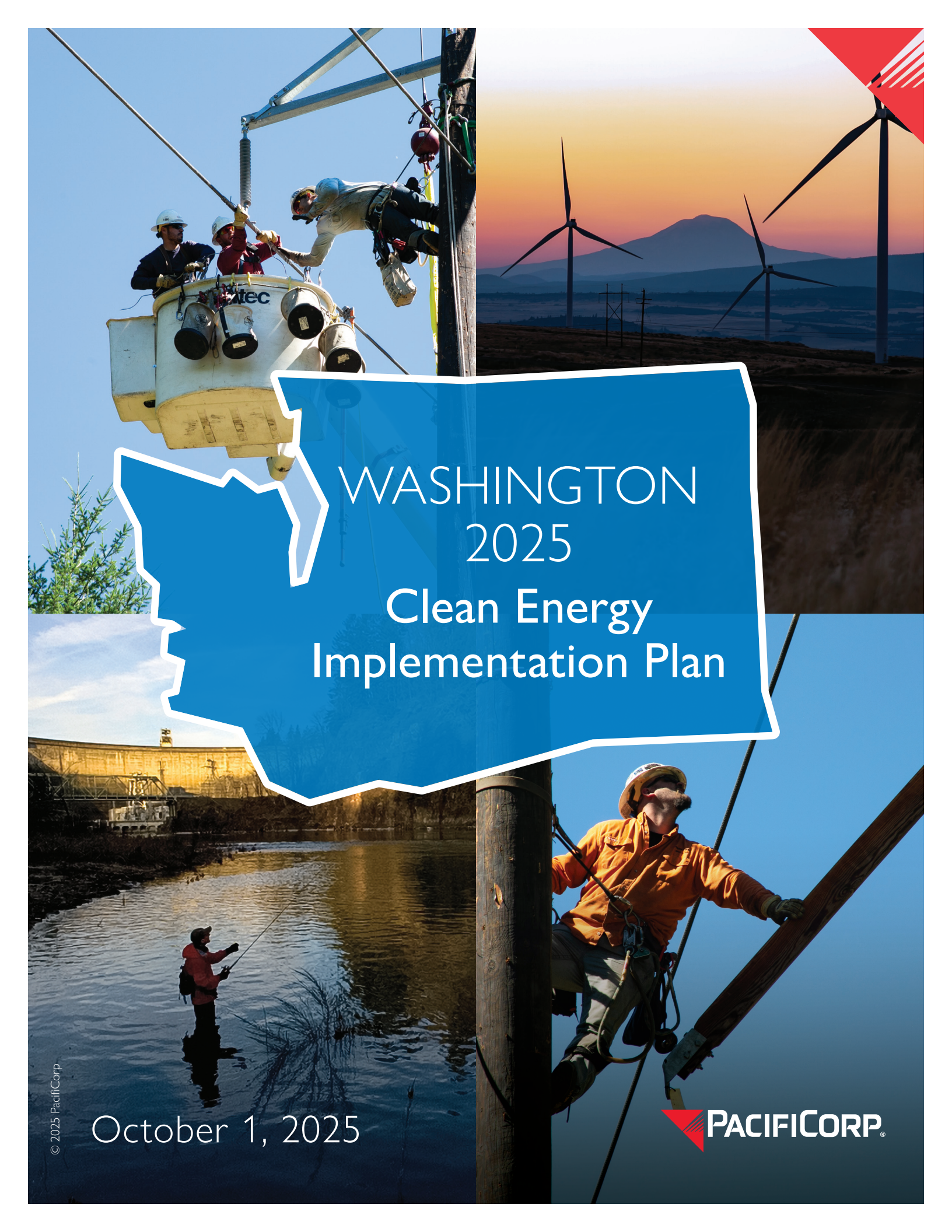




WASHINGTON 2025 Clean Energy Implementation Plan

October 1, 2025

 **PACIFICORP**

This 2025 Washington Clean Energy Implementation Plan is based upon the best available information at the time of preparation. The CEIP action plan will be implemented herein but is subject to change as new information becomes available or as circumstances change. Any updates to this CEIP will be submitted to the Washington Utilities and Transportation Commission for their information and approval.

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Acronyms

BCP	Biennial conservation plan
BESS	Battery Energy Storage Systems
CAIDI	Customer Average Interruption Duration Index
CBI	Customer benefit indicator
CBO	Community-based organization
CCA	Climate Commitment Act
CEAP	Clean energy action plan
CEIP	Clean energy implementation plan
CEMI	Customers Experiencing Multiple Interruptions
CETA	Clean Energy Transformation Act
CPA	Conservation potential assessment
CO ₂	Carbon dioxide
CO ₂ e	Carbon Dioxide Equivalent
COD	Commercial operation date
DLC	Direct load control
DR	Demand response
DSM	Demand-side management
DSP	Distribution System Planning
EAG	Equity Advisory Group
EDAM	Extended Day Ahead Market
EEP	Energy Equity Project
EIA	Energy Independence Act
EV	Electric vehicle
GW	Gigawatt
HVAC	Heating, ventilation, and air conditioning
HIC	Highly impacted community
IRP	Integrated Resource Plan
KLI	Known Low-Income
LEAD	Low-income energy affordability
LT	Long-term (PLEXOS Model)
LIAG	Low-Income Advisory Group
LIBA	Low-Income Bill Assistance (Program)
LIWx	Low-Income Weatherization
MW	Megawatt
NEI	Non-energy impact
NO _x	Nitrogen Oxides
OBBBA	One Big Beautiful Bill Act
PCORC	Power cost only rate case
PPP	Public Participation Plan
PV	[Solar] Photovoltaic

PVRR	Present value revenue requirement
REC	Renewable energy credit
RFP	Request for proposals
RTF	Regional Technical Forum
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SO ₂	Sulfur Dioxide
ST	Short-term (PLEXOS Model)
SCGHG	Social cost of greenhouse gases
TLR	Tribal Liaison Representative
VP	Vulnerable population
UIWC	Utah, Idaho, Wyoming, and California
WAC	Washington Administrative Code
WDOH	Washington Department of Health
WRAP	Western Resource Adequacy Program

PACIFICORP’S 2025 CLEAN ENERGY IMPLEMENTATION PLAN

Chapter I. Introduction

PacifiCorp, doing business as Pacific Power in Washington, presents its 2025 Clean Energy Implementation Plan (CEIP).

Background

Washington enacted the Clean Energy Transformation Act (CETA) in 2019. The legislation combines directives for utilities to pursue a clean energy future, with assurances that benefits from a transformation to clean power are equitably distributed among all Washingtonians, at reasonable costs. Under the law, Washington electric utilities must:

- Eliminate coal-fired resources from Washington’s allocation of energy by the end of 2025;
- Ensure all retail electricity sales in Washington are greenhouse gas (GHG) neutral by 2030; and
- Ensure all retail electricity sales in Washington are sourced from 100 percent renewable or non-emitting energy sources by 2045.

Investor-owned electric utilities must file the following long-term planning documents to describe how the utility will make progress toward these clean energy goals:

Integrated Resource Plan: The integrated resource plan (IRP) is a roadmap for continual progress in safely, reliably, and affordably serving over two million customers across six states. This roadmap continues to deliver on PacifiCorp’s commitments to the diverse communities in which it operates. The plan is developed through open, transparent and extensive public involvement from state utility commission staff, state agencies, customer and industry advocacy groups, project developers, and other interested parties.

The key elements of the IRP include: an assessment of resource need, focusing on the first 10 years of a 20-year planning period; the preferred portfolio of supply-side and demand-side resources to meet this need; transmission projects; and an action plan that identifies the steps that will be taken over the next two-to-four years to implement the plan.

Clean Energy Action Plan: The clean energy action plan (CEAP) is a ten-year planning document that is derived from and included as an appendix in the IRP. The CEAP provides a Washington-specific view of how PacifiCorp is planning for a clean and equitable energy future that complies with CETA.

Clean Energy Implementation Plan: This document, the CEIP, is a plan that lists the specific actions PacifiCorp will take over the next four years to move toward the 2030 and 2045 clean energy directives.

PacifiCorp is a multi-jurisdictional, vertically integrated utility that serves over two million customers in six western states: California, Idaho, Oregon, Utah, Washington, and Wyoming. In Washington,

PacifiCorp serves approximately 141,000 customers in Yakima, Walla Walla, Columbia, Benton, Cowlitz, and Garfield Counties. The company's generation and transmission system spans the west and connects customers to safe, reliable, and affordable electricity. PacifiCorp's integrated transmission system connects thermal, hydroelectric, wind, solar, and geothermal generating facilities with markets and loads. The diversity of this integrated system benefits all of PacifiCorp's customers in all six states. PacifiCorp owns approximately 11,700 megawatts (MW) of generating capacity, 1,389 MW in Washington, and about 18,203 miles of transmission lines, of which 671 miles are in Washington.

As the largest regulated utility owner of wind power in the West, PacifiCorp continues to expand its renewable energy capacity, while also building transmission lines, strengthening the grid and making smart investments for a clean, reliable and resilient energy system. PacifiCorp is proud to operate one of the lowest-cost systems in the country.

PacifiCorp filed its inaugural 2021 CEIP based on the 2021 IRP,¹ and later filed the Revised 2021 CEIP in 2023,² which was approved subject to a set of conditions, including direction for the company to file an update to its near-term interim targets in the biennial update if required.³ The company has worked diligently through the set of 50 conditions while implementing its planning and reporting over the last few years.

In 2023, PacifiCorp filed its 2023 Biennial CEIP Update, which included key updates to system procurement activities, renewable resource costs, multistate cost allocations, and other standard modeling updates, that lead to a near-term reduction in the company's forecasted interim targets for 2024-2025.⁴ The Commission subsequently rejected the 2023 Biennial CEIP Update, and recommended PacifiCorp consider implementing several of the conditions requested by parties in that proceeding.⁵ More information regarding how PacifiCorp has addressed these various conditions is included in Appendix B.

This CEIP details the specific actions PacifiCorp will take over the next four years (2026-2029) to move toward CETA's clean energy goals. There are potentially significant operational and financial impacts and risks associated with compliance over the next two decades to be considered, particularly as the company approaches the 2045 zero-emitting CETA target. The company will continue to evaluate the benefits and costs of specific compliance strategies in each planning cycle, assessing the timing and pace of new resource additions and progress toward 100 percent GHG neutrality and ultimately, a zero-carbon future. Given uncertainties in the planning environment, exacerbated by frequent changes in federal policies, flexibility and agility will be required to ensure that benefits from the transformation to clean power are equitably distributed among all Washingtonians at reasonable costs.

The subsections below provide an introduction to some of the key features of PacifiCorp's 2025 CEIP.

¹ PacifiCorp's 2021 Clean Energy Implementation Plan, Docket UE-210829 (Dec. 30, 2021).

² PacifiCorp's 2021 Revised CEIP, Docket UE-210829 (Mar. 13, 2023).

³ Docket UE-210829, Commission Order 06, Appendix A: Multiparty Settlement Agreement (Oct. 25, 2023).

⁴ PacifiCorp's 2023 Biennial CEIP Update, Docket UE-210829 (Nov. 1, 2023).

⁵ Docket UE-210829, Order 16 (May 19, 2025).

Key Features

PacifiCorp’s 2025 CEIP forecasts the need for 2,551 MW of new situs-allocated renewable, non-emitting and storage resources to meet Washington customers’ capacity, energy and GHG reduction goals over the 21-year planning horizon, in addition to cost-effective demand-side management (DSM) resources.

In the near term, by 2030 Washington customers will require 1,444 MW of new renewable resources, including 709 MW of wind and 735 MW of solar to generate CETA-compliant energy. Additionally, 462 MW of batteries are selected to meet resource adequacy needs and support the generation and value of intermittent CETA-compliant energy. Storage resources are an essential part of transitioning Washington to a reliable, cost effective, and zero-GHG portfolio.

Also essential for PacifiCorp to be able to provide reliable electric service is adequate transmission capacity to deliver this electricity to serve Washington customers. To this end, the 2025 CEIP includes approximately \$1.7 billion in new transmission investments to interconnect new resources, resulting in 3,617 MW of expanded interconnection capacity, with 1,187 MW of export and import capabilities among constrained areas on PacifiCorp’s system.

These results incorporate recent amendments to federal tax and trade policies, which have materially impacted renewable resource procurement and economics. Further, PacifiCorp compares the results from the 2025 CEIP under several sensitivities, including: under PacifiCorp’s proposed Washington 2026 Protocol for interjurisdictional cost allocations; under lower-than-expected renewable generation conditions, for example, in years of low hydroelectric generation output; and what PacifiCorp’s preferred portfolio, after incorporating the social cost of greenhouse gases (SCGHG), would look like without CETA.

These results are detailed in Chapter V – Key Features of the 2025 CEIP Preferred Portfolio and Chapter VI – Interim Targets , while a discussion on how the CEIP portfolio was developed, including necessary adjustments from the 2025 IRP, are included in Chapter IV – Portfolio Development.

Setting Targets

The CEIP is filed on a four-year cycle, with a possible update every two years in between, and sets interim targets for non-emitting and renewable energy to meet retail electric sales and sets specific targets for energy efficiency and demand response. PacifiCorp’s 2025 IRP,⁶ including the CEAP, serves as the starting point to determine the interim and specific targets included in this CEIP. The 2025 CEIP preferred portfolio presents a near and long-term portfolio of resources optimally selected to meet Washington customers’ energy, capacity and compliance needs.

PacifiCorp’s interim target is the percentage of retail energy sales that it forecasts being served with renewable and non-emitting generation in each year. The 2029 interim target for this CEIP is 71 percent, or an average of 47 percent over the four years, 2026-2029. By 2030, the 2025 CEIP preferred portfolio includes enough renewable and non-emitting generation to meet 100 percent of retail sales on an annual basis and reaching a projected 118 percent in 2045 to meet CETA’s long term objectives. For perspective, the percentage of PacifiCorp’s Washington retail sales served by renewable and non-

⁶ PacifiCorp’s 2025 Integrated Resource Plan, Docket UE-210821 (Mar. 31, 2025) (available online at: <https://www.utc.wa.gov/casedocket/2023/230812/docsets>).

emitting energy resources in 2020 amounted to 21.9 percent. This means that PacifiCorp forecast the ability to achieve CETA’s 2045 target approximately 15 years early, but only if long-term resources are procured earlier than is explicitly required. However, in its current solicitation for new resource bids, PacifiCorp is requesting bids for unbundled renewable energy credits (RECs) on a forward-basis that can be used for alternative compliance and may provide a cheaper alternative to compliance before 2045. PacifiCorp will explore all possibilities and balance cost impacts with early compliance.

Actual percentages are likely to vary from forecasts, as has been illustrated in PacifiCorp’s recent progress reports showing the actual generation of CETA-compliant energy falling short of forecasts given uncertainties and fluctuations in climate-driven renewable generation. However PacifiCorp continues to expand its non-emitting and renewable resources on its system, and these targets are expected to trend upward, achieving not only GHG neutrality by 2030 for Washington customers.

Next, energy efficiency target setting begins with energy efficiency potential based on cost-effective selections identified by the 2025 IRP. These targets, after further adjustments, help determine the two-year Energy Independence Act (EIA) target that is provided in the biennial conservation plan (BCP). The 2025 CEIP energy efficiency target is currently 145,371 MWh at generation (135,256 MWh at site) for the 2026-2029 period. These targets will be updated in 2027 through the 2028-2029 BCP process, and in the 2027 Biennial CEIP Update.

Finally, as with energy efficiency, target setting for demand response begins with the demand response selection in the 2025 IRP. From there, PacifiCorp makes adjustments based on factors that are not accounted for in the model, such as the speed at which a program can ramp up, and the operational need to have relatively consistent funding year over year, to sustain implementers and avoid losing market recognition. The 2025 CEIP demand response target is 22 MW by 2029.

These targets are addressed in more detail in Chapter VI– Interim Targets, and Chapter VII – Specific Targets.

Taking Action

PacifiCorp is taking action to meet CETA targets identified in Chapter IX – Specific Actions. Specific actions to achieve targets in the years 2026 through 2029 are grouped into four key areas:

1. Supply-Side Resources
2. Energy Efficiency
3. Demand Response
4. Community Outreach and Engagement

Regarding supply-side resources, to meet near-term capacity and energy needs identified in the 2025 CEIP preferred portfolio, PacifiCorp issued a Washington-specific request for proposals (RFP). PacifiCorp expects to procure resources from this RFP in the next 3-6 months. Depending on the results of this RFP, PacifiCorp may identify additional resource needs that may lead to another RFP or may pursue bilateral contract negotiations. PacifiCorp will also continue to pursue federal and state grant and loan opportunities to fund projects that enhance grid reliability, resilience, transmission infrastructure, and mitigate wildfire risks, creating system benefits for all customers. PacifiCorp will also continue to investigate reasonably priced short-term procurement strategies and evaluate how non-energy impacts might be generated from supply-side resource acquisition and improve future non-price scoring applications.

Additionally, the company is committed to maintaining or expanding existing energy efficiency programs, including low-income weatherization and home/business efficiency upgrades. Demand response programs, launched in Washington during the implementation of the inaugural 2021 CEIP, will continue to grow through 2029, helping to manage grid needs. The company will also continue its efforts to strengthen customer engagement across Washington, improving outreach and educational access, providing clear feedback opportunities, and partnering with community organizations to support proactive outreach and informed program development.

Assessing Costs

Based on the specific actions in the 2025 CEIP, PacifiCorp forecasts annual incremental CETA compliance costs of \$25.39 million, an average of \$6.35 million per year, for the next four-year compliance period ending in 2029. This \$6.35 million amount is below PacifiCorp's forecasted annual two percent CETA cost cap threshold of \$25.5 million, and \$101 million four-year threshold.

However, PacifiCorp highlights that this forecast is not a reasonable representation of actual CETA compliance costs that the company's customers may bear. For example, the 2025 CEIP preferred portfolio has a forecasted present value revenue requirement (PVRR) of \$1,189 million Washington-allocated over the 20-year planning horizon, 2026-2045. This is contrasted with the counterfactual portfolio that is optimized to meet Washington needs but without CETA's clean energy targets, which forecasts a PVRR of \$486 million over the same period. Taking the difference between the two, the costs to comply with CETA are currently forecasted at \$703 million on a present-value basis over the next two decades. In nominal figures, CETA compliance costs through 2045 are forecasted to amount to \$1.4 billion. This would more than quadruple current 2024 Washington retail revenues—an increase of 423 percent.

Actual compliance costs will depend on the pace and scale of resource procurement, but these are material compliance costs that will require prompt Commission monitoring and action to ensure appropriate cost containment.

Further, the incremental resources costs do not include the approximate \$1.7 billion in transmission investments that are necessary to serve Washington, resulting in 3,617 MW of expanded interconnection capacity, with 1,187 MW of export and import capabilities among constrained areas on PacifiCorp's system. For years 2025 through 2050, the CEIP assigns between 6.25 and 7.55 percent of these transmission resources to Washington customers. Yet these costs are not included in PacifiCorp's cost cap forecast. These incremental transmission resources, regardless if selected only to meet Washington needs, will only add to our Washington customer cost burdens. Further, given uncertainty in how transmission resources will be treated in future allocation methodologies, if these incremental transmission costs are situs-allocated to Washington customers, CETA compliance costs increase from the 423 percent forecasted increase, to nearly 500 percent by 2045.

Providing Benefits and Engaging the Public

Consistent with CETA directives, PacifiCorp has engaged in a structured and collaborative process with Commission staff (Staff), advisory groups, and other interested parties to identify the highest-priority benefits for customers, and to assess potential barriers to the equitable delivery of these benefits over the last four years.

As an outcome of this engagement, PacifiCorp established a set of customer benefit indicators (CBIs), each accompanied by weighting factors to facilitate the evaluation of the equitable distribution of benefits across the company's Washington service area. These CBIs serve as a measurable framework for assessing and monitoring the impacts of the company's proposed programs, actions, and investments. The CBIs are directly attributable to, and serve as guiding metrics for, the company's actions and tactics set forth in Chapter IX – Specific Actions.

PacifiCorp also directs particular attention to benefits intended for communities experiencing disproportionate environmental, economic, and health-related challenges. These communities, designated as highly impacted communities and vulnerable populations, are collectively referred to as named communities. Since filing its initial CEIP, PacifiCorp has refined its methodology for identifying named communities, incorporating updated demographic characteristics, as well as feedback from interested parties and advisory group members, to enhance precision and relevance. The company continues to leverage its CBI framework to evaluate its programmatic offerings, public participation and outreach initiatives, and investment strategies to ensure that benefits are directed toward named communities in a manner that mitigates historical inequities and advances the principles of an equitable clean energy transition. These CBIs are discussed further in Chapter VIII – Customer Benefit Indicators.

PacifiCorp also appreciates the participation in its advisory groups, technical workshops and public meetings, each of which serves to illuminate equity challenges and public interest and ground the company's CEIP to the concerns of Washington named communities. PacifiCorp recognizes that engagement is essential to the development of this CEIP. These issues are further developed in Chapter II– Energy Equity, and Chapter III – Public Participation.

Ongoing CETA Progress

PacifiCorp continues to add new renewable and non-emitting resources, maximize energy conservation and increase availability of demand response programs that will contribute to a reliable and clean energy future.

For example, since its inception in spring 2021, PacifiCorp's Equity Advisory Group (EAG) has helped center energy equity in utility planning by ensuring that communities most affected by energy-related disparities have a formal voice in the process. EAG members are community leaders with deep ties to underserved populations, and they offer essential insights grounded in lived experience throughout Washington. Through collaboration with the EAG, PacifiCorp has created a robust CBI framework that the company, with input from the EAG and interested parties, continues to develop and improve to better track and understand the impacts of utility actions on customers over time.

From 2021 through 2024, PacifiCorp's energy efficiency programs have provided over 168,000-MWh savings, measured at generation, helping to maximize energy conservation and aid in meeting CETA's 2030 clean energy standards by offsetting some of the need for additional renewable or non-emitting energy resources.

Additionally, PacifiCorp opened its first demand response program in Washington to customer enrollment in 2023, as part of its CEIP demand response action plan. By the end of 2024, PacifiCorp's demand response programs were providing 7.8 MW of capacity annually, with over 400 customers and over 700 end-use loads enrolled. By the end of 2025, PacifiCorp will have launched three new residential programs for a total of five programs in the portfolio, projected to provide just under 12 MW of capacity. The existing portfolio provides participation options for all customer classes, and delivers peak

management, contingency reserve and frequency response services to support a flexible and resilient energy grid.

Last, but certainly not least, since 2021 PacifiCorp has brought online or contracted over 3,300 MW of new renewable or storage resources that will support the company’s forward progress toward GHG neutrality and increased clean energy generation. Table 1 summarizes these recent and near-term clean resource additions. Washington customers receive a system share of energy, capacity, costs and benefits of each of these resources. Recent resource procurement has included several battery energy storage systems (BESS) that will shift energy from periods with excess renewable generation to more valuable periods, increasing reliability and helping to further reduce generation from emitting resources. PacifiCorp has also converted 713 MW of coal-fired units to run on natural gas (Jim Bridger units 1 and 2), continuing to provide dispatchable generation, but with fewer GHG emissions. Importantly, this work will help satisfy CETA’s first clean energy milestone (the elimination of coal from the allocation of electricity that serves our Washington retail customers by the end of 2025), and will contribute to meeting the second milestone (GHG neutral by 2030).

Table 1 - PacifiCorp’s New CETA-Supporting Resources (2021-2026)

Name	Type	Capacity	Commercial Operation Date (Actual or anticipated)
TB Flats I Wind	Wind	306	2/28/2021
Foote Creek I (repower)	Wind	43.2	3/24/2021
TB Flats II Wind	Wind	194	7/26/2021
Foote Creek III	Wind	24.75	11/21/2023
Foote Creek IV	Wind	16.8	11/21/2023
Cedar Creek Wind	Wind	151.8	3/21/2024
Rock River I (repower)	Wind	50	9/23/2024
Rock Creek I Wind	Wind	190	12/30/2024-9/12/2025
Anticline Wind	Wind	100.5	12/31/2024
Boswell Wind	Wind	320	12/31/2024
Cedar Springs Wind	Wind	350.4	1/31/2025
Hornshadow Solar ⁷	Solar	300	6/30/2025
Rock Creek II Wind	Wind	400	12/31/2025
Green River	Solar + BESS	400	5/31/2026
Dominguez Grid	BESS	200	6/1/2026
Escalante Storage	BESS	80	6/1/2026
Enterprise Storage	BESS	80	6/1/2026
Granite Mountain	BESS	80	6/1/2026
Iron Springs BESS	BESS	80	6/1/2026

Moving forward, as described in Chapter V, PacifiCorp identifies an additional near-term resource need of 1,444 MW of new renewable resources and 462 MW of batteries by 2030 to help meet Washington customers’ energy and capacity needs, while remaining on a trajectory to meet long-term clean energy

⁷ The Hornshadow Solar contract was executed in conjunction with a REC sale to a retail customer under PacifiCorp’s Oregon Schedule 272. Washington customers are currently receiving only energy from the contract, and not RECs. However beginning in 2030, Washington customers will be allocated their system resource share of both the energy and associated RECs for Hornshadow and positively contribute toward the 2030 CETA targets and beyond.

targets. In support of these goals, the company issued a request for proposals (RFP) to the market on September 2, 2025, for supply-side resources with an expected commercial online date (COD) before the end of 2029.

Additionally, PacifiCorp projects offsetting some renewable generation needs with 145,371 MWh of energy efficiency at generation (or 135,256 MWh at site, after accounting for line losses) over the next four years, and 22.0 MW of available demand response capacity by 2029.

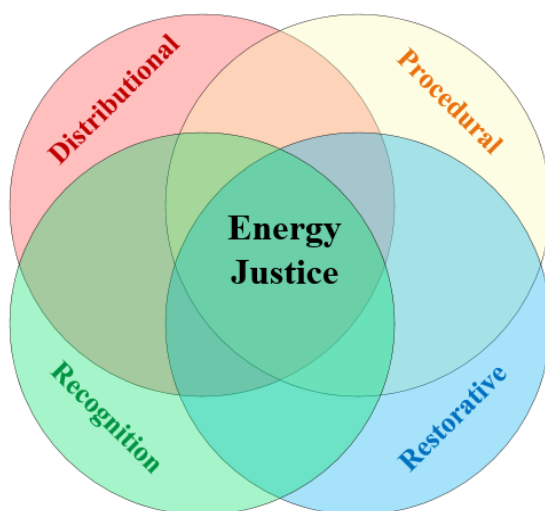
Chapter II. Energy Equity

CETA mandates the consideration of the equitable distribution of energy and non-energy benefits and burdens across populations.⁸ In 2023, the WUTC initiated Docket A-230217 (Equity Docket) to address the application of equity and justice in WUTC and regulated companies' processes and decisions.⁹ The Commission subsequently outlined the four tenets of energy justice: distributional, procedural, recognition and restorative,¹⁰ and the Commission acknowledges the commitment the utilities have shown to promote equity in their services and operations, and expects this commitment will continue.

PacifiCorp similarly acknowledges a continued commitment to reducing energy burden and advancing equity, through investments and essential services to the communities we serve in Washington. PacifiCorp is taking intentional steps to align with the four tenets of energy justice, and is working to call out and increasingly embed these principles into the company's work, especially in activities related to clean energy planning and implementation.

Figure 1, duplicated here from PacifiCorp's 2025 CEAP,¹¹ illustrates the interconnected relationship of the four tenets coming together to conceptually realize energy justice. PacifiCorp recognizes that fully integrating the principles and language of energy justice into its processes and investments is ongoing and will continue to evolve with regulatory processes that continue to mature. This transformation is not just about individual understanding, but about collective movement and growing together with the communities we serve.

Figure 1 - Tenets of Energy Justice



The CEAP provided a detailed discussion of the four tenets of energy justice and associated each of the tenets with relevant activities undertaken broadly within the 2025 IRP filing. The CEIP retains the

⁸ E.g., RCW 19.405.060(1)(c)(iii); WAC 480-100-610(4)(5).

⁹ Docket A-230217 Washington <https://www.utc.wa.gov/documents-and-proceedings/utc-equity-docket>

¹⁰ *Commission-led Policy Statement to Address the Application of Equity and Justice in Commission and Regulated Companies' Process and Decisions*, Docket No. A-230217, Notice of Continuance (Dec. 2, 2024) (pending equity policy statement docket); *Washington Utilities and Transportation Commission v. Cascade Natural Gas Corporation*, Docket No. UG-210755, Final Order 09 at 18.

¹¹ PacifiCorp's 2025 Integrated Resource Plan, Volume II, Appendix O – Clean Energy Action Plan.

definitions and discussion from the 2025 IRP in its pursuit of energy justice as applied to the achievement of CETA standards. Currently, PacifiCorp aligns its understanding of the four tenets of energy justice with what has been expressed in commission orders.¹²

- **Distributional Justice:** “which refers to the distribution of benefits and burdens across populations. This objective aims to ensure that marginalized and vulnerable populations do not receive an inordinate share of the burdens or are denied access to benefits.”
- **Procedural Justice:** “which focuses on inclusive decision-making processes and seeks to ensure that proceedings are fair, equitable, and inclusive for participants, recognizing that marginalized and vulnerable populations have been excluded from decision-making processes historically.”
- **Recognition Justice:** “which requires an understanding of historic and ongoing inequalities and prescribes efforts that seek to reconcile these inequalities.”
- **Restorative Justice:** “which is using regulatory government organizations or other interventions to disrupt and address distributional, recognition, or procedural injustices, and to correct them through laws, rules, policies, orders, and practices.”

Named Communities

The term “named communities” describes key groups or parts of the population that should be prioritized for the equitable distribution of energy and non-energy benefits as utilities work towards CETA’s clean energy goals. Named communities collectively refers to “highly impacted communities” and “vulnerable populations” which WAC 480-100-605 defines as:

- **Highly Impacted Communities (HICs):** a community designated by the department of health based on the cumulative impact analysis required by RCW **19.405.140** or a community located in census tracts that are fully or partially on “Indian country,” as defined in 18 U.S.C. Sec. 1151; and,
- **Vulnerable Populations (VPs):** communities that experience a disproportionate cumulative risk from environmental burdens due to: (a) adverse socioeconomic factors, including unemployment, high housing and transportation costs relative to income, access to food and health care, and linguistic isolation; and (b) sensitivity factors, such as low birth weight and higher rates of hospitalization.

PacifiCorp considers impacts to named communities across its implementation of CEIP-specific actions and in regard to the tracking of its CBIs. This effort is to ensure that benefits and reductions of burdens are being equitably dispersed across customers and communities that may have been historically underrepresented or that face higher proportionate vulnerabilities, particularly in relation to energy usage and needs. PacifiCorp continues to advance program-specific outreach and incentives for named communities, for example through:

- Providing higher incentives to customers in named communities that participate in its Wattsmart Business and Wattsmart Homes programs, reducing barriers to participation and energy burdens for these customers.

¹²E.g., Docket UG-210755, Washington Utilities and Transportation Commission v. Cascade Natural Gas Corporation, Final Order 09, at 18.

- Dedicating fifty percent of spending on its transportation electrification program to underserved communities.
- Continually working with advisory group members to increase participation and improve access to its other customer support and demand response programs.

Next Steps

Looking ahead, PacifiCorp recognizes that fully integrating the principles and language of energy justice into its processes and investments is ongoing and will continue to evolve with regulatory processes. This transformation is not just about individual understanding, but about collective movement and growing together with the communities we serve.

PacifiCorp continues to advance energy equity through:

- **Outreach and engagement** - Continuing to build and improve on a diverse set of engagement strategies, including but not limited to the company’s EAG low-income advisory group (LIAG), DSM advisory group, CEIP engagement sessions, and public workshops on key energy topics. This critical work helps build partnerships with customers, community members, community-based organizations (CBOs) and Tribal nations that are well-positioned to advance equitable outcomes and foster the community trust necessary for meaningful engagement. See the section, “Communications, Outreach and Engagement” in Chapter III.
- **Accessibility and communications** - Providing information in accessible formats and language to reach a broader audience. See the section, “Addressing Barriers to Participation” in Chapter III.
- **Planning and modeling** - Revising elements of the modeling process that is fundamental to the supply-side planning processes. Refer to both the 2025 CEAP, contained in the 2025 IRP, Volume II and the section, Chapter IV.
- **Procurement** - Expanding equity-related insight into the procurement of resources. See the section “Supply-side Resource Actions” in Chapter IX.
- **Programs** – Continue evolving equity considerations in programs and engagement with advisory groups to build on lessons learned and align with specific customer and community needs., specifically as it relates to:
 - Rates and income qualified program tariffs. See section, “Demand Response Actions”.
 - DSM programs (i.e., energy efficiency and demand response). See section “Energy Efficiency Actions”.
 - Electric vehicle (EV) and other programs. See section, “Establish an Electric Vehicle (EV) Grant Program” all contained in Chapter IX.
- **Tracking and metrics** – CBIs provide a practical and quantifiable set of metrics that translate the broad concepts of energy equity and justice into measurable outcomes. CBIs and their companion metrics enable the company to systematically evaluate how its programs, resource procurements, and other activities deliver tangible benefits, such as job creation, emissions reductions, increased access to clean energy, and reduction of energy burden in named communities. By linking the principles of energy justice and equity with actionable data, the

company's CBI framework supports fair and equitable distribution of benefits across all communities by facilitating transparent tracking, accountability, and continuous progress toward energy equity-focused outcomes. See Chapter VIII

Chapter III. Public Participation

Washington utilities must ensure that all customers benefit equitably from the transition to renewable energy. In compliance with WAC 480-100-655(2), PacifiCorp established a plan to encourage public participation throughout the development of the 2025 CEIP, the 2025 Public Participation Plan (PPP).¹³ The 2025 PPP addresses how the company plans to seek and incorporate public feedback to inform the preparation and filing of its 2025 CEIP. As outlined in the plan, PacifiCorp remains dedicated to advancing equity and engagement within its clean energy implementation planning process and is prepared for the long-term work of breaking down traditional barriers to public participation. The company will continue to leverage previous learnings, build upon its existing relational partnerships, and continue to deepen its community lens using available data to understand unique community characteristics that impact planning and the implementation of clean energy efforts and initiatives. PacifiCorp incorporated learnings from its advisory groups and existing public engagement channels to ensure that the communities the company serves in Washington were considered in the 2025 CEIP development process.

The sections below discuss PacifiCorp’s outreach methods, timing and language considerations; addressing barriers to participation; incorporating learnings; and tribal engagement.

Outreach Methods, Timing, and Key Takeaways

Over the years, PacifiCorp has worked to establish a CEIP public participation process that is open, transparent and accessible. To meet these goals, the company developed a process of seeking public participation and input that embraces inclusive design and ensures that communication with interested persons is proactive and easy to understand.

Outreach Methods

An overview of PacifiCorp’s existing public participation outreach methods is provided in Table 2. Additional details are described in the “Communications, Outreach, and Engagement” section in Chapter IX – Specific Actions.

¹³ PacifiCorp’s 2025 Public Participation Plan, Docket UE-240285 (Apr. 25, 2025) (available online at: <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=4&year=2025&docketNumber=250285>).

Table 2 - Outreach Methods and Opportunities for Feedback

Getting the Word Out		
Tool	Description (2025 plan)	Proposed 2026-2029 plan
Project website¹⁴	The project website provides information about CETA and the company's CEIP in English and Spanish, shares public participation opportunities, hosts CBI data (report card), includes the company's Washington feedback tracker, includes historical survey data, and memorializes EAG and other advisory group meeting materials for public use and reference. The CEIP webpage has received 3,122 page views from mid-2024 through mid-2025.	PacifiCorp will continue to use and update this page as a living resource for sharing information and materials related to CETA.
Email updates	Announcements and CEIP website updates were communicated to Washington interested parties/persons via e-mail. Public meeting information was communicated to customers via e-mail.	Email was noted as a top method of outreach for public meetings through attendee poll results. E-mail has also been instrumental in receiving comments from both advisory group members and Washington interested parties/persons throughout the last year in preparation for the company's next CEIP. PacifiCorp will continue to send email updates to Washington interested parties/person and customers.
Project fact sheet and flyers	PacifiCorp provides digital and printed public participation information to customers in English and Spanish. A comprehensive infographic was developed in English and Spanish that can be shared as an online resource or printed as collateral and was used during in-person meetings and shared with EAG members in 2025, as well as distributed through a Hispanic Heritage Month event with the Central Washington Hispanic Chamber of Commerce.	EAG members identified a need for additional educational collateral to distribute with community partners and those they serve. PacifiCorp will continue to provide printed and digital fact sheets and flyers in English and Spanish.
Advisory group pre-meeting materials	Meeting materials are shared with advisory group members prior to each meeting. While meeting materials may vary within each of PacifiCorp's Washington advisory group spaces EAG pre-meeting materials include the presentation slide deck and an expanded agenda that describes the meeting objectives and discussion questions to support member preparation and engagement.	As advisory group meetings continue in 2026-2029, PacifiCorp plans to share available pre-meeting materials with advisory group members.

¹⁴ Available here: <https://www.pacificpower.net/community/washington-clean-energy-transformation-act-equity.html>.

Getting the Word Out		
Tool	Description (2025 plan)	Proposed 2026-2029 plan
Meeting summaries	Following each EAG meeting, meeting summaries are prepared and posted on PacifiCorp's CETA / CEIP website and distributed to EAG members. Meeting notes are also prepared for public meetings. Meeting presentations and notes are subsequently translated into Spanish and posted online.	Meeting summaries (including those translated in another language) will continue to be posted on the company's CETA / CEIP webpage and distributed to EAG members.
Utility bill inserts	Informational bill inserts are provided to customers who receive their bill in the mail in printed format and provided digitally to customers who are on paperless billing. Bill inserts included information in English and Spanish. Call-in information is included to notify customers of public participation meetings to reach those who may not have access to the Internet.	Bill inserts will continue to be provided to customers as a valuable way of directly sharing information.
Utility bill messages	Informational bill messages are printed or provided digitally with customer bills in both English and Spanish.	Bill messages will continue to be provided to customers providing a valuable way of directly sharing information.
Interactive Voice Response (IVR)	PacifiCorp customers in Washington who call the customer service hotline receive a pre-recorded Interactive Voice Response (IVR) message in English or Spanish that directs customers to the CEIP webpage.	Interactive Voice Response (IVR) messages will be provided to customers as needed.
Social media	Informational content is posted on the company's social media accounts directing customers to the CEIP website.	PacifiCorp will continue to use existing social media channels to share CETA-related information.
Paid media	To reach customers in Washington, PacifiCorp uses paid advertising across various media channels, including newspaper, radio and social media ads.	According to public meeting feedback, paid media was an effective way to reach customers about CETA information. PacifiCorp will continue to reach customers in Washington through paid media channels as needed.
Press release	Press releases are issued to local publications in PacifiCorp's Washington service area to notify customers about public participation meetings.	PacifiCorp will continue to issue press releases to publications in Washington and will consider new Spanish outlets to include as deemed necessary.
Partner channels	PacifiCorp partners with its EAG and local community groups and organizations to share CEIP information.	PacifiCorp received feedback from the public and EAG members that one of the most impactful forms of outreach is to work directly with local community organizations and EAG members. PacifiCorp plans to increase outreach through partner channels in 2026-2029.

