and effective use of

white space (the area on a page not occupied by text or graphics). United States (1998)

notes that effective use of white space increases readability. Layout, line and paragraph

length, color, graphics, and tables can also increase readability and the ease with which a

document can be understood (Williams, 2008). As Willerton (2015) notes, "Visual design

substantially affects how users understand a document, even if the document is already in

plain language" (p. 159). Whether focusing on accessibility, document design, or plain language as a whole, these concepts aid in communicating materials so users understand them, and therefore contribute to the dialogue necessary for two-way symmetric communication.

## Feedback

In any communication, a critical step is assessing the audience, part of the rhetorical situation; as Bernays (1928) states, communication should be "carefully adjusted to the mentality of the masses" (p. 110). However, it is equally important to obtain feedback from the audience, especially for "documents that affect many people," such as public utility documents (Willerton, 2015, p. 118; United States, 1998). Roberts (2004) too advises that communication and decision making should be monitored to ensure they are effective and that the public and organization are learning from each other and achieving mutual goals. Such feedback may occur in the form of usability testing or research, in which qualitative data is gathered from participants (Willerton, 2015; Simmons, 2007). United States (1998) recommends testing documents with focus groups, or audience-centered testing. After all, "Effective plain-language communication involves dialogue with audiences, not a monologue delivered at them" (Willerton, 2015, p. 42).

CHAPTER SEVEN: CONCLUSIONS

Public utilities have far-reaching effects on the public and natural resources, yet there is little literature on typical communication between public utilities and the public outside of emergency situations or conflicts. Specifically, instances of two-way symmetric communication between public utilities and the public are lacking. However, an examination of literature on public participation regarding public policies and decision making offers insights into the numerous benefits two-way symmetric communication may offer. Such benefits include increasing understanding and agreement among participants, gaining knowledge of local effects, increasing the critical debate necessary to democracy, creating valuable partnerships, increasing social responsibility and ethical considerations, and reducing long-term costs. Although two-way symmetric communication offers many benefits, constraints such as representation, time, knowledge, and bias can impede its success.

These constraints may in part be the reason utilities mostly communicate with the public using one-way, or one-way asymmetric communication, particularly through marketing and traditional media. However, there have been several successful examples of two-way symmetric communication being used that suggest the constraints should not limit its use entirely. Further, advances in technology could prove a useful tool in overcoming some of these limitations. Institutional and cultural changes, as well as defining processes with the public at the start of communications, have also increased the

success of two-way symmetric communication. Regulatory requirements, despite increasing the basic participation of citizens (Simmons, 2007), could increase citizens' actual decision-making power if they are more specific, allow room for dialogue and debate before decisions are made, and view the communication as a democratic process instead of a means to achieve approval. Last, plain language offers a practical tool for communicators to use to bridge the knowledge gap between the public and experts, as well as make information accessible and understandable to the public so they may more effectively and confidently contribute to two-way symmetric communication.

Overall, two-way symmetric communication may not be achievable in all situations, but its benefits are worth the task to try. Further, opportunities for its application between public utilities and the public are numerous, particularly surrounding planning issues for wicked problems and more broadly for decisions that affect all of us. As Simmons (2007) states, "there are spaces and moments for different stakeholders where change is possible" (p. 133).

## A Proposed Model for Two-Way Symmetric Communication

The benefits and opportunities for two-way symmetric communication between public utilities and the public are numerous. Within these opportunities, practical application should be considered in order to advance the use of two-way communication. Drawing on the literature examined herein, I propose a model of how such communication should occur and what would be needed for it to be successful. In the following example, I will assume Idaho Power intends to create its biennial IRP (a document that outline the utility's twenty-year plan to provide service to its

customers). To support two-way symmetric communication between Idaho Power and its public audiences in the creation of its IRP, I would follow seven steps:

1. **Consider the application**. Before any communication begins, the purpose of the communication should be assessed to determine if it requires two-way symmetric communication. As Grunig and Hunt (1984) admit, two-way symmetric communication is not necessary in all situations. However, if the communication is only informational in nature and does not require direct involvement, the communication should still attempt to present all sides of an issue, view the idea from the audience's perspective, and provide a mechanism for feedback from the public. In addition, any communication to the public about situations or decisions that may affect their lives should be considered for two-way symmetric communication, and therefore direct public involvement.

   For Idaho Power's IRP, this means identifying whether the public should be involved in creating the IRP. Currently, public involvement is required by the IPUC and OPUC. However, planning for providing electricity includes making decisions about natural resources and potential rate increases such that regardless of the requirement, this would constitute a "wicked problem" suitable enough to involve the public. Setting specific criteria for when to involve the public that can be referenced before decisions are made may be useful.

2. **Address constraints**. If involving the public in direct communication, constraints, such as ensuring adequate representation, should be addressed

before the communication process begins. Multiple methods (at least two)

should be used to ensure the public is notified of how they can participate and

ensure they can participate. For example, traditional media, social media, and

bill inserts can be used to notify customers of opportunities to participate.

Meetings, qualitative surveys, and focus groups may be used in combination

as means for participating. Further, the public should be included when

deciding how to address certain constraints, such as meeting times and places.

