

Agenda Date: March 24, 2026
Item Number: D1

Docket: UE-250617
Company: PacifiCorp d/b/a Pacific Power & Light Company

Staff: Paul Barrager, Regulatory Analyst
Angelena Bohman, Regulatory Analyst

Recommendation:

Issue an Order in Docket UE-250617 approving PacifiCorp's 2025 Clean Energy Implementation Plan, filed on October 1, 2025, subject to the conditions in Attachment A.

Background:

In 2019, the Washington Legislature passed the Clean Energy Transformation Act (CETA) to address the impacts of climate change by transforming the energy supply and modernizing the electric system, while ensuring the burdens and benefits are shared broadly. The act sets the following mandatory targets:¹

2025 – All electric utilities must eliminate coal-fired resources serving Washington state customers.

2030 – All electric utilities must be greenhouse gas neutral – for example, remaining carbon emissions are offset by renewable energy, energy efficiency, carbon reduction project investments, or payments funding low-income assistance.

2045 – All electric utilities must supply one hundred percent of retail sales of electricity from renewable or zero-carbon resources.

CETA requires utilities to submit a clean energy implementation plan every four years describing the utility's plan for making progress toward meeting these clean energy transformation standards. In 2021, PacifiCorp d/b/a Pacific Power & Light (PacifiCorp or Company) submitted its very first Clean Energy Implementation Plan (CEIP), the 2021 CEIP. After adjudication, the 2021 CEIP was approved by the Washington Utilities and Transportation Commission (Commission) with 50 conditions.²

In May 2025, the Commission rejected PacifiCorp's 2023 Biennial CEIP Update (BCEIP).³ These events provided context and the foundation for Commission staff (Staff), the Company,

¹ RCW 19.405.010, RCW 19.405.030, RCW 19.405.040, RCW 19.405.050.

² UE-201829 Full Multi-Party Settlement Agreement, Appendix A.

³ UE-210829 Order 16, Final Order Rejecting CEIP Biennial Update.

and other interested parties to negotiate the 18 proposed conditions of approval in this 2025 CEIP.

Overview of the CEIP

In this 2025 CEIP, PacifiCorp has proposed the following annual interim targets,⁴ representing the percentage of energy sold to Washington customers using renewable or non-emitting resources. These targets are required by rule⁵ of all regulated electric utilities in the state of Washington and are meant to demonstrate reasonable progress toward CETA compliance.

2026 – 34%

2027 – 34%

2028 – 48%

2029 – 71%

PacifiCorp also describes specific targets for renewable resources and battery storage, demand response (DR), and energy efficiency (EE) while laying out specific actions to achieve those targets. The Company provided updates to its customer benefit indicators (CBI), refinements to the definition of vulnerable populations, and mapping of CBI metrics to specific actions. Next, PacifiCorp includes a projection of the incremental cost of compliance with CETA within this compliance period and a longer-term projection covering the full CETA compliance horizon until 2045. Staff discussed these and other aspects of the CEIP in its previously written comments.⁶

The Company responded to each of the conditions that the Commission previously ordered⁷ both in narrative throughout this CEIP and summarized as an appendix.⁸ Staff notes that PacifiCorp also included the conditions proposed in the 2023 BCEIP process which were not adopted by the Commission but nevertheless encouraged in the order rejecting that plan.⁹

In the January 9, 2026, comments, Staff emphasized that we have significant concerns about the absence of progress in the 2022 – 2025 compliance period that has led to the lackluster interim targets at the beginning of this CETA compliance period, illustrated in Figure 1 below.

⁴ Staff supports PacifiCorp proposing annual interim targets as opposed to providing an average across all four years.