Getting the Word Out		
Tool	Description (2025 plan)	Proposed 2026-2029 plan
PacifiCorp website	PacifiCorp has referenced the CEIP project on its primary website and provided a link to https://www.pacificorp.com/energy/washington-clean-energy-transformation-act-equity.html	PacifiCorp will keep references to the CEIP webpage on its primary website.
Sharing Information and Seeking Input		
Tool	Description (2025 plan)	Proposed 2026-2029 plan
Project email¹⁵	One way input has been collected from interested parties/persons has been via PacifiCorp's project e-mail. Feedback and responses are included in Appendix A.	PacifiCorp will continue to review and consider public comments received through its project email. PacifiCorp also encourages members of the public who wanted to participate in the development of the CEIP to join the company's email list, which is used to communicate upcoming meetings, meeting materials, and other opportunities for education and feedback.
CEIP Public Meetings	PacifiCorp hosts a series of quarterly public meetings to solicit additional feedback from its customer base in Washington. Meeting materials are prepared and shared on the CEIP website. Public meeting notes are shared on the CEIP website and made available in both English and Spanish.	PacifiCorp is prepared to host additional public meetings and technical conferences in 2026-2029 based on interest level and need.
Feedback Tracker	During the company's first CEIP process, a feedback tracker was developed to capture input received within the company's core engagement spaces. The feedback tracker notes the month, year, engagement space where input is provided, the feedback provided to PacifiCorp, responses provided, and, in some instances, impacts as they are known and/or incorporated. PacifiCorp's feedback tracker helps the company improve its clean energy implementation plan engagement process by identifying areas for improvement, enhanced engagement and program development opportunities, provides insight into the participant experience, and supports continued participation by demonstrating the company's commitment to needs by way of feedback collection and response.	The feedback tracker will continue to be updated as additional engagement sessions and collaboration take place. This will allow information to flow in both directions, where feedback provided by advisory group members, general members of the public and interested parties can inform PacifiCorp's strategic priorities, and provide opportunities to better inform customers, interested persons and the company. PacifiCorp is committed to publishing an updated copy of the feedback tracker on its CETA webpage on a quarterly basis. PacifiCorp's responses to comments are

¹⁵ ceip@pacificorp.com

Getting the Word Out		
Tool	Description (2025 plan)	Proposed 2026-2029 plan
		summarized in Appendix A.
EAG and Existing Advisory Group Meetings	PacifiCorp’s CEIP project team and subject matter experts (SMEs) present information on CEIP topics for the EAG and existing advisory group members to discuss, react to, and comment on. Participants provide input and/or engage in shared and honest dialogue with the CEIP project team, SMEs, and each other on the designated topics.	PacifiCorp plans to continue meeting with the EAG to discuss the implementation of the company’s 2025 CEIP. Details of PacifiCorp’s 2025 EAG meeting schedule can be found in Table 3. Table 3.
Residential Customer Surveys	PacifiCorp conducts a biennially scheduled residential customer survey across its entire service area, including in the state of Washington. The original purpose of this survey was to understand how customers use energy in their homes. Over time, PacifiCorp has made slight modifications to the survey, adding key demographic and household-level questions to assess and cross-verify customers’ status within vulnerable populations, and cross-tabulate with certain key CBI metrics. This has been done to support the company’s CEIP Annual Progress Report when possible.	In the future, PacifiCorp plans to continue leveraging residential customer survey data to support certain key CBI metrics and associated reporting. The company plans to conduct its next Washington residential customer survey in the fall of 2025, and another in 2027.

Timing

PacifiCorp’s existing Washington advisory groups met regularly in 2025 and will continue to hold meetings to, in part, support CEIP development and implementation. A timeline of advisory group meetings and public meetings throughout 2025 is shown Table 3.

Table 3 - 2025 Advisory Group and Public Participation Meeting Schedule

Meeting Type	Date
EAG Meeting (#1)	January 09, 2025
IRP Public Input Meeting	January 22-23, 2025
Low-Income Advisory Group Meeting (#1)	January 27, 2025
CEIP Engagement Series Meeting (#1)	January 29, 2025
Low-Income Advisory Group Meeting (#2)	February 12, 2025
EAG Meeting (#2)	February 13, 2025
Low-Income Advisory Group Meeting (#3)	February 18, 2025
Low-Income Advisory Group Meeting (#4)	February 25, 2025
IRP Public Input Meeting	February 27, 2025
Low-Income Advisory Group Meeting (#5)	March 03, 2025
Low-Income Advisory Group Meeting (#6)	March 11, 2025
DSM (#1) / EAG (#3) Advisory Group Joint Meeting	March 21, 2025
CEIP Engagement Series Meeting (#2)	March 25, 2025
Low-Income Advisory Group Meeting (#7)	March 25, 2025
EAG Meeting (#3)	April 10, 2025
Low-Income Advisory Group Meeting (#8)	April 22, 2025
CEIP Special Session for Washington's RFP Non-	May 15, 2025
EAG May One-on-One Community Visits	May 20-22, 2025
EAG Meeting (#4)	June 12, 2025
DSM Advisory Group Meeting (#2)	June 18, 2025
CEIP Engagement Series Meeting (#3)	June 24, 2025
Low-Income Advisory Group Meeting (#9)	July 07, 2025
EAG Meeting (#5)	July 10, 2025
DSM Advisory Group Meeting (#3)	July 16, 2025
Low-Income Advisory Group Meeting (#10)	August 11, 2025
CEIP Engagement Series Meeting	August 26, 2025 (morning)
DSM Advisory Group Meeting (#4)	August 26, 2025 (afternoon)
EAG Meeting (#6)	September 11, 2025
IRP Public Input Meeting	October 1, 2025
EAG Meeting (#7)	October 09, 2025
Low-Income Advisory Group Meeting (#11)	To be determined for November
CEIP Engagement Series Meeting (#4)	November 04, 2025
IRP Public Input Meeting	November 12, 2025
DSM (#5) / EAG (#8) Advisory Group Joint Meeting	December 11, 2025
IRP Public Input Meeting	December 17, 2025

*Upcoming scheduled meetings subject to change

Addressing Barriers to Participation

PacifiCorp understands that accessibility is key to ensuring an inclusive public participation process. Through discussions with utility peers, state agency partners, CBOs, the EAG, and other interested parties/persons, the company has identified potential barriers to public participation more broadly and is working to apply learnings to encourage additional participation from members of the public.

In the discussion that follows, PacifiCorp has identified several potential barriers to public participation and describes how the company continues to address them.

A Perception That Feedback is Not Considered

For customers who do not regularly participate in utility planning processes, there may be a perception that input will not be considered by the utility. PacifiCorp is working to clearly outline how feedback is being considered and accounted for as part of its 2025 CEIP process. The company is conducting proactive outreach to community partners and advisory group members, by providing meeting notes and materials that include feedback received during key meetings, and through the communication of the company's existing feedback tracker that captures feedback and utility responses and impact points where applicable. This supports a more transparent view of how feedback is being incorporated within the company's developing 2025 CEIP. In some instances, feedback is also recorded via engagement recordings that are then posted online for later reference and use.¹⁶

Language Considerations

PacifiCorp addresses language considerations by working with a translation service group to provide Spanish translation/transcreation of meeting materials, plan information, and other documents, all available on the company's CEIP website.¹⁷ Providing Spanish translations of materials is consistent with the company's current outreach process in Washington. The company's website includes Spanish-translated versions of meeting materials, instructions regarding how to participate in future meetings, a tentative schedule of topics to be addressed during future meetings, and an invitation to contact PacifiCorp at CEIP@PacifiCorp.com to join a CEIP-related mailing list to receive more information about the CEIP, and ask questions related to information on the website. PacifiCorp also provides live Spanish and American Sign Language interpretation services for public participation meetings.

Cultural Considerations

PacifiCorp works to address cultural barriers and embrace cultural differences by obtaining a deeper understanding of the communities within its service area. PacifiCorp's EAG advised PacifiCorp that the company needs to learn more about its different communities so that it can specifically refine and enhance its mechanisms for outreach and communication. Through contacts with CBOs, the company is continually learning and working toward accommodating cultural differences. PacifiCorp will continue

¹⁶ Available here: <https://www.pacificpower.net/community/washington-clean-energy-transformation-act-equity.html> (under the "Washington Feedback Tracker" section).

¹⁷ Available here: <https://www.pacificpower.net/community/washington-clean-energy-transformation-act-equity.html> (beginning with the section entitled "Nuestra ruta hacia el 100% de energía renovable y distribución equitativa de beneficios en Washington").

to have conversations with the EAG and public to learn more about the ways in which the company can better communicate to meet the cultural needs of its communities. In 2023, PacifiCorp hired a Tribal Liaison Representative to support relationship-building and cultural understanding of Tribal partners and customers.

Economic Barriers to Participation

Members of the public may face economic barriers to participation as most utility engagements have historically been held during weekdays and traditional working hours. PacifiCorp has engaged its advisory group members to provide feedback on preferred meeting times, with options for meetings outside of typical working hours if necessary or expressed interest is communicated. While meetings during weekdays are still the preferred option for advisory groups such as the EAG, PacifiCorp has taken alternative proactive steps to address economic barriers by offering a stipend to EAG members who indicate that a stipend would be helpful to support their continued and active engagement in the company's CEIP public participation process. Since the stipend has been offered, EAG members have the option to receive \$400 per PacifiCorp convened EAG meeting. Additionally, in 2025, members have also been offered the option to receive compensation for attending broader CEIP Engagement Series meetings as the company sees and values their input and engagement to inform a better CEIP.

Data Education

Utility planning processes are often data heavy, and improvements are planned to make data available in broadly understood terms. PacifiCorp is working to ensure that data is available in broadly understood terms to ensure fair and equitable access to resource materials and information. PacifiCorp has implemented alternative approaches to promote public participation that include:

- Bill inserts and bill messages provided electronically for customers who receive their bills electronically or printed for customers who receive their bills by mail
- Social media posts targeting PacifiCorp's service area in Washington
- Notices published in newspapers of general circulation in PacifiCorp's service area in Washington
- Radio ads running on stations in PacifiCorp's service area in Washington
- Direct emails to customers who have provided email addresses

Incorporating Learnings from Engagement Spaces

PacifiCorp has historically considered input throughout the planning process from the company's existing Washington advisory groups which include the DSM Advisory Group, LIAG, and EAG. Additional public input is also captured through engagements such as the IRP Public Input Meeting Series and the CEIP Engagement Series.

These meeting spaces support an engagement ecosystem that offers various options for different types of participants, so they may engage with the company when and where it makes sense for them to do so, regarding topics that matter to them. Generally, input from the advisory groups and Washington interested parties/persons discussed in this chapter have been used in the following ways to inform PacifiCorp's 2025 CEIP:

- Iterative development of the CEAP;

- Identification of vulnerable populations within the CEIP;
- Ongoing development of CBIs flowing to named communities and all customers;
- Development of the CEIP utility actions.

Specific incorporation of feedback from these engagement spaces are discussed below.

Clean Energy Implementation Plan Engagement Series

During PacifiCorp’s first Washington CEIP development process, the company identified the need to initiate a complementary and educational CEIP meeting series to support existing engagements, and to more intentionally provide the time and space to dive into key CEIP topics. Although PacifiCorp has various dedicated engagement spaces that support clean energy implementation planning engagement, the CEIP Engagement Series was developed to focus specifically on the company’s Washington CEIP filing and regulatory requirements.

PacifiCorp’s CEIP Engagement Series meetings provide wider access to the company’s clean energy implementation planning process. Within this engagement series, feedback is solicited on elements of the company’s developing CEIP from WUTC staff; environmental and justice advocates; members of the company’s EAG, LIAG and DSM Advisory Group; community representatives; and general members of the public. The CEIP Engagement Series will continue to be offered throughout development of the company’s CEIP, to socialize the CEIP, to socialize implementation activities and to provide additional opportunities for community and interested party input. Unless communicated otherwise, CEIP Engagement Series meetings will continue to be recorded for expanded accessibility and notes from each meeting will continue to be shared on the company’s Washington CETA webpage in both English and Spanish following each individual session.

PacifiCorp has held four CEIP Engagement Series public meetings so far in 2025 and has one more scheduled to occur this year on November 4, 2025. CEIP Engagement Series meetings have been strategically scheduled to occur on a quarterly basis to complement not disrupt other ongoing engagement efforts and to allow time and space for both internal PacifiCorp staff and external Washington interested parties/persons to engage in other items as their interests and work requires them to do. Details surrounding past and future meetings can be found on the company’s Washington Clean Energy Transformation Act webpage. The company ensures key information is easily visible at the top of the webpage in the form of a banner to ensure webpage visitors are connected to key communications as they become available. This includes any meeting registration or accessibility information.

IRP Public Input Series

A critical element of PacifiCorp’s IRP is the public input process. PacifiCorp has pursued an open and collaborative approach involving its commissions, customers, and other interested parties in PacifiCorp’s IRP before making resource planning decisions. Since these decisions can have significant economic and environmental consequences, conducting the IRP with transparency and full participation from interested and affected parties is essential to achieve long-term planning objectives.

Interested parties have been involved in the development of the 2025 IRP from the beginning. The public-input meetings held beginning in January 2024, were the cornerstone of the direct public-input process, and 10 public-input meetings were included as part of the 2025 IRP development cycle. In

addition to the 2025 IRP public-input meeting series, the IRP continues to be represented as appropriate in advisory group meetings and in communications with regulators in all jurisdictions.

PacifiCorp’s website houses feedback forms included in the IRP filing.¹⁸ This standardized form allows parties to provide comments, questions, and suggestions. PacifiCorp posts its responses to the feedback forms at the same location. Additional discussion regarding the Public-Input Series can be found in Volume II of the 2025 IRP, Appendix C – Public Participation, and Appendix M – Stakeholder Feedback Forms.

The company’s IRP public-input process generates input that directly informs the development of the company’s IRP. New to the 2025 IRP, stakeholder feedback forms are referenced throughout the document in footnotes, providing a connection between feedback forms and relevant sections of the IRP. Most notably, this can be seen through the company’s scenarios and sensitivities run as part of the portfolio modeling process, inputs to modeling assumptions such as the supply-side resource table and price-policy scenarios, and its portfolio modeling methodology and approach. Appendix M addresses the handling of more than 50 requests for data and modeling changes or considerations in the 2025 IRP development cycle. These requests fell into three broad categories:

1. Requests for data inputs or modeling work that was already planned or required.
2. Requests to add detailed legislation, technologies or special interests to base inputs and assumptions for all studies.
3. Requests for additional cases studies—either variants or sensitivities.

The robust, transparent, and inclusive IRP public-input process included participation from members of 69 organizations, not counting unaffiliated individuals and members of the public. This level of participation and feedback ensures that PacifiCorp’s IRP produces a 20-year resource portfolio that is reliable and at the lowest reasonable cost, considering risk.

Low-Income Advisory Group

PacifiCorp’s LIAG meets regularly to discuss issues related to energy burden, as well as to advise the company on programs designed to increase limited-income customers’ ability to pay their monthly bills through energy assistance, efficiency measures, and bill discounts. The group currently has two existing programs in its purview:

- **Bill Discount Program:** Included an average of 8,033 participating households in 2024 with a total assistance amount of \$4.9 million.
- **Low-Income Weatherization:** Has provided weatherization funding to over 8,200 homes since the program began. Program eligibility based on 200 percent of federal poverty guideline or 80 percent of state median income, whichever is greater.

Members of the LIAG include: Commission Staff, The Energy Project, Public Counsel, Northwest Energy Coalition, PacifiCorp and the three local Community Action Agencies that administer Low Income Bill Assistance Program (LIBA or Schedule 17) (Blue Mountain Action Council in Walla Walla, Northwest Community Action Center in Toppenish, and Opportunities Industrialization Center in Yakima). A few of the LIAG members are also members of PacifiCorp’s EAG.

¹⁸ Feedback forms including PacifiCorp’s responses can be found here:
<https://www.pacificorp.com/energy/integrated-resource-plan/comments.html>.

In the multi-party settlement in Docket UE-230172, PacifiCorp agreed to work closely with its LIAG and EAG to discuss and seek consensus on enhancements to the company's LIBA program. PacifiCorp agreed to file proposed changes to the LIBA program no later than April 30, 2025, with an effective date of October 1, 2025. The stipulation required parties to discuss the following elements in an effort to reach consensus:

- A. Number of discount tiers
- B. Use of self-declaration of income with eligibility verification for a randomly selected group
- C. Low-Income arrearage management plan
- D. CBO outreach program
- E. Changing the billing logic so that federal assistance is applied before bill discounts.

PacifiCorp engaged with LIAG and EAG, holding discussion sessions throughout 2024 through April 2025, providing background on the existing LIBA program, contracted for an updated Energy Burden Assessment (EBA), and discussed all of the stipulation items listed in an effort to reach consensus. PacifiCorp filed Advice 25-04—Schedule 17—Low Income Bill Assistance Program-Residential Service Optional for Qualifying Customers with the WUTC on April 30, 2025, and awaiting decision on the proposed filing.

In light of PacifiCorp's recent rate increases, the company recognized that low-income customers may need more immediate assistance before the October 1, 2025, effective date. To provide relief, PacifiCorp filed proposed changes to Schedule 17 in Docket UE-250253 to give its LIBA customers a one-time arrearage forgiveness credit up to \$400. PacifiCorp determined that a credit of \$400 would help to alleviate potential increases in bills and would address existing arrearages LIBA participants are experiencing. PacifiCorp received approval from WUTC and began applying credit on eligible customer accounts beginning May 2025. The temporary one-time arrearage forgiveness will sunset September 30, 2025.

PacifiCorp plans to continue to hold meetings at least once a quarter with the LIAG to discuss and provide updates on low-income programs.

Demand-Side Management Advisory Group

PacifiCorp uses its DSM Advisory Group to meet the requirements of WAC 480-109-110. The DSM Advisory Group was initially created in 2000,¹⁹ and current topics are focused on energy efficiency (also known as conservation) and include, but are not limited to: the EIA biennial target setting process, including program design and plans; program forecasts and adaptive management of programs, budgets, and communication strategies to achieve the Commission-approved biennial target; cost recovery through the system benefit charge; cost effectiveness; CBI metrics; and non-energy impacts research. Regulatory filings related to conservation must be provided to the DSM Advisory Group at least 30 days ahead of filing. Members are asked to provide written comments on conservation filings within two weeks so their feedback can be incorporated into the final filed documents and responses are typically provided to member comments within one week of receipt.

The DSM Advisory Group meets at least four times per year. Presentation materials are provided two to three days before the meeting. Supplemental files may also be provided. The meeting is typically

¹⁹ E.g., Docket UE-991832.

conducted by one or more members of PacifiCorp’s conservation delivery team. Company speakers rotate depending on subject matter. Subject matter experts outside the company may be asked to speak, for example, on non-energy impacts research or cost-effectiveness studies. Presentations are informal with questions encouraged and discussed during the presentation. Meeting notes are kept by the company but not typically circulated back to the group. Specific action items and follow-ups are captured and either responded to via email to the DSM Advisory Group, or included in the next meeting agenda, as appropriate.

Advisory Group members include Commission Staff, The Energy Project, Public Counsel, Northwest Energy Coalition, and PacifiCorp. Representatives from Northwest Power and Conservation Council, Northwest Energy Efficiency Council, PacifiCorp customers, Puget Sound Energy, Avista and the Northwest Energy Efficiency Alliance (NEEA) have attended selected meetings in the past. PacifiCorp members have attended Puget Sound Energy and Avista advisory group meetings in the past.

On June 18, 2025, PacifiCorp provided an overview of trends from tracking energy efficiency program CBI metrics. On August 26, 2025, PacifiCorp provided draft program details and budgets which included utility actions for energy efficiency that would be included in the draft CEIP. The draft DSM Business Plan provided to the Advisory Group on October 1, 2025, requested comments and also included the utility action information. The DSM Advisory Group provided direct input on PacifiCorp’s specific actions developed as part of the 2026 CEIP. PacifiCorp will provide regular updates to the DSM Advisory Group on the energy efficiency, demand response, and related communication specific actions included in the CEIP on an ongoing basis as standing agenda items in its advisory group meetings.

Equity Advisory Group

To help build a more equitable and inclusive electricity system in Washington, PacifiCorp established its EAG in 2021. The EAG was created to center energy equity in utility planning by ensuring that communities most affected by energy-related disparities have a formal voice in the process. EAG members are community leaders with deep ties to underserved populations, and they offer essential insights grounded in lived experience throughout Washington State.

Building on the work of EAG in 2021, PacifiCorp has continued to deepen its commitment to equity-centered energy planning. The early phases of the EAG’s work defining vulnerable populations, shaping CBIs, and informing the CEIP established a durable framework that guides ongoing efforts. Since then, the EAG has evolved from a foundational advisory group into a sustained and active partner in shaping clean energy implementation, development, and community engagement strategies. In 2025, the EAG continues to inform PacifiCorp on equity issues by offering grounded insights, reviewing progress on CBI outcomes, and helping refine implementation strategies to better serve highly impacted communities. This continuity ensures that equity remains embedded in PacifiCorp’s clean energy transition, not only as a regulatory requirement, but as a sustained organizational commitment to just and inclusive outcomes.

Throughout the development of PacifiCorp’s CEIPs, the EAG has served as a vital partner in shaping a more inclusive and equitable clean energy transition for communities in Washington. The EAG’s input is integrated across key components of the CEIP, resulting in a plan that reflects the needs, values, and lived experiences of historically underserved populations. PacifiCorp’s current EAG members are listed in Table 4.

Table 4 - PacifiCorp 2025 EAG Members

Name	Organization
Paul Tabayoyon	Asian Pacific Islander Coalition
Sylvia Schaeffer	Blue Mountain Action Council of Walla Walla
Todd Hilmes	Northwest Community Action Center
Candi Jaeger	Opportunities Industrialization Center
Norman Thiel	SonBridge
Erendira Cruz	Walla Walla Sustainable Living Center
Paris Valdez	Yakama Nation Fisheries
Jonathan Smith	Yakima County Development Association
Andy Wilson	Yakima County Health District

One of the earliest and most significant contributions of the EAG was helping PacifiCorp define what equity means in the context of clean energy implementation planning. These definitions laid the foundation for identifying “named communities”, those disproportionately affected by the energy system and environmental burdens. EAG members helped refine the approach to identifying HICs under CETA and were instrumental in developing the list of VPs prioritized in the CEIP. Just as importantly, they provided critical insight into the systemic and practical barriers that these communities face when trying to access clean energy programs, insights that directly informed the company’s community outreach and engagement strategies.

The EAG also played a central role in developing PacifiCorp’s CBIs. These indicators articulate the tangible benefits that communities should receive as the clean energy transition unfolds. Drawing on their deep understanding of local challenges, EAG members guided the definition and prioritization of CBIs, helping PacifiCorp understand which benefits matter most to communities and why. Their input was used to weight the CBIs, ensuring that the plan aligns with the real needs and preferences of those most affected.

In terms of utility actions, the EAG has helped shape several initiatives that center community access and inclusion. Their recommendations emphasize the importance of clear, culturally appropriate communication about available programs, and advocate for outreach that meets communities where they are linguistically, geographically, and socially. Based on this input, PacifiCorp has adopted new approaches to outreach and engagement, including strategies tailored to specific populations. EAG feedback has also spurred the creation of new program designs, such as support for residential energy efficiency upgrades and an electric vehicle grant program aimed at increasing equitable access to transportation electrification.

Finally, the EAG has brought valuable expertise to the development of CBI companion metrics. They emphasized the need for measurable indicators that go beyond basic participation counts to track actual outcomes and impacts within named communities. Their contributions have shaped leading equity metrics, which PacifiCorp will use to measure the success and fairness of its programs over time.

The EAG’s role in the CEIP process is not merely consultative, it is transformative. Their guidance has helped PacifiCorp build a CEIP that is grounded in equity, actionable in its commitments, and accountable to the communities it serves. The EAG’s involvement exemplifies the power of community-

centered planning and underscores PacifiCorp’s long-term commitment to a just and inclusive energy future.

Tribal Engagement in Washington

PacifiCorp hired a Tribal Liaison Representative (TLR) in 2023 who is part of the company’s government affairs team. One objective for the role is to develop relationships with Tribal leaders and staff, especially those in company service areas or who claim ancestral ties on lands that PacifiCorp may use. The TLR is also charged with internal education and training regarding Indigenous culture, history and meeting protocol to support cultural competency and streamline outreach to Tribal partners.

PacifiCorp’s service area in Washington State is consolidated to southern Washington, and most Tribal interaction is with representatives and members of the Yakama Nation and their enterprises.²⁰ To facilitate engagement, PacifiCorp’s community engagement manager and TLR traveled to Toppenish, WA during May 20-22, 2025, to meet with members of EAG and the Yakama Nation. A summary of key takeaways from meetings from that trip are provided below:

- On May 21, 2025, the Regional Business Manager and the TLR met with the General Manager of Yakama Power. The General Manager shared his latest report to the Yakama Tribal Council and membership about current projects, including educational opportunities, apprenticeships, and more middle-income housing on the reservation.
- Another meeting was scheduled with the environmental coordinator for Yakama Nation Fisheries, who had recently accepted an invitation to serve as a member of the EAG, which for the past year has seen Tribal participation decline somewhat. (While Oregon has created a similar group for only Tribal Nations and CBOs, there has not been the same level of participation in Washington.)
- On that May trip there was also a meeting with EAG members and managers for the Northwest Community Action Center, a non-profit organization that provides home weatherization and energy-saving programs to lower income families and seniors. They discussed Northwest Community Action Center funding and client needs, some of whom are Tribal members.
- On May 22, 2025, the TLR met with the director of Yakama Nation Economic Development, who shared details about the Yakama Nation’s biggest Economic Development projects: launching a tourism campaign for the region that includes commercials and a visitor guide; remodel of its museum and cultural center; and determining feasibility of a second casino enterprise.

Additionally, outside of the in-person meetings that took place in May 2025, the TLR has had several email and phone conversations with the editor of the *Yakama Nation Review* (Tribal newspaper) and the Yakama Nation’s Public Information Officer regarding promotion of Pacific Power wildfire preparedness and community meetings in the region as well as other programs the members may be interested in. All wildfire mitigation and preparedness tools PacifiCorp offer were shared with the Yakama Nation Communications and Emergency Management teams and posted to their social media platforms.

²⁰ More information regarding Yakama Nation can be found online at <https://yakama.com/>.

In July 2025, Yakama Nation Fisheries hosted a hybrid EAG, where about half of the members met in person in Toppenish. The goal is to have several in-person or hybrid meetings per year for connection and networking.

Other outreach and engagement with tribes in Washington State include Chair of the Chinook Tribe in Lewis County (not federally recognized); and members of the Cowlitz Tribe in Southwest Washington.²¹ Neither of these tribes are in PacificCorp service area, but the company has had prior consultation with them on a variety of projects.

PacificCorp recognizes tribal sovereignty, and understands each tribe has a unique culture, history, and form of governance. PacificCorp will continue its engagement with the Yakama Tribe and its enterprises, (including Yakama Power and Yakama Nation Fisheries) to support their self-determination efforts and strategic priorities.

PacificCorp is dedicated to advancing public participation in its clean energy implementation plan processes. The company will continue to leverage previous learnings, relational partnerships and will use its existing ecosystem of engagement channels for greater inclusion and impact. Additionally, PacificCorp will continue to actively seek opportunities to grow in the area of Tribal engagement, working in consultation with Tribal representatives and the company's Tribal liaison. Finally, PacificCorp is continuing to work to better understand the underlying factors that have impacted public participation and will take steps to address existing gaps through the implementation of support resources that work for the specific communities the company impacts and serves. This will better position the company for a more equitable and inclusive public participation process. For details on specific actions planned for this CEIP planning period, refer to Chapter IX – Specific Actions.

²¹ More information regarding the Cowlitz Tribe is available online at <https://cowlitz.org/>.

Chapter IV. Portfolio Development

This subsection provides a high-level overview of the process to create a preferred portfolio that addresses system and state-specific policy and planning objectives. Additional information on these processes can be found in the 2025 IRP.

Jurisdictional Definitions

PacifiCorp serves more than 2 million customers across six states. In the past, all portfolio decisions in the context of an IRP have been considered at a system-wide level to arrive at the best results for all customers, where customers share in the costs and benefits from system-wide planning. However, each jurisdiction now has distinct requirements, some of which conflict. Consequently, PacifiCorp's initial portfolio modeling is now separated into three jurisdictions reflecting these distinctions. In the 2025 IRP and the 2025 CEIP, these jurisdictions are distinguished as follows:

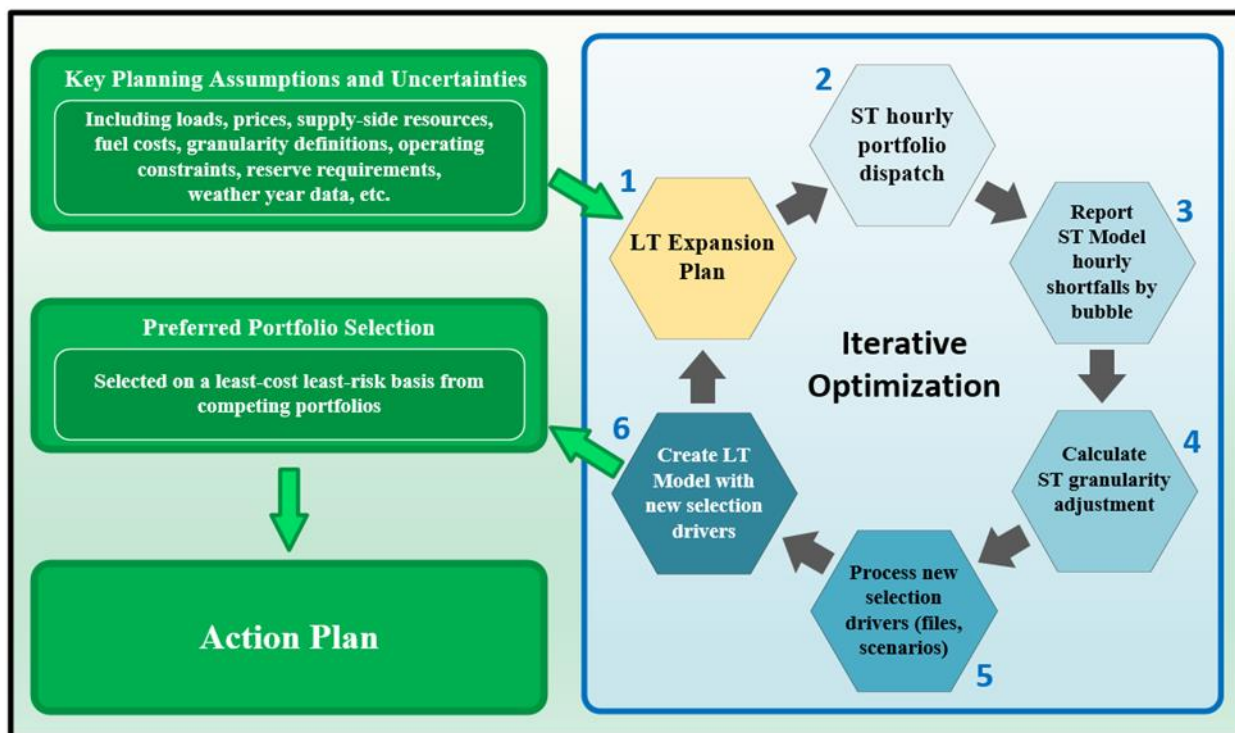
- **Utah/Idaho/Wyoming/California (UIWC):** The four states included in this jurisdictional category in the 2025 IRP/CEIP incorporate resource requirements driven by the Western Resource Adequacy Program (WRAP) for each jurisdiction. These requirements enforce the selection of sufficient firm capacity (including existing resources under the currently approved cost-allocation protocol) to meet the UIWC load requirement, plus a WRAP planning reserve margin.
- **Oregon:** Jurisdictional modeling for Oregon includes compliance with WRAP, Oregon House Bill 2021 emissions reductions goals, Oregon Senate Bill 1547, which requires, among other things, the removal of coal resources from rates and establishes renewable portfolio standard (RPS) requirements, and the small-scale renewable standard. Like other jurisdictions, Oregon must be WRAP compliant.
- **Washington:** In addition to WRAP compliance as described for UIWC above, jurisdictional selections for Washington resource selections were optimized using the SCGHG price-policy assumption and include dollar-per-megawatt-hour drivers starting in 2028 that incentivize the selection of incremental proxy resources to meet CETA clean energy standards. The inclusion of drivers in 2028 and 2029 is a change from modeling in the 2025 IRP and reflects requests from interested parties to see a smoother path towards compliance with the 2030 CETA clean energy standard. Emitting resources incur a dispatch-cost adder under SCGHG, applying pressure to decrease emissions. This is also part of regional dispatch in the development of market price assumptions used to develop the portfolio.

The 2025 CEIP preferred portfolio includes proxy resource selections for the other jurisdictions (UIWC and Oregon) along with the proxy resource selections optimized for Washington. Thermal resource selections are determined by the UIWC jurisdictional selections.

Modeling

PacifiCorp’s portfolio evaluation uses two models from the PLEXOS platform.²² Resource expansion plan modeling, performed with the LT model, is used to produce resource portfolios with sufficient capacity to achieve reliability over the 21-year study horizon by evaluating groups of hours on an aggregated basis. Each resource portfolio is refined for reliability at an hourly granularity in the ST model. Each portfolio is uniquely characterized by the type, timing, location, and number of new resources in PacifiCorp’s system over time. Figure 2 summarizes the modeling and evaluation steps for the 2025 IRP and CEIP.

Figure 2 - Portfolio Evaluation Steps within the IRP and CEIP Process



Long-Term Capacity Expansion Model

The LT model is used to establish an initial portfolio and then modified for each case based on study parameters to eliminate shortfalls and maintain reliability. The LT model operates by minimizing operating costs for existing and prospective new resources, subject to system load balance, reliability, and other constraints. Over the 21-year planning horizon, the model optimizes resource additions subject to resource costs and load constraints. These constraints include seasonal loads, operating reserves, and regulation reserves. Operating reserve requirements include contingency reserves, which are calculated as 3 percent of load and 3 percent of generation. Consistent with modeling in the 2025 IRP, the planning reserve margin is based on compliance with WRAP.

²² Additional information regarding the PLEXOS platform is available online here:
<https://www.energyexemplar.com/plexos>.

If early retirement of an existing generating resource is assumed or selected for a given planning scenario, the LT model will select additional resources as required to meet loads plus reliability requirements in each period and location. The LT model may also select additional resources that are more economic than an existing generating resource.

To accomplish these optimization objectives, the LT model performs a least-cost dispatch for existing and potential planned generation, while considering cost and performance of existing contracts and new DSM alternatives within PacifiCorp's transmission system. Resource dispatch is based on representative data blocks for each of the 12 months of every year. To enhance the ability of the LT model to differentiate key resource types and system conditions for the 2025 CEIP, each month was split into four blocks of hours based on load and wind and solar generation profiles:

1. The top ten percent highest net load hours. 10 percent is approximately 70 hours per month, or an average of 2-3 per day, though some days may not have any hours in this group.
2. The top ten percent highest wind generation hours on a system basis.
3. The top ten percent highest solar generation hours on a system basis.
4. All other hours

The intent of this modeling is to indicate to the LT model that wind and solar have very high availability in some hours, and very low availability in others. This contributes to more reasonable selections of wind and solar, as they will saturate some periods where they would have lower value. This approach also leads to more reasonable selections of storage and peaking resources, targeted to cover periods in which wind and solar provide little generation supply.

PLEXOS LT model dispatch among blocks of hours in a month is not chronological, so it cannot constrain energy storage charging and discharging, except to ensure that over the course of a month, these remain balanced. But within that limitation, PLEXOS determines generation and storage dispatch, optimal electricity flows between zones, and optimal market transactions for system balancing. The model minimizes the system present value revenue requirement (PVRR), which includes the net present value of existing contract costs, market purchase costs, market sale revenues, generation costs (fuel, fixed and variable operation and maintenance, decommissioning, emissions, amortized capital costs for thermal resource upgrades and potential new resources), costs of DSM resources, costs for potential transmission upgrades, and costs for unserved energy and unmet capacity.

These LT results are then re-analyzed through ST modeling, discussed below, to provide more granular and accurate resource selections.

Short-Term Cost and Risk Analyses

To evaluate portfolio selections under the range of conditions experienced in actual operations, the portfolio selected in the LT model is run through the ST phase of the model. This hourly view dispatches the entire system and provides critical data for evaluation. Relevant here, the ST model analyzes:

- *Reliability Assessment and System Cost.* The ST model begins with a portfolio from the LT model that has not yet been refined to reflect the reliability and compliance needs of a particular study (e.g., a particular sensitivity or price-policy scenario). The ST model is first run at an hourly level for 21 years to retrieve two critical pieces of data: 1) reliability shortfalls by hour, and 2) the value of every potential resource to the system that is specific to the portfolio itself, and the other

input assumptions, such as the price-policy scenario. These data points are fed back into the LT model to prompt endogenous selections of resources that lead to a reliable portfolio.

- *Resource Value.* PLEXOS calculates a locational marginal price specific to each area in each hour based on supply and demand and available imports and exports on transmission links to adjacent areas (a shadow price). PLEXOS then multiplies these prices by the optimized energy of a resource and operating reserve provision for each hour and reports the total as the estimated revenue for a resource. When variable costs (such as fuel, emissions, and variable operations and maintenance costs) are subtracted out, the result is the “net revenue” for a resource. Net revenue provides a clear model-optimized assessment of the value that a resource brings to the system, which is then used to assess resource additions needed to preserve reliable operation of the system.

While the net revenue approach is demonstrably superior to past resource value measures, especially as it is evaluated simultaneously for all potential resources, net revenue has limitations that should be acknowledged. Net revenue represents the value of the last MW of capacity from a given resource. As resources grow larger, the average value from the first MW of capacity to the last MW of capacity will tend to be somewhat higher than the reported marginal value. Conversely, adding more of a particular resource will result in declining values. While marginal prices will be very high in hours with supply shortfalls, this only indirectly contributes to reliable operation by helping to identify beneficial replacement resources. Once sufficient resources are added, shortfalls will mostly be eliminated, and marginal prices will again reflect the variable cost of an available resource.

- *Portfolio Refinements.* While many resource options are evaluated, utility-scale generation resources are mostly restricted to two circumstances: surplus or replacement resources at generators that are eligible to retire, and new resources at locations with interconnection or transmission upgrade options. Small resources (those with a capacity of up to 20 megawatts) are eligible to be sited within any of the load regions and are unconstrained by new transmission requirements. PacifiCorp’s studies have shown that resources that are sufficiently small and sized consistent with the local grid can be integrated without large transmission investments. Like small resources, PacifiCorp has added a “local” battery option within each of the load areas which is available for selection at a higher cost than those co-located with other resources.
- *Portfolio Cost.* Each run of the ST model produces an optimized dispatch of a portfolio to reflect least-cost operations while meeting all requirements and adhering to modeled constraints. The hourly granularity of the ST model means that this system cost will take into account operational nuances that are obscured in the less granular LT model. This allows resource portfolios that are constructed in the LT model to be compared based on the system PVRR determined through the ST model.

