

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of	DOCKET UE-250617
PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY'S	ORDER 01
2025 Clean Energy Implementation Plan	APPROVING CLEAN ENERGY IMPLEMENTATION PLAN SUBJECT TO CONDITIONS

BACKGROUND

- 1 Revised Code of Washington (RCW) 19.405, Washington's Clean Energy Transformation Act (CETA), and Washington Administrative Code (WAC) 480-100-640(1) direct electric investor-owned utilities to develop a clean energy implementation plan (CEIP or Plan) every four years. Under CETA, CEIPs must be informed by both a utility's clean energy action plan and its long-term integrated resource plan.¹
- 2 As required by WAC 480-100-640, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) filed its first CEIP with the Washington Utilities and Transportation Commission (Commission) in Docket UE-210829 in 2021.² PacifiCorp's first CEIP was approved following a multi-party settlement with 50 conditions.³
- 3 On November 1, 2023, PacifiCorp filed its first Biennial Update to the 2021 CEIP with the Commission. On May 19, 2025, the Commission rejected the Biennial Update in Order 16 in Docket UE-210829 following a full adjudication.⁴
- 4 On October 1, 2025, PacifiCorp filed with the Commission its 2025 CEIP, which is PacifiCorp's second CEIP since the passage of CETA. Interested parties including Commission staff (Staff), the Attorney General's Office – Public Counsel Unit (Public

¹ *In re Adopting Rules Relating to Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act and Amending or Adopting rules relating to WAC 480-100-238, Relating to Integrated Resource Planning*, Dockets UE-191023 & UE-109698 (Consolidated), General Order 601, p. 24, ¶ 59 (CETA Rulemaking Order) (Dec. 28, 2020).

² Per WAC 480-100-640(1).

³ See generally, Docket UE-210829, Final Order 06 (Oct. 25, 2023).

⁴ See generally, Docket UE-210829, Final Order 16 (May 19, 2025).

Counsel), the Northwest Energy Coalition (NVEC), Renewable Northwest (RNW), and The Alliance of Western Energy Consumers (AWEC), submitted comments on PacifiCorp's 2025 CEIP on or before January 9, 2026. Washington Conservation Action (WCA) submitted comments on PacifiCorp's 2025 CEIP on February 12, 2026. AWEC filed additional comments in this docket on March 20, 2026.

5 In its 2025 CEIP, PacifiCorp proposes the following annual interim targets as percentages of energy sold to Washington customers using renewable or non-emitting resources:

- 2026: 34 percent
- 2027: 34 percent
- 2028: 48 percent
- 2029: 71 percent⁵

6 PacifiCorp also outlines specific targets for renewable resources, battery storage, demand response (DR), and energy efficiency (EE) in its 2025 CEIP. The Company also describes the specific actions it will take to achieve those targets. The Company further provides updates to its customer benefit indicators (CBI), refinements to the definition of vulnerable populations, and mapping of CBI metrics to specific actions. PacifiCorp includes a projection of the incremental cost of compliance with CETA within this compliance period and a longer-term forecast covering the full CETA compliance horizon.

7 Staff notes that PacifiCorp's engagement with interested parties throughout this process has been commendable, including CEIP public engagement, bilateral meetings, and a draft CEIP filed August 15, 2025.⁶ Staff notes that since filing the 2025 CEIP, PacifiCorp has further been in regular contact with interested parties. Despite this, Staff notes it has some concerns with the 2025 CEIP, including "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."⁷ On the first concern, Staff comments that a number of Company decisions have resulted in the Company making minimal progress towards achieving CETA's 80 percent clean energy mandate by 2030, and that in Staff's

⁵ PacifiCorp's 2025 CEIP, at p. 50, Table 8 – 2026-2029 Interim Targets (MWh).

⁶ Staff's Memo, at p. 4.

⁷ Staff's Memo, at p. 4.

view, the Company must “move with a purpose to procure renewable and non-emitting resources with a sense of urgency....”⁸

8 Staff further comments that PacifiCorp has diverged from prior plans and lays out a future where incremental costs of compliance with CETA may prompt alternative compliance pathways.⁹

9 To address its concerns, Staff proposes 18 conditions, which are contained in Appendix A of this Order. PacifiCorp agrees to all of the conditions, except Condition 12. Staff’s understanding is that NWEA, RNW, WCA, and Public Counsel support all of the proposed conditions.¹⁰ In AWEC’s March 20, 2026, comments, AWEC notes that it does not oppose any condition other than Condition 16.