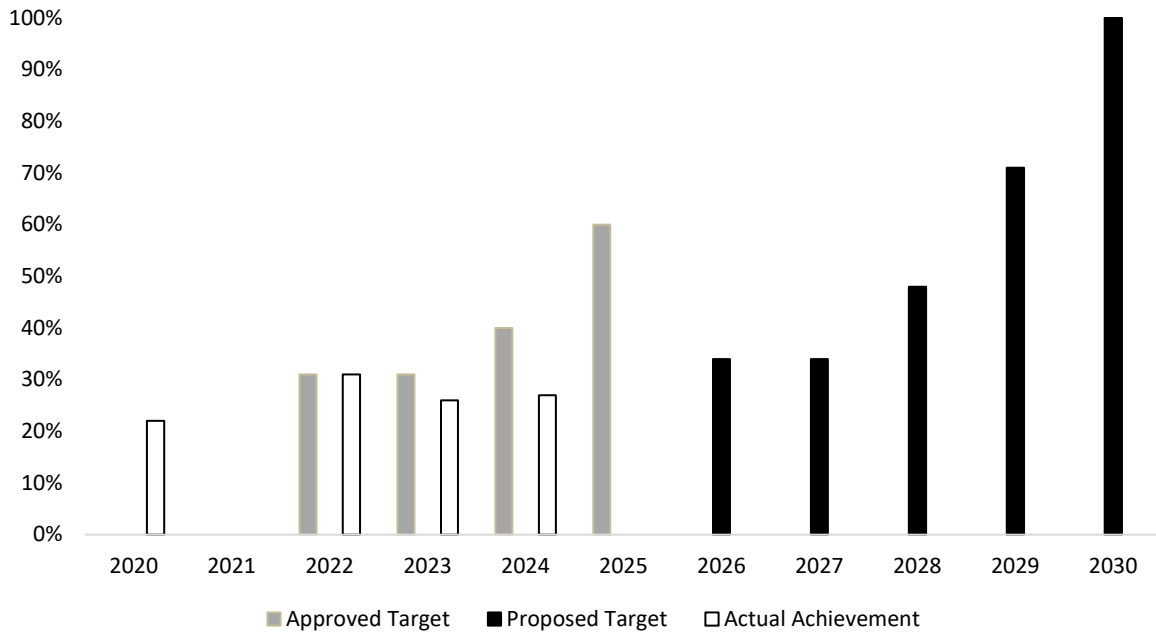
⁵ WAC 480-100-640(a)(b)

⁶ UE-250617 Commission Staff Comments Regarding PacifiCorp's CEIP, Submitted January 9, 2026

⁷ UE-210829 Order 06, Final Order Approving and Adoption Settlement Agreement, Filed October 25, 2023

⁸ UE-250617, Appendix B Washington Regulatory Compliance, Filed October 1, 2025

⁹ UE-210829 Order 16, Final order Rejecting Biennial Update, Filed May 19, 2025



The approved targets are interim targets from PacifiCorp’s 2021 CEIP. The proposed targets are from this 2025 CEIP. Actual achievement refers to the reported percentage of WA retail sales supplied by renewable and non-emitting resources.

Figure 1. Forecasted vs. Actual Share of CETA Qualifying Resources Serving WA Retail Sales.^{10, 11, 12, 13}

As shown in Figure 1, the actual clean energy achievement has remained relatively flat compared to the Company’s interim targets, and Staff has serious concerns with the ambitious ramp rate proposed in the 2025 CEIP’s targets. Staff contends, however, that the 2025 CEIP submitted by the Company potentially *could* make meaningful progress toward CETA compliance in the next four years *if* the proposed specific actions are indeed carried out. As such, Staff believes that the conditions for approval of this CEIP are needed, appropriate, and serve as public interest guideposts to ensure the Company achieves its CETA mandates.

¹⁰ UE-210829, Revised 2021 Final Clean Energy Implementation Plan, Filed March 13, 2023.

¹¹ UE-210829, CEIP 2023 Progress Report, Filed July 3, 2023.

¹² UE-210829, 2025 CEIP Progress Report, Filed July 1, 2025.

¹³ UE-250617, PacifiCorp 2025 CEIP, Filed October 1, 2025.