Together, these ST cost and risk analyses provide more accurate resource selections.

Planning Environment Changes

For integrated resource planning, PacifiCorp uses the best information available at the time of its analysis, and updates data and assumptions as they become available (subject to state-specific timing considerations). At the same time, PacifiCorp must make decisions about when data or assumptions must

be locked for evaluation to enable modeling to be completed and to conform with rule and law. For the 2025 IRP, most major assumptions were locked in September 2024, with some adjustments following the publication of the Draft IRP in December 2024. Between the data lockdown and filing of the 2025 IRP, changes to the regulatory and economic environments occurred, and additional significant regulatory and legislative changes have occurred. These changes are discussed below and are reflected in the 2025 CEIP preferred portfolio.

Federal Tax Policy

On July 4, 2025, the OBBBA became law, materially impacting the costs and benefits of certain renewable and storage resources needed to comply with CETA clean energy targets.²³ While preparing the 2025 IRP, the company was operating under then-current laws that specified that generation facilities that do not produce GHG emissions were entitled to a production tax credit (PTC) for each kilowatt hour of generated electricity,²⁴ and an investment tax credit (ITC) for a percentage of each dollar invested in the resource.²⁵ There were similar production credits for clean hydrogen resources.²⁶

The OBBBA phases out and repeals these tax credits for new renewable and non-emitting resources, particularly reducing potential benefits for new wind and solar resources.²⁷ There is a narrow window of time in which new projects can start construction and be placed in service to qualify for 100 percent of the tax credits, while the technology neutral investment tax credits are available for projects that begin construction by 2033 and are placed in service by 2037. Additionally, the law includes new Foreign Entity of Concern (FEOC) restrictions that could potentially limit the ability for projects to qualify for tax credits at all, and this uncertainty has the potential to limit developer's willingness to claim credits until there is more clarity on how these restrictions might be enforced.²⁸ Moreover, President Trump issued an executive order on July 7, 2025, that has subsequently influenced how the start of construction is interpreted, adding uncertainty as to how a developer can meet deadlines under the OBBBA before tax credits are phased out.²⁹ In August 2025, the U.S. Treasury a bright-line test for start of construction solar projects over 1.5 MW and for all wind projects in favor of a less-clear approach that looks at the amount of physical work done to manufacture custom-made equipment for a project or the amount of work done at the project site. Before this change, developers could have met start-of-construction requirements by having "begun" physical work. Now, the U.S. Treasury will require work to have been "performed" going forward. This adds uncertainty for a developer regarding the amount of work that might be required to qualify for federal tax credits. The implementation of the new FEOC and start-of-construction adds new risks and uncertainties for project developers that is anticipated to increase PPA pricing for contracted wind and solar resources, which would directly impact the cost to meet CETA targets.

In the 2025 IRP, it was assumed that new storage or offshore wind resources could earn the ITC (and that new wind and solar resources could earn the PTC for 10 years if the resource was built any time

²³ The One Big Beautiful Bill Act, Pub. L. No. 119-21 (2025).

²⁴ 26 U.S.C. § 45Y(a)(1).

²⁵ 26 U.S.C. § 48E(a)(1).

²⁶ 26 U.S.C. § 45V(a).

²⁷ Pub. L. No. 119-21, § 70512 (repealing clean energy production credit after 2028), § 70513 (repealing clean energy investment credit after 2028); § 70511 (repealing clean hydrogen production credit after January 1, 2026).

²⁸ Pub. L. No. 119-21, §70512.

²⁹ *Ending Market Distorting Subsidies for Unreliable, Foreign-Controlled Energy Sources*, Exec. Order No. 14,315, 90 Fed. Reg. 30,821 (Jul. 7, 2025).

before 2040, after which the available PTCs dropped by 20 percent each year until they were 0 percent in 2045).

In preparation of this 2025 CEIP, given the significant change in federal policy since the filing of the 2025 IRP, it is assumed that new proxy resources are no longer eligible to receive new tax credits and proxy resource costs reflect this change in assumption. PacifiCorp remains committed to evaluating all near-term resource options to prioritize potential tax credit eligible resources if available. In the 2025 IRP, the proxy utility scale solar option in Walla Walla, Washington with federal tax credits was \$22.17/MWh, utility scale wind in Walla Walla was \$22.22/MWh and utility scale 4-hour lithium-ion battery storage in Walla Walla was \$84.07/MWh. Without federal tax credits, the modeled utility scale solar option in Walla Walla, Washington in the 2025 IRP is \$47.32/MWh, utility scale wind in Walla Walla is \$45.68/MWh and utility scale 4-hour lithium-ion battery storage in Walla Walla is \$112.68/MWh. Dollar per megawatt hour proxy resource costs with and without federal tax credits included may be found in Tables 7.9 through 7.11 of PacifiCorp's 2025 IRP.

Impacts of the 2026 Protocol

On April 1, 2025, PacifiCorp filed the 2025 Power Cost Only Rate Case (PCORC).³⁰ The 2025 PCORC deals with the removal of coal-fired generation resources from Washington customer rates by 2026 as required by CETA, and additionally introduces the Washington 2026 Protocol to supersede the current cost allocation methodology—the Washington Inter-Jurisdictional Allocation Methodology (WIJAM). The adoption of the Washington 2026 Protocol, if approved by the Commission later this year, would change the allocation of system resources and associated costs when establishing rates for Washington customers. The Washington 2026 Protocol, if adopted as proposed, is expected to improve progress towards CETA and provide more certainty when establishing and then developing plans to achieve both interim and binding targets. If the Washington 2026 Protocol is approved it will go into effect when setting rates for Washington customers on January 1, 2026, changing the trajectory of near-term clean energy interim targets.

The proposed Washington 2026 Protocol varies from the WIJAM in the following ways:

1. All cost-allocation factors for Washington are fixed, rather than dynamic, so all resource allocations are known over time.
2. Washington customers no longer receive an allocation of the Hermiston natural gas plant.
3. Washington customers are allocated 100 percent of the Chehalis natural gas plant.
4. Washington customers are allocated a higher share of the Rolling Hills wind facility (by adding a previously unallocated share to Washington's current system share).
5. Washington's share of Jim Bridger 1-2 natural gas-converted units is reduced.

To illustrate the impacts of moving to the proposed Washington 2026 Protocol, starting in 2026 and assuming the allocation methodology never expires (in lieu of known future allocations), PacifiCorp ran a sensitivity of the 2025 CEIP preferred portfolio under the Washington 2026 Protocol and produced associated clean energy interim targets.

³⁰ *WUTC v. PacifiCorp d/b/a Pacific Power & Light Company*, Docket No. UE-250224 (Apr. 1, 2025).

Impacts of Low Renewable Output

New for the 2025 IRP and CEIP, all wind and solar generation profiles for existing and proxy resources are based on historical weather conditions on the same historical day underlying the load forecast. This captures the relationship between load, wind, and solar that happened in recent history. Each month of the company's chaotic normal load forecast reflects the range of weather conditions experienced in the most typical month from 2013-2022, while stochastic analysis for the final 2025 CEIP reflects the range of weather conditions experienced in every year from 2006-2023. The effect of extreme weather events associated with climate change is an evolving area of research that is growing in importance as renewable, intermittent resources dependent upon wind, solar, and hydrologic conditions comprise an increasing proportion of utility resource portfolios. For the 2025 CEIP, PacifiCorp does not project specific climate impacts on wind and solar generation but notes that recent history may be more representative of future conditions than earlier conditions. As a result, reliability and system cost risks identified using inputs derived from recent historical years may be of greater value when assessing future risk.

The 2025 CEIP includes a low renewable output sensitivity using more conservative wind and solar generation profiles than the base profiles to test how impacted near-term interim target projects might be under less favorable renewable output conditions. The hourly generation profiles used for this sensitivity reflect wind, solar, and hydro shapes from 2023 conditions.

Modeling Updates

Given the changes in the planning environment discussed previously, and other updates regarding available information, PacifiCorp made the following changes and enhancements to the modeling assumptions for the 2025 CEIP, relative to the modeling assumptions used in the 2025 IRP:

- Removal of federal tax credit eligibility for new renewable and non-emitting resources.
- The CCA cap-and-invest price applicable to the Chehalis natural gas plant was updated to reflect the March auction price of \$50/metric ton of greenhouse gas emissions.
- Use of the June 2025 SCGHG price curve.
- Minor corrections to the modeling of Washington compliance with the WRAP. The allocation of each existing resource to Washington WRAP compliance in PLEXOS was re-evaluated and resource allocations were corrected where appropriate to align with the currently approved cost-allocation methodology and updated forecasted factors.
- Use of allocation factors for existing resources consistent with the 2025 IRP retail sales forecast.
- Escalation rates for proxy resources were corrected to align with the commercial operation date assumed in the Supply-Side Resources Table in the 2025 IRP.
- Dollar-per-megawatt-hour drivers to incentive CETA-compliant resource selection for Washington customers beginning in 2028 (as opposed to 2030).

The results of these portfolio development processes are discussed in the following chapters.

Chapter V. Key Features of the 2025 CEIP Preferred Portfolio

Based on the portfolio development, planning environment changes, and modeling updates discussed above, the discussion that follows describes key outcomes of the 2025 CEIP preferred portfolio in terms of generating resource selections, transmission, and emitting resources, and distributed generation, all of which support progress towards CETA’s long-term clean energy goals. The 2025 CEIP preferred portfolio represents the selection of resources to meet energy, capacity and compliance needs for Washington customers at the lowest reasonable cost, considering risk.

Supply-Side Resources

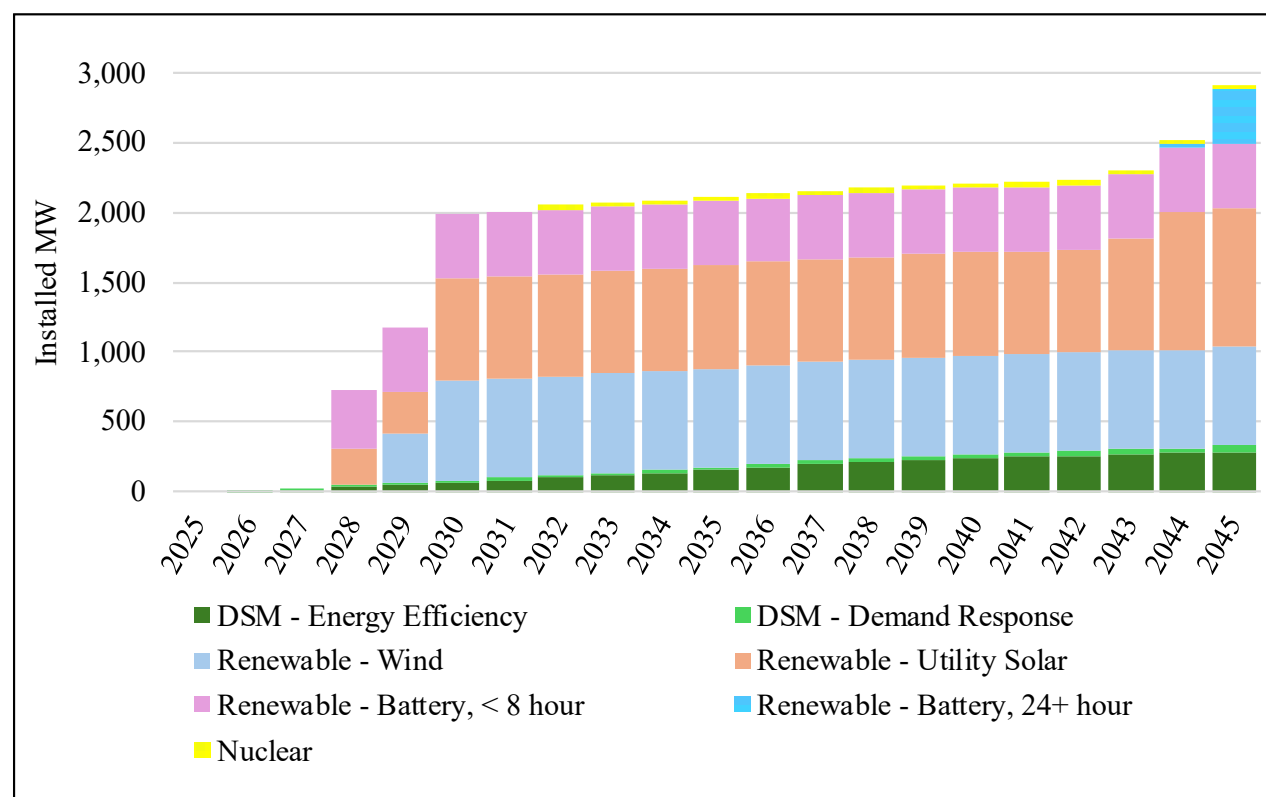
In 2020, the ratio of Washington retail load served by renewable and non-emitting energy resources was 21.9 percent. Based on the CEIP preferred portfolio, PacifiCorp projects increasing Washington-allocated renewable and non-emitting energy to serve electric sales to 71 percent by 2029, and eventually over 100 percent by 2030 and through the zero-GHG emitting target in 2045. This trajectory of growth in clean energy is driven by the selection of 2,551 MW of new situs-allocated renewable, non-emitting and storage resources to meet Washington customers’ capacity, energy and GHG reduction goals over the 21-year planning horizon, in addition to cost-effective DSM resources, as summarized in Table 5.

In the near-term by 2030, Washington customers will require 1,444 MW of new renewable resources, including 709 MW of wind and 735 MW of solar to generate CETA-compliant energy. Additionally, 462 MW of batteries are selected to meet resource adequacy needs and support the generation and value of intermittent CETA-compliant energy. Storage resources are an essential part of transitioning to a reliable, zero-GHG emitting portfolio.

Table 5 - Washington Jurisdictional Shares of 2025 CEIP Preferred Portfolio

CEIP Preferred Portfolio Shares by Resource Type and Year, Installed MW																						
Resource	Installed Capacity, MW																					
	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	Total
Nuclear	-	-	-	-	-	-	-	-	32	-	-	-	-	-	-	-	-	-	-	-	-	32
Renewable Peaking	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DSM - Energy Efficiency	-	-	13	16	15	17	18	18	19	19	20	19	19	15	14	12	11	11	10	8	7	280
DSM - Demand Response	-	-	-	15	2	2	-	-	-	-	-	8	-	6	1	1	1	-	1	-	14	51
Renewable - Wind	-	-	-	-	359	350	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	709
Renewable - Utility Solar	-	-	-	264	35	436	-	-	-	-	-	-	-	-	-	-	-	-	67	187	-	989
Renewable - Small Scale Solar	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Renewable - Battery, < 8 hour	-	-	-	422	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	462
Renewable - Battery, 24+ hour	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22	370	392

Figure 3 depicts the cumulative portfolio shares for the Washington jurisdictional view of the 2025 CEIP preferred portfolio from 2025-2045.

Figure 3 - Washington Jurisdictional Cumulative Portfolio Shares of the 2025 CEIP Preferred Portfolio

Transmission

PacifiCorp uses a transmission topology that captures major load centers, generation resources, and market hubs interconnected via firm transmission paths. Transfer capabilities across transmission paths are based on the firm transmission rights of PacifiCorp's merchant function, including transmission rights from PacifiCorp's transmission function and other regional transmission providers.

In support of the renewable resource additions identified for Washington in the 2025 CEIP preferred portfolio, PacifiCorp has identified transmission options that will reinforce existing transmission paths, allow for increased transfer capability, and will support the interconnection of new renewables. A summary of PacifiCorp's identified transmission additions serving Washington is shown in Table 6.^{31,32}

³¹ Export and import values represent total transfer capability. The scope and cost of transmission upgrades are planning estimates. Actual scope and costs will vary depending upon the interconnection queue, the transmission service queue, the specific location of any given generating resource and the type of equipment proposed for any given generating resource.

³² Transmission upgrades frequently include primarily all-or-nothing components, though the cluster study process allows for project-specific timing and some costs are project-specific.

Table 6 - Incremental Transmission Additions to Serve Washington Customers in 2025 CEIP Preferred Portfolio

		Export (MW)	Import (MW)	Interconnect (MW)	Build Investment (\$m)	Build (%)	From	To
2028	Cluster 1 Area 11: Willamette Valley	0	0	199	14	100%	n/a	n/a
2028	Cluster 1 1/2/3: Walla Walla	0	0	260	217	66%	n/a	n/a
2028	Cluster 2 Area 23: Willamette Valley	0	0	393	2	100%	n/a	n/a
2028	Serial queue: Central Oregon	0	0	152	4	100%	n/a	n/a
2029	Cluster 1 1/2/3: Walla Walla	0	0	98	83	25%	n/a	n/a
2030	Cluster 1 Area 14: Summer Lake	400	400	400	115	100%	Summer Lake	Hemingway
2030	Serial/Cluster 1/2: Yakima	0	0	182	19	29%	n/a	n/a
2030	Walla Walla - Yakima 230 kV	364	364	364	129	91%	Walla Walla	Yakima
2031	Serial through Cluster 1 Area 13: Southern Oregon	0	0	92	17	40%	n/a	n/a
2032	Serial through Cluster 1 Area 13: Southern Oregon	0	0	34	6	15%	n/a	n/a
2035	Serial/Cluster 1/2: Yakima	0	0	205	24	33%	n/a	n/a
2036	Cluster 2 Area 18: Central Oregon 500 kV Substation	0	0	66	51	13%	n/a	n/a
2036	Serial/Cluster 1/2: Yakima	0	0	123	15	20%	n/a	n/a
2037	Cluster 2 Area 18: Central Oregon 500 kV Substation	0	0	177	138	34%	n/a	n/a
2037	Serial/Cluster 1/2: Yakima	0	0	102	12	16%	n/a	n/a
2038	Cluster 2 Area 18: Central Oregon 500 kV Substation	0	0	47	38	9%	n/a	n/a
2040	Cluster 1 Area 12: Southern Oregon	0	0	124	149	41%	n/a	n/a
2040	Cluster 2/3: Willamette Valley - Central Oregon 230 kV	423	423	423	460	94%	Willamette Valley	Central OR
2041	Cluster 1 Area 12: Southern Oregon	0	0	176	214	59%	n/a	n/a
Grand Total		1,187	1,187	3,617	1,708			

Emissions and Emitting Resources

Regarding emitting resources, in 2025 Washington is currently allocated costs from two coal-fired facilities within PacifiCorp's resource portfolio: Colstrip Unit 4 in Colstrip, Montana, and Jim Bridger Units 3-4 in Point of Rocks, Wyoming. The allocation of resources to Washington, in accordance with WAC 480-100-610(1), will no longer include these coal-fired resources by December 31, 2025.

The company converted Jim Bridger Units 1 and 2 from coal-fired to natural gas-fired in 2024 and expects to continue to allocate generation and costs from these units when setting rates for Washington customers through the end of 2044.

Washington is also currently allocated generation and costs from two natural gas-fired units: the Chehalis Generating Station (Chehalis) in Chehalis, Washington and the Hermiston Generating Station (Hermiston) in Hermiston, Oregon. Current modeling assumptions include both Chehalis and Hermiston serving Washington customers through the end of 2044.³³

Regarding emissions, CETA serves as the principal statutory driver of decarbonization within the electric utility sector in Washington. The Washington Climate Commitment Act (CCA), enacted in 2021, complements CETA by establishing an economy-wide cap-and-invest program to reduce GHG emissions from the largest sources in the state. The program imposes an annual, declining emissions cap on covered entities emitting 25,000 metric tons or more of carbon dioxide equivalent (CO₂e) per year and requires them to obtain and surrender one compliance instrument—either an allowance or an eligible offset credit—for each metric ton of covered emissions. Allowances are primarily sold through quarterly auctions administered by the Washington Department of Ecology (Ecology), with a limited number allocated at no cost to certain electric and natural gas utilities, and emissions-intensive, trade-exposed industries, to mitigate the cost burden of the program. Auction proceeds are deposited into dedicated accounts to fund a variety of initiatives, including GHG reductions, clean energy deployment, air quality

³³ Under the proposed 2026 Protocol allocation methodology, PacifiCorp proposes removing Hermiston from Washington's retail allocation starting in 2026, but this assumption is consistent with currently approved cost allocation.

improvement, ecosystem restoration, wildfire resilience, and transportation electrification, with specified investment requirements for overburdened communities and federally recognized tribes.

The GHG Reporting Program, established under Chapter 70A.15 RCW and Chapter 173-441 WAC, requires facilities, fuel suppliers, and electric power entities emitting 10,000 metric tons or more of CO₂e annually to submit detailed emissions reports to Ecology, with independent third-party verification required beginning in 2023. The CCA builds upon the GHG Reporting Program by relying on this verified emissions data to determine compliance obligations and allocate allowances, making accurate reporting essential to ensuring environmental integrity, equitable allowance distribution, and enforcement of emission reduction requirements. PacifiCorp, subject to both the CCA and the GHG Reporting Program, must submit its annual GHG report to Ecology by June 1 and complete third-party verification by August 10.³⁴

While the CCA establishes a broad, market-based framework for statewide GHG reductions, CETA prescribes specific, enforceable standards that govern utility-sector decarbonization. The Legislative intent is clear that utility compliance and long-term planning are to be driven primarily by CETA, with CCA implementation for utilities aligned to and supportive of CETA's mandates while ensuring that cost impacts to customers are minimized. Clean energy generation and targets are the focus of this CEIP, which is expected to drive reductions in emissions over time.

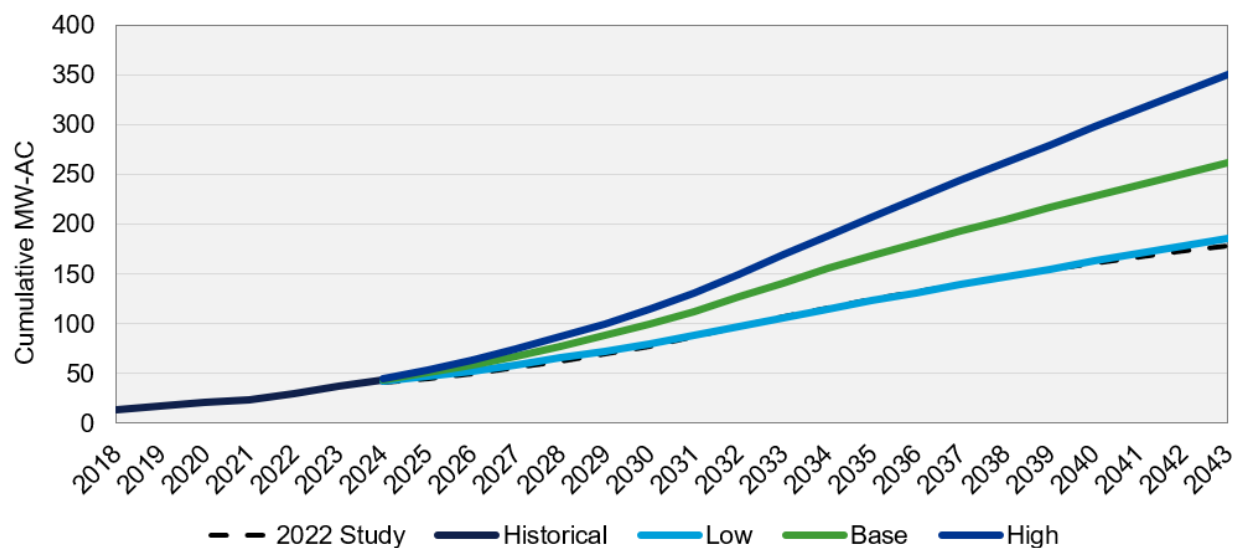
Distributed Generation

New customer-sited generation is forecasted within the 2024 Distributed Generation Forecast: Behind-the-Meter Resource Assessment, included as Appendix L in Volume II of the 2025 IRP.³⁵ This assessment was conducted by DNV for all states and for each distributed generation resource type including solar, small-scale wind, small-scale hydro, reciprocating engines and micro turbines. The resource costs and state specific policies and incentives are integrated in the forecast of customer adoption of these resources across low, base, and high case scenarios. The base case results are netted against each state's load forecast. Washington's distributed generation assumptions are shown in Figure 4.

This forecast of distributed generation was accounted for in the load forecast that underpins the 2025 IRP/CEIP results.

³⁴ Mandatory greenhouse gas reports and more information can be found online at <https://ecology.wa.gov/air-climate/reducing-greenhouse-gas-emissions/tracking-greenhouse-gases/mandatory-greenhouse-gas-reports>.

³⁵ Available online at https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025_IRP_Vol_2.pdf

Figure 4 - Washington Distributed Generation Assumptions – All Technologies

Avoided Costs

PacifiCorp has prepared a comparison of the resource costs and avoided costs of various resource types, including some selected in the 2025 CEIP preferred portfolio. Resource costs include construction costs, fixed operations and maintenance expenses, and inclusion of the value of tax credits, where applicable. Avoided costs include capacity value, which has been calculated relative to the costs of a simple cycle combustion turbine (SCCT), and energy value, which has been calculated based on each resource's generation profile and locational marginal prices reported by the PLEXOS model for the 2025 CEIP preferred portfolio. Avoided costs for wind and solar are reduced to account the integration costs for those resource types reported in Appendix F in Volume II of the 2025 IRP.³⁶ Avoided costs for energy storage include the value of discharging energy and the cost of charging energy at the locational marginal price, as well as the value of operating reserves held by the storage resource, valued at the marginal operating reserve price. These calculations are public and provided with the workpapers accompanying the 2025 CEIP, refer to Appendix D for the reference.³⁷

Stochastics

As in the 2025 IRP, the 2025 CEIP stochastic risk modeling of resource portfolios is performed using actual historical conditions as a guide to volatility and stochastic relationships. These conditions, including weather patterns, thermal outages, fuel and market prices, hydro generation and wind and solar generation profiles are mapped to historical dates underlying PacifiCorp's chaotic normal load forecast. PacifiCorp has data reflecting eighteen discrete annual conditions, specifically the historical data and variances from 2006-2023 for each of the stochastic inputs.

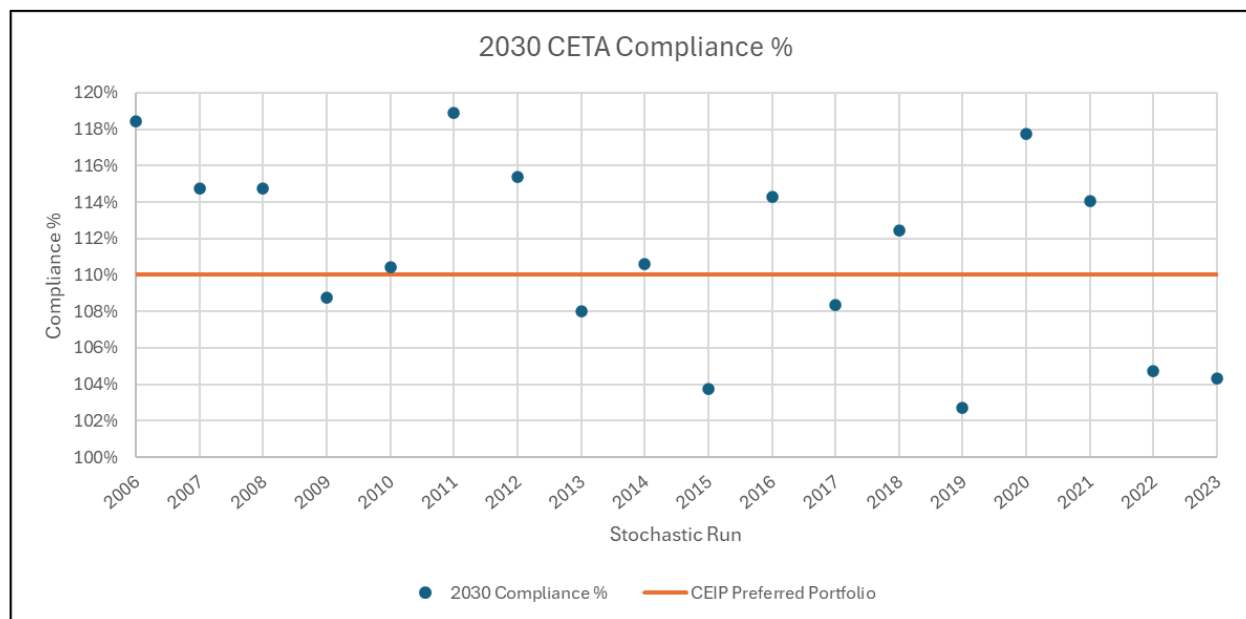
Stochastic risk modeling of resource portfolios is performed with the ST model. PacifiCorp considered the 2025 CEIP preferred portfolio under stochastic conditions and operational dispatch assumptions. Figure 5 presents the CETA interim target compliance percentage in 2030 for each of the 18 stochastic

³⁶ Ibid

³⁷ See the file "250617-PAC-CEIP-WP-Tbl-27-Incremental-Cost-Workbook-10-01-2025.xlsx"

runs of the CEIP preferred portfolio compared to the deterministic view of the CEIP preferred portfolio. The stochastic results show that the CEIP preferred portfolio is likely to achieve interim targets when considering the risks of experiencing conditions that deviate from base forecasts, as is captured in stochastic model runs. Additional results for all 18 stochastic runs may be found along with the rest of the workpapers included with the 2025 CEIP.

Figure 5 - Stochastic Results for 2025 CEIP Preferred Portfolio 2030 Interim Target %



Alternative “Without-CETA” Portfolio

WAC 480-100-605 defines the “alternative lowest reasonable cost and reasonably available portfolio” as the “portfolio of investments the utility would have made and the expenses the utility would have incurred if not for the requirement to comply with RCW 19.405.040 and 19.405.050,” and must include the SCGHG in the resource acquisition decision.

To create the alternative portfolio consistent with rule, PacifiCorp determined the portfolio of resources that would occur, but for CETA clean energy obligations. This is a fully integrated portfolio that optimizes resource selections across all states’ requirements but is not required to meet CETA’s GHG neutrality target in 2030 or zero-carbon emissions target in 2045. This portfolio, like the CEIP preferred portfolio, is determined using the SCGHG for Washington resource selections. All other inputs and assumptions are assumed to be unchanged between the 2025 CEIP preferred portfolio and the alternative portfolio for the purpose of determining the incremental cost.

As summarized in Table 7, the alternative portfolio includes just 1,779 MW of new renewable and storage resources to serve Washington customers over the 21-year planning horizon, over 700 MW less than selected in the preferred portfolio. Specifically, over the 2026-2029 CEIP planning period, the alternative portfolio includes no new wind resources, and 158 MW less of new solar resources. Conversely, the alternative portfolio includes 63 MW more of new batteries, relative to the CEIP preferred portfolio.

Table 7 - Washington Jurisdictional Shares of the Alternative Portfolio

CEIP Alt Shares by Resource Type and Year, Installed MW																								
Resource	Installed Capacity, MW																							
	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	Total		
Nuclear	-	-	-	-	-	-	-	32	-	-	-	-	-	-	-	-	-	-	-	-	-	-	32	
Renewable Peaking	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
DSM - Energy Efficiency	-	-	13	16	15	17	18	18	19	19	20	19	19	15	14	12	11	11	10	8	7	280		
DSM - Demand Response	-	-	-	15	2	2	-	-	-	-	-	8	-	6	1	1	1	-	1	-	14	51		
Renewable - Wind	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Renewable - Utility Solar	-	-	-	141	-	-	-	-	-	-	-	-	-	-	-	-	-	215	272	256	-	884		
Renewable - Small Scale Solar	-	-	-	-	-	-	-	-	-	-	-	-	0	-	-	-	-	-	-	-	-	-	0	
Renewable - Battery, < 8 hour	-	-	-	511	15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	525	
Renewable - Battery, 24+ hour	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	368	370		

Overall, the 2025 CEIP preferred portfolio includes significant new resources to serve Washington customers' energy, capacity and compliance needs over the next two decades. A significant portion of the new resources are driven by requirements to generate enough CETA-compliant energy, as depicted by the comparison with the alternative portfolio. Relative to the 2025 IRP, recent changes in the planning environment and to the modeling assumptions also drive changes to the Washington-allocated resource selections.

Relative to the 2025 IRP, the 2025 CEIP preferred portfolio results in just over 1.2 GW less of new renewable and storage resources. This is mostly reflected by an 811 MW reduction in new batteries, 440 MW less new wind, and 36 MW less new solar resources. Specifically, in the near-term, the 2025 CEIP preferred portfolio results in 923 MW less of new battery capacity, and 64 MW more of new renewables. These significant changes in resource selections are driven by a combination of the change in federal tax credit policy and all other modeling updates and enhancements that drive differences in model outcomes.

Figure 6, Figure 7, and Figure 8 show a cumulative comparison of the Washington-allocated resource selections for proxy solar, wind and storage resources between the 2025 IRP preferred portfolio, 2025 CEIP preferred portfolio, and the alternative “without-CETA” portfolio.

Figure 6 - Washington-allocated Proxy Wind Resource Selections

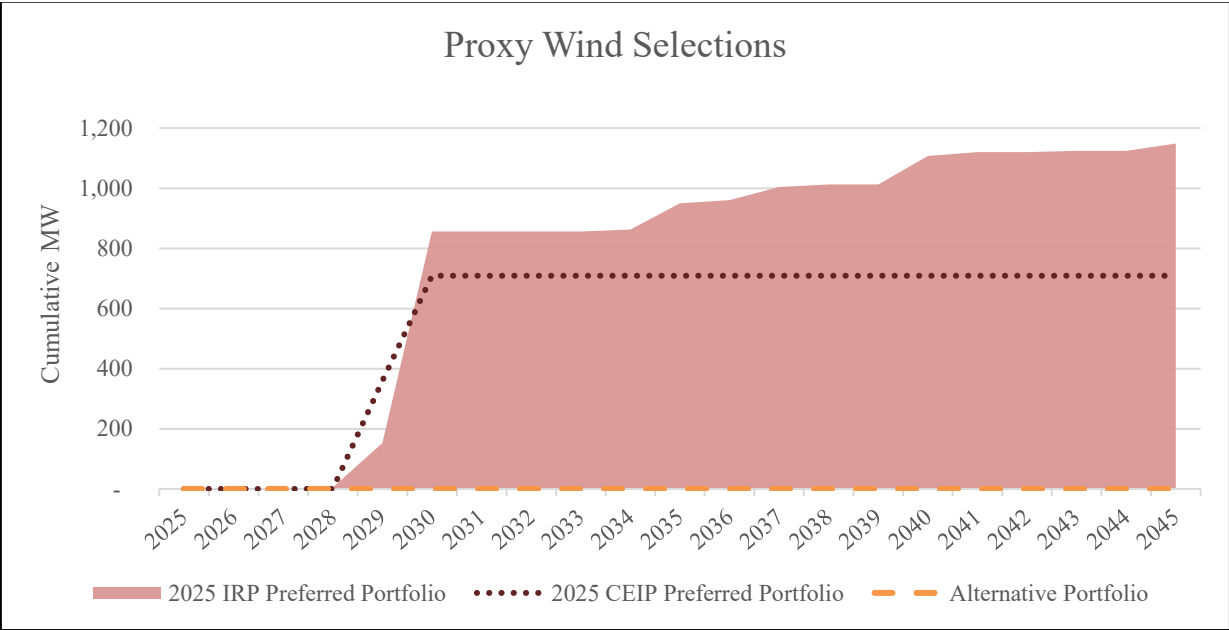


Figure 7 - Washington-allocated Proxy Solar Resource Selections

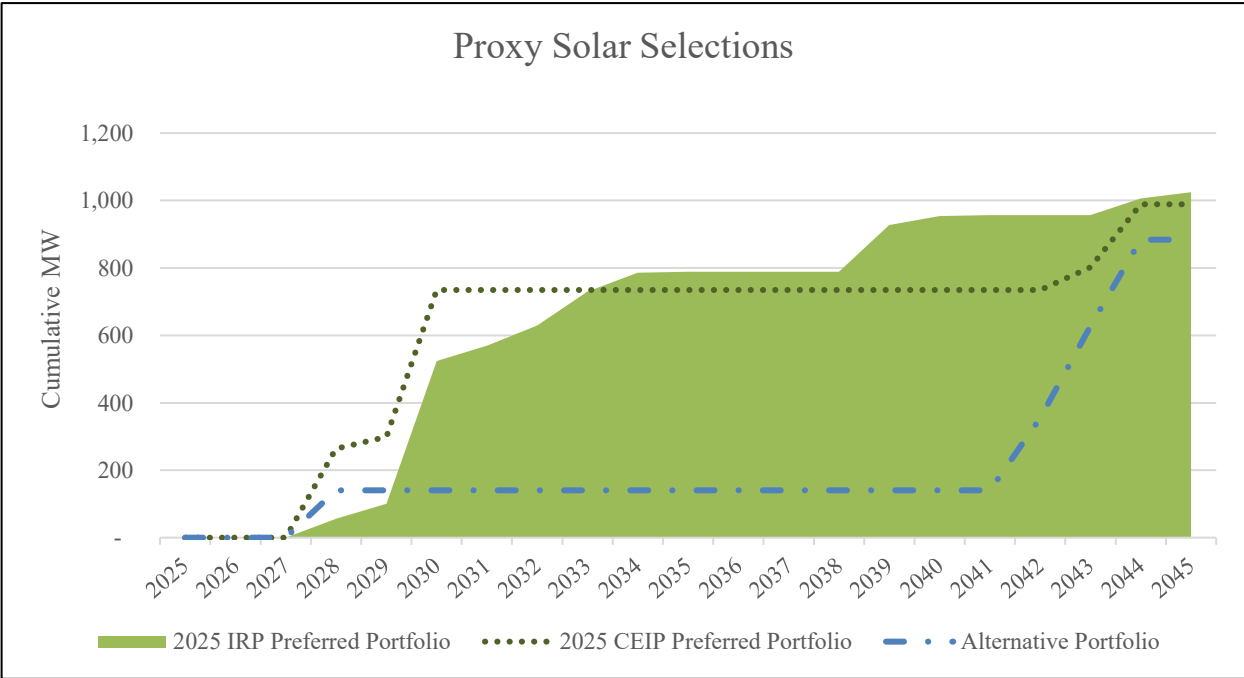
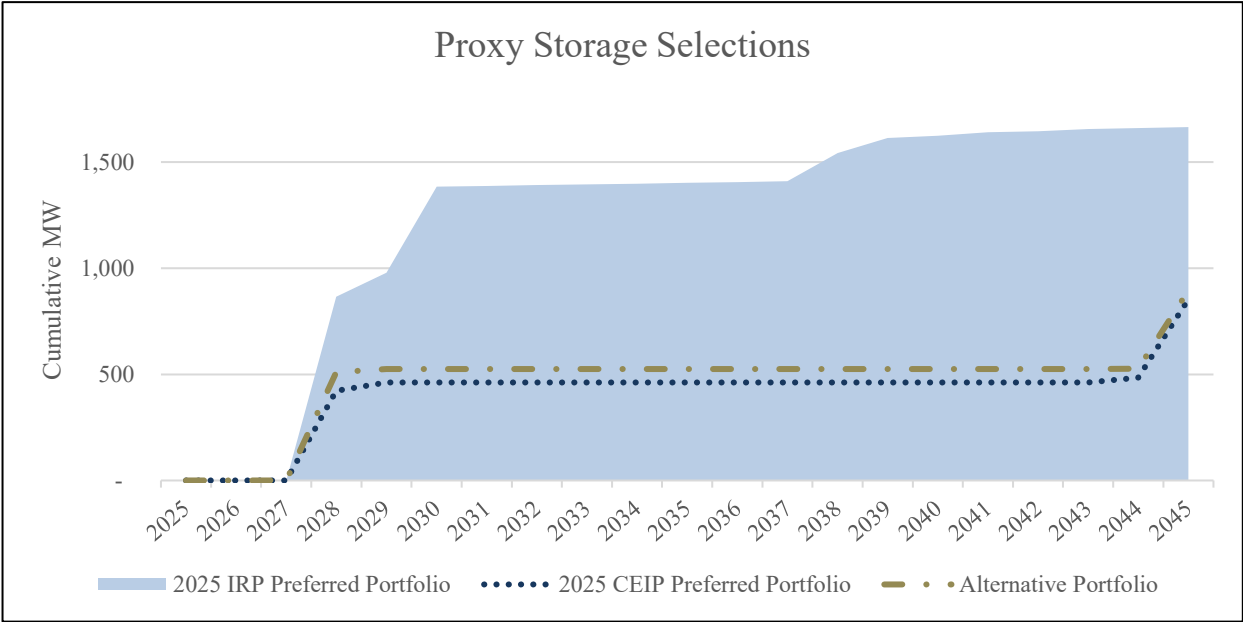


Figure 8 - Washington-allocated Proxy Storage Resource Selections



Chapter VI. Interim Targets

To support CETA’s clean energy objectives, PacifiCorp must propose clean energy interim targets in its CEIP, documenting the company’s path to the 2030 GHG neutral standard, and from 2030 to the 2045 zero-carbon requirement.³⁸ Interim targets demonstrate a long-run trajectory of clean-energy procurement and decarbonization for the supply of electricity to Washington retail customers and are derived from a long-run model at the lowest reasonable cost, considering risk, consistent with PacifiCorp’s most recent IRP, in this case the 2025 IRP.