For Idaho Power's IRP, this means ensuring the public is adequately

represented and has sufficient opportunities to participate. I suggest Idaho

Power notify all customers of their potential to be involved through all

communication channels available, including social media, traditional media,

bill inserts, and email (when available). Idaho Power can request customers

that want to participate notify the company so they may gain an accurate

estimate of those involved and determine process requirements from this

number. An attempt should be made to include enough of the public to

be produce statistically valid results (e.g., 530,000 customers = approx.

270-customer sample size with a 90% confidence level and 5% margin of

error). Note, this is a large number of participants, particularly in comparison

to historical amounts, but two-way symmetric communication has been

accomplished involving much larger numbers. To encourage interest, initial

communications should state how decisions that will be made can affect

customers' lives. Once participants have responded, surveys should be sent to

determine channels of communication, times, etc. A combination of IRPAC meetings, surveys, and small group meetings might be appropriate.

3. **Use plain language**. All communication, including initial notices to the public about participation, materials given or presented to the public, and language used when communicating with the public should be written in plain language to help ensure equal access to information. This will also help the public attain necessary levels of knowledge about technical subjects needed for dialogue. For Idaho Power's IRP, this means initial outreach, informational materials, surveys and meeting materials, and the IRP document should be written in plain language. Providing participants with a glossary of terms may be useful, as well as opportunities to clarify technical concepts. Technical communicators or writers experienced in plain language should be used to ensure materials meet this requirement.

4. **Define the process**. At the start of communication, the public and public utilities should define the process together and set expectations, boundaries, roles, and guidelines. In particular, two-way symmetric communication and its goals should be discussed and agreed on. Such agreement should also come from top-down within the public utility before communication begins and be visible to employees, such that management has agreed to make decisions collaboratively with the public and employees are expected to implement this approach. Including a visual diagram of the process and any guidelines and displaying these at all times might be also helpful.

For Idaho Power's IRP, this means participants should define and agree on the

process and goals during initial meetings/surveys, etc. These goals should be

documented and made available to participants through the duration of the

process. Management should agree on the goals as well, and the senior

planning analyst or planning leader in charge of the meetings should be

in alignment.

5. **Use an impartial facilitator**. As part of defining the process, it may be

helpful to use an impartial facilitator. Using a facilitator throughout the

communication process may eliminate any distrust or sense of unequal power

relations to help further collaborative dialogue. The facilitator should also

highlight key questions, comments, and issues to address for future reference.

For Idaho Power's IRP, this would require hiring a third-party facilitator to

run meetings, verify communications, and keep the process and

communication on track. The facilitator should be experienced in two-way

symmetric communication as well as conflict or negotiation management.

6. **Ensure symmetry and equal power**. For two-way symmetric

communication to be successful, both parties must have equal power to

influence each other and decisions being made. One method for ensuring

this is to use plain language, as well as encourage open dialogue.

Also, all parties that may have power to influence decisions should be present

so unequal power relations do not take place outside of the established

communication. Comments should be recorded, and any dialogue that does

occur outside the direct involvement with the public but that influences

decisions should consider these comments in an equal manner to

other considerations.

For Idaho Power's IRP, this means using plain language, adhering to definitions of two-way symmetric communication as agreed on, using a facilitator to identify and address unequal power relations, and involving decision makers in the communication process. All communication should be recorded, including results from surveys or comments from participants, and these should be considered at any internal Idaho Power meetings. Further, the language used when referring to participants or their comments should not position experts as more powerful or influential than the public. For example, instead of saying, "we need to set customers straight," experts might say, "we need to further discuss technical concepts in plain language and have a conversation about them." Experts should be trained in two-way symmetric communication before participating. Ensuring equal power in decision making is also subject to regulations and the discretion of the PUC; any requirements utilities must comply with should be communicated to the public, and PUC staff should be involved in the process to clarify.

7. **Revisit the results and process**. As part of any collaborative process, results and assumptions should be checked to ensure an accurate representation of decisions made. Further, feedback should be gathered to make the process more effective in the future, ensure the agreed-on goals were achieved, and seek innovative ideas for using two-way communication that may not have been considered previously.

For Idaho Power's IRP, this means reviewing the draft IRP with the public before it is submitted to the PUCs. Further, surveys or personal communication should be used (depending on the sample size) after the IRP has been submitted to gather feedback from participants on their satisfaction with the process and ideas for improvement.

## Limitations & Further Research

This thesis is not an exhaustive review of all literature related to two-way symmetric communication and its various applications and definitions. Rather, I review general ideas and theories and apply them to communication between public utilities and the public. The public utility industry varies greatly, and each instance of communication, as well as the regulations that govern decision-making power between parties, are different, so conclusions drawn here cannot be applied to every situation. This paper is also limited in its assumptions and conclusions because the public and public utilities were not directly involved in contributing to this research.

Overall, more research is needed to ascertain the effectiveness and appropriateness of two-way symmetric communication between public utilities and the public (Simmons, 2007). Further research is also needed to understand what motivates publics to participate and what is required for them to effectively participate, both at the individual and group level (Roberts, 2004). To extend theory into real-world analysis and to validate my conclusions, further research in the form of specific case studies would be useful. For example, performing a content analysis of discussions made at advisory committee meetings, or conducting interviews with participants. Pairing such analyses with the concepts raised in this paper will further this research; however, to truly

understand how useful and effective two-way symmetric communication between public utilities and the public may be, the public should be involved in determining this and drawing conclusions.

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