Discussion

Staff appreciates the level of engagement from the Company, beginning with the CEIP public engagement series and extending through several productive bilateral meetings both virtually and in person at the Company's headquarters in Portland, Oregon. PacifiCorp filed a draft version of its 2025 CEIP on August 15, 2025, soliciting input from Staff and others, some of which was incorporated into the final CEIP.¹⁴ Since the filing, Staff has been in regular contact with the Company and interested parties to discuss the content of the plan, its compliance with rule and statute, and condition language.

Primary Staff Concerns

In written comments to this docket,¹⁵ Staff identified several concerns with the content of the CEIP, including but not limited to: the narrow timeframe for complying with CETA's 2030 mandate; the pending status of the procurement process; and the wide range of projected incremental costs.

First, the interim targets proposed in this plan mirror very closely those from the previous compliance period, which implies that the Company is unlikely to have met its targets from the 2021 CEIP. Staff contends that, through a series of Company decisions,^{16, 17} PacifiCorp has made *negligible progress* towards CETA's 2030 mandate. This has left the Company with essentially just one four-year compliance period to make all necessary progress to achieve at least 80 percent clean energy serving Washington retail load, projecting a steep "hockey stick" trajectory to meet CETA compliance in a very brief period, as outlined in Figure 1.

In Staff's view, the Company must *move with a purpose to procure renewable and non-emitting resources with a sense of urgency and with a heightened consideration of any risks associated with this shortened timeline.* Failure to do so would raise serious questions about the Company's commitment to compliance. Additionally, Staff believes that the Company should be in closer communication with Staff with respect to procurement timing, challenges, and impacts on achievement of interim targets in advance of the next BCEIP in 2027.

¹⁴ Staff note here as it did in our January 9, 2026. comments that there were significant differences between the draft and final versions of this plan, which may have minimized the value of some feedback received. Substantive changes were made to proposed interim targets, resource procurement strategy, and incremental costs of CETA compliance irrespective of any input received from Staff or other parties.

¹⁵ UE-250617 Commission Staff's Comments Regarding PacifiCorp's CEIP, Filed January 9, 2026.

¹⁶ UE-210979, Cancellation of PacifiCorp's 2022 All-Source Request for Proposals, Filed April 3, 2024.

¹⁷ UE-210829, PacifiCorp 2023 CEIP Biennial Update, Filed November 1, 2023, at 5 (Extending assumed life of thermal resources to WA customers and revising assumptions around resource allocation across PacifiCorp's service territory.).

Second, the specific actions proposed by the Company hinge on a series of hypotheticals. The Company's resource allocation methodology¹⁸ has changed since this plan was filed, cost assumptions around illustrative proxy resources will likely change because of Federal action and actual bids received,¹⁹ the results of the Company's Washington situs request for proposals (RFP) are unknown at this time. Previous Commission orders have rejected the notion that RFPs alone constitute a specific action.²⁰ While Staff understand that we rarely have perfect information when a plan is filed, the sheer number of unknowns in this case warrants heightened scrutiny that our proposed conditions promote.

Further, the Company's two prior RFPs produced little in the way of procurement of renewable or non-emitting resources with the 2020 all-source RFP leading to fewer than expected short list bids²¹ and the 2022 all-source RFP cancelled outright. On September 25, 2025, the Commission required an independent evaluator for PacifiCorp's Washington situs RFP. Though none was specifically required by code, this was ordered by the Commission to ensure that the Company gave reasonable consideration to resources and made acquisition decisions prudently.²² The Commission has provided an unprecedented level of heightened scrutiny relative to peer utilities—and for good reasons.

Third, diverging from previous plans, the Company lays out a future where the incremental costs of compliance with CETA may prompt PacifiCorp to consider alternative pathways to compliance. The Company says it is possible, though unlikely²³ that this may occur during this compliance period.²⁴ However, PacifiCorp states that the forecasted incremental costs of compliance with CETA will rapidly increase soon thereafter to a total of \$1.4 billion in additional CETA-attributable spending from 2026 - 2045 on a nominal basis. This translates to \$72 million annually, or 17 percent of Washington revenues as of December 2024.