For the 2025 CEIP, PacifiCorp proposes the following interim targets through 2029: 34 percent for 2026 and 2027; 48 percent for 2028; and 71 percent for 2029. The interim targets identified for this CEIP will support progress towards the 2030 GHG neutral standard. The 2025 CEIP preferred portfolio resource selections are forecasted to generate over 100 percent of Washington’s retail sales energy need in 2030. The development and results of these interim targets are discussed below.

Target Development

To develop a long-term energy forecast in accordance with the 2030 and 2045 clean energy targets, the Washington allocation of the 2025 CEIP preferred portfolio was determined and analyzed against forecasted retail electric sales in Washington.

To estimate the amount and mix of energy forecasted to serve Washington customers for the 2025-2045 period, PacifiCorp summed annual generation from its qualifying resources allocated to Washington customers under the WIJAM for existing resources and proxy resources.³⁹

To calculate the energy and the total amount of renewable and carbon non-emitting energy allocated to Washington customers, the company makes the assumptions set forth below. Generally, where a resource is assumed to generate RECs, where one REC is generated for one megawatt-hour of renewable energy, the resource is assumed to generate CETA-compliant energy. In addition to REC-generating resources, it is assumed that all Washington-allocated energy from non-emitting resources is also CETA compliant, namely hydroelectric.⁴⁰ In summary, the resource allocation assumptions are:

1. For REC-generating resources, generation of CETA-compliant energy is consistent with the company’s REC entitlement start and end date.
2. Allocation of energy for new proxy resources was situs to the state whose need directed that resource addition.
3. Customer preference and voluntary renewable resources were not assumed to generate RECs for the system or the state of Washington and thus are not included in the allocation of renewable energy.

³⁸ WAC 480-100-640(2).

³⁹ The WIJAM and the 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol (2020 Protocol) define how resources and costs are allocated to Washington customers through December 21, 2023. The Washington Utilities and Transportation Commission approved the WIJAM and 2020 Protocol in its Final Order 09/07/12 in docket UE-191024 et. al., effective January 1, 2021. The company is in the process of seeking approval for the Washington 2026 Protocol through its ongoing power cost only rate case in docket UE-250224. This new allocation agreement would be effective January 1, 2026.

⁴⁰ WAC 480-100-610(3) states that by January 1, 2045, each utility must ensure that “non-emitting electric generation and electricity from renewable resources supply one hundred percent of all retail sales of electricity to Washington electric customers”.

4. All proxy renewable and non-emitting resources were assumed to be CETA-compliant, including any wind, solar, geothermal, and hydro. For renewable resources co-located with battery storage, RECs were assumed to be generated pre-storage; no RECs are generated at battery discharge.
5. The nuclear resource in the preferred portfolio was assumed to not be CETA compliant, because it remains uncertain when or if PacifiCorp will retain non-emitting attributes associated with this asset.
6. Thermal resources were assumed to not be CETA compliant and did not count towards the clean energy total. Coal-fired resources were removed from Washington rates after 2025.

Washington retail electric sales are defined as total energy served to customers annually, net of distributed generation, existing and optimized energy efficiency and DSM resources. CETA interim targets are calculated annually as a percentage of Washington retail electric sales. The clean energy transformation standards WAC 480-100-610(2) specify that for each year 2030 and beyond, each utility must ensure all retail sales of electricity to Washington are greenhouse gas neutral. By 2045 each utility must ensure that non-emitting electric generation and electricity from renewable resources supply one hundred percent of all retail sales of electricity to Washington customers. Annual targets are calculated as the total energy of renewable and carbon non-emitting energy projected to serve Washington electric sales in compliance with CETA standards and regulations.

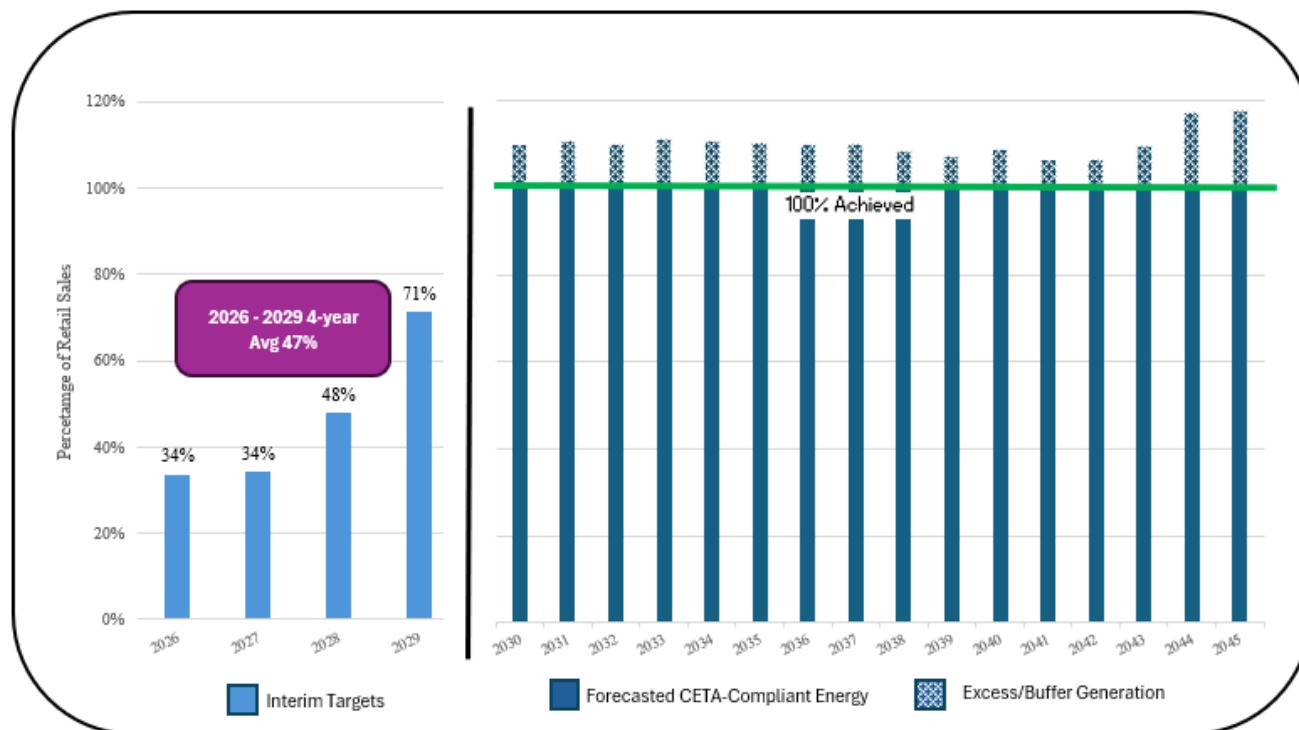
Up to 2045, CETA allows for up to 20 percent of the GHG-neutral standard to be met with alternative compliance in the form of alternative compliance payments, unbundled RECs, energy transformation projects, or energy recovery from a municipal solid waste facility.⁴¹ To achieve the 2045 target, the clean-energy standard must be met with 100 percent non-emitting generation or electricity from renewable energy resources. For purposes of this CEIP, PacifiCorp does not assume reliance on the use of unbundled RECs to satisfy the alternative compliance component of the 2030 greenhouse gas neutral standard. However, PacifiCorp may meet up to 20 percent of its aggregate retail electric sales over the four-year compliance period with alternative compliance from January 1, 2030, through December 31, 2044, if actual generation of bundled CETA-compliant energy falls short of the 100 percent GHG neutral standard. PacifiCorp will continue to evaluate the cost-benefit trade-offs of acquiring more long-term resources sooner to reach CETA's decarbonization goals, versus using alternative compliance, like the purchase of unbundled RECs, to meet up to 20 percent compliance in the near-term.

PacifiCorp does not contemplate the use of energy transformation projects as a compliance mechanism in this CEIP due to uncertainty regarding their application to the clean energy requirements. The company will continue to monitor stakeholder and agency developments at Ecology and leverage

⁴¹ RCW 19.405.040 (1)(b).

opportunities for energy transformation projects that may provide verifiable and sustained benefits to Washington customers and will include its analysis of potential projects in future CEIPs.

Figure 9 - PacifiCorp's Clean Energy Interim Targets 2026-2045



Results

PacifiCorp’s 2025 CEIP preferred portfolio, based on the modeling and methods discussed above and in the 2025 IRP, demonstrates a need for supply-side and demand-side projects and programs over the next two decades, optimized under the SCGHG price-policy assumption. Specifically, Washington’s share of the 2025 CEIP preferred portfolio includes 709 MW of wind, 735 MW of solar, and 462 MW of batteries by the end of 2029.⁴² Of these resources, 350 MW of wind and 436 MW of solar are added on December 31, 2029. These resources allow Washington to reach compliance with the GHG neutral standard in 2030, potentially surpassing the 100 percent interim target in 2030. By the end of 2045, Washington’s portfolio shares include a total of 709 MW of wind, 989 MW of solar, and 856 MW of batteries.

These additional renewable and non-emitting resources increase the amount of clean energy available to serve Washington customers through generation, or offset reliance on potentially emitting market purchases, through the storage of that generation during periods of low demand and then re-dispatched during periods of higher demand. DSM resources reduce or shift electricity use and/or generation of electricity by consumers, contributing to a least cost, and sometimes more equitable, overall portfolio of resource selections. The interim targets are informed by the company’s historical performance under median water conditions, a factor in developing expected resource behaviors and Washington retail sales.

⁴² Resource additions reported in PLEXOS as of 1/1/2030 are assumed to be built one day earlier on 12/31/2029. PLEXOS only adds resources on the first day of a year, but practically, 24 hours do not make a difference except in identifying “near-term” resource need over the next four years. For that reason, PacifiCorp assumes the shift in resource build timing.

A summary of the resulting interim targets based on these resource needs over the next 21 years is available in Figure 9. The figure divides interim targets into two forecast ranges aligned with the objectives for 2030 (100 percent GHG neutrality) and 2045 (100 percent non-emitting and renewable energy). PacifiCorp forecasts a clean energy interim target of 34 percent in 2026, 34 percent in 2027, 48 percent in 2028 and 71 percent in 2029, or an average of 47 percent over the four-year planning period, marking significant progress towards the 2030 greenhouse gas neutrality CETA standard. Moving beyond 2030, PacifiCorp forecasts over 100 percent renewable and non-emitting electricity generation being available to serve Washington customers, moving towards the 2045 zero-emitting goal. The increase in clean-energy interim targets over time is driven by the removal of coal-fired units from Washington's rates by the end of 2025 and significant additions of new renewable, non-emitting and DSM resources over the planning horizon.

Table 8 reports near-term interim targets in annual megawatt hours of energy rather than as percentages, yielding annual interim compliance targets from 2026 through 2029. These interim targets are subject to change and will be re-evaluated in the 2027 IRP two-year progress report and biennial CEIP update.

Table 8 - 2026-2029 Interim Targets (MWh)

	2026	2027	2028	2029	Total
Retail Electric Sales	4,023,917	4,160,614	4,297,349	4,268,516	16,750,396
Projected Renewable and Non emitting Energy	1,353,697	1,424,997	2,055,679	3,046,342	7,880,715
Net Retail Sales	2,670,221	2,735,617	2,241,669	1,222,174	8,869,681
Target Percentage	34%	34%	48%	71%	
Interim Clean Energy Target	1,353,697	1,424,997	2,055,679	3,046,342	7,880,715

Sensitivities

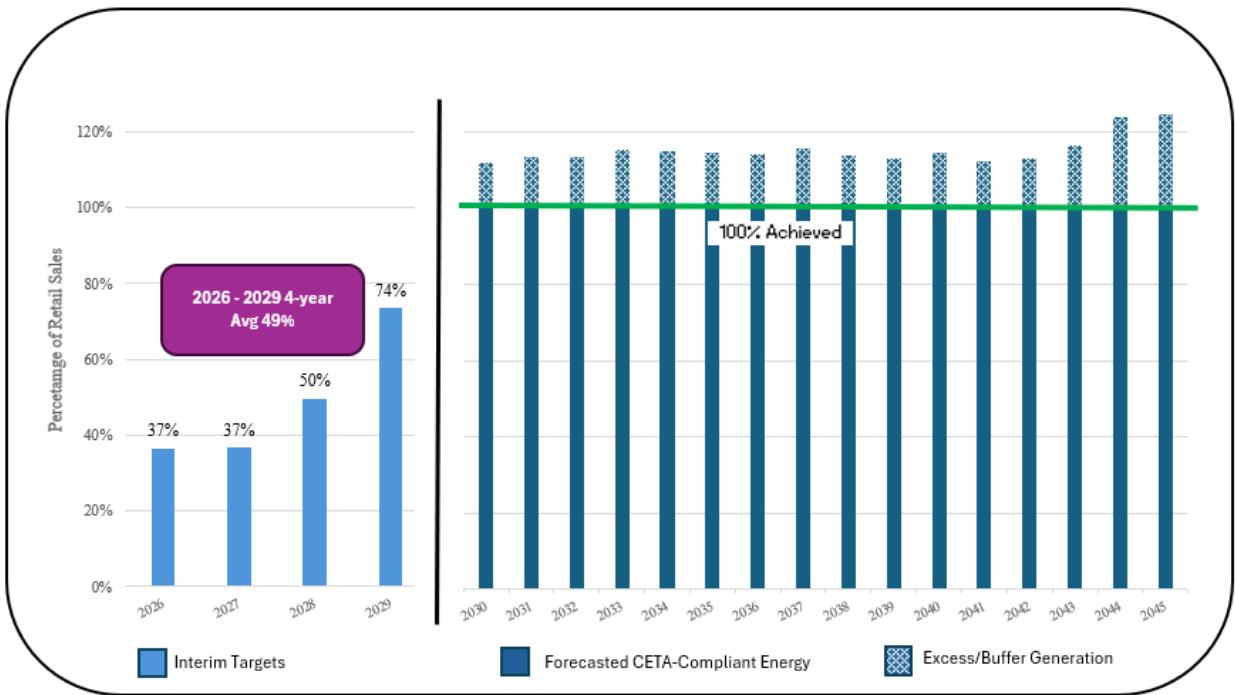
2026 Protocol Impact on Interim Targets

As discussed previously, PacifiCorp recently proposed the Washington 2026 Protocol to prescribe cost-allocation of resources to Washington customers beginning January 1, 2026. If approved by the Commission, the 2026 Protocol will dictate how the company allocates resource generation and associated attributes, impacting the allocation of CETA-compliant energy for Washington customers, particularly driven by changes to allocations for existing resources. In preparation of this CEIP, PacifiCorp relied on the currently approved allocation methodology to estimate and analyze all jurisdictional portfolios and resource selections for Washington customers. The interim targets for this CEIP are presented under those same assumptions.

PacifiCorp included testimony in its 2025 PCORC stating the proposed Washington 2026 Protocol is expected to increase near-term clean energy interim targets and improve progress towards CETA's long-term clean energy goals. To test the impacts of moving to the 2026 Protocol on the portfolio of resources selected in the 2025 CEIP, PacifiCorp ran a sensitivity of the 2025 CEIP preferred portfolio, re-dispatching the portfolio under the proposed Washington 2026 Protocol assumptions. The change in resource allocations assumptions resulted in near-term interim targets of 37 percent in 2026, 37 percent in 2027, 50 percent in 2028 and 74 percent in 2029, furthering progress towards CETA's 2030 greenhouse gas neutrality standard by an additional 3 percentage points by the end of the next planning period, relative to expected outcomes under current cost-allocation assumptions. Figure 10 depicts 2026-

2045 interim targets for the preferred portfolio re-dispatched and allocated using the proposed Washington 2026 Protocol.

Figure 10 - 2026-2045 Interim Targets under Washington 2026 Protocol



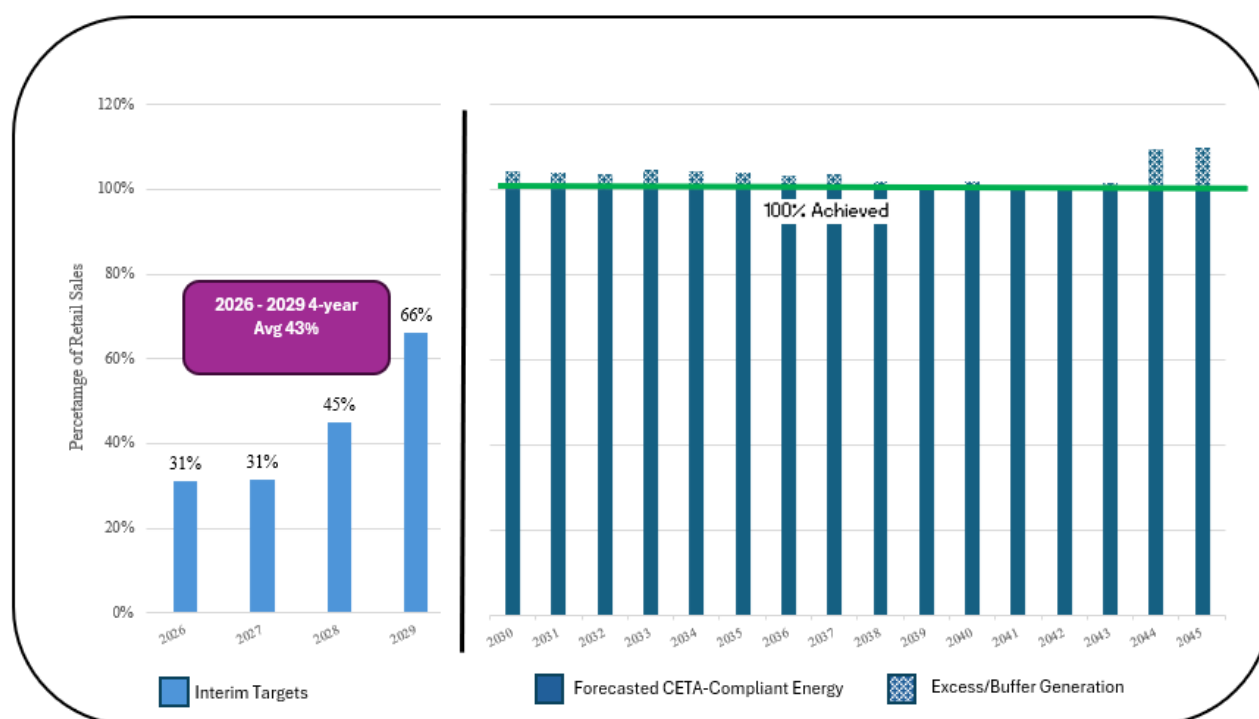
In Table 9, the near-term clean energy interim targets expressed in terms of energy produced are recast for the 2025 CEIP preferred portfolio dispatched under the cost-allocation assumptions of the proposed Washington 2026 Protocol. Under the 2026 Protocol, PacifiCorp forecasts producing 96,279 MWh more of CETA-compliant energy for Washington customers by 2029.

Table 9 - 2026-2029 Interim Targets under Washington 2026 Protocol (MWh)

	2026	2027	2028	2029	Total
Retail Electric Sales	4,023,917	4,160,614	4,297,349	4,268,516	16,750,396
Projected Renewable and Non emitting Energy	1,472,589	1,526,945	2,136,288	3,142,621	8,278,443
Net Retail Sales	2,551,328	2,633,669	2,161,060	1,125,895	8,471,953
Target Percentage	37%	37%	50%	74%	
Interim Clean Energy Target	1,472,589	1,526,945	2,136,288	3,142,621	8,278,443

Low Renewable Output Impact on Interim Targets

PacifiCorp ran a sensitivity of the 2025 CEIP preferred portfolio to test expected conditions under “low renewable output” as described previously. This sensitivity re-runs the dispatch outcomes of the preferred portfolio using less favorable renewable output as compared to the baseline modeling inputs used in the 2025 IRP and CEIP. The hourly generation profiles used for this sensitivity reflect wind, solar, and hydro shapes from 2023 conditions. Figure 11 summarizes the long-term clean energy interim targets for the preferred portfolio outcomes under low renewable output.

Figure 11 - 2026-2045 Interim Targets under Low Renewable Output

The impact of facing a future of low renewable output, relative to more optimistic assumptions embedded into standard modeling, is to lower near-term interim targets by 223,607 MWh, resulting in only a 66 percent interim target in 2029, relative to the 71 percent proposed in this CEIP, roughly 5 percentage points lower. The near-term interim targets in terms of energy under the low renewable output sensitivity are summarized in Table 10. This sensitivity provides a useful benchmark to understand the potential risk of not making expected progress towards clean energy interim targets due to unexpected lower performance of renewable resources in any given year.

Table 10 - 2026-2029 Interim Targets under Low Renewable Output

	2026	2027	2028	2029	Total
Retail Electric Sales	4,027,425	4,160,614	4,297,349	4,268,516	16,753,904
Projected Renewable and Non emitting Energy	1,254,490	1,308,662	1,932,110	2,822,735	7,317,997
Net Retail Sales	2,772,935	2,851,952	2,365,239	1,445,781	9,435,907
Target Percentage	31%	31%	45%	66%	
Interim Clean Energy Target	1,254,490	1,308,662	1,932,110	2,822,735	7,317,997

Chapter VII. Specific Targets

To support the clean energy interim targets, CETA requires utilities to set specific targets for renewable energy, energy efficiency, and demand response within each CEIP. PacifiCorp proposes specific targets for renewable energy, energy efficiency, and demand response.

Similar to the interim targets, specific targets for renewable energy are informed by the 2025 CEIP preferred portfolio which provides an optimal assessment of resources required to meet system requirements over a 21-year planning period.

The specific targets for energy efficiency and demand response are informed by the 2025 IRP but are also adjusted based on additional information and feedback from the DSM Advisory Group to determine specific targets over the next four years.⁴³ PacifiCorp’s proposed demand-side specific targets include 145,371 MWh of energy efficiency at generation (or 135,256 MWh at site, after accounting for line losses) over the next four years, and 22.0 MW of available demand response capacity by 2029.

Each target is discussed below.

Renewable Energy Targets

For 2026-2029, the renewable energy targets, specifically describing the expected generation of renewable resources to serve retail electric sales, is identical to the forecasted interim targets – there are no “non-emitting” generation resources expected to contribute towards the CETA targets by the end of 2029.

Renewable resources are defined as “water; wind; solar energy; geothermal energy; renewable natural gas; renewable hydrogen; wave, ocean, or tidal power; biodiesel fuel that is not derived from crops raised on land cleared from old growth or first growth forests; or biomass energy”.⁴⁴ A summary of projected renewable energy generation is included in Table 11 for 2026-2029, and the target percentage is determined by determining the percentage of retail electric sales that will be met with that renewable energy. PacifiCorp projects 71 percent of retail electric sales being served with renewable energy by the end of 2029.

The increase in renewable energy from 34 percent in 2026 to 71 percent in 2029 is expected to be driven both by the additions of new renewable resources that PacifiCorp has recently brought online, as described previously in Table 1, and by the significant addition of new proxy renewable resources as described in Chapter IX – Specific Actions.

⁴³ More information regarding PacifiCorp’s DSM Advisory Group including past presentations is available online at <https://www.pacificpower.net/community/washington-clean-energy-transformation-act-equity.html>.

⁴⁴ WAC 480-100-605.

Table 11 - 2026-2029 Renewable Energy Targets (MWh)

	2026	2027	2028	2029	Total
Retail Electric Sales	4,023,917	4,160,614	4,297,349	4,268,516	16,750,396
Projected Renewable Energy	1,353,697	1,424,997	2,055,679	3,046,342	7,880,715
Net Retail Sales	2,670,221	2,735,617	2,241,669	1,222,174	8,869,681
Target Percentage	34%	34%	48%	71%	
Renewable Energy Specific Target	1,353,697	1,424,997	2,055,679	3,046,342	7,880,715

Demand-Side Targets

PacifiCorp’s proposed demand-side specific targets include 145,371 MWh of energy efficiency at generation (or 135,256 MWh at site, after accounting for line losses) over the next four years, and 22.0 MW of available demand response capacity by 2029.

PacifiCorp’s energy efficiency and demand-response targets are informed by the 2025 Conservation Potential Assessment (CPA), which provided estimates of the magnitude, timing, and costs of DSM resources likely available to PacifiCorp over the planning period.⁴⁵ The study analyzed class 1, 2, and 3 DSM, i.e. demand response, energy efficiency, and rates.

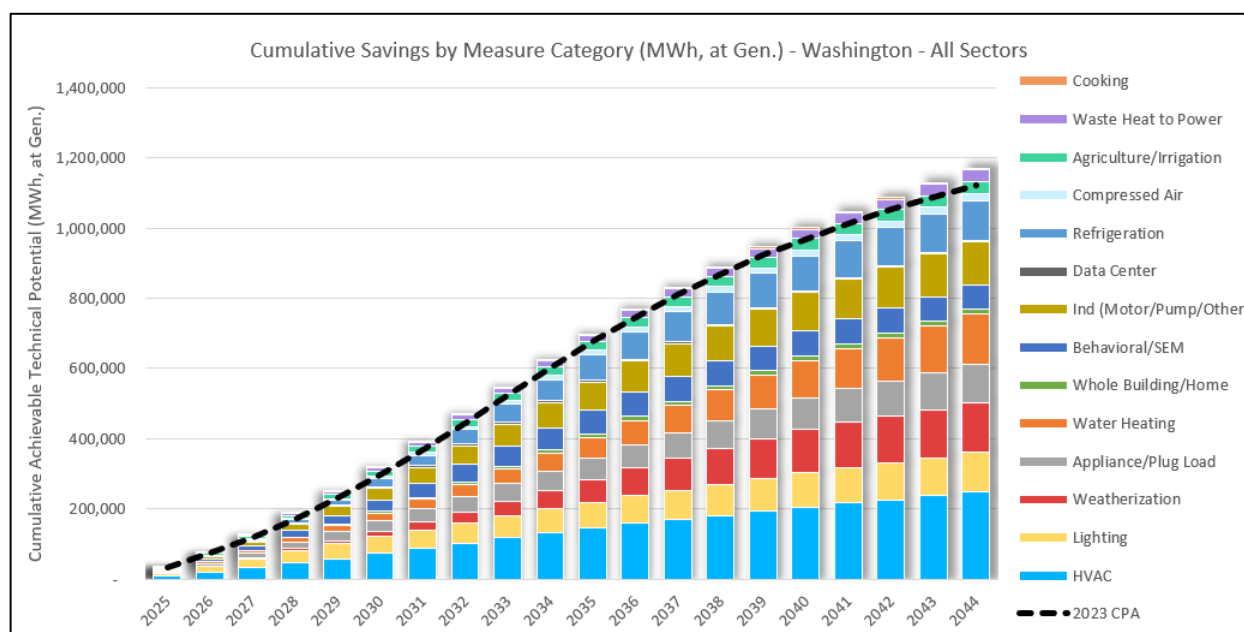
New cost-effective energy efficiency measures were among the new resource selections that were present in every IRP portfolio. The potential for these resources was first identified through the development of a CPA. Several measures quantified non-energy impacts netted against measure cost. Examples included health benefits from avoided woodsmoke with installation of ductless heat pumps, operations and maintenance cost savings with new lighting, and water savings for measures which conserve water use as well as electricity use.

For the past several IRP cycles, PacifiCorp has contracted with Applied Energy Group (AEG) to conduct this assessment.⁴⁶ A comprehensive description of the study methodology, underlying assumptions, and results can be found on PacifiCorp’s website.⁴⁷ Figure 12 shows cumulative technical achievable energy efficiency potential results from the CPA for the Washington service area.

⁴⁵ Available online at https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025-irp-support-studies/PacifiCorp_2025_CPA_Report_Vol_1.pdf and https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025-irp-support-studies/PacifiCorp_2025_CPA_Report_Vol_2.pdf.

⁴⁶ As of Q4 2024, AEG became a part of ICF.

⁴⁷ Available online at <https://www.pacificorp.com/energy/integrated-resource-plan/support.html>.

Figure 12 - Washington CPA Technical Achievable Energy Efficiency Potential

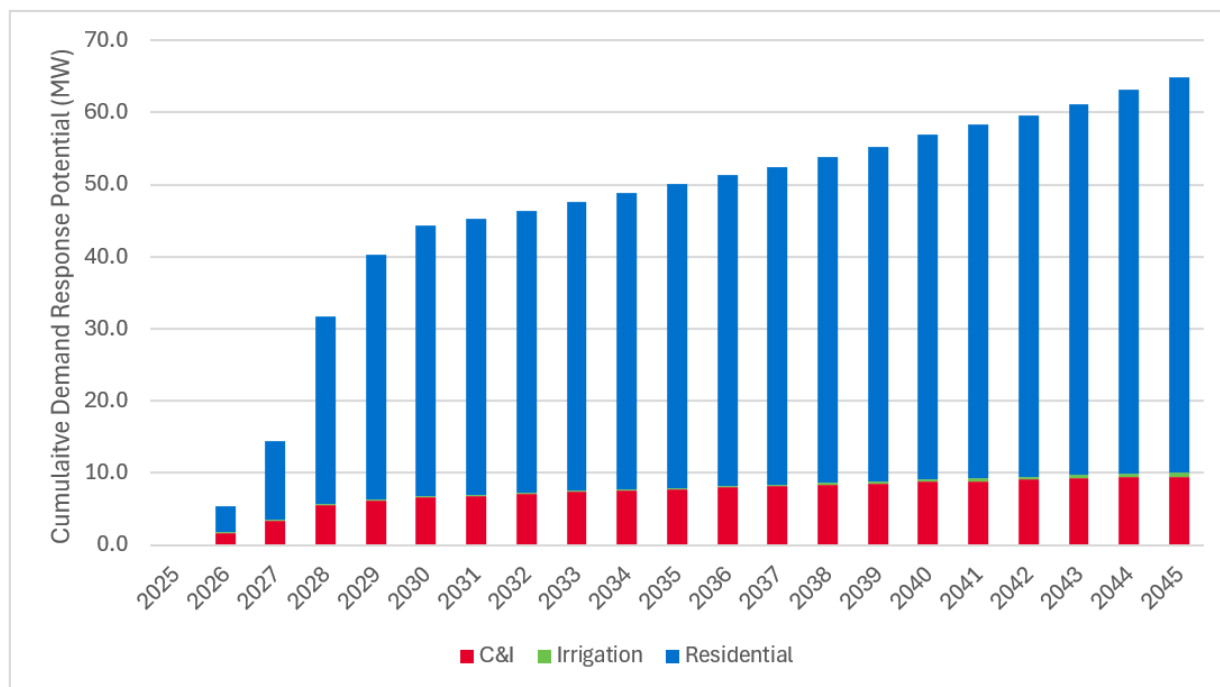
The study resulted in over 8,000 individual energy efficiency measure permutations per state which were then bundled into 27 groups for each of PacifiCorp's six states. The output from the 2025 CPA served as an input to the PLEXOS model which selected the optimal mix of resources from the defined bundles to provide system adequacy at the lowest reasonable cost, considering risk.

The conservation resources which were selected in the preferred portfolio and summarized in Table 12, became the cost-effective conservation potential, informing acquisition of energy efficiency.

Table 12 - 2025 IRP Selections: Energy Efficiency Resources, 2026-2035 (First-Year Savings, MWh at generation)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
MWh	33,253	36,986	44,044	41,252	43,767	45,340	50,434	53,981	55,377	54,949

In addition to estimating energy efficiency potential, the 2025 CPA developed an estimate for the maximum technically achievable DR potential and costs for a range of end uses, over the same planning horizon. The amount and cost of load curtailment or shift is characterized by customer type and type of end use that is being controlled. The CPA primarily used 5-year ramp rates for all non-existing programs (typical ramp time from the Northwest Power and Conservation Council's program assumptions) with the exception of several programs with longer ramp rates (grid-interactive water heaters, for example, with a 10-year ramp rate). Additional growth beyond the programs ramping up is attributed to saturations and load/customer growth. Combined, this yields a curve with a steeper ramp of potential in the near term, with a leveling-off trend after five years. See Figure 13. This final technical achievable potential for demand response is input to the IRP model as a resource option to be selected to meet system adequacy.

Figure 13 - Washington CPA Technical Achievable Demand Response Potential

The 2025 IRP included for selection 30 different demand response resource options across different load control technologies, seasons, and customer classes. These included heating, ventilation, and air conditioning (HVAC) direct load control (DLC), water heating load control, EV connected chargers, thermostats, and pool pumps, among others.

The demand response resources selected in the 2025 IRP preferred portfolio, summarized in Table 13, became the cost-effective potential ceiling, informing acquisition targets for demand response, discussed in the next section.

Table 13 - 2025 IRP Selections: Demand Response Resources, 2026-2035 (Cumulative MW)

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
MW	15.0	15.2	30.3	32.6	34.3	34.3	34.3	34.3	34.3	34.3

Class 3 DSM resources, or rates/pricing programs, include time-of-use rates, critical-peak pricing and other behavioral pricing tools. The third focus of the CPA was to quantify the technical potential and magnitude of demand impacts possible through these pricing designs. The results were used to inform future rate design concepts that are proposed with rate cases, but the IRP model is not used to determine the type and amount of pricing programs as a part of the preferred portfolio. This is because all pricing programs are designed to be cost effective to the system but may not be cost effective for the individual customer to select. Therefore, setting targets for programs that only benefit the utility system, but not customers, is not appropriate for the IRP, but is analyzed and designed through other stakeholder and regulatory processes. The company did not include time-of-use pilots in the CEIP target calculations. The impacts of the 2025 CPA and 2025 IRP on energy efficiency and demand-response targets are discussed below.

Energy Efficiency Targets

CETA requires a four-year conservation target (2026-2029) and an intermediate target (2026-2027). The IRP preferred portfolio identified cost-effective, reliable, and feasible conservation from 2026 through 2035 for the EIA target. PacifiCorp proposes to use the same forecast to draft specific targets for the CEIP, as follows:

- 2026-2027 target is provided with 2026-2027 BCP, which will be filed on November 1, 2025.
- 2028-2029 target uses additional two years of conservation pro-rata share, plus adders for decoupling. These targets will be updated in 2027 through the 2028-2029 BCP process via the EIA docket.

The conservation forecast for end-use efficiency, behavioral programs and market transformation (collectively referred to in this document as energy efficiency) is developed using the following data sources, assumptions and methodology:

- Completion of the 2025 CPA.
- Economic screening/selection of resources through the 2025 IRP development process.
- Addition of projected savings from the existing Home Energy Reports (behavioral) program, along with other categories of conservation defined by the EIA, including production efficiency, distribution efficiency, and high efficiency cogeneration.
- Identification of adjustments to the 2025 IRP preferred portfolio conservation resource selections based on updates from Regional Technical Forum (RTF) unit energy savings values, along with addressing areas of uncertainty in the BCP.
- Comparison of the annual conservation forecast with the pro-rata share of the ten-year forecast. The target is the larger of the two consistent with the methodology used in the EIA process.

Table 14 - 2026-2029 Energy Efficiency Targets

Target Category MWh at Generation	2026	2027	2028	2029
Washington - 1st Year Energy Efficiency IRP Preferred Portfolio	33,253	36,986	44,044	41,252
Additional Conservation (HERs, production, distribution, co-gen)	2,686	2,334	7	7
RTF & Other Adjustments (Total)	(8,344)	(9,091)	(10,909)	(10,522)
Adjusted Energy Efficiency Forecast - Annual	27,595	30,228	33,142	30,737
Adjusted Energy Efficiency Forecast - Pro-rata	34,612	34,612	34,612	34,612
Decoupling Commitment (5%)	1,731	1,731	1,731	1,731
Annual Target	36,343	36,343	36,343	36,343
2026-2029 Target:				145,371

PacifiCorp notes that the 2026-2029 target is equal to 135,256 MWh at site, after accounting for line losses.