10 AWEC comments that while similar to earlier conditions in the 2021 CEIP and Biennial Update, the condition has now evolved to designate 27 percent of all energy and non-energy benefits without being limited to distributed energy resources.¹¹ AWEC clarifies it does not oppose conditions or programs that ensure equitable distribution of clean energy benefits to named communities and vulnerable populations, but argues the conditions should be clear in intent and applicability.¹² For example, if the intent of Condition 16 is for investments and distributed energy resources in Washington to be in Named Communities, AWEC does not oppose the condition but asks it be clarified. However, AWEC comments that if the intent is for PacifiCorp to dedicate 27 percent of the value of PacifiCorp’s entire generation portfolio to Named Communities, then AWEC argues that the condition is “manifestly unreasonable.”¹³

11 Staff explains its position on both Condition 12 and Condition 16, which are contested by PacifiCorp and AWEC respectively.

12 Condition 12 states “[i]n 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

⁸ Staff’s Memo, at 4, *citing* UE-210979, Cancellation of PacifiCorp’s 2022 All-Source Request for Proposals (RFP) (April 3, 2024) *and* UE-210829, PacifiCorp 2023 CEIP Biennial Update, at p. 5 (November 1, 2023) (Extending assumed life of thermal resources to WA customers and revising assumptions around resource allocation across PacifiCorp’s service territory.)

⁹ Staff’s Memo, at p. 5.

¹⁰ Staff’s Memo, at p. 6

¹¹ AWEC’s Comments, at p. 2.

¹² AWEC’s Comments, at p. 2.

¹³ AWEC’s Comments, at p. 2.

achieved.”¹⁴ Staff comments that the Company opposes Condition 12 as having no value, is based on too many assumptions, and could not be meaningfully compared to actual or forecasted costs. Staff argues that the Company’s own 2020 and 2022 RFPs are reasonable starting points for minimizing asset and cost assumptions. Staff proposes this Condition 12 because PacifiCorp has indicated CETA’s incremental cost compliance pathway may be utilized early in the next compliance period, and Condition 12 will provide context and shine a light on how PacifiCorp’s inaction has played a part in creating this situation.¹⁵

13 Condition 16 states, “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.”¹⁶ While Staff’s Memo was published before AWEC’s comments were filed, Staff notes that Conditions 15 and 16 closely mirror language advocated for by Staff during the 2023 BCEIP. Staff notes the Company has made progress in these efforts and that PacifiCorp is not opposed to the condition.

14 On March 24, 2026, the Commission heard comments at its recessed open meeting from Staff, PacifiCorp, Public Counsel, NWECA, RNW, WCA, AWEC, and PacifiCorp customers.

15 Staff reiterated its position outlined in its memo and recommended that the Commission adopt the additional conditions it proposes. PacifiCorp presented on its 2025 CEIP and commented on the progress that the Company has made broadly since its 2021 filing. PacifiCorp also clarified that the basis of this 2025 CEIP is the Washington Inter-Jurisdictional Allocation Methodology (WIJAM), which has since been abandoned in Washington, but the Company presented updated modeling of interim targets under the 2026 Protocol during the recessed open meeting.

16 PacifiCorp further highlighted updates to its CBIs, as well as modeling inputs such as resource pricing. PacifiCorp also highlighted that when modeling its portfolio under the 2026 Protocol, the interim target for 2029 increases from 71 percent to 74 percent. PacifiCorp further highlighted specific actions the Company will take to meet its interim targets, highlighting its ongoing RFP, increasing energy efficiency measures, growing existing DR programs, and creating an equity plan for each DR program, communications, outreach, and engagement. PacifiCorp provided that it has shortlisted

¹⁴ Staff’s Memo, at p. 8.

¹⁵ Staff’s Memo, at pp. 8-9.

¹⁶ Staff’s Memo, at p. 10.

resources in the RFP with plans to bring the resources online before the end of 2029. PacifiCorp shared that the short-list contains more than 800 MW of solar resources and 200 MW of battery resources.