While Staff acknowledges and appreciate this longer-term analysis from the Company, we also wish to underscore PacifiCorp's own complicity in creating these conditions. Staff consistently expressed concern over the Company's slow pace of resource procurement,²⁵ and agrees with the Northwest Energy Coalition (NWECC) and Renewable Northwest (RNW) who, in their

¹⁸ UE-250224 PacifiCorp 2026 Power Cost Only Rate Case, Order 08 ¶ 36, Filed December 22, 2025.

¹⁹ UE-250617 PacifiCorp 2025 CEIP at 115, Filed October 1, 2025.

²⁰ See UE-210795 Final Order 08 Approving Clean Energy Implementation Plan (PSE), ¶ 221.

²¹ UE-210829 Exh. MDM-1T Direct Testimony of Matthew D. McVee, pg. 8 ¶ 23-25.

²² UE-250460 Order 03 Approving PacifiCorp's 2025 RFP Subject to Conditions, Filed September 25, 2025.

²³ UE-250617 PacifiCorp 2025 CEIP at 115.

²⁴ UE-250617 PacifiCorp 2025 CEIP, Chapter 10 Compliance Costs, Filed October 1, 2025.

²⁵ UE-210829 Commission Staff's Comments Regarding PacifiCorp's Biennial Conservation Plan, Filed January 11, 2024.

comments²⁶ in this docket note that PacifiCorp’s modeling framework has systematically pushed procurement to the very threshold of the 2030 CETA compliance mandate, while also consistently arguing that this represents the “least-cost, least-risk” path to compliance. While this has suppressed incremental costs in this four-year compliance period, it increases the risk of cost spikes as 2030 approaches. Indeed, Staff has been making a similar case since the first round of CEIPs were filed in 2021.²⁷ Staff continues to advocate for the Company to take steps early in this compliance period to acquire resources to minimize the incremental costs of compliance with CETA.

Summary of Conditions

To address Staff’s concerns above, we recommend the Commission adopt the conditions listed in full in Attachment A to this memo. Below we provide discussion on a subset of those conditions that Staff finds of note.

It is Staff’s understanding that NWECA, RNW, Washington Conservation Action (WCA), Public Counsel, and Staff support all the proposed conditions of approval. The Alliance of Western Energy Consumers (AWEC) took part in discussions and proposed language changes to Condition 15, but otherwise takes no position on any of the remaining conditions. PacifiCorp agrees to all but one: Condition 12.

Specific Targets

- Condition 1: *PacifiCorp must revise its energy efficiency targets for all four years of the CEIP compliance period and refile this updated CEIP to Docket UE-250617 within 90 days of approval of the 2025 CEIP.*

This condition resulted from a recent Commission order²⁸ approving PacifiCorp’s refiled energy efficiency targets, removing the downward adjustment due to “economic uncertainty.” PacifiCorp refiled its Biennial Conservation Plan after the Clean Energy Implementation Plan was filed, which still reflects the original lower energy efficiency targets. Staff proposes that this would keep uniformity between plans and provide for a more accurate accounting of energy efficiency across this compliance period.

²⁶ UE-250617 Comments, on Behalf of Northwest Energy Coalition and Renewable Northwest, Filed January 9, 2026.

²⁷ UE-210628 Staff Comments Regarding Avista Corporation’s CEIP at 5, Filed January 28, 2022.

²⁸ UE-250825 Order 01 Accepting 2026-2035 Ten-Year Achievable Conservation Potential and 2026-2027 Biennial Conservation Target, Filed January 14, 2026.

- Condition 3: *In the 2027 BCEIP, the Company must update its demand response specific target for this compliance period with all cost-effective demand response (DR) likely to result from its next DR RFP.*

The Company plans to commence a DR RFP this year. Staff believes that the Company's currently proposed DR target of 22 MW is conservative,²⁹ significantly reducing the target from its previous CEIP and IRP. Through discussions with the Company, Staff understand that this target reduction is based in part on overly optimistic adoption forecasts and unrealized growth in previous DR programs. As Staff noted previously,³⁰ the Company has not initiated a DR RFP since 2021 and there is reason to believe with new entrants and more mature programs the DR potential may be greater. Staff recommends aligning the target in the 2027 BCEIP with the most up to date information available to the Company. Staff also notes that the Company has a role to play in its customers' willingness to participate in DR programs (education, outreach, accessible materials, etc.).