Demand-Response Target

In setting a demand response target for 2029, PacifiCorp applied lessons learned from setting a target for 2025 in its first CEIP. PacifiCorp is unlikely to meet its 2025 target of 37.4 MW. PacifiCorp set this target in its initial CEIP based on its 2021 CPA and bids received from its 2021 RFP (which informed the 2021 IRP modelling). Neither of these sources was informed by concrete experience operating

demand response programs in Washington state, since PacifiCorp's first demand response programs, Irrigation Load Control and Wattsmart Business Demand Response programs, did not begin recruiting participants until 2023. Since launching its portfolio, PacifiCorp has updated its understanding of achievable ramp rates and program costs. In addition, the company has refined its understanding of its own grid management needs and learned valuable lessons about delivering demand response programs to different customer segments. PacifiCorp has also navigated external headwinds, such as severe equipment shortages following the COVID pandemic that extended into late 2023 that impacted the Wattsmart Business Demand Response program. This information is documented in the company's demand response annual reports, which are publicly available.⁴⁸

To establish a 2029 target for demand response resources, the company relied on results from the 2025 CPA and the 2025 IRP, as described in the previous section, in addition to the company's own forecasts for the maximum ramp rate for each program. When reviewing demand response resources in the 2025 IRP preferred for target setting, several important considerations were taken into account. Those considerations include:

1. The 2025 IRP tested the upper limit of possibility with respect to demand response resources, exploring cost-effectiveness thresholds of the resource by modeling numerous program designs and accelerated acquisition in the near term.
2. Demand-response offerings, characterized by sector, rely on a subset of electrical end uses that are understood to have the potential to provide demand response services. While program design offerings for demand response differ in IRP modeling, the capacity derived from a given end use may have some interaction with other resources and programs characterized in the CPA. For example, a smart thermostat demand response program and a residential HVAC DLC program are different programs with different pricing and performance characteristics, however, both rely on similar electric end-uses for demand response services.
3. Experience from operating demand-response programs in Washington since 2023 have informed a bottom-up forecast of load potential, based on on-the-ground customer recruitment strategies and historic adoption rates. The IRP results may indicate incremental increases that are highly variable over time. A surge in capacity in one year may be followed by several years of no incremental additions, for example. Program operation, by nature, is less dynamic. In order to optimize the program benefit relative to costs, it is necessary to ramp program participation gradually but steadily, to converge with IRP selections over a long-term timeframe.
4. Initiation, facilitation, and expansion of demand response programs requires on-going evaluation of program design and strategies to deliver and maintain positive customer experience and minimize program attrition over time. IRP modeling may not fully account for how programs may evolve over time and how customers interact with different programs or offerings. PacifiCorp plans to be deliberative and meticulous in launching and growing demand response programs to prevent customer fatigue and to maintain and grow participation in programs over time.
5. IRP modeling examines capacity impacts from both a summer and winter standpoint. IRP results reflect the summation of seasons; it is possible that there will be divergences in how capacity impacts are reported from demand response programs (average annual impacts) and how they are modeled (sum of seasonal impacts).

One result of this 2029 target-setting process is that the target for 2029 is below the target for 2025, which had been established as part of the original 2021 CEIP. Notwithstanding, it is important to note

⁴⁸ PacifiCorp 2023 Demand Response Annual Report and 2024 Demand Response Annual Report are filed with the Commission under docket UE-220550. <https://www.utc.wa.gov/casedocket/2022/220550/docsets>

that the 2029 target still represents a significant increase in PacifiCorp’s demand response capacity, relative to the present. The updated target is partially a result of more conservative estimates of the potential ramp rates for individual programs, as described above. Another important factor is the variability in the IRP selection for demand response. From the initial 2021 IRP, through the 2023 IRP Update, the selection for cumulative demand response capacity by 2025 fell from 77.7 MW (2021 IRP) to 48.5 MW (2023 IRP Update). In the 2025 IRP, the cumulative selection for demand response by 2029 was 32.6 MW. While these shifts are relatively minor compared to PacifiCorp’s overall load, they represent a more substantial shift relative to the demand response portfolio. The relative volatility of the IRP selections from one iteration to the next was another consideration in determining the extent to which the IRP informed the final target.

In summary, while the IRP indicates that up to 32.6 MW of demand response capacity by 2029 would be cost-effective, meeting this selection would require the existing programs to ramp at an unprecedented rate, and then not grow at all for the next several years. This is impractical from a program management standpoint, because implementers need a more consistent workload in order to maintain an optimal level of program staff. PacifiCorp has set a 2029 target that is below the 2025 IRP’s selection for that year but still represents a stretch goal as it is slightly above the company’s initial program growth forecasts. PacifiCorp’s estimated demand response target for the 2026-2029 CETA planning period is 22.0 MW of available demand response by December 31, 2029.⁴⁹ To achieve this target PacifiCorp will need to expand its 2024 demand response capacity by nearly a factor of three in just five years. An estimated forecast of the growth of demand response capacity to achieve this target is provided in Table 15.

Table 15 - Estimated Growth Forecast to Achieve the Demand Response Target

	2026	2027	2028	2029
Available Capacity, MW at Generation	15	18	21	22

⁴⁹ This target includes both summer and winter capacity estimates and does not include line losses.

Chapter VIII. Customer Benefit Indicators

PacifiCorp’s CBI framework offers a structured approach to guiding and improving customer support and clean energy programs, ensuring the benefits and burdens of the clean energy transition are shared equitably across all communities consistent with CETA objectives. Since its inaugural CEIP filing, the company has engaged with regulators and advisory groups to refine the framework and its method for identifying named communities to better reflect customer needs in its Washington service area.

The sections that follow detail: (1) the rationale and methodology behind the company’s selection of each CBI and its companion metrics, and (2) the ways in which these metrics may influence the company’s operational decisions and strategic initiatives. This overview provides interested parties with a clear understanding of the framework’s foundation, and its practical implications for measuring the company’s impact on the communities it serves. CBI outcome data is published in the annual CEIP report card and progress reports, with additional insights available in the slides, notes, and recordings of its CEIP Engagement Series meetings. All these materials are available for viewing and downloading on the company’s CETA webpage.⁵⁰

Evolution of the CBI Framework

As noted in PacifiCorp’s inaugural CEIP, Washington’s transition to a clean electricity system necessitates comprehensive, system-wide changes that impact utilities and customers. These changes bring a mixture of costs and benefits to all communities. To support the equitable realization of the benefits in alignment with CETA, PacifiCorp co-developed a CBI framework in collaboration with members of the public and community-based entities, including the EAG, that:

- **Identifies named communities:** While many of the projects and programs outlined in PacifiCorp’s CEIP provide benefits to all customers, the CBI framework includes additional considerations to ensure that customers in HICs and VPs, collectively referred to as named communities, are prioritized in the distribution of benefits and reduction of burdens.
- **Establishes a set of Customer Benefit Indicators:** CBIs serve as a critical tool for evaluating PacifiCorp’s programs, actions, and investments and the impacts on the customers it serves, with particular emphasis on advancing equity for named communities. The ten CBIs presented in this CEIP (see Table 16) are designed to guide and measure progress toward energy equity-centered outcomes that include reducing energy burden, enhancing access to environmental benefits, improving public health outcomes, and strengthening grid resilience and reliability.
- **Establishes metrics to measure progress toward reducing those burdens and delivering equitable benefits:** To effectively measure the impact of its CBIs, PacifiCorp developed a set of companion metrics, each designed to capture meaningful outcomes related to equitable distribution of benefits, customer well-being, and system performance. In support of transparent and data-driven planning, the company also established a baseline for each metric to enable tracking of progress over time. This baseline serves as a foundational reference point for evaluating how its actions and investments are influencing outcomes aligned with the CBI framework.

⁵⁰ PacifiCorp’s CETA webpage, available online at: <https://www.pacificpower.net/community/washington-clean-energy-transformation-act-equity.html>.

Since the filing of the inaugural 2021 CEIP, PacifiCorp has made additions and updates to its CBI framework to reflect settlement conditions included as part of the Commission approval of PacifiCorp's 2021 Revised CEIP.⁵¹ Many of the conditions were addressed in PacifiCorp's 2024 Annual CEIP Progress Report while a few are ongoing, and described in this chapter, or are permanently implemented changes reflected in this CEIP and CBI framework.⁵² For more information regarding how PacifiCorp addressed each condition, refer to Appendix B.

Importantly, although PacifiCorp has established baselines for each of its CBIs and associated metrics, it has not established specific targets. This approach acknowledges that the CBIs identified within this framework serve primarily to provide the company with meaningful insights into the impacts of its activities on the communities it serves over time, while also recognizing that various external factors beyond the company's control may affect the outcomes of its efforts. Nonetheless, CBIs can and do inform company planning and decision-making where it is appropriate and applicable to do so. For example:

- PacifiCorp incorporated relevant CBIs into a nonprice scoring methodology for its 2025 Washington Situs RFP to include consideration of benefits for supply-side resources that may not be captured by cost metrics alone. These include, for example, the addition of questions to evaluate the extent of planned community outreach and engagement and investment(s) in impacted communities.
- As part of the Low-Income Weatherization Program, the company implemented fuel conversion measures for ductless heat pumps. Additionally, based on interested parties' engagement and recommendations, the company expanded these measures to include ducted heat pumps. This expansion provided partner agencies with additional resources to support income-qualified customers. While no fuel conversion projects have been completed to date, PacifiCorp continues to engage with partner agencies to identify potential projects.
- For the Wattsmart Business program, the introduction of higher small business incentives in HICs has proven to be a highly effective strategy for increasing program participation. Following the implementation of these incentives, the company observed a notable increase in program participation among small businesses in these communities, underscoring the value of targeted program design.

Furthermore, PacifiCorp committed to expanding data availability throughout the 2021 CEIP reporting period and remains dedicated to these efforts. Going forward into the 2025 CEIP reporting period, the company will look into ways to streamline data collection and aggregation activities, and improve the accessibility of its reporting. To promote operational efficiency, the company anticipates leveraging data collected through other regulatory dockets where appropriate, thereby avoiding unnecessary duplication of data collection activities

⁵¹ Docket UE-210829, Commission Order 06, Appendix A: Multiparty Settlement Agreement, CBI conditions 1-14 (Oct. 25, 2023).

⁵² PacifiCorp's 2024 CEIP Progress Report, Docket UE-210829 (Jul. 1, 2024) (available online at: <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=867&year=2021&docketNumber=210829>).

CBIs and Energy Justice

As discussed in Chapter II – Energy Equity, PacifiCorp has committed to taking intentional steps to align its work with the four core tenets of energy justice. At a high level, the company’s CBI framework operationalizes the four core tenets of energy justice as described below:

- **Recognition justice.** Systematically identifying HICs and VPs using a combination of data-driven methodologies and community-informed insights.
- **Procedural justice.** Actively engaging with representatives from named communities, advisory groups such as the EAG, other interested parties, and peer utilities to evolve and refine its CBI framework.
- **Distributional justice.** Establishing CBI metrics to evaluate the extent to which named communities are benefiting from the clean energy transition and whether the associated burdens are being minimized.
- **Restorative justice.** Undertaking intentional and structured efforts to integrate equity and the four tenets of energy justice into the company’s internal CEIP (and related planning) processes in alignment with regulatory guidance.

Within this context, it is important to note that CBIs are an important and increasingly leveraged mechanism to advance equity within energy planning. However, the company regards them as one part of a broader, company-wide equity framework that is currently in development,⁵³ as the company continues to support ongoing efforts to identify, measure, and track equity outcomes related to its CBIs, while also meeting regulatory expectations and community-defined priorities.

PacifiCorp’s CBI Framework

PacifiCorp developed its CBIs through an iterative, engagement process that leveraged the voices, perspectives, expertise, and creativity of internal subject matter experts and external interested parties, including: the EAG; the LIAG; DSM Advisory Group; IRP interested parties; WUTC Staff; the Washington Attorney General’s Office of Public Counsel; and interested members of the public

This process resulted in the ten CBIs and associated metrics that make up PacifiCorp’s CBI framework. Where available, baselines for each metric were reported in PacifiCorp’s inaugural 2021 CEIP filing. In PacifiCorp’s 2023 CEIP Progress Report, the company provided a second incremental measurement for each metric, as well as an initial analysis of trends and the impact of PacifiCorp’s fulfillment to date of its CEIP utility actions. The company has also presented the CBIs, metrics, and both waves of metric valuation in multiple public engagement sessions. The current CBI framework is summarized in Table 16.

⁵³ For additional discussion and insights, the Energy Equity Project (EEP) framework, developed by the University of Michigan – School for Environment and Sustainability, is a potentially valuable resource that may offer important insights and guidance to support the company’s ongoing efforts toward continuous improvement of its CBI framework. The EEP framework is uniquely suited to meet the requirements of WAC 480-100-640, as it is specifically designed to operationalize equity within the energy sector and provides a structured methodology for measuring and tracking benefits across diverse communities.

Table 16 - PacifiCorp's Customer Benefits Indicators

No.	CBI Category	CBI	Metric(s)
1	Non-energy benefits	Increase culturally and linguistically responsive outreach and program communication.	- Number of topics addressed in outreach in non-English languages. - Number of impressions from non-English outreach. - Percentage of responses to surveys in Spanish. - Number of programs for which PacifiCorp provides translation services or translated material. - Number of languages PacifiCorp uses for translated material.
2	Non-energy benefits	Increase community-focused efforts and investments.	- Number of workshops on energy related programs. - Headcount of staff supporting program delivery in Washington who are women, minorities, and/or can show disadvantage. - Number of public charging stations in named communities.
3	Energy benefits	Increase participation in company energy and efficiency programs.	- Number of households/businesses, including named communities, who participate in company energy/efficiency programs. - Dollar value of energy efficiency expenditures. - Number of households/businesses who participate/enroll in demand response, load management, and behavioral programs. - Dollar value of demand response, load management, and behavioral program expenditures. - Number of residential appliances and equipment rebates provided to named community customers (where known). - Number of residential rebates provided to customers residing in rental units. - Investment and/or energy efficiency savings in rental residential housing stock.
4	Energy benefits	Increase efficiency of housing stock and small businesses, including low-income housing.	- Number of households and small businesses that participate in company energy/efficiency programs. - Dollar value of energy efficiency expenditures.
5	Energy benefits	Increase renewable energy resources and reduce emissions.	- Amount of renewables/non-emitting resources serving Washington. - The amount of Washington allocated greenhouse gas emission from Washington allocated resources. - NOx and SO₂ emissions (PROPOSED).
6	Reduction of Burdens	Decrease households experiencing high energy burden.	- Number and percent of customers experiencing high energy burden by: highly impacted communities, vulnerable populations, low-income bill assistance (LIBA) and Low-Income Weatherization (LIWx) participants, and other residential customers; and average excess burden per household. - Number and percentage of eligible households that participate in Low-Income Bill Assistance (LIBA) programs. - Number and percentage of eligible households that participate in Low-Income Weatherization (LIWX) programs.

No.	CBI Category	CBI	Metric(s)
			Number and percentage of customers from named communities participating in LIBA and LIWX programs.
7	Energy Benefits	Improve indoor air quality.	- Number and percentage of households using wood as primary or secondary heating. - Number and percentage of non-electric to electric conversions for Low-Income Weatherization program.
8	Energy Benefits	Reduce frequency and duration of energy outages.	SAIDI⁵⁴, SAIFI⁵⁵, CAIDI⁵⁶, and CEMI-4⁵⁷ scores at area level including major events.⁵⁸
9	Energy Benefits	Reduce residential customer disconnections.	- Number and percentage of residential electric disconnections for nonpayment by month, measured by location and demographic information (zip code/census tract, known low-income (KLI) customers, Vulnerable Populations (where known), Highly Impacted Communities, and for all customers in total). - Residential arrearages as reported in accordance with Commission Order 04 (Appendix A Third Revised Term Sheet, Section J, Part 8 a-c)
10	Energy Benefits	Increase named community clean energy	- Total MWh of distributed energy resources 5 MW and under, where benefits and control of resource accrue to members of named communities. - Total MWs of energy storage resources 5 MW and under, where benefits and control of the resource accrue to members of named communities. - Number (i.e., sites, projects, and/or households) of distributed renewable generation resources and energy storage resources, where the benefits and control of the resource accrue to members of named communities, including storage/ backup/ emergency powered centers for emergencies. - Total MWh of energy savings from EE programs, where benefits and control of the savings accrue to members of named communities. - Where known, for a), b), c), and d) above, PacifiCorp will specify whether the named community resources are highly impacted communities (HIC) and/or vulnerable population and/or Known Low-Income (KLI).

⁵⁴ SAIDI (System Average Interruption Duration Index) is a measure of the average cumulative duration (typically minutes) of outages for customers served in a given area (e.g., census tract) and time period.

⁵⁵ SAIFI (System Average Interruption Frequency Index) is a measure of how often customers in a given area and time period experience an outage.

⁵⁶ CAIDI (Customer Average Interruption Duration Index) is a measurement of the average amount of time (typically minutes) it takes to restore power after an outage occurs for impacted customers.

⁵⁷ CEMI (Customers Experiencing Multiple Interruptions) measures the percentage of customers who experience more than a specified number of outages within a given period. Pursuant to CBI Settlement Condition 8, PacifiCorp, in collaboration with stakeholders, determined that the IEEE Customers Experiencing Multiple Interruptions (CEMI-4) index will be used to measure the frequency of outages, as it more accurately reflects customer-level outage experiences.

⁵⁸ Higher SAIDI, SAIFI, CAIDI, and CEMI values can indicate that an area is more prone to outages. However, it is important to note that extreme weather, natural disasters, wildfire mitigation efforts, or other unforeseen events outside the control of the utility can result in higher values.

This CBI framework is based on an outcome-oriented approach designed to align community benefits with measurable, equity-centered outcomes. The key steps in that process, highlighting how each stage was shaped by an intentional focus on outcomes that reflect community priorities and long-term impact, included:

1. **Identify named communities and the challenges they face:** To monitor the equitable distribution of benefits, PacifiCorp took input from interested parties and the EAG using collaborative process to identify named communities and consider the challenges and barriers that they face.
2. **Match challenges to corresponding benefit categories:** To support the equitable distribution of benefits, PacifiCorp engaged in an iterative process informed by input from interested parties and the EAG. This approach helped identify named communities and incorporate the unique challenges and barriers they experience into the framework. This effort was then shared with the EAG and compared with peer utility methodologies for validation.
3. **Determine the challenges that PacifiCorp can influence:** PacifiCorp then prioritized the challenges that it could influence as a utility, putting focus on areas where its programs and investments could meaningfully advance the equitable distribution of benefits. These challenges were then organized into broader benefit categories, each of which reflected a key dimension of community need. Building on this foundation, PacifiCorp developed a set of draft CBIs designed to monitor the distribution of benefits in measurable and impactful ways. Through a collaborative and iterative engagement process, the EAG and interested parties were able to offer feedback on the proposed CBIs.
4. **Align CBIs with regulation:** Guidance from Commission Staff played a key role in the development of the initial CBI framework. As part of the development process, PacifiCorp presented its draft CBIs to Staff for review and input, which was instrumental in validating its alignment with regulatory intent and ensuring it met the expectations set forth under CETA.
5. **Weigh CBIs to understand the significance and prioritization of each:** PacifiCorp incorporated input from an EAG activity, and a public survey conducted between July 2 and August 10, 2021. In the survey, customers were asked to rank each benefit category by priority to help identify the categories that mattered most to them. The goal was to gain insight into customer preferences and priorities for the CBIs, as well as to better understand the key concerns and challenges they faced in the clean energy transition. Based on the results of the prioritization exercise and survey responses, the highest-ranked CBIs in each benefit category were selected for inclusion in the 2022 CEIP. The revised list of CBIs was then reviewed by interested parties and the EAG through a series of public meetings.
6. **Incorporating input on CBIs:** PacifiCorp conducted a comprehensive review of the Joint Comments on CBIs submitted by the Energy Project, Front and Centered, NW Energy Coalition, and the Washington State Office of the Attorney General, Public Counsel Unit, collectively known as the Joint Advocates. As part of this process, PacifiCorp compared the CBIs proposed by the Joint Advocates with those under consideration by the company. This mapping exercise led to the refinement of several CBIs. To further support collaboration and respond to comments on the CBIs included in the draft CEIP, PacifiCorp held a conference call with the Joint Advocates to gain further insight. Additionally, The Energy Project completed its own comparative analysis of the CBIs proposed by both parties.
7. **Define metrics to monitor and track CBIs:** PacifiCorp created a set of quantifiable companion metrics to measure the CBIs, tying at least one metric per CBI. PacifiCorp used internal and external data sources, interested parties, peer utilities, advocates, and the EAG to refine and validate the proposed metrics. PacifiCorp prioritized metrics that were reliable, repeatable, and representative of communities served by the company and the objectives of the CBIs. The metrics are described at greater length in the next section.

8. **Use CBIs to inform specific actions:** In this final step in the process, PacifiCorp aimed to “put it all together” and apply the CBIs to specific actions, in accordance with WAC 480-100-640(5). Building on earlier phases of analysis and engagement, PacifiCorp convened internal meetings with subject matter experts across departments to evaluate how specific actions could meaningfully address disparities and deliver measurable benefits to named communities. This culminated in a more formalized and comprehensive mapping of actions to CBIs.

Vulnerable Populations Update

CBI condition 14 from the 2021 Revised CEIP settlement conditions requires PacifiCorp: “convene interested stakeholders for up to two workshops to review and improve the company’s approach to identifying and tracking vulnerable populations. These workshops will consider the vulnerability factors listed below (including reasonable alternatives or additions) and determine the extent to which the company should incorporate each into the 2025 CEIP.” A discussion on this condition follows.

Vulnerable Populations Workshops

PacifiCorp convened three workshops with Washington interested parties and advisory group members to review and refine its methodology for identifying and monitoring vulnerable populations. These workshops also examined the vulnerability factors defined in CBI condition 14. The first workshop, held in June 2024, focused on PacifiCorp’s current approach to identifying and tracking vulnerable populations, and a review of peer utility practices. The second workshop introduced a revised geographic methodology that incorporated vulnerability criteria informed by input from the EAG and aligned with the vulnerability factors outlined in the settlement agreement. The third workshop, built on feedback from the second, further refined the methodology to include additional vulnerability criteria. The updated vulnerable population methodology was adopted by the company in January 2025.

PacifiCorp’s revised vulnerable population geographic methodology is modeled after the Washington Department of Health’s (WDOH) HIC framework and applies a percentile ranking approach to census tracts within the company’s Washington service territory. However, unlike the WDOH methodology, PacifiCorp’s approach uses a total of thirty-nine criteria to identify VPs and HICs, nine of which are not currently used by the WDOH. Under the newly adopted vulnerable population geographic methodology, thirty-six of the sixty-one census tracts within the company’s Washington service area have been identified as vulnerable. The updated vulnerability criteria are presented below in Table 17.

Table 17 - Population Vulnerability Factors

Variable	Data Source
Tribal Flag	Internal Data
Rural (RUCA)	United States Department of Agriculture
HUD Qualified Census Tract	Housing and Urban Development
Community in Economic Distress	US Dept. of the Treasury
Older adults (>=65 Years)	American Community Survey
Young Children (<5 Years)	American Community Survey
Single Parents	American Community Survey
Immigrant (Foreign Born)	American Community Survey

Variable	Data Source
Race	American Community Survey
Ethnicity - Hispanic	American Community Survey
Non-English at Home	American Community Survey
Deaths from Cardiovascular Disease	Washington Department of Health – Washington Tracking Network
Low Birth Weight	Washington Department of Health – Washington Tracking Network
Hearing Impairment	American Community Survey
Disabilities	American Community Survey
Hospitalization Rate	Comprehensive Hospital Abstract Reporting System
Deep Poverty (<=50% FPL)	American Community Survey
At or Below Poverty Level (<=200% FPL)	American Community Survey
Fixed Income	American Community Survey
Energy Burdened	Low-Income Energy Affordability Data Tool
Housing Quality	Housing and Urban Development
Transportation Burdened	Not Available
Food Insecurity	United States Department of Agriculture
Unemployment	American Community Survey
Certified MWBE	Certified Business Directory
Agricultural Workers	American Community Survey
Low Education Attainment	American Community Survey
Renters	American Community Survey
Multi-Generational Household	American Community Survey
Multi-Family Household	American Community Survey
Gas-Heated Homes	American Community Survey
Private Generation	Internal Data
Different Land Statuses	Yakima County Assessment Office/Internal Data
Access to Internet	American Community Survey
Access to Healthcare (% Insured)	American Community Survey
PM2.5	Washington Department of Health – Washington Tracking
Medical Certificates	Internal Data
Arrearages	Internal Data
Disconnections	Internal Data

As described in PacifiCorp’s 2025 CEIP Progress Report,⁵⁹ the change in the company’s vulnerable populations methodology impacted how CBIs are reported. Because the new methodology was adopted in January 2025, program participation percentages were available for the 2024 program year only, with no historical data for prior years. The resulting metrics therefore establish the baseline count and percentage of named communities served by each program. Going forward, the company expects to use this data to inform future program planning and support targeted outreach to named communities,

⁵⁹ PacifiCorp’s 2025 CEIP Progress Report, Docket UE-210829 (Jul. 1, 2025) (available online: <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=1390&year=2021&docketNumber=210829>).

consistent with CETA’s directive to ensure that the benefits of the clean energy transition are distributed equitably.

Further Refinement of Vulnerable Populations

Use of 2020 Census Tracts

PacifiCorp recognizes that the State of Washington uses 2010 census tracts in its Environmental Health Disparities Map and other tools. Nonetheless, the company is exploring the practicality of: (1) transitioning to use of the 2020 census tracts to track its CBI metrics and (2) continually updating its methodology for identification of vulnerable populations to align with each subsequent decennial census. Using the most current tract boundaries is more likely to reflect current population patterns and community characteristics that may not be captured in dated tract boundaries.

Identification of Critically Vulnerable Populations

CBI condition 13, from the 2021 Revised CEIP settlement conditions, dictates the following: “PacifiCorp must choose at least two of its current CBIs and work with stakeholders to determine which five subsets of PacifiCorp’s named communities in its system, and at what granularity, should be tracked and reported for the chosen CBIs.”

PacifiCorp held a listening session with its EAG July 2025, to solicit input on which five subsets of named communities within its service area should be prioritized for tracking, as well as the appropriate level of granularity at which they should be tracked. EAG members emphasized the importance of tracking named communities of Hispanic/Latino/a/e ethnicity, low-income migrants, multi-generational households, renters, agricultural workers, and non-English-speaking communities. The corresponding vulnerability factors are presented in Table 18.

Table 18 - Proposed Vulnerability Factors for Critically Vulnerable Populations

Variable	Data Source
Immigrant (Foreign Born)	American Community Survey
Ethnicity - Hispanic	American Community Survey
Non-English at Home	American Community Survey
At or Below Poverty Level	American Community Survey
Agricultural Workers	American Community Survey
Renters	American Community Survey
Multi-Generational Household	American Community Survey

Additionally, the company will assess, in collaboration with the EAG, what granularity would be appropriate and valuable to track the vulnerability factors identified in Table 18.

In the coming months, PacifiCorp will continue to engage with the EAG and other advisory groups as appropriate to refine its categorization of named community subsets, assess the appropriate geographic scale for tracking certain demographic and socioeconomic characteristics, and/ or develop methodologies for integrating this information into future planning processes. PacifiCorp emphasizes that this work is analytical in nature and is intended solely to improve the company’s understanding of

community demographics relative to the distribution of benefits and burdens in its Washington service area.

Companion Metrics

Companion metrics serve as critical complements to CBIs by significantly enhancing the usefulness and robustness of the overall framework. By providing additional detail and analytical depth, companion metrics enable a more comprehensive assessment of whether benefits are being delivered equitably, not just across the general population, but specifically to named communities.

This greater granularity allows PacifiCorp to disaggregate CBIs into specific, measurable components, enabling more refined and insightful analyses relative to the impacts of company programs. This provides a clearer understanding of how benefits are distributed across different customer segments, including by income level and demographic characteristics. Importantly, companion metrics also support the ability to monitor incremental progress over time, which is essential for monitoring program effectiveness and informing adjustments as needed. The section below provides a description of the companion metrics the company developed for its CBI framework.

Reduction of Burdens

Benefits from customer programs that result in lower energy prices are an essential component of a fair and inclusive clean energy transition. These benefits not only improve overall affordability for customers but also help reduce the disproportionate energy burden faced by named communities. Lower energy prices enhance economic resilience, support household stability, and create more equitable access to clean energy technologies and services. As such, ensuring that the cost-saving impacts of customer programs are equitably distributed across all customer segments, particularly named communities, is a vital consideration.

PacifiCorp has five companion metrics designed to track the reduction of burden in the communities it serves:

- Number and percent of households with high energy burden, with high energy burden defined as greater than or equal to six percent of household annual income for all PacifiCorp customers, known low-income (KLI) customers, and named communities.
- Number and percent of customers experiencing high energy burden by highly impacted communities, vulnerable populations, low-income bill assistance (LIBA) and Low-Income Weatherization (LIWx) participants, and other residential customers; and average excess burden per household.
- Number and percentage of eligible households that participate in LIBA programs.
- Number and percentage of eligible households that participate in LIWx programs.
- Number and percentage of customers from named communities participating in the LIBA and LIWx programs.

LIBA and LIWx program participation tracking provides concrete, measurable insight into how well energy affordability programs are supporting named communities, especially as energy costs continue to rise in tandem with the transition to clean energy. Further, taking the additional step of tracking LIBA and LIWx program participation at the census tract level can help to identify whether named communities are receiving this critical support. For example, disparities in enrollment can point to

systemic barriers like language gaps, digital access issues, or burdensome paperwork. It can also reveal ways that utilities can facilitate outreach regarding these critical programs.

As part of the company's efforts to meet the requirements stipulated in CBI condition 13, PacifiCorp selected CBI six, to decrease household energy burden, as one of its chosen CBIs. This means that, in tandem with tracking the critically vulnerable populations described above, it will also take the extra step of tracking customer participation in the LIBA and LIWx programs relative to these populations.

Non-Energy Benefits

Ensuring that program outreach is culturally appropriate and linguistically relevant to all communities is critical to advancing energy equity. Language barriers, in particular, can significantly limit awareness, understanding, and participation in utility programs, particularly in named communities. By providing outreach materials in multiple languages and formats, PacifiCorp can help bridge communication gaps, reduce barriers to engagement, and promote more equitable access to energy assistance, energy efficiency, and other customer support programs. These efforts align with the company's broader objectives by helping to ensure that all customers, regardless of language proficiency or cultural background, have meaningful opportunities to benefit from utility services and programs. PacifiCorp has identified five companion metrics to monitor whether its outreach to customers is both culturally and linguistically responsive:

- Number of programs for which PacifiCorp provides translation services or translated material.
- Number of impressions from non-English outreach.
- Percentage of responses to surveys in Spanish.
- Number of programs for which PacifiCorp provides translation services or translated material.
- Number of languages PacifiCorp uses for translated material

As part of the company's efforts to meet the requirements stipulated in CBI condition 13, PacifiCorp selected CBI one, to increase culturally and linguistically responsive outreach, as one of its chosen CBIs. This means that, in tandem with tracking the critically vulnerable populations described above, it will also take the additional step of monitoring the impact of its non-English outreach relative to these populations, specifically.

Tracking benefits related to local jobs and workforce diversity are a critical dimension of equitable clean energy implementation. Programs and investments that generate high-quality, family-sustaining jobs within the company's service area has the potential to strengthen local economies and contribute to long-term community resilience. Prioritizing workforce diversity ensures that the economic opportunities associated with these opportunities are inclusive and accessible to individuals from named communities. PacifiCorp has two companion metrics that it uses to track local job creation and workforce diversity:

- Number of workshops on energy related programs.
- Headcount of staff supporting program delivery in Washington who are women, minorities, and/or can show disadvantage.

The transportation electrification program's emphasis on equitable access to clean mobility solutions for named communities aligns directly with the purpose and intent of the company's CBI framework. Because of this, the company developed a companion metric to track the number of public charging

stations in its Washington service area. This metric groups publicly available charging stations into one of four categories: Tribal Lands, all HIC, vulnerable population, and non-HIC/vulnerable population.

Energy Benefits

Energy benefits refer to the positive outcomes that result from clean energy investments, utility programs, or policy implementation. These benefits can take many forms, such as lower energy costs, improved reliability, reduced emissions, and energy security. CBIs help to answer the central question of who is benefiting from these investments. They are critical to evaluating the equitable distribution of energy benefits across all communities and for named communities, specifically. In partnership with its EAG, PacifiCorp developed five subcategories of energy benefits into which the companion metrics for its energy benefits CBIs can be grouped. It is important to note, though, that some companion metrics may fall into more than one category; for example, incentive program participation can be easily tied to both cost reduction and public health.

Environment

CETA mandates significant reductions in GHG emissions, though there are other air pollutants that are also byproducts of the electricity generation process. GHG emissions are global pollutants that cause damage everywhere regardless of the point of emission. In contrast, local pollutants cause more damage closer to the source of emission. The regulation of global pollutants gains more attention; however, the reduction of GHG emissions is also thought to correlate with reductions in local pollutants.

Reducing emissions improves air quality, which not only has positive impacts on environmental outcomes but on health outcomes for communities by reducing respiratory illnesses and other diseases that can be related to pollution. Tracking emissions will help PacifiCorp meet CETA targets and monitor the impact of its power generation activities on all communities served by the company. To this end, PacifiCorp identified two CBI metrics to track the environmental impacts of its activities:

- Amount of renewables/non-emitting resources serving Washington.
- The amount of Washington allocated greenhouse gas emission from Washington allocated resources.⁶⁰

Additionally, the company enhanced its framework for monitoring and evaluating the environmental impacts of its activities by adding five additional metrics:

- Total MWh of distributed energy resources 5 MW and under, where benefits and control of resource accrue to members of named communities.
- Total MWs of energy storage resources 5 MW and under, where benefits and control of the resource accrue to members of named communities.
- Number (i.e., sites, projects, and/or households) of distributed renewable generation resources and energy storage resources, where the benefits and control of the resource accrue to members of named communities, including storage/ backup/ emergency powered centers for emergencies.
- Total MWh of energy savings from energy efficiency programs, where benefits and control of the savings accrue to members of named communities.

⁶⁰ Emission reductions, namely CO₂e as required by CETA, are measured against a Washington-allocated emissions baseline, calculated using Ecology's methodology as described in WAC 173-441.

- Where known, for a), b), c), and d) above, PacifiCorp will specify whether the named community resources are HIC and/or VP and/or KLI.

In addition to tracking the reduction of CO₂e, PacifiCorp will seek approval to also track sulfur dioxide (SO₂) and nitrogen oxides (NO_x) emissions, beginning with the 2026 CEIP progress report. That is because tracking SO₂ and NO_x emissions is critical due to their far-reaching impacts on public health, the environment, and regulatory compliance. Like CO₂e, these pollutants contribute to respiratory illnesses such as asthma and bronchitis, with children, the elderly, and individuals with pre-existing health conditions being at higher risk. SO₂ and NO_x also lead to the formation of fine particulate matter (PM_{2.5}) and ground-level ozone, both of which are linked to serious health effects. While SO₂ and NO_x are not GHGs, efforts to reduce them frequently coincide with actions that also lower carbon dioxide (CO₂) emissions.

Cost Reduction

Improving energy efficiency for named communities can help ensure that the benefits of the transition to clean energy are equitable. Energy efficiency upgrades, such as weatherization, insulation, efficient appliances, and other improvements, can offer significant long-term benefits, especially for these customers. For example, low-income individuals and families often live in substandard housing, such as older homes, multi-unit housing, or mobile homes. Substandard housing conditions often go hand-in-hand with poor energy efficiency. Energy efficiency upgrades not only lower energy use but can also result in safer, healthier homes. These improvements are particularly important for seniors, children, and individuals with disabilities. Additionally, energy efficiency upgrades can result in cost savings for customers that are able to take advantage of them.

Tracking energy efficiency incentive program participation by census tract can reveal what customers are benefiting from these important programs and support identification of structural or procedural problems that could be associated with access to them. These could include, for instance, language barriers or a general lack of customer awareness. To accomplish this, the company developed a set of seven companion metrics:

- Number of households/businesses, including named communities, who participate in Company energy/ efficiency programs.
- Dollar value of energy efficiency expenditures.
- Number of households/businesses who participate/enroll in demand response, load management, and behavioral programs.
- Dollar value of demand response, load management, and behavioral program expenditures.
- Number of residential appliances and equipment rebates provided to named community customers (where known).
- Number of residential rebates provided to customers residing in rental units.
- Investment and/or energy efficiency savings in rental residential housing stock.

PacifiCorp continues to engage its DSM Advisory Group, EAG, and the LIAG, surfacing strategies to increase the number of participating households in named communities in energy efficiency and billing assistance programs. Additional detail on the specific actions that contribute to these CBI metrics can be found in “Energy Efficiency Actions” in Chapter IX.

Public Health

Community-level adaptation to environmental health risks and energy-related vulnerabilities is essential to protect public health and wellbeing, particularly for named communities. Poor air quality from sources such as wildfire smoke or residential wood burning is known to exacerbate respiratory conditions, including asthma and chronic obstructive pulmonary disease, with risks especially pronounced in older buildings with substandard ventilation and filtration systems. Central to effective adaptation is the ability to maintain safe indoor environments through measures such as air conditioning (both window-mounted and central systems) and building weatherization. However, access to these protective measures is unequally distributed, and named communities can face significant barriers. Tracking metrics such as the number of households that rely on wood as a primary or secondary heating source can serve as a useful proxy for localized exposure to environmental pollutants and related health risks. To that end, PacifiCorp developed two companion metrics to track indoor air quality:

- Number and percentage of households using wood as primary or secondary heating as reported in the company's biennial residential survey.
- Number and percentage of non-electric to electric conversions for the LIWx program.⁶¹

Energy Security

Energy security is intricately linked to other forms of material hardship. Research consistently shows that households experiencing energy insecurity are significantly more likely to face housing or food insecurity, often forced to make difficult trade-offs between paying utility bills and meeting other essential needs. The financial stress associated with high energy costs and the risk of service disconnection can further exacerbate existing mental health conditions, including depression and anxiety. Although financial assistance programs are available to help offset utility costs, limited public awareness and uncertainty regarding eligibility or benefits can create barriers to access.

Tools such as the LEAD Tool⁶², developed by the U.S. Department of Energy, can support a detailed understanding of household energy burden across geographies and income levels that can help utilities identify where energy insecurity is most acute and where interventions can be most effective. Complementing this, monitoring disconnections and arrearages is yet another powerful and practical way to evaluate energy security. That is because understanding where disconnections and arrearages are can be an indicator of where, when, and for whom, energy affordability issues are more acute. Thus, in combination with tracking energy burden via the LEAD tool, the company developed the following companion metrics to assess the effectiveness of its low-income assistance programs:

- Number and percent of residential customer disconnections including disconnections within named communities, and
- Residential arrearages.

Resiliency

Improving grid resilience (the ability to anticipate, withstand, adapt to, and rapidly recover from disruptive events like wildfire and extreme weather) and reliability (the ability to deliver power to

⁶¹ Because the program is administered by external agencies, this metric may not adequately capture the public health impacts of PacifiCorp's activities. To that end, the company plans to evaluate whether there is an alternative or supplemental metric that is better suited to accomplish this.