- 17 Finally, PacifiCorp commented that it is not predicting exceeding CETA's price cap in this planning period, but long-term modeling shows that the Company is likely to exceed CETA's cost cap as soon as sometime between 2030-2034. PacifiCorp notes that changes to federal policy, foreign entity of concern rules, competition with hyperscale artificial intelligence, and other market factors have changed long-term renewable pricing forecasts. PacifiCorp requested the Commission approve the Company's 2025 CEIP subject to 17 of 18 of Staff's conditions, declining to adopt Condition 12. PacifiCorp reiterated that the modeling in Condition 12 would not be meaningful and would rely on far too many assumptions.
- 18 Public Counsel began by thanking all interested parties for their involvement and participation. Public Counsel stated that PacificCorp had relied on "just-in-time" CETA analyses for some years, and that Condition 12 was therefore "key".
- 19 RNW commented on behalf of both RNW and NWECA, stating that it was positive that PacificCorp announced shortlisted new renewable resources for this implementation period; however, the Company's projection that it may utilize the alternative compliance path during 2030-34 tempered the good news. As such, RNW and NWECA also supported inclusion of Condition 12 to understand whether the company's non-procurement of resources in the last implementation period weakened its ability to comply with CETA without having to resort to alternative compliance in the future.
- 20 RNW commented that the conditions proposed by Staff are reasonable and appropriate. Specifically, as to Condition 12, RNW commented that the condition will provide insight and clarity as to whether ultimate CETA compliance and costs are a result of external factors or Company planning.
- 21 WCA thanked Staff and interested parties for their work on this 2025 CEIP. WCA also commented that while it shares Staff's concerns about PacifiCorp's interim targets and lack of progress to date, WCA believes Staff's conditions set the Company on a path towards CETA compliance.
- 22 AWEC reiterated its concerns regarding Condition 16. Specifically noting that it is unclear as to what the 27 percent of benefits applies to and leaves that determination to its advisory groups. AWEC asks the Commission to ensure that Condition 16 is clarified or rejected as drafted.

23 In response, Staff and PacifiCorp notes that energy benefits are not defined in statute, and that Condition 16 is broad to allow for flexibility in programming in consultation with advisory groups. NWECA provided further comments that a similar process exists for PSE, and that the work has been beneficial to PSE, advisory group members, and customers.

24 Customers expressed their desire for the Commission to continue to hold PacifiCorp accountable to invest in non-emitting resources, noting a growing urgency regarding growing utility bills. Customers commented that the CEIP should reflect the real needs of the customers PacifiCorp serves and ensure that the transition is both clean and affordable, noting that many customers are struggling to pay bills. Finally, customers shared appreciation for the collaborative process and community engagement.

DISCUSSION

25 We approve PacifiCorp's 2025 CEIP subject to the conditions to which the interested parties agree, and subject to the amendments we make below to Condition 16.

26 RCW 19.405.060(1) requires electric utilities to develop and submit to the Commission CEIPs that meet specific criteria every four years. WAC 480-100-640 sets out the targets, data, and narrative information that must be included in those plans. As Staff observes in its memo, the proposed conditions are made in addition to these requirements, and PacifiCorp's Plan must comply with them all.

27 We are pleased that the collaborative and comprehensive discussions between the Company and interested parties resulted in proposed conditions that strengthen PacifiCorp's commitments to its customers and put the Company on a path towards CETA compliance. While we share Staff's concerns that the Company has made minimal progress to date, we are encouraged by the Company's 2025 CEIP and that this filing involved much more collaboration than we have previously seen in PacifiCorp's CEIP filings.

28 Regarding the conditions, we are convinced that Condition 12 is appropriate. On Condition 12, we agree with the comments of RNW that Condition 12 will provide additional insight into ultimate compliance with CETA. We further recognize that the data sought by Condition 12 will provide a narrative which will help the Commission better understand the changing landscape to renewables pricing and planning.

29 For Condition 16 we agree in part with AWEC that determinations as to how the 27 percent of benefits flow through to customers should not be left entirely to PacifiCorp and its advisory groups.

30 Accordingly, we adopt Staff's recommended Condition 16 subject to the following amendments to reflect the opportunity for further clarity on what is achievable in subsequent filings and to ensure that the Commission retains the ability to approve specific actions:

Condition 16: After accounting for DR- and EE-specific program requirements and constraints, PacifiCorp shall work with interested parties and advisory groups to ~~commit to~~ develop a recommendation to the Commission for 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, and for specification of the meaning and impact of the term energy benefits within PacifiCorp's 2025 CEIP. PacifiCorp must present this recommendation ~~identify~~ in its 2027 Biennial CEIP Update, and identify how the proposal will consider:

- a. What specific portion of budget for each DER program ~~has been~~ will be allocated to Named Community outreach, recruitment, and participation.
- b. Which specific actions ~~have been~~ would be added, or existing specific actions ~~have been~~ would be modified to achieve this goal.
- c. ~~The~~ How progress would be measured 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.