- Condition 6: *If the Company contracts for new resources from its 2025 Washington situs RFP or outside of this RFP it must submit a supplemental filing to Docket UE-250617 detailing all relevant information pertaining to WAC 480-100-640 (5) and (6). In this filing, PacifiCorp must also detail the changes to the incremental costs of compliance with CETA, the effect on interim targets, and an assessment of risk associated with the acquisition.*

As described above, one of Staff's principal concerns with this CEIP is a reliance on a proposed RFP as a specific action. The Company has also raised the prospect that the incremental cost of compliance for this compliance period may diverge materially from those forecasted in the CEIP once the bids from the Washington Situs RFP are known.³¹ Staff believes that this implied risk of near-term alternative compliance, combined with the Company's history of changing forecasting assumptions,³² extending dependence on

²⁹ December 2025 Demand-Side Management Advisory Group meeting, Slide 59, PacifiCorp is forecasting 27MW of demand response by year end of 2029.
https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/washington-ceip/WA-EAG-DSM_Meeting_2025-12_December_2025_Slides.pdf.

³⁰ UE-250460 Staff's Comments Regarding PacifiCorp's Draft WA Situs Request for Proposals at 9, Filed July 25, 2026.

³¹ UE-250617 PacifiCorp Clean Energy Implementation Plan at 115.

³² Staff note pronounced differences in the Washington specific portfolios from the 2025 IRP in Docket UE-230812, and between the Draft and Final 2025 CEIP in Docket UE-250617. Though Staff acknowledge the modeling process evolves and changes are expected, the scale of the changes in plans submitted only months apart indicates uncertainty in forecasting in Staff's assessment.

thermal resources,³³ and outright cancelling RFPs, has created the need for increased communication between the Company and Commission before the submission of the 2027 BCEIP when it may be too late to correct course.

- Condition 10: *In the 2027 BCEIP, the Company must propose at least one alternative pathway to achieve CETA compliance with a reliance on unbundled renewable energy credits (REC) and/or changes to the proposed procurement timeline.*

The Company's CEIP describes in its CETA compliant scenario, one where 2045 CETA compliance is achieved well ahead of the statutory mandate, reaching 110 percent renewable generation in 2030. Accomplishing this through the acquisition of the proposed proxy resources is forecasted to have a rapid and outsized impact on the incremental cost of compliance. Staff is asking the Company to perform a scenario analysis relying on RECs to achieve some portion of the allowable 20 percent retail sales through alternative compliance by 2030 to transparently assess the impact on incremental costs.

- Condition 12: *In the 2027 BCEIP, PacifiCorp must provide a scenario analysis of its projected incremental costs assuming that the targets set in the 2021 CEIP had been achieved.*

Staff understands that the Company strongly disagrees with this condition. Staff met with the Company on March 2, 2026, and have discussed this issue numerous times since. The Company asserts Condition 12 is without value, is based on too many assumptions, and could not be meaningfully compared to actual or forecasted costs. Staff refutes this claim, pointing out that the Company's own 2020 and 2022 RFPs are a reasonable starting point for minimizing both asset and cost assumptions. Further, Staff emphasizes that PacifiCorp is welcome to caveat and footnote all assumptions made just as it would with any scenario analysis. Lastly, Staff points out that the Company has never said that it would be impossible or overburdensome to produce this scenario, only that they would prefer not to.

As has been discussed at length above and in our comments,³⁴ Staff believes that PacifiCorp's CEIP implies that the Company will seek to utilize CETA's incremental cost alternative compliance pathway early in the next compliance period or sooner.³⁵ Staff proposes this condition to provide context to the Commission in the 2027 BCEIP to

³³ UE-250617 Commission Staff's Comments on the 2025 Clean Energy Implementation Plan at 4, Filed January 9, 2025.