⁶² Available here: <https://lead.openet.org/>.

customers without interruption under normal conditions) are critical components of ensuring the equitable distribution of benefits, as specified by CETA. The System Average Interruption Duration Index (SAIDI), System Average Interruption Frequency Index (SAIFI), Customer Average Interruption Duration Index (CAIDI), and Customers Experiencing Multiple Interruptions (CEMI) are established industry reliability metrics that can provide critical insight into grid resilience and reliability for named communities. SAIDI measures the total average duration of power interruptions experienced per customer over a given period and serves as a key indicator of cumulative exposure to service disruptions. Elevated SAIDI values may pose health and safety risks, particularly for customers who rely on electrically powered medical equipment, refrigeration for medications, or temperature control during periods of extreme heat or cold. SAIFI, which measures the average number of outages experienced by each customer, highlights areas where repeated service interruptions could create compounding hardship, particularly for customers in named communities who may have limited resources to recover from frequent service disruptions. CAIDI measures the average duration of each outage event and identifies where restoration times are prolonged, increasing the likelihood of food spoilage, exposure to extreme temperatures, and the inability to maintain critical services. CEMI is a complementary measurement of the percentage of customers who experience an outage more than a specified number of times in a given period.

Collectively, these metrics are essential for identification of localized disparities in grid resilience and reliability.⁶³ As such, PacifiCorp developed the following companion metrics for inclusion in its CBI framework:

- SAIDI scores (seven-year rolling average) at area level including major events.
- SAIFI scores (seven-year rolling average) at area level including major events.
- CAIDI scores (seven-year rolling average) at area level including major events.
- CEMI-4 index at area level.

It is important to place special emphasis on CEMI because it captures a dimension of the customer experience that system-wide averages often overlook. While system-level metrics such as SAIDI, SAIFI, and CAIDI reflect the average outage experience across all customers, they can mask situations where a subset of customers experience significantly more outages than the average. For example, the CEMI-4 index identified above measures the percentage of customers who experience four or more sustained outages in a year, which provides critical insight into localized reliability challenges within the company's service area. This information is central to promoting energy equity because it identifies areas where reliability issues can disproportionately impact specific subsets customers such as named communities.

⁶³ It is important to note that extreme weather, natural disasters, wildfire mitigation efforts, or other unforeseen events outside the control of the utility can result in higher SAIDI, SAIFI, CAIDI, and CEMI values.

Chapter IX. Specific Actions

CETA outlines the specific actions that utilities must consider when developing CEIPs, including: (a) pursuing all cost-effective, reliable, and feasible conservation and efficiency resources, and demand response; (b) maintaining and protecting the safety, reliable operation, and balancing of the electric system; and (c) ensuring that all customers are benefiting from the transition to clean energy through various processes.⁶⁴

This chapter describes the steps that PacifiCorp will take to achieve the interim and specific targets described in Chapter VII – Specific Targets in a cost-effective way that supports reliability, safety, and equity for Washington customers. PacifiCorp proposes specific actions that fall into four categories: supply-side resources, energy efficiency, demand response and community outreach and engagement.

 Supply-Side Resources These actions support PacifiCorp to generate more electricity from carbon-free and non-emitting resources for customers in Washington	 Community Outreach & Engagement These actions create greater opportunities for the communities PacifiCorp serves to reap the benefits of clean electricity programs, regardless of their economic or cultural circumstances.
 Energy Efficiency These actions help customers transform their homes, offices, and businesses to use electricity more efficiently. This has the effect of lowering bills and creating more comfortable spaces.	 Demand Response Demand response is when customers reduce or shift electricity usage at certain times to better match overall demand levels to supply availability, and to help offset the need to increase generation to maintain reliability.

The supply-side resource actions describe the near-term capacity and energy need that PacifiCorp identified to meet Washington customers’ energy and capacity needs, and make progress towards CETA obligations. PacifiCorp issued the 2025 Washington Situs RFP to the market this fall to solicit resource bids to meet this identified need.

PacifiCorp’s existing energy efficiency programs will be maintained or expanded, including weatherization for low-income customers, and home and business programs. These programs are designed to incentivize lower energy use by helping customers access more efficient equipment including appliances, heating and cooling equipment, and lighting. Through these programs,

⁶⁴ WAC 480-100-610(2)-(3).

PacifiCorp anticipates not needing to generate 145,371 MWh of electricity due to energy efficiency savings during the four-year CEIP timeframe.

Through demand response programs, utilities can incentivize customers to reduce or shift electric consumption in response to various grid needs, instead of meeting these grid needs through increased supply. As part of the implementation of the inaugural 2021 CEIP, PacifiCorp launched its first demand response programs in Washington. These programs provide resources to manage unusually high demand, unexpected reductions in generation, or frequency imbalances, reducing the need to add generation or purchase power. Over the next four years, PacifiCorp will nearly double the size of its portfolio, growing the capacity to 22 MW by 2029.

To ensure that these actions provide benefits to all customers equitably, PacifiCorp will continue to explore ways to meaningfully engage and connect with customers across its Washington service area. These actions will support more equitable benefits and outcomes for the communities PacifiCorp serves across Washington, regardless of one's economic or cultural circumstances.

Supply-side Resource Actions

PacifiCorp identified a near-term resource need to meet Washington customers' capacity, energy and compliance obligations and will take actions to pursue procurement of supply-side resources to meet those needs at the lowest cost possible. As the first action item, PacifiCorp issued an RFP to market to solicit bids for new renewable and storage resources. Given recent changes in federal tax credit policies applicable to wind, solar, and battery resources, as PacifiCorp reviews resource bids received in the 2025 Washington Situs RFP, it will seek every opportunity to procure prudent CETA-eligible projects. To take advantage of federal tax credits, PacifiCorp has accelerated its RFP timeline.

2026-2029 Supply-Side Resources Action Plan

1. Complete the 2025 Washington Situs RFP to procure long-term resources to serve Washington customer needs and make progress towards CETA targets.
2. Identify additional resource needs after completion of 2025 Washington Situs RFP that may lead to another RFP, or pursuit of bilateral contract negotiations.
3. Continue to pursue federal and state grant and loan opportunities to fund projects that enhance grid reliability, resilience, transmission infrastructure, and mitigate wildfire risks, creating system benefits for all customers.
4. Continue to investigate reasonably priced short-term procurement strategies.
5. Continue to evaluate how non-energy impacts might be generated from supply-side resource acquisition, and improve future non-price scoring applications.

Washington's Resource Need

PacifiCorp's most recent CETA progress report (for 2024) forecasts new renewable generating resources that have or will come online by the end of 2025, and forecasted Washington retail sales. These estimates support the need for an additional 2,024,669 – 2,875,789 MWh of CETA-compliant energy by the end of 2030 (providing a range of 80-100 percent of electric retail sales met with CETA-eligible resources, accounting for up to 20 percent would be met with alternative compliance like the purchase of unbundled RECs).

This energy need translates into about 770-1,094 MW of average annual renewable capacity, assuming a technology-agnostic capacity factor of 30 percent, by 2030. To ensure resource adequacy and reliability, there is also a need for firm capacity that can be met more easily by storage capability resources, like batteries. Based on a forecast 2030 WRAP position for Washington’s summer and winter peak demand needs PacifiCorp estimates a need of roughly 750 MW of storage capability resources, using a 4-hour lithium-ion battery as an example, to provide firm capacity by 2030, to meet this need. Some combination of renewable and battery resources will be necessary to meet both energy and capacity needs, depending on individual technologies and interactions between them.

Table 19 describes the proxy supply-side resources selected for Washington customers to fill this energy and capacity need by the end of each year for 2026-2029, resulting in 709 MW of installed capacity of wind and solar resources and 735 MW of batteries online by 2030. The following section describes how PacifiCorp will evaluate resource selection in an RFP process to meet these identified supply-side resource needs.

Table 19 - 2026-2029 Proxy Supply-Side Resource Selections⁶⁵

Location	Type	Washington-allocated Installed Capacity Built (MW)			
		2027	2028	2029	Total
Willamette Valley	Solar - Photo Voltaic	3	20	0	23
Walla Walla	Solar - Photo Voltaic	260	15	436	711
Yakima	Solar - Photo Voltaic	25	0	132	157
Walla Walla	Wind	0	359	350	709
Walla Walla	4-hour Battery	408	37	0	445
Yakima	4-hour Battery	15	2	0	17

Long-Term Resource Procurement

To procure resources to meet this identified need, PacifiCorp filed the initial draft RFP (2025 WA Situs RFP) with the Commission on June 10, 2025, and issued the RFP to market on September 2, 2025.⁶⁶

The 2025 WA Situs RFP will accept and evaluate cost-competitive bids for resources that have a minimum nameplate capacity of one MW and have a guaranteed commercial operation date on or before December 31, 2029, and is registered in WREGIS within 90 days of COD, maintaining WREGIS registration throughout the contract. Resources that may bid into the 2025 WA Situs RFP may generate electricity from: wind, photovoltaic (PV) solar, wave, geothermal, hydroelectric, qualified biomass, or other non-emitting energy sources that will contribute to CETA clean energy standards.⁶⁷ Energy storage resources (e.g., battery) are also eligible to bid into the RFP and provide important reliability benefits even if they do not directly produce CETA-compliant energy. Because the 2025 WA Situs RFP will

⁶⁵ “Installed Capacity Built” represents total capacity of resources expected online by the end of that year, which in PLEXOS is reported as January 1 of the following year. For example, a resource selected to come online 1/1/2030 in PLEXOS is reported as a resource need to come on-line by 12/31/2029.

⁶⁶ PacifiCorp’s Petition for Partial Waiver of WAC 480-107 and Approval of the Draft 2025 Request for Proposals, Docket UE-250460 (Jun. 10, 2025).

⁶⁷ WAC 480-100-610(2)-(3).

procure resources to meet state-specific needs for our Washington customers, PacifiCorp assumes that resources from this RFP will be assigned entirely to Washington customers.

Solicitation for Renewable Energy Credits

The 2025 WA Situs RFP included a solicitation for long-term proposals for the provision of firm RECs that satisfy CETA compliance requirements.⁶⁸ In the 2025 REC RFP, PacifiCorp stated that it is seeking approximately 800,000 unbundled RECs per year that can be used to satisfy up to 20 percent of compliance with CETA's greenhouse gas neutrality standard between 2030 and 2044. Some specifications for bidders include:

- RECs must be sourced from a CETA-compliant generating source.
- RECs must have a vintage period between January 1, 2030, and December 31, 2044.
- REC proposes must include contract terms from a minimum of 5 years to a maximum of 15.

Given the cost of forward contracts for unbundled RECs that PacifiCorp receives, the company can balance the decision to procure additional long-term resources that will accelerate the pace of growth in renewable and non-emitting energy with potentially cheaper, unbundled RECs, to satisfy the last 20 percent of CETA-compliance energy targets for 15 years, before 2045.

Resource Adequacy in Supply-side Resource Selection

As part of the 2025 IRP, PacifiCorp developed a multifaceted approach to model resource adequacy and reliability. First, portfolios must have sufficient resources to meet WRAP requirements. As part of this, the share of resources identified for inclusion in Washington retail customer rates must be sufficient to meet the WRAP requirements associated with Washington load. WRAP compliance does not guarantee reliability, in particular the monthly qualifying capacity contribution values used in WRAP do not ensure resources will be available to meet all hourly requirements, including the hourly balancing test in the California Independent System Operator's (CAISO) Extended Day-Ahead Market (EDAM), which PacifiCorp plans to begin participating in during 2026. To help represent these hourly requirements, all portfolios must also have sufficient resources to meet expected load and operating reserve requirements during potentially constrained conditions when PacifiCorp's load is high and other WRAP and EDAM participants may not have excess resources. Portfolio selection accounts for all of these requirements, along with resource and transmission costs, and the potential dispatch and congestion impacts of different combinations of resource additions. To account for risk, portfolios are also evaluated under a range of stochastic conditions that include variations in load, wind, solar, hydro, thermal resource availability, and market prices. These requirements and metrics will be used as part of bid selection in the RFP.

Equity and CBIs in Supply-side Resource Selection

The 2025 WA Situs RFP incorporates a non-price scoring methodology in its bid evaluation process to consider both direct and indirect impacts of a resource bid into the RFP.⁶⁹ Non-price scoring makes up twenty percent of the overall score of a bid while the remaining eighty percent will be based on cost. To

⁶⁸ Appendix X included in PacifiCorp's 2025 Washington Situs RFP, issued to market on September 2, 2025 can be viewed online at https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/suppliers/rfps/2025-wa-situs-rfp/2025_WA_Situs_RFP_Appx_X_REC_RFP.pdf.

⁶⁹ Appendix P included in PacifiCorp's 2025 Washington Situs RFP, issued to market on September 2, 2025 can be viewed online at https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/suppliers/rfps/2025-wa-situs-rfp/2025_WA_Situs_RFP_Appx_P_Community_Benefit_Indicators_Questionnaire.xlsx.

assess a fair distribution of benefits and burdens in its RFP process, PacifiCorp developed a questionnaire consisting of nineteen questions based on the existing CBI framework and with consideration of the core tenets of energy justice.

Each question is equally weighted and requires a binary yes or no response; several of the questions ask for a short narrative to support the response. The questionnaire was developed by PacifiCorp and socialized with interested parties and EAG members for feedback before it was finalized and incorporated into the RFP.⁷⁰ Although this RFP represents a first effort in this space, PacifiCorp aims to continue to refine and mature the non-price scoring methodology over the course of future RFPs.

Short-Term Resource Procurement

CETA's goal of decarbonizing the supply of Washington's electricity, switching from traditional emitting generation resources to renewable, non-emitting, or storage resources, will require substantial volumes of CETA-eligible resources. However, long-term resource development, whether through construction or contracting, requires significant lead time due to regulatory, financial, and operational processes.

While these long-term resources are under development, Washington utilities nonetheless have binding annual interim renewable energy targets to meet. To the extent long-term resources have yet to come online, or procurement has stalled for any variety of reasons, utilities could consider procuring short-term resources to meet annual interim targets.

Yet CETA requires PacifiCorp to comply with CETA with the lowest reasonable cost strategies, after considering risk.⁷¹ The Commission "expects utilities to propose reasonable interim targets" and comply with CETA "in a cost-effective manner."⁷² Interim targets must demonstrate how a utility "has made progress towards" CETA's standard "at the lowest reasonable cost."⁷³

Yet interim targets "would be largely meaningless if the utility does not in good faith establish and comply with those targets."⁷⁴ As a result, the Commission noted that it will "use discretion, as opposed to rote adherence, in enforcing the interim targets."⁷⁵ For PacifiCorp specifically, "the Company risks incurring noncompliance costs" when it fails to meet CETA targets, and the "lack of a feasible path towards 2030 compliance can and may well result in penalties."⁷⁶

⁷⁰ Feedback and PacifiCorp's responses regarding the development of the non-price scoring/CBI questionnaire included in the draft 2025 WA Situs RFP was filed as Exhibit B in docket UE-250460 and is available online: <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=4&year=2025&docketNumber=250460>

⁷¹ E.g., RCW 19.280.030(1)(j); WAC 480-100-620(11)(a); RCW 19.280.030(1)(j) (IRPs must consider implementing CETA "at the lowest reasonable cost and risk to the utility and its customers, while maintaining and protecting the safety, reliable operation, and balancing of its electric system"); WAC 480-100-620(11)(a) ("Each utility must provide a narrative explanation of the decisions it has made, including how the utility's long-range integrated resource plan expects to . . . Achieve the clean energy standards . . . at the lowest reasonable cost"); RCW 19.280.020(11) requiring utilities to comply with CETA "in a timely manner and at the lowest reasonable costs"); WAC 480-100-600 (same).

⁷² *In re Commission CETA Rulemaking*, Docket Nos. UE-191023 and UE-190698, General Order R-601, ¶ 105 (Dec. 28, 2020). (cleaned up).

⁷³ WAC 480-100-610(5).

⁷⁴ General Order R-601, n. 34

⁷⁵ *Id.*

⁷⁶ *In re PacifiCorp's 2023 CEIP Update*, Docket UE-210829, Order 16, ¶ 99.

Given these priorities, PacifiCorp is actively pursuing short-term CETA-compliant resources to serve Washington customers, reduce reliance on unspecified market purchases and emitting generation, and support progress toward interim targets. For example:

- In the fall of 2024, PacifiCorp engaged in a confidential request for proposals with certain counterparties for, among other products, CETA-compliant resources for summer 2025. PacifiCorp received one offer for CETA-compliant resources out of 29 offers received. The offer was not cost-effective.
- In the summer of 2025, several parties contacted PacifiCorp to engage in bilateral discussions regarding short-term procurement options. None were cost-effective.
- In the summer of 2025, PacifiCorp submitted a bid for the procurement of CETA-compliant energy for Summer 2026. PacifiCorp's offer was not accepted.

None of these efforts resulted in cost-effective resources. However PacifiCorp plans to continue investigating short-term strategies in the future. Later this fall, PacifiCorp will engage in another confidential, limited RFP for, among other products, CETA-compliant resources for summer 2026, and expects to do so in future years. The company will continue to evaluate these strategies and procure short-term products if there are more reasonable offers.

Federal and State Grant and Loan Opportunities

PacifiCorp is currently developing a broad portfolio of projects to enhance grid reliability, resilience, transmission infrastructure, and mitigate wildfire risks by leveraging various state and federal grant and loan opportunities. These initiatives span states across the western U.S. and target both rural and urban communities, with particular attention to areas facing extreme weather and wildfire risks and improving or increasing transmission capacity. PacifiCorp continues to actively pursue additional funding opportunities within its service area as they become available.

Specific initiatives underway, with awarded and pending federal and state grant and loan opportunities, include:

- Project WIRE. On January 16, 2025, the Department of Energy (DOE) Loan Programs Office (LPO) provided a conditional loan commitment guarantee of up to \$3.52 billion to PacifiCorp to build and reconductor transmission lines across PacifiCorp's service territory.⁷⁷ Project Wire is anticipated to create approximately 700 miles of new high-voltage transmission, increasing transmission capacity by 3,000 megavolt-amperes over the next decade, and the LPO commitment would extend up to \$3.52 billion with a 30-year term to cover approximately 80 percent of estimated project costs. PacifiCorp is currently reviewing draft definitive loan documents, and PacifiCorp has until January 2026 to finalize and execute the loan agreement in collaboration with the Loans Program Office.
- Project PEER (PacifiCorp's Equity-Aware Enhancement of Grid Resiliency):⁷⁸ This project has been executed and implementation commenced in October 2024. Supported by a \$100M federal

⁷⁷ E.g., "LPO Announces Conditional Commitment to PacifiCorp to Expand Transmission in Several Western States" (LPO Jan. 16, 2025) (available here: <https://www.energy.gov/lpo/articles/lpo-announces-conditional-commitment-pacificorp-expand-transmission-several-western>).

⁷⁸ E.g., "PacifiCorp selected for federal infrastructure funding to enhance wildfire mitigation." (available here: <https://www.pacificorp.com/about/newsroom/news-releases/selected-for-federal-infrastructure-funding.html>).

grant, this Oregon and California-based project focuses on fire-resistant technologies and grid hardening to protect vulnerable communities.

- Project REFORM (Resiliency Enhancement for Fire mitigation and Operational Risk Management):⁷⁹ This project has been executed and implementation commenced in October 2024. With a \$50M grant, REFORM deploys advanced wildfire detection and operational risk management technologies across six states to reduce fire occurrences and enhance grid reliability.
- Project RELIEF (Reliable Electric Lines: Infrastructure Expansion Framework):⁸⁰ Backed by a \$249M federal grant conditionally awarded December 2024 and awaiting execution, RELIEF expands transmission capacity for Utah, Arizona, Idaho, Oregon, and Wyoming, aiming to eliminate outages and boost economic activity. PacifiCorp is a subrecipient to Utah Office of Energy Development for this DOE award.
- Utah 40101d Projects (2): PacifiCorp has secured two state 40101(d) grants totaling over \$8M support underground cable upgrades, substation upgrades and sectionalizing strategies to minimize outage exposure and improve reliability for Utah communities. Both programs are awaiting execution.
- Wyoming 40101d Project: A \$4.4M grant enables undergrounding of critical circuits to protect essential services and reduce outages in high-risk regions. Project execution is pending.
- Oregon 40101d Project: A \$4.1M grant funds reconductoring and the installation of fire-resistant poles to minimize wildfire ignition risk and outage frequency in Josephine County. Project execution is pending.
- California 40101d Project (Round 1): A \$12.5M grant has been awarded and awaiting execution, supporting conductor upgrades and advanced metering infrastructure upgrades in rural, tribal communities of Northern California.
- California 40101d Project (Round 2): An \$18M grant application is currently under review, requesting support for conductor upgrades, infrastructure modernization, and satellite-based vegetation management in Northern California, especially in areas serving tribal communities.
- Idaho 40101d Project: A \$1.5M grant application is currently under review, directed toward substation upgrades and automated switching systems to modernize rural grid infrastructure and reduce outage duration.

CBI/Action Mapping: Supply Side Specific Actions

As discussed above, the non-price scoring questionnaire in the 2025 WA Situs RFP incorporates the four core tenets of energy justice, and the questionnaire was structured to align with the company’s CBI framework, ensuring that each CBI could be meaningfully connected to relevant questionnaire items

⁷⁹ *Id.*

⁸⁰ *E.g.*, “Utah Office of Energy Development and partners to Improve Regional Grid with Half Billion Dollar RELIEF Project,” Utah Office of Energy Development (Aug. 7, 2024) (available here: https://energy.utah.gov/wp-content/uploads/RELIEF_20240806.pdf).

where possible. Table 20 summarizes how each CBI is represented within the questionnaire and RFP. Where a CBI was not applicable, it is noted with supporting justification.

Table 20 - CBI Mapping to Supply-Side Resource Acquisition

No.	CBI	Application/ Representation in Non-Price Scoring
1	Increase culturally and linguistically responsive outreach and program communication.	Explicitly addressed in the current non-price scoring questionnaire.
2	Increase community-focused efforts and investments.	Explicitly addressed in the current non-price scoring questionnaire.
3	Increase participation in Company energy and efficiency programs.	Not applicable. The scope of the 2025 Washington Situs RFP solicitation does not include or consider DSM resources. For discussion regarding CBI mapping and DSM resources, see subsequent sections.
4	Increase efficiency of housing stock and small businesses, including low-income housing.	Not applicable. The scope of the 2025 Washington Situs RFP solicitation does not include or consider DSM resources. For discussion regarding CBI mapping and DSM resources, see subsequent sections.
5	Increase renewable energy resources and reduce emissions.	As the RFP is limited to accepting only renewable, non-emitting, or storage resource types, all eligible proposals will, by definition, align with and advance the company's objective to increase renewable energy resources, and reduce emissions.
6	Decrease households experiencing high energy burden.	Energy burden reflects the relationship between overall utility costs and rates. PacifiCorp recognizes that procuring new resources will add costs that may affect rates; however, the extent of the impact on customer rates from an RFP cannot be appropriately identified as the cost of a resource is only one factor in the determination of household energy burden (for example, household income is not directly driven by PacifiCorp decisions, nor is it known at the time of committing to a resource). The company emphasizes that the RFP process is intrinsically designed to secure competitive pricing for new resources, which is expected to help mitigate potential negative effects on energy burden.
7	Improve indoor air quality.	The procurement of non-emitting resources will inherently displace existing resources that emit harmful local pollutants, including SO ₂ and NO _x , which can adversely affect indoor air quality. Accordingly, it is reasonable to conclude that such procurement may yield a positive ancillary effect; however, any resulting improvements to indoor air quality would be indirect.
8	Reduce frequency and duration of energy outages.	Not applicable. It is currently unclear what specific information could be collected with each bid that would reliably indicate how a given resource might influence the frequency and duration of energy outages. While resilience and reliability are critical considerations in resource procurement, quantifying a resource's direct impact on outage metrics through bid submissions remains challenging due to the complex and variable nature of grid operations, system contingencies, and external factors such as weather events.
9	Reduce residential customer disconnections.	Not applicable. At this time, there is no information that can be reasonably collected from individual resource bids that is directly relevant to reducing residential disconnections or arrearages. While addressing these critical customer outcomes remains a priority, such impacts are more effectively influenced through complementary programs, policies, and targeted customer assistance initiatives rather than through the supply-side resource procurement process itself.
10	Increase named community clean energy	As more information becomes available through the RFP process, the company may evaluate how the project may contribute to local economic

No.	CBI	Application/ Representation in Non-Price Scoring
		development, community resilience, and environmental impacts in named communities affected by the project.

Energy Efficiency Actions

PacifiCorp offers a variety of residential and non-residential programs for its customers in Washington and many of these programs offer enhanced incentives to target benefits to named communities, furthering progress along several CBIs. PacifiCorp’s proposed utility actions are to maintain existing energy efficiency programs, expand reach and participation across programs, and to generate benefits for members of highly impacted communities and vulnerable populations.

2026-2029 Energy Efficiency Action Plan

1. Continue to offer existing energy efficiency and customer programs available for Washington customers.
2. Starting in 2026, the changes to the utility actions include the following:
 - a. Expand the higher incentives available for select measures for residential and small business customers located in Highly Impacted Communities to include Vulnerable Population census tracts.
 - b. Removing outreach emphasis to reach new home construction projects in Highly Impacted Communities due to no participation over the last three years. The program offer will still be available if a customer chooses to select this option but customers and trade allies prefer the prescriptive incentives for individual measures without the need for energy analysis to show better than 5 percent savings below code.
3. Increase participation across programs and benefits for members of Named Communities with specific enhanced incentives and offerings, specifically for the:
 - a. Home Energy Savings Program, through: multifamily window incentives; direct install duct sealing; enhanced HVAC incentives; and assistance for non-electric, non-gas heating, replacement with ductless heat pumps.
 - b. Wattsmart Business Program, through: higher incentives and targeted small business delivery and outreach.
 - c. Low-income Weatherization, through an increase in repair funds and electric heat installations.

Existing Customer Programs

PacifiCorp offers a variety of programs which can be beneficial to customers that are living in named communities, specifically either HICs or VPs as described in Chapter II, such as providing low-cost electricity, which positively impacts housing expenditures and lessens the cost burden for impoverished households. Below are some additional details regarding a select number of PacifiCorp programs which beneficially impact Washington named communities.

- **Low-income Weatherization Program:** Provides energy efficiency services through a partnership between the company and local non-profit agencies to low-income eligible households residing in single family homes, manufactured homes and multi-unit residential housing. Services are provided at no cost to participants.

- **Project Help – Fuel Fund** provides energy assistance to customers in need with funds donated by customers and employees which PacifiCorp matches 2:1, up to \$34k annually in Washington. Donated funds are provided to Project Help in Washington, a non-profit program providing energy assistance with donated funds.
- **Low Income Bill Assistance Program:** Provides a monthly bill discount to income eligible households year-round. A three-tiered bill discount based on the income and monthly billing, and percentage discount is applied to net bill excluding taxes. The credit amount is based on the qualification level for which the customer was certified. The program is administered through partner Low Income Home Energy Assistance Program (LIHEAP) agencies for income certification services.
- **Energy Efficiency Programs** (available regardless of income): For residential customers, the Wattsmart Homes program provides cash incentives for qualifying home energy efficiency improvements and appliance upgrades. Approximately half of the residential customers receive a Home Energy Report that provides information on energy use within the home and comparisons with similar homes. For business customers (including small businesses), the Wattsmart Business program provides cash incentives and technical expertise for upgrades to efficient lighting, heating and cooling and more. Wattsmart Business also provides expert facility and process analysis and incentives to help lower energy costs by optimizing the customer's energy use. Enhanced incentives are available for small businesses for lighting and non-lighting retrofits. Both programs provide support and training for participating retailers, suppliers and contractors so these trade allies can help bring the program to customers.

Incremental Energy Efficiency Actions

PacifiCorp will use the energy efficiency programs described in Table 21 and more fully described in the 2026-2027 DSM Business Plan, to deliver on the energy efficiency specific targets and achieve all cost-effective conservation. PacifiCorp programs in combination with market transformation savings delivered by the Northwest Energy Efficiency Alliance are projected to deliver 182,931 MWh at site, which exceeds the target of 135,256 MWh at site (or 145,371 MWh at generation), discussed in the prior target-setting section (see Table 14). The difference between forecasted program delivery and target is due to adjustments made to the target based on addressing areas of uncertainty in the BCP.

Table 21 - Energy Efficiency Programs and Estimated Savings (2026-2029)

Program or Initiative (MWh/Yr)*	2026	2027	2028	2029	Total
Low Income Weatherization	72	72	72	72	290
Wattsmart Homes	4,794	4,744	4,794	4,744	19,075
Home Energy Reports	2,616	2,328	2,616	2,328	9,888
Total Residential Programs	7,482	7,145	7,482	7,145	29,253
Wattsmart Business - Commercial	25,461	23,981	25,461	23,981	98,885
Wattsmart Business - Industrial	8,838	7,713	8,838	7,713	33,103
Wattsmart Business - Irrigation	1,241	1,251	1,241	1,251	4,983
Total Business Programs	35,540	32,945	35,540	32,945	136,971
Northwest Energy Efficiency Alliance	3,914	4,377	3,914	4,377	16,582
Distribution Efficiency	63	-	63	-	126
Production Efficiency	-	-	-	-	-
Total Other Conservation Initiatives	3,977	4,377	3,977	4,377	16,707
Total Conservation	46,999	44,467	46,999	44,467	182,931

*All savings values are at site.

PacifiCorp will continue to adaptively manage residential and non-residential customer energy efficiency programs to achieve: 1) BCP Plan targets and achieve all cost-effective conservation with a cost-effective portfolio of programs;⁸¹ and 2) CETA objectives including a focus on delivery of program services and benefits to Named Communities. The company is committed to expanding participation in all energy efficiency programs, based on the incremental utility actions described below for each program. Starting January 1, 2026, PacifiCorp will expand its energy efficiency utility actions to include the company's geographically defined VP census tracts. PacifiCorp will engage its DSM Advisory Group to discuss a non-binding minimum threshold for distribution of energy efficiency benefits to customers in named communities; as part of this discussion, PacifiCorp will note the recommendation of WUTC Staff, that PacifiCorp adopt a minimum threshold of 27 percent.

The energy efficiency utility actions described below by program were informed in part, based on input from the EAG, and relate to the following CBIs:

- Decrease households experiencing high energy burden;
- Increase participation in company energy and efficiency programs and billing assistance programs;
- Increase efficiency of housing stock and small businesses, including low-income housing; and
- Improve indoor air quality.

⁸¹ In compliance with WAC 480-109-100, 10c, the Low Income Weatherization program is excluded from portfolio-level cost-effectiveness calculations.

Details are available in PacifiCorp's 2026-2027 BCP (see Appendix 2, 2026-2027 DSM Business Plan).⁸² The incremental utility actions for this CEIP are described below.

Residential

Wattsmart Homes⁸³

Wattsmart Homes will continue to implement program design and delivery practices that serve and support customers in named communities through enhanced incentives, no-cost and low-cost efficiency measures, delivery channels, and marketing, communication, and outreach that build awareness and increase participation. Examples of this include:

- Enhanced incentives for windows in multi-family units on residential rate schedules. Initial focus on buildings in HICs and VP census tracts.
- Continued LED bulb distribution to VP customers through named community CBOs, including customers on Tribal land. Continue focus in HICs and add VP census tracts.
- Continued direct install duct sealing in HICs and include VP census tracts. The emphasis on this program offer originally focused on customers in manufactured homes and the effort was so successful reaching this customer segment that the program shifted in 2025 to single family homes.
- Serve named community residential customers who use non-electric fuel sources in their primary heating systems by decommissioning these systems and installing ductless heat pumps.
- Continue enhanced incentives for heat pumps for customers in HICs and include VP census tract customers with eligibility criteria available on the program website.
- Continue offering no-cost tree planting to customers in HICs and VP census tracts.

Low Income Weatherization

- Continuing to allow reimbursement for repairs up to 30 percent of the annual reimbursement on energy efficient measures received (increased from 15 percent in 2022). This reimbursement amount was increased to lessen the amount of deferrals of homes for weatherization projects and the amount of increase was determined through consultation with the DSM Advisory Group.
- Continuing to allow installation of electric heat to replace permanently installed electric heat, space heaters or any fuel source except natural gas with adequate combustion air as determined by the agency. This is designed to promote the installation of electric heat and minimize use of wood heat, solid fuels, or natural draft equipment in specific applications where combustion safety (and indoor air quality) cannot be maintained.

⁸² For example, in the 2026-2027 DSM Business Plan, the company notes the Wattsmart Homes program is not projected to be cost effective in 2026-2027 and the Company prioritized improving participation (kWh savings) and CETA equity objectives over improving cost effectiveness at the program level while maintaining cost effectiveness at the overall portfolio level.

⁸³ More information available online: <http://wattsmartsavings.net/washington-residential/>.

Non-residential**Wattsmart Business⁸⁴**

Continue to increase the number of small businesses and businesses in named communities receiving program services and benefits. The results of the specific utility actions below will be measured by these CBI metrics: number of businesses that participate in company energy/efficiency programs and the dollar value of energy efficiency expenditures.

- Enhanced customer incentives:
 - Continue the small business enhanced incentive lighting and non-lighting offers targeting Small Businesses located in a named community (HICs and, starting in 2026, VP census tracts) and the smallest businesses using less than 30,000 kilowatt-hours per year (very small businesses) on Schedule 24.
 - Continue to offer higher customer incentives than the regular small business offer with incentives capped at 100 percent (rather than 90 percent) of project costs for lighting to reduce the customer out-of-pocket cost barrier.
- Enhanced vendor incentives: Continue to offer approved small business lighting vendors a higher vendor incentive for completed lighting retrofit projects with small businesses in named communities (HICs and, starting in 2026, VP census tracts) and very small businesses.
- Targeted outreach:
 - Continue to target a portion of company-initiated proactive outreach to small businesses in named communities (HICs and, starting in 2026, VP census tracts) and very small businesses; continue to tie proactive outreach to approved small business vendor capacity to respond to customer inquiries.
 - Target a portion of company-initiated proactive outreach to business customers located on Tribal land.
- Continue and increase outreach to Latine business customers, vendors, and community groups.

Participation Tracking

PacifiCorp will track program participation for the following programs:

- Low Income Weatherization
 - Participants located in a HIC and/or VP census tract
 - Vulnerable Populations:
 - Language - Participants where the primary language spoken in the household is other than English
 - Renters - Participants who rent or lease rather than own (home is a rental)
 - Low income – all participants
 - Participants living in a manufactured home
- Wattsmart Homes
 - Participants located in a HIC and/or VP census tract

⁸⁴ More information available online: <http://pacificpower.net/savings-energy-choices/business/wattsmart-efficiency-incentives-washington.html>.

- o Vulnerable Populations:
 - Language - Participants where the primary language spoken in the household is other than English
 - Renters - Participants who rent or lease rather than own (identify and track participation for rental properties)
- o Participants living in a manufactured home
- o Participants living in a multi-family unit
- Wattsmart Business (except midstream/Instant Incentive)
 - o Participants located in a HIC and/or VP census tract
 - o Participants where the primary language spoken at the project site is other than English
 - o Participants who rent or lease rather than own
 - o Participants who are smaller businesses (e.g., account associated with project receives electric service on Schedule 24)

Summarized in Table 22, costs of the energy efficiency programs align with the budgets and the calculation of direct benefits in the 2026-2027 DSM Business Plan. Costs include funding for NEEA. 2028 and 2029 are set equal to 2026 and 2027. Appendix 3 of the 2026-2027 DSM Business Plan provides the measurement and verification (M&V) framework for energy efficiency.

Table 22 - Proposed Cost (\$ millions) of Energy Efficiency Programs

Year	Incentives/direct benefits	General implementation	Total
2026	\$16.01	\$11.30	\$27.31
2027	\$15.80	\$10.59	\$26.38
2028	\$16.01	\$11.30	\$27.31
2029	\$15.80	\$10.59	\$26.38
Total	\$63.62	\$43.77	\$107.39

Note: This table reflects the total estimated costs of the energy efficiency portfolio, consistent with the 2026-2027 DSM Business Plan. Only the estimated portion of incremental costs attributable to CETA are included in the incremental cost analysis included in Chapter X – Compliance Costs.

Energy and Non-Energy Impacts (NEIs)

Energy impacts by program (except for low-income weatherization which is not required to be cost effective and is not included in the analysis) for 2026-2027 are available in the cost effectiveness analysis from ICF provided as an Appendix to the DSM Business Plan provided in the BCP. Energy impacts for 2028-2029 have not been calculated, but are expected to be similar since the annual energy savings are comparable.

In 2021, as part of the 2022-2023 biennial planning process, PacifiCorp, in conjunction with the other investor-owned utilities, contracted with DNV to assess and quantify additional NEIs. The DNV analysis identified NEIs from the existing literature and assigns those NEIs to relevant PacifiCorp programs and measures. DNV's NEI Database contains 50 separate residential and C&I NEIs from 46 publicly available studies. After assigning the NEI to PacifiCorp programs and measures, DNV adjusted the estimates based on plausibility, confidence, and economic adjustment factors. The adjustments improve the transferability of the research to PacifiCorp's service area. The analysis also adjusted the NEI values to account for uncertainty stemming from extremely high or low values, the quality of the methods used

in the original study, the age of the original study, and differences in economic conditions between the area covered by the original study and PacifiCorp service area. The result is a single matched value as the final recommended NEI for each measure-by-NEI combination.

In 2025, ICF reviewed and assessed previously cited studies, conducted a broad review of publicly available studies to identify new sources of NEI quantification, and updated NEI values where applicable. This approach reflects the continuous process of incorporating the latest available data and ensuring alignment with evolving industry practices, consistent with conditions from WUTC Order 01 Attachment A in Docket UE-230904. The review resulted in updates to three NEI values: bad debt write-offs, avoided illness from air pollution, and thermal comfort. The remainder of the NEIs from the DNV report were left unadjusted. PacifiCorp presented results of the adjustments at the June 2025 DSM Advisory Group meeting and the memo is included in Appendix 4 in the 2026-2027 BCP. The DNV report documenting the original analysis is also included in Appendix 4 (NEI Report) in the 2026-2027 BCP.

Table 23 provides an initial estimate of how the measure-specific NEIs from the DNV analysis are distributed by customer programs for the 2026-2029 period (using the assumption that the last two years are equal to the first two years). These estimates are calculated using the measure-NEI mapping found in the NEI values spreadsheet referenced above. The values presented below represent the net present value of NEIs over the lifetime of measures installed during the 2026-2029 period.

Table 23 - Non-Energy Impacts by Energy Efficiency Program for 2026-2029

Program	NEI (\$)
Low Income Weatherization	\$886,963
Home Energy Savings	\$408,251
Home Energy Reports	\$0
Wattsmart Business	\$3,132,301
Northwest Energy Efficiency Alliance	\$2,004,566
Total Conservation	\$6,432,081

CBI/Action Mapping: Energy Efficiency Specific Actions

PacifiCorp proposes eleven specific energy efficiency actions (see Appendix C for a detailed listing of PacifiCorp’s energy efficiency specific actions), and there are five CBIs related to energy efficiency specific actions.

These CBIs include: participation in company energy and efficiency programs and billing assistance programs; households experiencing high energy burden, community-focused efforts and investments; indoor air quality and efficiency of housing stock and small businesses; including low-income housing. Each CBI and associated energy efficiency specific actions and related metrics are meant to address the challenges expressed by the EAG and other stakeholders regarding equitable distribution of benefits of PacifiCorp’s energy efficiency and billing assistance programs.