31 We find the amendments to Condition 16 strike a balance by establishing a process to further clarify the terms, intent, and implementation of this condition. The modifications address the need for Commission approval of plans and benefits, while ensuring that progress is being made to ensure that energy benefits flow through to Named Communities and Vulnerable Populations.

32 We recognize that this CEIP is the result of a collaborative process, and we commend the Company and interested parties for working to improve PacifiCorp's 2025 CEIP with additional conditions that will benefit all customers. We further commend the Company and interested parties for the work done prior to the filing of the 2025 CEIP, including providing feedback, and we thank all of those who attended and provided comments at our recessed open meeting. Having considered the record and comments presented, we approve PacifiCorp's 2025 CEIP subject to the conditions set out in Appendix A to this Order, incorporating the amendments set forth in paragraph 30.

FINDINGS AND CONCLUSIONS

- 33 (1) The Commission is an agency of the state of Washington vested by statute with the authority to regulate the rates, rules, regulations, practices, accounts, securities, transfers of property and affiliated interests of public service companies, including electric companies.
- 34 (2) PacifiCorp is an electric company and a public service company subject to Commission jurisdiction.
- 35 (3) PacifiCorp is subject to RCW 19.405.060, which requires investor-owned electric companies to file CEIPs with the Commission every four years beginning January 1, 2022.
- 36 (4) PacifiCorp filed its 2025 CEIP on October 1, 2025, in Docket UE-250617.
- 37 (5) This matter came before the Commission at its recessed open meeting on March 24, 2026.
- 38 (6) After reviewing PacifiCorp's CEIP filed on October 1, 2025, and giving due consideration to all relevant matters, the Commission finds that PacifiCorp's CEIP is consistent with the public interest and concludes that it should be approved subject to the conditions set out in Appendix A to this Order and the amendments to Condition 16, as follows:

Condition 16: After accounting for DR- and EE-specific program requirements and constraints, PacifiCorp shall work with interested parties and advisory groups to ~~commit to~~ develop a recommendation to the Commission for 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, and for specification of the meaning and impact of the term energy benefits within PacifiCorp's 2025 CEIP. PacifiCorp must present this recommendation identify in its 2027 Biennial CEIP Update, and identify how the proposal will consider:

- a. What specific portion of budget for each DER program ~~has been~~ will be allocated to Named Community outreach, recruitment, and participation.
- b. Which specific actions ~~have been~~ would be added, or existing specific actions ~~have been~~ would be modified to achieve this goal.
- c. ~~The~~ How progress would be measured 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.

ORDER

THE COMMISSION ORDERS:

- 39 (1) PacifiCorp d/b/a Pacific Power & Light Company's Clean Energy Implementation Plan meets the requirements of RCW 19.405.060 and WAC 480-100-640 and should be approved subject to the conditions set out in Appendix A to this Order and the amendments to Condition 16, as set forth below:

Condition 16: After accounting for DR- and EE-specific program requirements and constraints, PacifiCorp shall work with interested parties and advisory groups to ~~commit to~~ develop a recommendation to the Commission for 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, and for specification of the meaning and impact of the term energy benefits within PacifiCorp's 2025 CEIP. PacifiCorp must present this recommendation identify in its 2027 Biennial CEIP Update, and identify how the proposal will consider:

- a. What specific portion of budget for each DER program ~~has been~~ will be allocated to Named Community outreach, recruitment, and participation.
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- c. ~~The~~ How progress would be measured 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.


- 40 (2) The Commission retains jurisdiction over the subject matter and PacifiCorp d/b/a Pacific Power & Light Company to effectuate the provisions of this Order.

Dated at Lacey, Washington, and effective March 27, 2026.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION



BRIAN J. RYBARIK, Chair



ANN E. RENDAHL, Commissioner



MILTON H. DOUMIT, Commissioner

NOTICE TO PARTIES: This is a final order of the Commission. In addition to judicial review, administrative relief may be available through a petition for reconsideration, filed within 10 days of the service of this order pursuant to RCW 34.05.470 and WAC 480-07-850, or a petition for rehearing pursuant to RCW 80.04.200 or RCW 81.04.200 and WAC 480-07-870.

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 develop a recommendation to the Commission for 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, and for specification of the meaning and impact of the term energy benefits within PacifiCorp's 2025 CEIP. PacifiCorp must present this recommendation ~~identify~~ in its 2027 Biennial CEIP Update, and identify how the proposal will consider:

- a. What specific portion of budget for each DER program will be allocated to Named Community outreach, recruitment, and participation.
- b. Which specific actions would be added, or existing specific actions would be modified to achieve this goal.
- c. How progress would be measured 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?