³⁴ UE-250617 Commission Staff's Comments Regarding PacifiCorp's Clean Energy Implementation Plan at 14, Filed January 9, 2026.

³⁵ UE-250617 PacifiCorp 2025 Clean Energy Implementation Plan at 116, Filed October 1, 2025.

illuminate the role that PacifiCorp's inaction (i.e., the "just-in-time" procurement strategy) has played in creating this situation. While Staff acknowledges that this proceeding has no bearing on decisions made in the past, we believe a transparent accounting of their effects will offer valuable perspective to the Commission as it weighs current actions and future incremental cost forecasts during the 2027 BCEIP process.

- Condition 13: *In its 2027 BCEIP PacifiCorp must work with peer utilities, Commission Staff, and advisory group members to propose a methodology for analyzing CBI data over multiple compliance periods.*

Similar to condition language in the most recent Avista CEIP, Staff believes that utilities should be better able to show long-term CBI trends rather than periodic updates representing a single point in time.

Both rule³⁶ and statute³⁷ direct utilities to demonstrate that all customers are benefiting from the transition to clean energy in both the short- and long-term. This being the second compliance period, all Washington utilities now have multiple data points to assess CBI metrics. Staff believes that PacifiCorp and all utilities must demonstrate that they have a methodology to analyze and report data across multiple compliance periods to better satisfy the intent of these rules and statute.

The Company has no objection to the inclusion of this condition. During discussions, the main concern PacifiCorp raised was with the unknown nature of the methodology. Therefore, Staff amended the condition language to reflect the need to cooperate with similarly situated peer utilities to develop a best practice for normalizing data across and between compliance periods.

- Condition 15: *In future CEIPs and BCEIPs the Company, working with interested parties and advisory groups must commit to:*
 - *Allocating a specific portion of distributed energy resources (DER) program budgets for Named Community outreach, participation, and recruitment.*
 - *Establishing minimum participation goals to ensure greater access to Named Community and low-income customer representation.*
 - *Dedicated outreach, education, and recruitment strategies which clearly establish how PacifiCorp will target named communities – including vulnerable populations – for involvement in its DER programs.*
 - *Expansion of existing incentives beyond highly impacted populations to include low income and vulnerable populations.*

³⁶ WAC 480-100-610(4)(c)(i)-(iii).

³⁷ RCW 19.405.010(6).

- Condition 16: *PacifiCorp must commit to a minimum targeted designation of 27 percent of all energy benefits (and including non-energy benefits where applicable) flow to members of Named Communities within this CEIP compliance period.*

Conditions 15 and 16 closely mirror language from conditions advocated by Staff and interested parties during the 2023 BCEIP process. In the Order rejecting the BCEIP,³⁸ the Commission encouraged the Company to implement these conditions in the current 2025 CEIP. Staff note that the Company has already made progress in these efforts, working with members of its advisory groups on a path forward thus far using a voluntary and non-binding framework. The Company is not opposed to the conditions outright but has offered language changes to reflect constraints on current EE and DR program offerings.

Conclusion

Staff attended PacifiCorp's public engagement series and advisory group meetings, reviewed PacifiCorp's 2025 draft and final CEIP, submitted written comments on January 9, 2026, and hosted multiple virtual discussions with the Company and other interested parties about this CEIP. Based on Staff's review and discussions since the initial filing in October, Staff believes that *only if* PacifiCorp fully complies with the conditions of approval in Appendix A, its 2025 CEIP may demonstrate adequate progress towards the goals of CETA, and therefore should be approved.

Staff expects many of the interested parties who commented in the docket to attend the March 24, 2026, Recessed Open Meeting, beginning at 9:30 a.m. PacifiCorp has indicated several of their representatives will attend in person. We look forward to hearing additional public comments and engaging in a constructive discussion about the CEIP and the proposed conditions. In summary, Staff recommends the Commission approve the 2025 CEIP subject to the negotiated conditions set forth in Appendix A.

³⁸ UE-210829 Order 16, Final order Rejecting Biennial Update, Filed May 19, 2025.