The CBI for “participation in company energy and efficiency programs and billing assistance programs” will help customers lower energy costs and reduce energy burden. Energy efficiency specific actions related to this CBI include Wattsmart Homes program’s (WSH) enhanced incentives for named community customers and target these customers with no-cost and low-cost measures including no-cost

duct sealing. The program introduced a new measure to allow non-electric heat customers to receive an incentive for electric HVAC conversions. WSH will continue to develop all program communications in Spanish language including web site, marketing collateral, and program forms, and leverage staff fluent in Spanish to ensure equitable participation among Spanish language customers. Other specific actions related to this CBI include Wattsmart Business program (WSB) higher lighting retrofit and non-lighting incentives for small businesses located in Named Communities and the smallest of the small businesses, WSB higher vendor incentives for completed lighting retrofit projects for the smallest of the small businesses and small businesses in named communities. The company will document its progress by: tracking the number of energy efficiency program participants, demand response program participants, and number and percent of participants converting from gas to electric heating under the low-income weatherization program.

The CBI for “households experiencing high energy burden will” track energy burden for low-income bill assistance program participants, low-income weatherization program participants, HICs, VPs, and all customers generally.

The CBI of “community focused efforts and investments” will track the company’s increased focus on a more equitable distribution of energy efficiency benefits. The WSH program dedicates a significant amount of time and effort to reach and engage named communities through a dedicated bilingual outreach team that actively participates in dozens of events in HICs targeting VPs. WSH uses strategies and tactics to engage named community customers with simple program offers as an entry point. These include such measures as LED light bulb kits, smart thermostats, weather stripping, duct sealing, air purifiers, and trees. Other specific actions related to this CBI include WSB higher lighting retrofit incentives for small businesses in named communities and the smallest of the small businesses, WSB higher vendor incentives for completed lighting retrofit projects for the smallest of the small businesses and small businesses in named communities, Low Income Weatherization (LIW) repair funds increase, and LIW non-electric to electric heat installations. The company will document its progress by tracking workshops on energy related programs and the headcount of minorities, women and other disadvantaged program delivery staff in Washington.

The CBI of “indoor air quality” aims to reflect the company’s efforts to improve air quality within the housing envelope. The energy efficiency action related to this CBI includes the LIW program electric heat installation specific action. The company will document its progress by tracking non-electric to electric conversions for the LIW program, and the number of households using wood as a primary or secondary heating source.

The CBI of “efficiency of housing stock and small businesses, including low-income housing” aims to increase non-energy benefits, such as a more comfortable home environment. Energy efficiency action related to this CBI includes the WSB higher lighting retrofit incentives for small businesses in named communities and the smallest of the small businesses, WSB higher vendor incentives for completed lighting retrofit projects for the smallest of the small businesses and small businesses in named communities, LIW repair fund increase and LIW program electric heat installation specific action. The company will document its progress by tracking expenditures⁸⁵ on energy efficiency programs for qualified candidates in the programs listed in the “Participation in company energy and efficiency programs and billing assistance programs” CBI. In addition, PacifiCorp will track non-electric (including natural gas, propane, oil and solid fuels) to electric heating conversions in our Washington service area.

⁸⁵ Energy efficiency expenditures include customer, partner, and direct install incentive payments and exclude all other administrative or program costs.

These metrics will be tracked annually with results made available each year as required by WAC-480-109-120(3).

Demand Response Actions

PacifiCorp has made rapid progress building up demand response resources in Washington. Prior to its initial CEIP, PacifiCorp offered no demand response programs in the state. By the end of 2025, PacifiCorp will have a broad portfolio of programs, providing participation options for all customer classes, and delivering various load management resources to support a flexible and resilient energy grid.

Over the 2022-2025 CEIP period, PacifiCorp completed a number of tasks—including all of the specific actions identified in the 2021 CEIP, as well as additional tasks necessary to ensure the long-term viability of its portfolio of demand response resources. As indicated in Order 6, Interim Target Condition 10, the following describes steps the company has taken since the filing of the original CEIP to implement demand response programs and acquire additional demand response capacity:⁸⁶

- Initiated three time-of-use pilot programs to study their potential to attract customer interest, achieve significant load shifts, and deliver a financial benefit to participants. PacifiCorp filed its final report detailing the outcome of these pilots in November 2024.
- Established Schedule 106 Tariff, an umbrella tariff for all demand response programs in Washington. Schedule 106 created a transparent, efficient process for the development of demand response programs. The Schedule 106 process ensures stakeholder engagement in program design, and streamlines the regulatory steps needed to create a new program. It ensures consistency across all aspects of program implementation including policies for outreach and documentation, cost-effectiveness analysis, annual reporting, and cost recovery.
- Developed and launched demand response programs based on bids received in the 2021 Demand Response RFP to control the following load groups: irrigation pumps, C&I, residential smart thermostats controlling central cooling, residential water heaters.
- Evaluated and subsequently terminated the Optimal Time Rewards program (smart thermostats and water heaters) because program-specific data revealed it was not cost-effective.
- Developed and launched Wattsmart Battery, identified as a demand response action in the 2021 CEIP, leveraging program infrastructure from a PacifiCorp program operated in Utah to achieve rapid implementation and economy of scale.
- Developed the Cool Keeper program as an alternative to the smart thermostat program included as an action item in the 2021 CEIP. Cool Keeper became effective in Washington on March 28, 2025, and is expected to begin enrolling customers in late 2025 or early 2026.
- Developed and launched the EV Managed Charging program – listed as a communication and outreach special action in the 2021 CEIP. Because this program provides demand response resources, it is now managed as part of the demand response portfolio.
- Conducted regular presentations to the DSM Advisory Group and the Equity Advisory Group to provide information and solicit feedback on new program designs, program performance, and program updates for adaptive management. PacifiCorp also provided updates on CBI metrics related to demand response, and progress against the CEIP demand response specific target.

⁸⁶ Washington Utilities and Transportation Commission, UE-210829, Order 6, Multi-party Settlement Agreement. <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=609&year=2021&docketNumber=210829>

Existing Customer Programs

As of 2025, PacifiCorp has five active demand response programs. The existing demand response programs include:

- **Wattsmart Business Demand Response:** This program targets commercial and industrial customers with loads exceeding 100 kW in the prior year. PacifiCorp contracts with a third-party vendor to help administer the program to qualifying customers. The program uses a block resource that is dispatched in its entirety for each event. Customers are given the opportunity to participate in frequency, contingency and peak management events. In later years dispatch flexibility around MW volume and location could potentially be used. Customers participate through direct load control and manual response with availability for dispatch year-round, though events are expected to be primarily called during summer and winter months.
- **Irrigation Load Control:** This program targets agricultural irrigation loads from customers on Schedule 41 or 48, who are irrigating or soil drain pumping agricultural areas. PacifiCorp contracts with a third-party vendor to help administer the program to qualify customers. The program uses billing demand data and gathers customer information on pump size to target customers which meet the ideal operational profile and load factor for the program. The program relies on field installed direct-load control devices to send signals to pumping equipment for reduction of irrigation loads. Once enrolled in the program, participants can set up notifications to be received via email or text. In addition, participants can view pump status, power usage, and event information for scheduled, running, and past events using their smart phone, tablet, or desktop computer. Dispatch for events are during summer months (June – September) during the hours from 2 PM – 9 PM.
- **Cool Keeper (Central Cooling Load Control):** Cool Keeper aggregates load from residential-scale central cooling units, using a direct load control switch provided by the program. The switch devices use cellular communication to transmit data and receive control signals from a cloud-based platform. The platform is integrated with the company's enterprise system software, allowing for automated dispatch signals. PacifiCorp uses this load as a contingency reserve resource and a frequency response resource. These use cases require extremely fast response (within minutes for contingency reserve, and instant for frequency response) but also allow for short-duration events of just 30 minutes or less. For an equivalent program the company runs in Utah, the average event duration was just 7 minutes in 2024. This results in a nearly non-noticeable impact on participating customers, though customers can opt-out of events up to two times a year. The switch is compatible with most central air conditioners and heat pumps. Participants receive \$30 in bill credits annually, spread over the summer cooling season.
- **Wattsmart Battery Program:** This program will target residential and commercial customers to promote and incentivize the installation of behind the meter on-site battery storage systems for utility integration in support of overall grid management. The company has leveraged existing contracting with third-party vendors supporting the Wattsmart Battery Program for Rocky Mountain Power. The company anticipates that initially, participation will come from residential customers with either existing or newly installed solar generation systems, who will charge the batteries with excess generation. Customers may participate by installing eligible battery equipment and allowing the company to use the battery for grid management. A four-year commitment term is required in order to receive an upfront enrollment incentive. Additionally,

ongoing participation incentives are provided to customers in the form of monthly bill credits. Availability for dispatch is expected to be year-round in any hour with rapid response and the potential for traditional demand response, frequency reserve, contingency reserve, regulation reserves, regional grid management, backup power and other ancillary needs.

- **Wattsmart Drive:** This program will send “pause charging” signals to enrolled electric vehicles; generally five-minute events will be scheduled during various times of the day throughout the year to test the viability of using electric vehicles as a frequency demand response resource as enrollment scales. This program will allow any PacifiCorp customer with a Washington account and an eligible electric vehicle to enroll and participate. Five-minute events will be scheduled during various times of the day throughout the year to test the viability of using this as a frequency demand response resource as enrollment scales. The company anticipates that initial enrollment will come from residential customers who already own or lease an eligible electric vehicle; however, vehicles used for non-residential purposes (such as fleet vehicles) are also welcome to enroll in the program.

2026-2029 Demand Response Action Plan

PacifiCorp has organized its 2026-2029 plan for demand response into three action areas that together will ensure PacifiCorp achieves desired outcomes of growth in capacity and equitable distribution of program benefits and burdens. The three specific actions for demand response for 2026-2029 are:

1. Grow existing programs to achieve the specific target of 22 MW of available capacity by 2029.
2. Create an equity plan for each program in the DR portfolio.
3. Establish and implement a formal competitive procurement framework for demand response.

Below, PacifiCorp provides more context around why each of these actions was adopted, and more detail about how PacifiCorp will implement each of these actions.

Grow existing programs to achieve the specific target of 22 MW of available capacity by 2029.

PacifiCorp expects to achieve the 2029 DR target by continuing to grow capacity in the existing programs. While it is possible that an RFP issued to market in 2027 (2027 DR RFP) will identify viable new programs, existing programs are already pursuing to the majority of the technically achievable capacity identified in the 2025 CPA, and the company does not expect to need new program opportunities to meet the demand response target. However, as directed by the Commission, PacifiCorp included a request for information (RFI) in its 2025 Washington Situs RFP, requesting information from suppliers providing demand responses programs.⁸⁷ Figure 14 shows the expected growth forecast by program over the 2026-2029 period. PacifiCorp anticipates that the more mature Irrigation Load Control and Wattsmart Business demand response programs will continue to provide the majority of available capacity over the plan period.

⁸⁷Appendix Y – RFI for Demand Response included in PacifiCorp’s 2025 Washington Situs RFP, issued to market on September 2, 2025 can be viewed online at https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/suppliers/rfps/2025-wa-situs-rfp/2025_WA_Situs_RFP_Appx_Y_RFI_Demand_Response.pdf.

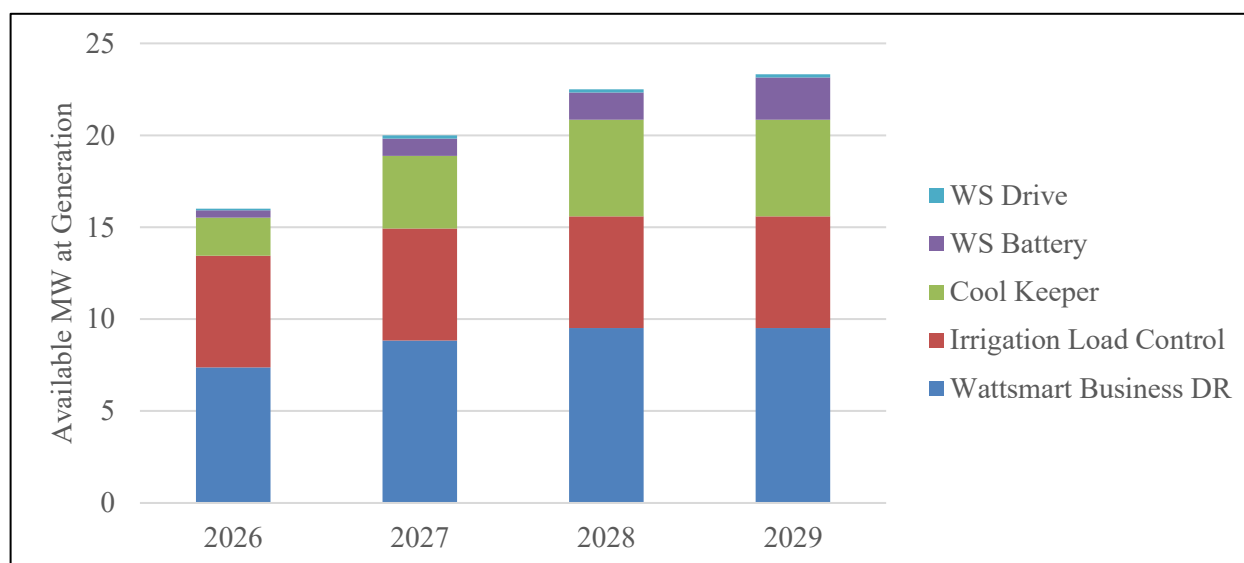
Figure 14 - Estimated Capacity by Program, 2026-2029

Table 24 shows the forecast portfolio budget for 2026-2029. PacifiCorp anticipates demand response spending to hold relatively steady over this CEIP planning period, even as programs expand. The relatively flat overall spending over the period obscures several dynamic shifts in budgets, as initial upfront enrollment costs decline, and customer incentives ramp up. The total incentives trend is also impacted by projected decreases in per-unit incentive levels for the Wattsmart Battery program, reflecting expected changes within the battery market. These costs are based on existing contracts, with rates projected past contract end dates to the end of the plan period. Actual spending may differ from this forecast depending on actual participation rates, and actual load per site or per device. Additionally, PacifiCorp plans to issue an RFP for all demand response resources in Washington in 2027. The results of this RFP could result in a significant change to the portfolio budget.

Table 24 - Proposed Demand Response Portfolio Budget 2026-2029

	2026	2027	2028	2029
Incentives	\$910,000	\$1,320,000	\$1,110,000	\$1,310,000
Implementation	\$1,440,000	\$1,580,000	\$1,460,000	\$1,530,000
Total	\$2,350,000	\$2,900,000	\$2,570,000	\$2,840,000

PacifiCorp will manage programs according to the protocols established in the initial filing under the Schedule 106 docket, UE-220550. PacifiCorp will file annual reports on program performance six months after the end of the year. Annual results, including survey results from participants, will be presented to the DSM Advisory Group and the EAG as early as possible each year, prior to finalization of the annual reports. The PacifiCorp team will employ adaptive management strategies on an annual basis. The adaptive management process will include review of annual results to identify opportunities to improve program impacts, participant experience or distribution of participation or incentives across the target market. Where opportunities exist, PacifiCorp will follow the process identified in the Schedule 106 initial filing to share proposed changes with stakeholders, solicit and incorporate feedback, and implement final changes.

Create an equity plan for each program in the demand response portfolio.

One of PacifiCorp’s first actions in 2026 will be to work with the DSM Advisory Group and the EAG to identify the key consideration for evaluating equity in demand response programs. One approach to assessing whether programs are distributing benefits equitably is look at the distribution of benefits—in the case of demand response, benefits are primarily incentive dollars—across all customers. However, demand response programs are necessarily limited to customers with both compatible equipment and a willingness to experience curtailments. The distribution of these customers is difficult to assess, and the proportion in named communities may not be equivalent to the proportion of all customers in named communities. In addition, there may be circumstances where driving higher participation does not result in greater equity, if doing so results in people who are less willing to experience curtailments, or less able, being enrolled in a program.

As part of this discussion, PacifiCorp will explore whether a non-binding minimum threshold for distribution of demand response incentives to customers in named communities is appropriate, and if so, what an appropriate minimum threshold would be. PacifiCorp will share the recommendation of Staff, that PacifiCorp adopt a minimum threshold of 27 percent, as a discussion point.

Also in 2026, PacifiCorp will develop an equity plan for each demand response program that will incorporate the equity considerations identified with stakeholders. The plans will describe the key equity considerations for the program and identify additional steps PacifiCorp will take to optimize the equitable distribution of benefits for the program, if it is determined additional steps are needed. As a starting point, for each residential program, PacifiCorp will:

- Publish the program webpage and all print marketing in Spanish; and
- Test alternative, non-digital channels of communication such as Spanish radio, postcards, and partnering with community organizations to identify effective mechanisms for reducing barriers to participation among named community customers.

PacifiCorp will also explore additional strategies such as introducing special incentives, relaxed eligibility or performance requirements, dedicated minimum funding for named community outreach, or other changes. PacifiCorp will solicit feedback from the DSM Advisory Group and the EAG on the plans and incorporate action items from the plans into program design through the annual adaptive management cycle.

PacifiCorp will continue to monitor the distribution of incentives to Tribal areas, other HICs and VPs, as these data are already tracked as CBI metrics. PacifiCorp will also continue to report results to the DSM Advisory Group and the EAG, and as part of the CEIP Progress Reports.

Establish and implement a formal competitive procurement framework for demand response.

CETA requires that utilities “pursue all cost-effective, reliable, and feasible conservation and efficiency resources and demand response.”⁸⁸ To provide clarity and transparency for how PacifiCorp is complying with this requirement, PacifiCorp plans to work with regulators and stakeholders to formalize a set of protocols for how the company will manage competitive procurement of demand response resources going forward. The company anticipates this framework will be similar to the one currently in place for

⁸⁸ WAC 480-100-610(4)(a).

its energy efficiency programs. The framework would establish a regular schedule and clear expectations for targeted DR procurements, supporting future portfolio planning and providing transparency for potential vendors. PacifiCorp will consult with WUTC Staff on the appropriate mechanism for developing this process. The company proposes submitting it as a filing under Docket UE-220550 to modify the existing requirements for Schedule 106 programs. This docket already includes a structured process for stakeholder outreach and feedback, which PacifiCorp would apply to this filing as well.

PacifiCorp will propose that the next DR RFP be issued in early 2027, and that it include the entire portfolio of DR resources in Washington. The company will share a draft RFP with the DSM Advisory Group (DSM-AG) and the Equity Advisory Group (EAG) to solicit their feedback prior to issuing the RFP. In addition, the company adopt a scoring framework for the RFP that appropriately incorporates CBI impacts. This framework will be based on the price and non-price scoring methodology employed in the 2025 Washington Situs RFP, though the company may make updates to the methodology based on the 2025 experience.

To prepare for the RFP and provide potential bidders with ample notice time, PacifiCorp plans to issue an RFI for high-level proposal ideas and pricing expectations in 2025, before the implementation period of this plan. The RFI will also solicit bidders perspectives on key consideration for PacifiCorp to address in the 2027 RFP.

Measurement and Verification Protocols for Demand Response

PacifiCorp has worked with program implementers to develop customized, detailed M&V methodologies for each demand response program. Methodologies vary based on available data, the nature of the end-use being curtailed, and the nature of the curtailment. Current M&V strategies for estimating kW impacts are outlined in

Table 25. M&V methodologies are subject to change based on contract negotiations with vendors.

Table 25 - M&V Strategies by Program

Program Category	M&V Strategies
Commercial and Industrial Curtailment	Data is collected on site from a program-installed monitoring device that captures an interval data feed from the utility meter to verify performance. Baseline methodologies vary by product, and rely on historical consumption and/or average consumption over corresponding periods prior to the event.
Irrigation Load Control	Data on actual curtailed load is collected from integrated load control devices installed in-line at the irrigation pump, providing near real time metrics on the amount of load curtailed for an event. Baseline usage is estimated using consumption an hour prior to event notification.
Cool Keeper	System load reductions are modelled using as inputs the estimated average load per unit, hourly runtime, the number of communicating devices, time of day and temperature.
Batteries	Batteries connect to the company's Energy Management System via internet connection to support near real time metrics for performance.
Wattsart Drive	Load reduction is measured as the total charging load from participating customers in the minute prior to the event start, calculated using telemetry data from participating vehicles.

Energy and Non-Energy Impacts

PacifiCorp will continue to use the California demand response cost-effectiveness protocol for evaluating expected distribution of cost and benefits for demand response programs.⁸⁹ Similar to energy efficiency, the company examines impacts from a utility cost test (UCT) and a total resource cost (TRC) test perspective. Energy impacts are measured as avoided need for capacity in kilowatts, which is monetized as avoided costs for generation, transmission and distribution.

The TRC perspective allows for inclusion of NEI in its assessment of costs and benefits. PacifiCorp has identified various non-energy benefits and costs that may result from a demand response program but has not attempted to quantify any of these impacts that may accrue from its own programs (see Appendix C – Specific Actions, for a list of potential non-energy impacts). Although these impacts are likely to exist, they are difficult to quantify or translate into a monetary value. The most significant NEI is likely the participant cost to participate, including the administrative burden and the impact of curtailments. As recommended in the California protocol, PacifiCorp uses some fraction of the incentive amount, up to 75 percent, to represent customer costs to participate. This value is assumed to be an adequate proxy because participation in the programs is voluntary, and customers would not participate if the incentive did not offset the cost.

Forward-looking cost-effectiveness analysis is provided for each program as part of the program filing under the Schedule 106 protocol. Cost effectiveness is assessed as a net present value based on estimated impacts over a 10-year time frame. In annual reports, PacifiCorp provides a one-year retrospective assessment of the cost effectiveness of each program, based on actual costs and benefits for the year.

CBI/Action Mapping: Demand Response Specific Actions

PacifiCorp proposes three specific actions for demand response, including continuing to grow capacity in all five existing programs, developing equity plans for each program, and developing and implementing a formal competitive framework for demand response (see Appendix C for a detailed listing of PacifiCorp’s energy efficiency specific actions). These specific actions impact the CBI of participation in company energy and efficiency programs and billing assistance programs.

PacifiCorp’s customer programs help customers lower their own energy costs and reduce energy burden and provide opportunities for customers to actively support the transition to clean energy, and to help PacifiCorp keep costs low for all customers. Increasing participation in these programs results in better equity outcomes and delivers more direct benefits to customers. The company will continue to track the contribution of demand response programs to this CBI by monitoring the number of customers participating, and the total incentive dollars paid, by customer subgroup (customers on Tribal lands, customers in HICs, customers in VPs, and all customers).

These metrics will be tracked annually and shared with the DSM Advisory Group and the EAG. Annual reporting on demand response will be conducted for the portfolio summarizing performance, CBIs, and any evaluation results. It will focus on programs that have been in operation for at least one year. For programs that have not reached a full year of operation a status update will be provided within the annual

⁸⁹ E.g., <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-costs/demand-response-dr/demand-response-cost-effectiveness>

progress report. Reporting on demand response programs will be developed based on feedback from the DSM Advisory Group and other stakeholders and is subject to change as a result.

Communications, Outreach and Engagement

In this CEIP, PacifiCorp has identified several action items that are not explicitly demand-side or supply-side actions. Generally, these “other” actions encompass improvements on delivery of programs and communications to customers on various CETA-related implementation activities, including to named communities. This category of action is a direct result of feedback received, including feedback received during advisory group meetings. During these meetings, accessibility improvements were identified in outreach and engagement efforts, particularly those pertaining to culturally and linguistically responsive outreach and program communications. The following action plan represents the continued offerings and improvement upon existing offerings that have been identified as important to further communications outreach and engagement, and additional actions PacifiCorp will implement over the next four years.

2026-2029 Communications, Outreach and Engagement Action Plan

1. Continue to offer and improve physical and digital communication materials regarding key information on CEIP and CETA implementation in plain language to serve as educational resources.
2. Continue offering and expand upon the array of engagement opportunities and public communication channels, specifically focused on expanded outreach to named communities.
3. Continue to work with EAG members on key elements of CEIP and CETA-related planning and implementation, working to bring more information sooner and provide more opportunities for feedback and input.
4. Recruit new EAG members to continue to offer and expand upon diverse and valuable feedback representative of PacifiCorp’s service area.
5. Continue to improve language accessibility of materials.
6. Establish an electric vehicle supply equipment grant program.
7. Continue to conduct outreach and engagement to build trust and understanding with tribes and leaders with a potential outcome being the creation of additional tribal-specific CBIs or metrics.

Outreach, Language and Education

PacifiCorp has worked to improve and expand its outreach and marketing to better reach all customers, including customers in named communities. The company has existing marketing plans for its various programs that broadly target its customer base in Washington, while also focusing outreach efforts on HICs identified by zip code. PacifiCorp is exploring new advertising channels to engage customers more directly within their communities in order to bring awareness to energy efficiency and energy assistance programs. This includes digital, social, radio, print, and TV ads. The use of printed informational and marketing materials, such as the company’s CEIP/CETA infographic,⁹⁰ enables the company to provide direct information at in-person events and meetings. Table 26 details these communications, outreach and engagement specific actions.

⁹⁰ https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/washington-ceip/2025_CEIP_Meeting_Infographic_Bilingual-ES.pdf

Table 26 - Communications, Outreach and Engagement Specific Actions

Category	Specific Actions
Communications	After receiving feedback from its EAG, PacifiCorp developed a CETA / CEIP infographic containing key information on these two topics in plain language to serve as a broader educational resource tool. PacifiCorp has begun to provide this resource at advisory group meetings and more directly to several community partners as a tactic to disseminate the information across PacifiCorp’s Washington service area. Physical and digital versions have been made available to expand access. The infographic is also double-sided, providing the same information on one side in English and on the other side in Spanish. Broader resources have been included at the bottom of the infographic for customers wishing to connect with the company on other matters. A link to PacifiCorp’s Washington Energy Resource Center has also been included as a tactic to connect more customers to the company’s existing programs, support resources, as well as additional educational material. The infographic can be found online at: https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/washington-ceip/2025_CEIP_Meeting_Infographic_Bilingual-ES.pdf
Engagement	PacifiCorp provides its Washington advisory group members with early access to key elements of planning documents and updates. This promotes transparency by: • Building trust with community partners. • Gives advisory group members time to collect feedback from their constituencies and return with more representative insights. • Encourages a more responsive and iterative planning process that integrates diverse perspectives.
Engagement	PacifiCorp’s advisory groups play a critical role in shaping PacifiCorp’s inclusive planning and outreach strategies by ensuring that underserved and disproportionately impacted communities are central to the company’s clean energy transition. More specifically, the company’s EAG focuses on elevating community voices in energy planning, especially those from marginalized or historically excluded populations.
Outreach	PacifiCorp uses a wide array of outreach tactics to increase accessibility and awareness: • PacifiCorp offers an array of different public input meeting opportunities and interactive workshops to garner community

Category	Specific Actions
	interest and feedback (e.g., on Distribution System Planning and Transportation Electrification). • PacifiCorp conducts targeted outreach to HICs to ensure broad representation. PacifiCorp has dedicated email channels that provide a flexible option for direct communication per topic area (example: CEIP email for CEIP matters, WA RFP mailbox for RFP matters...etc.). PacifiCorp staff can add or remove participants as needed. These channels are used mindfully to relay key updates and other important details. Email channels are advertised widely across company-convened public meetings, on the company's webpages, and via word of mouth when necessary.
Engagement	PacifiCorp's public engagement is amplified by engaging with trusted CBOs and public state agencies, including: • Washington State Department of Commerce • Washington State Department of Ecology • Washington Utilities and Transportation Commission staff • Northwest Community Action Center dba Yakima Valley Farm Workers Clinic • Opportunities Industrialization Center • Blue Mountain Action Council These and other groups bring policy updates relevant to their line of work and expertise directly into advisory group spaces and support mutual exchange of resources and knowledge, helping ensure there is alignment with community needs and state policy priorities.
Engagement	PacifiCorp's EAG helps to reduce participation barriers and increase the inclusion of environmental justice advocates, Tribal representatives, public health professionals, and other voices. Specific approaches include: • Conducting annual one-on-one in-person community visits, tailored to the unique needs and contexts of local communities. • Recruiting EAG members to reflect geographic, cultural, and socioeconomic diversity within PacifiCorp's Washington service area.

Category	Specific Actions
	• Providing educational tools, such as 101-level presentations and recordings, to demystify utility planning processes. • Enhancing web presence and usability to make meeting materials, updates, and engagement opportunities more accessible.

NEIs that may result from these activities are expected to include increased awareness and participation of PacifiCorp programs and are expected to be counted and attributed to NEIs specific to PacifiCorp programs. Examples of NEIs from better outreach and increased participation include trust and partnership between customers and PacifiCorp, along with increased home comfort. Trust and transparency are especially important when collaborating with Tribal Nations, as well as having an accurate understanding of each tribe’s history, culture, and style of government.

PacifiCorp believes these specific actions can be implemented with existing marketing funds, and additional outreach costs are expected to be modest, and will be used for enhanced outreach and materials for EAG and public meetings.

EAG Engagement and Membership

The EAG will remain foundational, not only as a consultative body, but as a partner in co-creating equitable outcomes for Washington’s communities. Since its inception, the EAG has helped shape the company’s clean energy goals by amplifying the voices of underserved communities, guiding inclusive outreach strategies, and embedding equity into utility actions, metrics, and planning processes as described in Chapter III – Public Participation. The company will continue to rely on the EAG as a sounding board for emerging initiatives, including culturally and linguistically responsive program design, customer engagement strategies, and equity-focused implementation of the CEIP.

In early 2022, the company began refining the structure of EAG meetings based on member feedback, recognizing that consistent evaluation and responsiveness are essential to the group’s effectiveness. This approach will continue with regular feedback loops, onboarding for new members, and intentional design of meeting agendas to focus on community priorities. Meetings will include dedicated time for member presentations, cross-advisory learning opportunities, and deeper dives into topics such as energy burden reduction, transportation electrification, and equitable access to residential energy efficiency. Looking beyond 2025, the EAG will evolve to include:

- Expanded community representation reflecting the diversity of PacifiCorp’s Washington service area. This involves building partnerships with CBOs and Tribal nations that are well positioned to advance equitable outcomes and foster the community trust necessary for meaningful engagement.
- Ongoing collaboration with the Yakama and other Tribal nations to support engagement and inclusion of Indigenous perspectives.
- Enhanced training and resources for members, including access to 101-level regulatory presentations and planning tools.
- Increased alignment with other advisory bodies, supporting joint meetings and sharing information to improve strategic coordination.

- Evaluation of progress on equity outcomes, with EAG input shaping the metrics and milestones that track community benefits.
- Hosting public meetings at varied times, including evenings, and offering virtual options, ensuring broader access. Events are intentionally held in accessible locations, near public transit when available, and within the most directly impacted communities. For those unable to attend in person, provide alternative avenues for input.
- Providing information in accessible formats and more than one language to reach a broader audience and supporting customers that face barriers to participation, through accommodations that allow full engagement. This includes:
 - Developing printed materials for impacted interested persons who may have limited or no internet access.
 - Ensuring company staff and consultants, including project managers and engineers, are adequately prepared to engage with communities in a respectful, informed, and culturally sensitive manner.
 - Delivering communications that are culturally and linguistically appropriate, in alignment with the company’s CBIs.
 - Providing translation services during public meetings to support inclusive participation.
 - Communicating in a clear, consistent, well-documented, and transparent way especially when it comes to demonstrating how community and stakeholder input informs decision making.

Tribal Engagement

As discussed in Chapter III – Public Participation, PacifiCorp recognizes Tribal sovereignty, and understands each tribe has a unique culture, history, and form of governance. PacifiCorp will continue its engagement with the Yakama Tribe and its enterprises, (including Yakama Power and Yakama Nation Fisheries) to support their self-determination efforts and strategic priorities. Additionally, the company will ramp up outreach to other tribes in Washington who should be consulted on company business and included in communications. Examples of issues requiring coordinated communications include wildfire and other emergencies, cultural resource protection, and renewable energy projects. Finally, the TLR will work in tandem with Washington’s regional business managers and community engagement staff to encourage Tribal participation in the EAG and other advisory groups.

As PacifiCorp continues to conduct outreach and engage with tribes and leaders to build trust and understanding, the company will collaborate with Tribal members and advisory groups to consider the creation of CBIs and/or metrics specific to tribes that would add value to be tracked and reported on over time.

Establish an Electric Vehicle Grant Program

PacifiCorp offers an electric vehicle program that provides additional support for named communities to install electric vehicle charging infrastructure, purchase electric vehicle charging infrastructure, conduct outreach and education related to transportation electrification, and potentially purchase electric vehicles. The grant program is intended to: 1) activate transportation electrification projects equitably throughout the PacifiCorp service area, and 2) ensure expansion of education and learning of what transportation electrification can mean for named communities. The program was designed alongside the EAG to establish an inclusive grant program with emphasis on named communities. PacifiCorp’s grants are intended to be inclusive of a variety of electric mobility projects from installation of

infrastructure to adoption of different modes of electric transportation to outreach and educational campaigns and events. PacifiCorp will continue to engage its EAG, and other interested parties in regular meetings for improving the communities grant program design and education and outreach program components.

Details regarding PacifiCorp’s EV programs are included in the Transportation Electrification Plan.⁹¹ The Transportation Electrification Plan also discusses regional and national trends in transportation electrification and identifies potential costs and benefits of its electric vehicle programs including non-energy impacts related to transportation electrification. The current budget of the grant program ranges from \$500k to \$750k over the 2026-2029 period but is subject to change as the number of grantees fluctuates each year.

CBI/Action Mapping: Community Outreach Specific Actions

The company’s CEIP proposes seven specific actions for community outreach and engagement (see Appendix C for a detailed listing of PacifiCorp’s community outreach and engagement actions), with two CBIs related to these outreach and engagement actions.

The first CBI is focused on culturally and linguistically responsive outreach and program communication, and the second CBI is focused on community-focused efforts and investments. These community outreach and engagement actions will help the company more effectively connect with customers, reducing burdens and increasing non-energy benefits for Washington residents. Specific actions include improving the delivery of programs and communications to targeted communities, enhancing language accessibility, expanding outreach efforts, and improving educational resources.

To measure progress on the CBI related to culturally and linguistically responsive outreach and program communication, the company will track outreach efforts in languages other than English, assess program communication impressions, and evaluate the number of responses to the Spanish version of PacifiCorp’s CETA Survey and Residential Survey.

In terms of community-focused efforts and investments, the company aims to ensure that communities receive equitable benefits, exemplified by the establishment of an electric vehicle grant program. The impacts of investments in this program are expected to yield positive outcomes for non-energy benefits and further reduce burdens for Washington customers.

Progress related to the CBI of community-focused efforts and investments will be documented by tracking the number of public electric vehicle charging stations in PacifiCorp’s service area. For additional details, please refer to Chapter IX – Specific Actions. As outlined in Chapter VIII – Customer Benefit Indicators, these metrics will be monitored, and the results will be presented in the annual clean energy progress report.

⁹¹ PacifiCorp’s most recent Transportation Electrification Plan was filed in Commission docket UE-220359 on January 16, 2024. More details and other updates to PacifiCorp’s planning process can be viewed online at <https://www.utc.wa.gov/casedocket/2022/220359/docsets>.

Chapter X. Compliance Costs

Under CETA, a utility has complied with the law if “over the four-year compliance period, the average annual incremental cost of meeting the standards or the interim targets established under subsection (1) of this section equals a two percent increase of the investor-owned utility’s weather-adjusted sales revenue to customers for electric operations above the previous year, as reported by the investor-owned utility in its most recent commission basis report.”⁹² All incremental compliance costs must be “directly attributable” to actions necessary to comply with RCW 19.405.040 and 19.405.050.⁹³

For the 2025 CEIP, this requires determining: (a) directly attributable incremental compliance costs over the next four-year compliance period (2026-2029); and calculating (b) whether these incremental compliance costs exceed CETA’s two percent threshold over the same four-year period.

Applied here, PacifiCorp forecasts annual incremental CETA compliance costs of \$25.39 million, an average of \$6.35 million per year, for 2026-2029. This \$6.35 million amount is below PacifiCorp’s forecasted annual two percent CETA cost cap threshold of \$25.5 million.

PacifiCorp’s incremental compliance costs, compliance cost threshold, and long-term compliance costs are discussed below. Additionally, given the discussion on long-term compliance costs, which provide a more fulsome review of the anticipated costs that PacifiCorp expects to incur to comply with CETA, PacifiCorp discusses how the cost cap could be improved to provide more effective guidance and reasoned implementation in the sections to follow.

Incremental Compliance Costs

To calculate directly attributable incremental CETA compliance costs, PacifiCorp compares its lowest reasonable cost portfolio to the alternative lowest reasonable cost and reasonably available portfolio (“Alternative Portfolio”) that would have resulted in the absence of CETA.⁹⁴ PacifiCorp must include the SCGHG in both portfolios,⁹⁵ and it can be incorporated in the CEIP as a “planning” or a “dispatch” adder.⁹⁶

These calculations should be generally consistent with the utility’s most recent IRP, and the utility must demonstrate the difference between portfolio choices and investment decisions between the two

⁹² RCW 19.405.060(3)(a).

⁹³ *Id.*

⁹⁴ WAC 480-100-660(1).

⁹⁵ WAC 480-100-605 (“The alternative lowest reasonable cost and reasonably available portfolio must include the social cost of greenhouse gases in the resource acquisition decision in accordance with RCW 19.280.030 (3)(a).”); GO R-601, ¶ 128 (“We find that including the SCGHG in the baseline portfolio is required by statute. Under RCW 19.280.030(a)(i) and (iii), a utility is required to include the SCGHG as a cost adder when “selecting and evaluating” intermediate and long-term resource options, as well as conservation policies, programs, and targets. Because these subsections would still be statutory requirements but for RCW 19.405.040 and -.050, the SCGHG must be included in the baseline portfolio.”).

⁹⁶ GO R-601, ¶ 37 (“The variety of proposals demonstrates the lack of statutory direction concerning the incorporation, or modeling, of the SCGHG emissions in IRPs. Accordingly, the rules we adopt by this Order do not require a specific modeling approach at this time. . . . How the utility chooses to model the SCGHG emissions in its preferred portfolio in the IRP will inform its CEAP and ultimately its CEIP. The utility must provide a description in its CEIP of how the SCGHG emissions are modelled and incorporated in its preferred portfolio.”); *but see* UE-210795, Order 08, ¶ 359 (“Because modeling the SCGHG in dispatch results in lower overall portfolio costs (including the SCGHG), we agree with Dr. Hart’s conclusions that the company’s No-CETA case does not reflect that actual, lowest reasonable cost “baseline” portfolio. It also indicates that applying SCGHG to dispatch provides more optimized portfolios and that this methodology should be adopted for the present time.”).

portfolios, to identify which costs are directly attributed to comply with CETA.⁹⁷ The Commission has identified various categories of expenses that are “directly attributable” CETA compliance costs.⁹⁸

For the 2025 CEIP, PacifiCorp’s 2025 CEIP preferred portfolio is the current lowest reasonable cost portfolio, while the “without-CETA” portfolio discussed above is the Alternative Portfolio. A comparison of these two portfolios reveals all incremental resources and associated costs that PacifiCorp would not select, *but for* compliance with CETA.