Appendix A

Specific Targets

1. PacifiCorp must file an updated CEIP to Docket UE-250617 within 90 days of a written decision approving the 2025 CEIP reflecting changes per Commission order 01 in Docket UE-250825 (2026-2027 Biennial Conservation Plan) with regards to Energy Independence Act targets and BCP conservation goals, by removing the economic uncertainty adjustment in energy efficiency targets for all four years of the CEIP compliance period.
2. In the 2027 IRP and the 2027 Biennial CEIP Update, PacifiCorp must run a complete and uniform jurisdictional analysis that identifies Washington-specific proxy resource selections. The form and optimization steps must be consistent between the IRP and BCEIP Update.
3. PacifiCorp will evaluate proposals from the next Demand Response RFP, and after consultation with Commission Staff, recommend a revised cost-effective demand response target reflecting likely program additions within this compliance period. Due: 2027 BCEIP.
4. PacifiCorp must model a full optimization of its preferred portfolio based upon the 2026 Protocol as opposed to WIJAM. With this optimization as a basis, PacifiCorp must submit a supplemental filing to Docket UE-250617, updating the Washington jurisdictional portfolio and interim targets for the 2026 – 2029 compliance period within 90 days of a written decision approving the 2025 CEIP.
5. In its 2027 IRP and CEIP updates, PacifiCorp must clearly disclose the complete basis, magnitude, and escalation of dollar-per-megawatt-hour resource cost assumptions used to model resource selection, along with a sensitivity analysis demonstrating how procurement timing, interim targets, and 2030 compliance outcomes change with the modification of those assumptions.
 - a. The Company must provide a qualitative analysis of the basis for these costs as they relate to NLR ATB, results from Company RFPs, or other third-party input.
 - b. This disclosure must analyze how PacifiCorp assessed known risks of competition, alternative CETA compliance strategies, price pressure, resource availability, permitting and construction, and other factors known to the Company.

Specific Actions

6. If PacifiCorp contracts to acquire supply-side resources from the 2025 WA Situs RFP in 2026, or similar resources outside this RFP, the Company must make a supplemental filing to Docket UE-250617 before August 1, 2026, that details all relevant information per WAC 480-100-640(5) and (6) on specific actions for renewable energy and non-emitting resources. PacifiCorp must include similar information for any supply-side Washington situs resources procured after this supplemental filing in the 2027 Biennial CEIP Update or 2027 CEIP Progress Report.
 - a. These filings must include an update to the Company's projected incremental costs of compliance for the 2026-2029 period, and subsequent periods as appropriate.
 - b. These filings must include an assessment of the resource's contribution toward the projected interim targets for the 2026-2029 period, and subsequent periods as appropriate.
 - c. These filings must contain an analysis of how the Company has assessed the risks of competition, price pressure, resource availability, permitting and construction, and other factors known to the Company.
7. In the 2027 Biennial CEIP Update, PacifiCorp must provide within the transmission planning section, a thorough narrative of the progress of each incremental transmission addition required to serve Washington customers, with detailed description of how each project relates to specific resources acquired from the 2025 WA Situs RFP or resources contracted/procured outside of the 2025 WA Situs RFP.

Incremental Costs

8. In its 2027 Biennial CEIP Update, PacifiCorp must update its incremental costs forecast to include costs associated with new procurement, transmission and interconnection, and changes to procurement timelines. PacifiCorp must also include a discussion of assumed incremental transmission costs, with an analysis of those costs associated with CETA compliance, along with corresponding workpapers.
9. In its 2027 Biennial CEIP Update, PacifiCorp must include with its incremental costs forecast, the total cost of each portfolio, not just the proposed resource additions. The total cost must include costs associated with fuel, battery charging, O&M, CCA compliance costs, and accurate assumed asset life.
10. In its 2027 Biennial CEIP Update, PacifiCorp must include with its incremental cost forecast at least one alternative pathway for CETA compliance scenario. This scenario must include reliance on unbundled RECs or accelerated supply-side resource procurement.

11. In its 2027 Biennial CEIP Update, PacifiCorp must include with its incremental cost forecast a sensitivity that analyzes the cost-effectiveness of increased or accelerated procurement of DER resources, including utility-owned and/or utility-operated distributed generation and distributed storage resources, to evaluate whether these resources can prevent projected incremental costs from rising over the 2 percent cost threshold before 2045.
12. In the 2027 BCEIP update PacifiCorp must include in its incremental costs forecast, a scenario analysis assuming the 2021 CEIP specific targets had been met for renewable energy, energy efficiency, and demand response.

Customer Benefit Indicators

13. PacifiCorp will work with its peer utilities to address concerns of continuity and consistency of CBIs across CEIP periods, and continue working with advisory groups, including at minimum Commission Staff and the Equity Advisory Group (EAG). Along with its peer utilities and advisory groups, PacifiCorp will work to determine how changes in Customer Benefit Indicators (CBI) metrics and Named Communities designations across multiple compliance periods will be accounted for, so that PacifiCorp, peer utilities, and other parties can analyze data trends over multiple compliance periods. This may include providing specific information on how metrics that measure numbers of customers will account for changing Named Community population size, and how metrics that have changed over compliance periods can be interpreted and analyzed in relation to one another, to view trends over the long-term. In its 2027 Biennial CEIP Update, PacifiCorp will propose a methodology, where feasible, for analyzing CBI data over multiple compliance periods.
14. In future CEIPs and Biennial CEIP Updates, PacifiCorp will provide as an appendix, data values by year for each CBI metric from that metric's inception to the most recent data collected by PacifiCorp.
15. In future CEIPs and Biennial CEIP Updates, PacifiCorp, after accounting for DR- and EE-specific program requirements and constraints, and after working with interested parties and advisory groups, must commit to: 1) the allocation of a specified portion of each DER program budget for named community outreach, recruitment, and participation; 2) minimum participation goals to ensure named community and low-income customer representation and greater access by these populations to the benefits associated with DER program benefits; 3) dedicated outreach, education, and recruitment strategies which clearly establish how PacifiCorp will target named communities – including vulnerable populations – for involvement in its DER programs; and 4) expansion of existing incentives beyond highly impacted populations to include low-income and vulnerable populations.

16. After accounting for DR- and EE-specific program requirements and constraints, PacifiCorp shall work with interested parties and advisory groups to commit to a minimum targeted designation of 27 percent of all energy benefits (which may include non-energy benefits) to flow to members of Named Communities within this CEIP compliance period. PacifiCorp must identify in its 2027 Biennial CEIP Update:
 - a. What specific portion of budget for each DER program has been allocated to Named Community outreach, recruitment, and participation.
 - b. Which specific actions have been added, or existing specific actions have been modified to achieve this goal.
 - c. The progress toward achieving the targeted designation of 27 percent.
 - d. Identify additional, or modify existing, specific actions PacifiCorp will take to address the equitable distribution of benefits and reduction of burdens to identified Vulnerable Populations. These specific actions may span the categories of renewable energy, energy efficiency and demand response, or include other actions outside of those categories.

Public Participation:

17. For full IRP/CEIPs and IRP/CEIP update cycles, PacifiCorp must convene, at minimum, quarterly CEIP Engagement Series meetings with Commission Staff; environmental and justice advocates; Public Council; members of the EAG, LIAG, and DSM advisory groups; community representatives; and members of the public.
18. PacifiCorp must identify and address diverse participation barriers to public input. Beginning with the 2027 Public Participation Plan planning processes, PacifiCorp must 1) develop a comprehensive forward-looking plan that outlines specific actions such as bill inserts, social media posts, and open houses to increase participation from its general customer base; 2) work with members of the EAG to develop a comprehensive assessment of cultural, economic, and other barriers to participation, and a plan to ensure that all customers, regardless of barriers, have equitable opportunity to participate in the planning process, and meaningful participant education; 3) send detailed information such as discussion items, slide decks, and other materials to participants at least three days in advance of all public input meetings. In particular these materials should highlight:
 - a. On what issues PacifiCorp requires specific public input?
 - b. On what issues is early public engagement critical and required throughout the process?