PacifiCorp has also included administrative and general CETA compliance costs in addition to these resource costs. These incremental compliance costs are not captured through long-term modeling, yet are tangible costs associated with actions taken to increase and improve outreach, engagement and participation, to improve the equitable distribution of benefits across programs, to improve internal management and coordination of resources and time, and other miscellaneous administrative and support-related costs to help the company and its staff implement the specific actions described in this CEIP, and to further progress towards CETA’s objectives.

Together, PacifiCorp forecasts an incremental cost for 2026-2029 of \$25.39 million, an average of \$6.35 million per year. These resource and administrative costs are discussed below.

Incremental Resource Costs

As described in Chapter V, PacifiCorp’s Alternative “without-CETA” Portfolio identified 158 MW of proxy solar and 359 MW of proxy wind resources that were incremental resources added for compliance with CETA’s clean energy standards between 2026 and 2029.

PacifiCorp estimated the dollar per megawatt-hour incremental compliance values for the Walla Walla proxy wind and solar resources that reflect the difference between the cost of each resource and the capacity and energy benefits it provides. The build cost, fixed cost, and capacity value are based on inputs from the 2025 IRP. The energy benefit reflects the marginal energy prices for these resources as part of the 2025 CEIP preferred portfolio. Based on this approach, the identified incremental cost of new resources is \$19 million over the next four year compliance period, 2026-2029, as summarized in Table 27.

The incremental cost forecast provided in this CEIP may be significantly lower than the incremental cost that will be incurred if PacifiCorp procures an equivalent quantity of resources. The incremental cost forecast is based on proxy resource costs that were developed by NREL in 2024 in a different planning environment. However, actual procurement costs will depend on specific bid costs in the current environment. PacifiCorp will receive actual bids for new resources through the 2025 WA Situs RFP process. PacifiCorp will use the same methodology presented in the CEIP to create an updated forecast of incremental costs based on actual bid data. Additionally, the incremental cost forecast in this CEIP only captures costs expected to be incurred in this planning period, but further resource additions will be necessary to reach the 2030 CETA standard. As stated previously, PacifiCorp intends to accelerate resource acquisition (based on the identified resource need in 2030) as resources are cost-effective and available, potentially driving a higher near-term incremental resource need, and thus higher incremental costs. PacifiCorp will continue to be proactive in providing revised estimates of incremental costs as appropriate.

⁹⁷ WAC 480-100-660(1)(a), (c).

⁹⁸ *Id.* -660(3)(a)-(d).

Table 27 - Incremental Resource Costs of Compliance with CETA

(\$million)	Compliance Year			
	2026	2027	2028	2029
Incremental Proxy Wind Resource Cost	-	-	-	\$14
Incremental Proxy Solar Resource Cost	-	-	\$2	\$4
Total	-	-	\$2	\$17

Administrative Costs

PacifiCorp’s long-term modeling only captures resource-specific incremental compliance costs. However, PacifiCorp will incur additional administrative costs to implement CETA. These costs include those associated with PacifiCorp’s ability to conduct broad outreach and engagement with members of our communities on clean energy planning, increase data availability to improve metrics and tracking for CBIs, enhance the equitable distribution of benefits from DSM programs, and incremental staffing needs to manage, implement and track CETA and CEIP-related objectives across the company.

As summarized in Table 28, the total forecasted incremental administrative compliance costs amount to \$6.19 million over four years, 2026-2029, or an average of \$1.55 million per year.

Table 28 - Incremental Administrative and General Costs of Compliance with CETA

(\$million)	Compliance Year				Description
	2026	2027	2028	2029	
Support Staff	\$0.40	\$0.41	\$0.42	\$0.43	Additional and ongoing internal staffing to coordinate, facilitate and perform strategic planning for all CEIP/CETA-driven implementation (non-program-specific support).
Engagement, Outreach and Communications	\$0.58	\$0.60	\$0.61	\$0.63	Facilitation of EAG meetings, CEIP-specific public meetings, materials for broader outreach for public participation, and translation services.
Data Support	\$0.10	\$0.10	\$0.10	\$0.11	Vendor and software expenses for data support specific to CEIP implementation and CBIs.
Program Expenses	\$0.42	\$0.42	\$0.43	\$0.44	CETA-driven incremental costs incurred to enhance reach and equitable distribution of DSM programs
Total	\$1.50	\$1.52	\$1.56	\$1.60	

Total Compliance Costs

As shown in Table 29, the total forecasted incremental cost for 2026-2029 is \$25.39 million, or an average of \$6.35 million per year. As described in the following section, these forecasted compliance costs are not expected to meet CETA's cost cap threshold.

Table 29 - Forecasted Incremental Cost of Compliance with CETA 2026-2029

(\$million)	Compliance Year			
	2026	2027	2028	2029
Portfolio Resource Costs				
Incremental Proxy Wind Resource Cost	\$0.00	\$0.00	\$0.00	\$13.60
Incremental Proxy Solar Resource Cost	\$0.00	\$0.00	\$1.92	\$3.69
Total Portfolio Resource Costs	\$0.00	\$0.00	\$1.92	\$17.29
Administrative & General				
Engagement/Outreach	\$0.58	\$0.60	\$0.61	\$0.63
Programs	\$0.42	\$0.42	\$0.43	\$0.44
Data Support	\$0.10	\$0.10	\$0.10	\$0.11
Staffing	\$0.40	\$0.41	\$0.42	\$0.43
Total Admin. & General Costs	\$1.50	\$1.52	\$1.56	\$1.60
Total Annual Incremental Cost	\$1.50	\$1.52	\$3.48	\$18.89
Total Incremental Cost (2026-2029)	\$25.39			
Average Incremental Cost	\$6.35			

Compliance Cost Threshold

Each CEIP must include a calculation of the average annual cost cap threshold amount, for determining potential reliance on the exemption as a means of complying with CETA.⁹⁹ For each four-year compliance period, the mathematical formula for the annual threshold amount is as follows:

$$\text{Annual Threshold Amount} = \frac{(\text{WASR}_0 \times 2\% \times 4) + (\text{WASR}_1 \times 2\% \times 3) + (\text{WASR}_2 \times 2\% \times 2) + (\text{WASR}_3 \times 2\%)}{4}$$

The company's forecasted weather-adjusted sales revenues for 2026-2029 results in a four-year cost threshold of \$101.9 million as shown in Table 30. This translates to an annual cost cap threshold amount of \$25.5 million. Forecasted, weather-adjusted sales revenues, were developed by applying currently approved rates (\$/MWh) in Washington, to weather-adjusted forecasted sales (MWh) in Washington.

⁹⁹ WAC 480-100-660(2).

Based on an annual threshold of \$25.5 million, the forecasted incremental cost to comply with CETA in this CEIP, of \$6.35 million on average per year, are not expected to reach or exceed this threshold. However, PacifiCorp will monitor actual costs of compliance over the next four years and make a determination at such time it appears that actual costs will exceed the threshold if any additional actions are required to pursue alternative means of compliance.

Table 30 - Forecasted Annual Threshold Amount for Alternative Compliance with CETA for 2026-2029

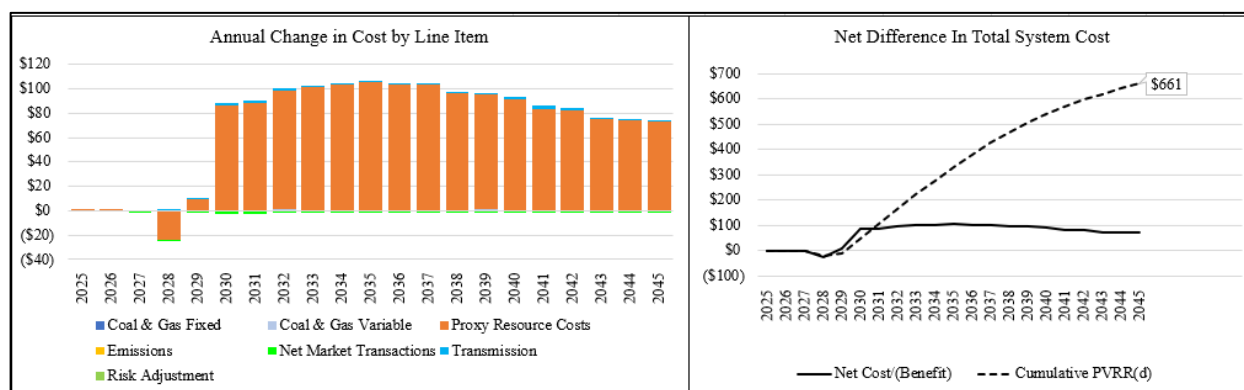
	<u>(\$ million)</u>	2026	2027	2028	2029	<u>Reference</u>
1	Forecasted WA Revenues	550,039	477,563	488,153	485,063	
2	2% of Revenues	11,001	9,551	9,763	9,701	<i>Line 1 x 2.0%</i>
3	Multiplier	4	3	2	1	
4	Threshold Amount	44,003	28,654	19,526	9,701	<i>Line 2 x Line 3</i>
5	Four-Year Threshold Amount	101,884				<i>Sum Line 4</i>
	Annual Threshold Amount	25,471				<i>Line 5 / 4</i>

Long-Term Compliance Costs

The Commission's incremental cost methodology focuses on the near-term actions over the planning period ending in 2029. However, PacifiCorp's 2025 CEIP forecasts significant incremental resource costs associated with meeting 2030 and 2045 CETA clean energy standards, with many of these costs falling just outside of the next four-year compliance period (in 2030).

For that reason, PacifiCorp shares the results below to provide a more informed view of the compliance costs that Washington customers are likely to encounter over the following decades generally, and the next compliance period specifically.

These costs can be assessed by comparing overall 2025 CEIP preferred portfolio results to the Alternative Portfolio. On a present-value revenue requirement (PVRR) basis, the 2025 CEIP preferred portfolio amounts to a \$1,035 million Washington-allocated PVRR cost. This is the total Washington expected PVRR to cover added resources to meet Washington customers' energy, capacity and CETA compliance needs over the planning period. This is contrasted with the Alternative Portfolio, which forecasts a PVRR of \$374 million over the same period. Taking the difference of the two, the costs to comply with CETA are currently forecasted at \$661 million on a present-value basis. This cost differential is summarized in Figure 15.

Figure 15 - 2025 CEIP Preferred Portfolio less Alternative Portfolio – Total System Costs (\$millions)

On a nominal basis, annual Washington-allocated costs over the 20-year planning horizon 2026-2045 total \$2,667 million for the CEIP preferred portfolio, and \$1,220 million for the Alternative Portfolio. This results in \$1.4 billion additional CETA compliance costs for Washington customers over the planning horizon, an average of \$72 million per year over the next 20 years. While the near-term forecast does not indicate incremental costs rising above the threshold for alternative compliance, additional resource costs could be expected to rise above the proposed 2 percent year-over-year cost cap. An average incremental cost of \$72 million per year is over 17 percent of Washington revenues as of December 2024 result of operations, which was \$420 million.

All portfolio costs are allocated to Washington customers consistent with currently approved cost-allocation methodologies, which includes system-allocated transmission costs. This means that the costs of PacifiCorp transmission assets are allocated to states based on a system transmission factor, which calculates demand and energy-related costs based on state-specific annual retail peak consumption and energy usage.¹⁰⁰ Similarly, each state receives a corresponding FERC revenue credit from PacifiCorp's wholesale revenue requirement under the same transmission factor.¹⁰¹ This means that Washington retail customers pay for a percentage of PacifiCorp's transmission system, accomplished by an offsetting credit from the use of this system by PacifiCorp's wholesale customers as determined by FERC.

PacifiCorp's 2025 CEIP reflects this approach. For years 2025 through 2050, the CEIP assigns between 6.25 and 7.55 percent of these transmission resources to Washington customers. Yet these costs are not included in the cost cap. These incremental transmission resources, regardless if selected only to meet Washington needs, will only add to our Washington customer cost burdens.

Further, considering that there is uncertainty in how transmission costs might be allocated among PacifiCorp's jurisdictions in the future, the company analyzed how Washington-allocated costs would change if the incremental transmission resources needed to comply with CETA are entirely situs-allocated to Washington customers. Development of this analysis should not be interpreted as a PacifiCorp proposal for future allocation methodologies. Rather, this analysis highlights a potential bookend of how alternative allocation approaches for transmission might influence cost. The incremental portfolio costs resulting from situs-allocation of transmission resources across the CEIP preferred portfolio relative to the Alternative Portfolio results in an incremental cost of \$1,754 million over 2026-2045. This is \$88 million on average per year for 20 years, which is 21 percent of PacifiCorp's most

¹⁰⁰ E.g., 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol, § 5.2.

¹⁰¹ *Id.*

recent Washington revenue. This is an additional incremental cost of \$306 million, relative to the case when incremental transmission costs are system allocated.

Table 31 summarizes these cost impacts. The table summarizes total nominal portfolio costs 2026-2045 (or revenues) allocated to Washington customers for the 2025 CEIP preferred portfolio, the same costs for the Alternative Portfolio, and reflects the incremental difference between each portfolio, which can be viewed as the incremental cost to comply with CETA. Additionally, the.

PacifiCorp would like to stress that through 2045, CETA compliance costs are forecasted to more than quadruple from 2024 revenues—an increase of 423 percent. This impact reaches nearly 500 percent when incremental transmission costs are situs allocated.

Table 31 - 2026-2045 Total Nominal Portfolio Costs and Incremental Portfolio Costs of CETA Compliance (Washington-Allocated, \$millions)

	Preferred Portfolio - Nominal Costs	Alternative Portfolio - Nominal Costs	Incremental Costs
System-Allocated Incremental Transmission	\$2,667	\$1,220	\$1,447
Situs-Allocated Incremental Transmission	\$2,973	\$1,220	\$1,754

Cost Cap Implementation Concerns

While PacifiCorp’s current 2025 CEIP does not forecast PacifiCorp exceeding CETA’s two percent cost cap (the forecasted \$6.59 million compliance costs are well below the annual \$25.5 million two percent cost threshold), actual compliance costs will diverge—and likely materially—from these forecasts.

First, the incremental cost forecast in this CEIP is based on proxy resource costs that were developed by NREL in 2024, a different planning environment than the current, given the significant reforms in 2025 to federal tax and trade policies. Yet actual procurement costs will depend on actual bids for new resources received through the 2025 WA Situs RFP process. While PacifiCorp will use the same methodology presented in the CEIP to create an updated forecast of incremental costs based on actual bid data, PacifiCorp expects significant differences in the assumed and actual resource costs.

Second, as noted above, this forecast does not include Washington’s share—system or situs—of the approximate \$1.7 billion in transmission investments that are necessary to serve Washington, resulting in 3,617 MW of expanded interconnection capacity, with 1,187 MW of export and import capabilities among constrained areas on PacifiCorp’s system.

Third, this incremental cost forecast only captures costs expected to be incurred through 2029, but further resource additions will be necessary to reach the 2030 CETA standard. Because of planning principles to select resources at the lower reasonable cost, considering risk, PacifiCorp’s modeling processes result in resource selections coming online in 2030 (as opposed to earlier), and those resources are not reflected in the cost forecast which ends in 2029. For this reason, as stated previously, PacifiCorp intends to accelerate resource acquisition based on the identified resource need in 2030 as resources are cost-

effective and available. This can potentially drive a higher near-term incremental resource need, and higher incremental costs for the next four-year compliance period.

To the point, while the 2025 CEIP forecasts the need for 517 MW of proxy solar and wind resources between 2026 and 2029 for cost cap purposes, the portfolio also includes 1,906 MW of wind, solar, and new storage resources by 2030. There is a strong likelihood that PacifiCorp will procure more than the 517 MW of proxy resources in the next four years to ensure compliance with CETA's 2030 requirement. This accelerated procurement will impact PacifiCorp's compliance costs and could raise cost cap issues—potentially as early as next year when PacifiCorp is selecting resources from the 2025 WA Situs RFP process.

Yet under the current cost cap regulations, there are significant compliance and cost risks for Washington. PacifiCorp interprets CETA's cost cap to indicate that, if *after* a four-year compliance period has ended, when investor-owned utility reports that actions it has taken to comply with relevant CETA standards over the *prior* four-year compliance period, and those actions incur incremental compliance costs that exceeds a two percent increase of the utility's weather-adjusted sales revenue year-over-year for the prior four-year period, a utility would be found in compliance with CETA, regardless if the specific clean energy targets or standards were met in that compliance period.

This means that utilities will need to make investment decisions up to four years in advance of when a potential cost cap exemption could be granted. This delay is different-in-kind compared to the regulatory lag typical in cost-of-service ratemaking, because a utility will not know with certainty whether its actions to comply with CETA were adequate until up to four years later. And if the utility's actions were not adequate, it would not have any ability to pursue additional compliance opportunities for the prior four-year period, and could be subject to administrative penalties as a result. Because of this reality, utilities are incentivized to procure an excess of resources to meet CETA's requirements that will well exceed CETA's cost cap. This over-procurement would be a detriment to customers, and contrary to the cost-containment provisions in CETA.

This 2025 CEIP contemplates three solutions to begin proactively addressing these risks and compliance lag.

First, shortly after creating a final shortlist from the 2025 WA Situs RFP, PacifiCorp intends to notify the Commission of the forecasted costs from these resources, and whether these costs are reasonably expected to exceed CETA's cost cap threshold. This informational filing would provide the Commission and stakeholders with the opportunity to review the cost impacts from these procurement decisions and inform future discussions on the appropriate balance between clean energy procurement and mitigating excessive compliance costs.

Second, PacifiCorp will provide revised estimates of incremental costs as appropriate, starting with the 2027 CEIP Biennial Update, and potentially with annual CETA progress reports if necessary.

Third, PacifiCorp will work with the Commission and stakeholders to investigate appropriate amendments to improve the current cost cap methodologies, to hopefully avoid the compliance risks discussed above, while ensuring reasoned and sustained procurement of CETA-compliant resources.

Chapter XI. Definitions

- **Customer benefit indicator (CBI):** an attribute, either quantitative or qualitative, of resources or related distribution of investments associated with customer benefits.
- **CBI metric:** the variety of methods in which PacifiCorp understands change in data/criteria used to track CBI progress.
- **Clean Energy Action Plan (CEAP):** The Clean Energy Action Plan (CEAP) is a ten-year planning document that is derived from the IRP and included as an appendix to the IRP. The CEAP provides a Washington-specific view of how PacifiCorp is planning for a clean and equitable energy future that complies with CETA.
- **Clean Energy Implementation Plan (CEIP):** This document, the CEIP, is a plan that lists the specific actions PacifiCorp will take over the next four years to move toward the 2030 and 2045 clean energy directives.
- **Conservation Potential Assessment (CPA):** The CPA for 2021-2040, conducted by Applied Energy Group (AEG) on behalf of PacifiCorp, primarily seeks to develop reliable estimates of the magnitude, timing, and costs of DSM resources likely available to PacifiCorp over the IRP's 20- year planning horizon.
- **Demand-side Management (DSM):** PacifiCorp classifies DSM resources into four categories, differentiated by two primary characteristics: reliability and customer choice. These resource classifications can be defined as: demand response (e.g., a firm, capacity focused resource such as direct load control), energy efficiency (e.g., a firm energy intensity resource such as conservation), demand side rates (DSR) (e.g., a non-firm, capacity focused resource such as time of use rates), and behavioral-based response (e.g., customer energy management actions through education and information).
- **Highly impacted community (HIC):** a community designated with a score of 9 or 10 based on the DOH cumulative impact analyses or a census tract that is fully or partially on sovereign Tribal lands. Scores are assigned based on several indicators that express: 1) environmental exposures, 2) environmental effects, 3) sensitive populations, and 4) socioeconomic factors. This information is available on the Washington Department of Health's Information by Location Environmental Health Disparities (EHD) map.
- **Integrated Resource Plan (IRP):** The IRP is a comprehensive decision support tool and roadmap for meeting the company's objective of providing reliable and lowest-reasonable cost electric service to its customers, considering risk. The plan is developed through open, transparent and extensive public involvement from state utility commission staff, state agencies, customer and industry advocacy groups, project developers, and other stakeholders.
- **Named communities:** a term for both highly impacted communities and vulnerable populations.¹⁰²
- **Non-energy impacts (NEIs):** benefits (positive) or costs (negative) of non-energy attributes
- **Request for Proposals (RFP):** A procurement solicitation announcement posted publicly indicating that bids for energy supply contracts and associated resources are sought.
- **Vulnerable population:** a community that experiences a disproportionate cumulative risk from environmental burdens due to: (a) Adverse socioeconomic factors, including unemployment, high housing and transportation costs relative to income, linguistic isolation, and access to

¹⁰² PacifiCorp recognizes these terms do not reflect the strength, individuality, and cultural values of the communities referenced. These are the terms being used to align with CETA legislation, however, PacifiCorp modified CETA's vulnerable population definition to include the insights and perspectives of the EAG.

food, education, technology, broadband, health care, capital and credit; and (b) Sensitivity factors, such as mental health, low birth weight, and higher rates of hospitalization.

APPENDIX A – FEEDBACK AND RESPONSES

This appendix summarizes feedback received from interested parties through various engagement opportunities during the development of the 2025 CEIP. View the feedback tracker online at

https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/washington-ceip/feedback/Washington_CEIP_Feedback_Tracker_2025-Cycle.pdf.

Stakeholder Feedback and Responses					
State	Engagement	Date	Category	Feedback	Response (If Applicable)
WA	Equity Advisory Group (EAG)	July 2024	Docket UE-230172 Stipulations	Regarding PacifiCorp's Low-Income stipulation considerations, the Asian Pacific Islander Coalition advocated against changing the billing logic, less benefits to low-income equals a less successful program. In general, Low-Income Bill Assistance (LIBA) programs should be combined with business/financial literacy programs to teach empower community members to self-advocate.	PacifiCorp acknowledged the feedback provided and is committed to providing equitable benefits to low-income households. PacifiCorp will keep all feedback top of mind as it considers the low-income stipulation items.
WA	Equity Advisory Group (EAG)	July 2024	Docket UE-230172 Stipulations	The Asian Pacific Islander Coalition expressed the need for more cash accepting pay stations in communities. The Blue Mountain Action Council echoed the concern that customers are unable to pay bills locally using cash.	PacifiCorp acknowledged the feedback provided and will work with its teams internally to ensure there are no access gaps and that there are cash payment pay stations available within each community the company services. PacifiCorp is committed to better understanding existing coverage gaps. Should updates become available, PacifiCorp will follow up with its EAG.
WA	Equity Advisory Group (EAG)	July 2024	Customer Generation Programs/Net Metering	The Asian Pacific Islander Coalition advocated against ending net metering and petitions against the cap. Would instead like PacifiCorp to further research the income levels of those on the net metering program. They also urged PacifiCorp to research repair services for damage by drivers under the influence.	Regarding net metering, the utility can continue enrolling customers in the net metering program, but other programs must also be evaluated. Customer generation is not going to end; the goal is to explore programs other than net metering. Regarding repair services for damage by drivers under the influence, the costs incurred are the responsibility of the individual involved to settle with PacifiCorp.
WA	Equity Advisory Group (EAG)	July 2024	Customer Generation Programs/Net Metering	Regarding a net metering successor program, SonBridge believes the complexity may deter participants. There needs to be proper education tied into the program rollout.	PacifiCorp acknowledged the feedback provided.
WA	Equity Advisory Group (EAG)	July 2024	Customer Generation	The Sustainable Living Center of Walla Walla suggests the company explore ways	PacifiCorp acknowledged the feedback provided.

Stakeholder Feedback and Responses					
State	Engagement	Date	Category	Feedback	Response (If Applicable)
			Programs/Net Metering	solar can benefit low-income customers in subsidized housing.	
WA	Equity Advisory Group (EAG)	July 2024	Customer Generation Programs/Net Metering	The Asian Pacific Islander Coalition would like more transparency around maintenance costs and contributing factors.	PacifiCorp acknowledged the feedback provided and will work on providing future educational opportunities to outline customer bills and the factors that go into them.
WA	Equity Advisory Group (EAG)	July 2024	Customer Benefit Indicators (CBIs)	The Asian Pacific Islander Coalition suggested measuring the metrics of Customer Benefit Indicator (CBI) #2 (increase community focused efforts and investments) by the number of fully functional public charging stations.	PacifiCorp acknowledged the feedback provided and stated it will continue to explore improvements to its CBIs. The company will also review data on available public charging stations.
WA	Vulnerable Populations Workshop (VP)	August 2024	Vulnerable Populations (VP)	Regarding vulnerable populations geographic tracking, Kathleen Saul asked if people on supplemental oxygen are considered in the specific metrics of vulnerable populations?	PacifiCorp offered to take that into consideration and research if people on supplemental oxygen are considered as disabled.
WA	Vulnerable Populations Workshop (VP)	August 2024	Vulnerable Populations (VP)	Regarding vulnerable populations geographic tracking, Charlee Thompson asked how customers with medical certificates may be incorporated into the vulnerable populations data set?	PacifiCorp responded that it is accounting for hearing impairments, disabilities, low-birth weight, and cardiovascular disease under its Vulnerable Population #6 as obtained from the Washington State Department of Health. However, there is not any data for customers with medical certificates. Pacific Power offered to research medical certificates and circle back.
WA	Vulnerable Populations Workshop (VP)	August 2024	Vulnerable Populations (VP)	Regarding vulnerable populations category number 17 (people experiencing homelessness) and the lack of homelessness data at the census tract level, Elijah Cetas suggested obtaining data from homeless shelters.	PacifiCorp acknowledged the feedback provided and expressed it will continue to explore different data sources as it refines its approach.

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WA	Vulnerable Populations Workshop (VP)	August 2024	Vulnerable Populations (VP)	Elijah Cetas suggested accessing data surrounding whether people have heating and cooling systems. Mr. Cetas also shared a count for the number of unhoused individuals that the Washington Chamber of Commerce shares by county.	PacifiCorp shared it is conducting an analysis to ensure data is usable.
WA	Equity Advisory Group (EAG)	September 2024	Weatherization	The Energy Project shared that single family home weatherization needs as much flexibility as possible so providers can site the best system for each home.	In response to the feedback from September 12, 2024, EAG meeting, on November 18, 2024, PacifiCorp filed Advice 24-06 Schedule 114 Residential Energy Efficiency Rider – optional for Qualifying Low Income Customers with the WUTC to make changes to Schedule 114 to add ducted heat pump. The addition of ducted heat pump provides an additional option or tool that contractors can consider if determined to be an efficient solution for the replacement of permanently installed electric heat system or for fuel conversions for homes with existing ductwork. A ducted heat pump provides a whole home solution, consistent, and powerful heating and cooling throughout the entire home. Additionally, ducted heat pump may be a better solution for a home depending on the home's size, layout, and heating zones. PacifiCorp requested an effective date of January 1, 2025. The WUTC approved the request at the open meeting on December 19, 2024. The draft of the filing was shared with EAG and LIAG on October 7, 2024, prior to filing with WUTC.
WA	Equity Advisory Group (EAG)	September 2024	Home Energy Savings Programs	Asian Pacific Islander Coalition wants to ensure participants in the tree planting program have water rights and have a schedule for maintenance.	PacifiCorp will ensure that all customers are educated on relevant tree species, care, and maintenance. The team is also open to

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					bringing the advisory group members in on the planning, if interested.
WA	Equity Advisory Group (EAG)	September 2024	Home Energy Savings Programs	Northwest Community Action Center would like PacifiCorp to evaluate the cost efficiency of a ducted system heat pump on low-income households.	After meeting with community agencies, PacifiCorp has begun exploring alternative methods for implementing ductless heat pumps.
WA	Equity Advisory Group (EAG)	September 2024	Irrigation Load Control	Asian Pacific Islander Coalition advises the ILC program not be based around large industrial customers because they have historically exploited resources and misdirected funds.	PacifiCorp acknowledged the concern and will continue to explore and evaluate the benefits and efficiency of the program.
WA	Equity Advisory Group (EAG)	September 2024	Battery Demand Response	Asian Pacific Islander Coalition wants the program to consider a specific landlord outreach program or there may be limited access to homes that need assistance the most. In Yakima 40% of homes are rentals and that rate is increasing due to corporate landlords and entities. Owners of 3+ homes should be forced to do it by law.	The customer and community solutions team is open to exploring available assistance options for renters; however, PacifiCorp cannot force landlords to participate in the program.
WA	Equity Advisory Group (EAG)	September 2024	Battery Demand Response	Asian Pacific Islander Coalition asked PacifiCorp to analyze how overlaying wind production would correspond with usage patterns.	PacifiCorp offered to circle back with this advisory group member.
WA	Clean Energy Implementation Plan (CEIP)	October 2024	General Feedback	To increase engagement, subject matter experts should provide materials during meetings instead of after meetings and ask members to return with feedback.	PacifiCorp acknowledged the feedback provided and will continue to adapt presentation styles based on the member experience.
WA	Clean Energy Implementation Plan (CEIP)	October 2024	Integrated Resource Plan (IRP)	The IRP team must plan for the 111 deregulation in the IRP cycle as it is currently being litigated. Ignoring 111 deregulation is problematic and risky for customers.	The IRP team is aware of the risk and has started running studies on 111 deregulation to figure out how to move forward.
WA	Equity Advisory Group (EAG)	December 2024	Energy Efficiency (EE)	PacifiCorp should partner with local rotaries to help with gardening for the Tree Planting Home Energy Savings Program.	PacifiCorp thanked SLCWW for the suggestion and is happy to connect with the local Rotary Association.

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WA	Equity Advisory Group (EAG)	December 2024	Energy Efficiency (EE)	Asian Pacific Islander Coalition proposed including developers in the conversations around efficient heat pumps. There are many community members in the agricultural industry that want to upgrade their residential and industrial systems.	The program actively engages home builders and developers/property owners/property management firms of multifamily properties to track their projects. New home construction projects track building permits by city, engage builder/developers for new projects as well as support their efforts to achieve efficiency through building envelope measures including windows and insulation.
WA	Equity Advisory Group (EAG)	December 2024	Energy Efficiency (EE)	The Asian Pacific Islander Coalition found the HPWH website difficult to navigate.	The intent of the HPWH pilot was to evaluate if customers would find this method helpful. However, given the low level of participation through the platform PacifiCorp is discontinuing the platform as a pilot but will keep the platform on the website. There will continue to be rebates for customers regardless of the approach or channel for customers interested in a HPWH.
WA	Equity Advisory Group (EAG)	December 2024	Demand Response	Northwest Community Action Center would like to see statistics regarding low-income participation in Cool Keeper program	While low-income participation specifically is not yet available, residential data is available from survey results and could possibly be cross tabulated to gauge how many participants are low income. Low-income participation will be further explored in 2025.
WA	Equity Advisory Group (EAG)	December 2024	Demand Response	Sustainable Living Center of Walla Walla suggests increasing education and outreach around heat pump water heaters	PacifiCorp currently educates customers about HPWH via email and social media. Additionally, there is in person outreach planned year-round across the Tri-Cities area of Washington to further engage and educate the community.
WA	Equity Advisory Group (EAG)	December 2024	Demand Response	Washington UTC staff shared that they anticipated PacifiCorp would have a load controlling EV program that is longer than 5 minutes.	PacifiCorp thanked WUTC staff for the feedback and noted the EV managed charging program is currently a pilot and

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					will continue to adapt as feedback and data are collected.
WA	Equity Advisory Group (EAG)	December 2024	General Feedback	Members prefer advance notice about planned meetings due to the 3-hour time commitment required.	In 2025 planning, PacifiCorp will develop meeting schedules for the entire year and connect interested parties with all meeting details as soon as available.
WA	Equity Advisory Group (EAG)	January 2025	General Feedback	SonBridge would like a presentation from regulatory bodies in neighboring states to learn about the processes other states are implementing.	Feedback resulted in Washington UTC being invited as a guest presenter in the EAG space, as well as ways to socialize in context to PacifiCorp's experience in other states.
WA	Equity Advisory Group (EAG)	January 2025	Community Priorities	Members want to continue amplifying trust building and access to information in 2025 as most important for the group. More vital issues would be employment and language barriers. It is important to share information in different languages and at various levels of complexity to ensure not just one group of people understand but target as many as possible.	PacifiCorp is committed to language access, including as documented in the company's inaugural Washington Language Access Plan. Because more than 97% of PacifiCorp's customers who speak a language other than English speak Spanish, the company's primary focus is on expanding the use of Spanish-language transcreation. Customers can access essential information in their preferred language by calling PacifiCorp's customer care center, and through affiliated partners, customers can communicate live with customer care representatives in 351 languages. The company will continue exploring opportunities to expand language access to support all customers.
WA	Equity Advisory Group (EAG)	January 2025	Community Priorities	As the political climate potentially shifts, members want to keep the conversations candid and reflective of the changes that will impact the utility industry.	PacifiCorp thanked members for the feedback and is appreciative of their continued engagement and support.
WA	Equity Advisory Group (EAG)	January 2025	General Feedback	SonBridge suggested 1) tools to gauge the flow of the meetings and 2) keeping smaller issues in monthly meetings while creating external spaces for larger topics.	PacifiCorp will review the structure of the meetings and evaluate the opportunity for external spaces, such as office hours, as necessary.

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WA	Clean Energy Implementation Plan (CEIP)	January 2025	Clean Energy Implementation Plan	The CEIP engagement schedule should clearly define where/when the group will discuss the key components of the CEIP such as CBIs, energy efficiency, renewable energy targets, and Demand Response.	PacifiCorp's CEIP Engagement Series meeting schedule will continue to evolve and expand as new information becomes available to share, and the company continues to collect feedback. PacifiCorp appreciates the recommended list of CEIP topics provided and will work on incorporating as many of these items as possible throughout the year and as time allows.
WA	Clean Energy Implementation Plan (CEIP)	January 2025	Clean Energy Implementation Plan	An audience member expressed concern that the 45-day review period may not be enough for the public to review the document, provide comments, and have those comments incorporated into the final filing.	PacifiCorp first proposed its 45 – day draft CEIP comment period during CEIP Engagement Series and EAG meetings near the end of 2024. At the time, there were no concerns expressed about the 45–day comment period as the proposed period fell right between the 30– and 90-days periods which were also considered. PacifiCorp encourages interested persons/parties to provide feedback/comments at any time leading up to its 2025 Clean Energy Implementation Plan filing. For those interested in reviewing pertinent CEIP content now, the company encourages individuals to review its 2025 Integrated Resource Plan, specifically Appendix O, which outlines PacifiCorp's Washington Clean Energy Action Plan (CEAP). The CEAP lays the foundation for what will be considered and incorporated into the company's CEIP later this year. Individuals can access the 2025 Integrated Resource Plan by visiting PacifiCorp's Integrated Resource Plan webpage.
WA	Equity Advisory Group (EAG)	February 2025	Resource Innovations/Customer Engagement	Members would like more events to spread across Washington, specifically	Community calendars have been expanded to include local, Home Energy Savings, and

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				Walla Walla, instead of being concentrated in Yakima.	Wattsmart Business events across Washington state.
WA	Clean Energy Implementation Plan (CEIP)	March 2025	Customer Benefit Indicator	It may be helpful to model the proposed CBI after Puget Sound Energy's (PSE) CBI which measures SO ₂ , NO _x , and PM 2.5 emissions based using PSE resources and contracts within a specific range of the border.	PacifiCorp reviews the CBIs for other investor-owned electric utilities, including PSE, to align its reporting and forecasting as much as possible. Currently, PacifiCorp does not account for PM 2.5 because we cannot accurately forecast the PM 2.5 rate, which is dependent on many factors and would require making many assumptions, so its usefulness as a CBI is more limited than measurements of SO ₂ and NO _x , which are much more accurate.
WA	Clean Energy Implementation Plan (CEIP)	March 2025	Engagement	Appreciation for the opportunity to directly participate during meetings and respond to surveys was expressed.	PacifiCorp thanked members for their feedback and is appreciative of their continued engagement and support.
WA	Equity Advisory Group (EAG)	April 2025	Low Income Bill Assistance	There is concern around the state of LIHEAP given the current federal administration. Members appreciate PacifiCorp's transparency and the actions behind the planning.	PacifiCorp responded that although the state of the planning is volatile due to federal changes, the company is trying its best to provide as much insight as possible into the future and will continue to share information as it becomes available.
WA	Equity Advisory Group (EAG)	April 2025	Integrated Resource Plan (IRP)	Northwest Community Action Center expressed gratitude for the level of detail provided by the IRP team and the information shared additional presentations would be appreciated.	PacifiCorp expressed it is happy to return to the EAG engagement space to provide integrated resource planning updates.
WA	Equity Advisory Group (EAG)	April 2025	Greenhouse Gas Reporting	While the presentation on GHG reporting was highly detailed, members would need additional time and/or presentations to further digest the concept of the "cap-and-trade" element as it is a newer concept to the group.	PacifiCorp is happy to incorporate relevant agenda items into upcoming meetings as appropriate. Additionally, educational materials can be provided, and office hours may be scheduled upon request.
WA	Equity Advisory Group (EAG)	April 2025	Greenhouse Gas Reporting	While the proposed CBI generally seems impactful at first glance, the group would like to explore if the metrics could be tied	PacifiCorp explained that reporting and modeling helps to understand the health impacts, but the health impacts cannot be

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				to the WA Health Disparities Mapping tool.	controlled. Tools like the Washington State Department of Health Disparities Map can be used to further analyze health impacts.
WA	Equity Advisory Group (EAG)	April 2025	Greenhouse Gas Reporting	In the proposed CBI, the definition of "local" needs to be more granular due to the “Not in My Backyard (NIMBY)” movement. Local communities need to be informed that one area is not more disadvantaged than others. Along with the benefits, the potential risks and pollutants need to be clearly communicated.	PacifiCorp offered to follow up with the IRP team to better understand the level of forecasting done around risks and benefits.
WA	Equity Advisory Group (EAG)	April 2025	Customer Benefit Indicators	A member suggested holding a community workshop to look at the granular details of publicly available information that can potentially inform the proposed CBI.	PacifiCorp has added its new Customer Benefit Indicator Adviser to the agenda for the upcoming Washington regulatory and advisory engagements to further discuss ongoing CBI efforts.
WA	Clean Energy Implementation Plan (CEIP) Special Session	May 2025	Non-Price Scoring	The concept of price vs non-price scores is unclear. More details need to be provided to clearly define what factors contribute to non-price scoring in comparison to price scoring.	PacifiCorp added that price scoring specifically speaks to the economics of the bid based on the technology and other operating factors. Non-price scoring refers to other information that is not economic but still adds value and benefits to the bid. If two bids have the same economic score, having non price scores as an additional layer of distinction helps determine the ranking. Additional engagement opportunities were provided at the June 2025 EAG and CEIP Engagement Series meetings to further discuss what factors contribute to non-price scores.
WA	Clean Energy Implementation Plan (CEIP)	June 2025	CEIP Settlement Conditions	Participants recommended additional details around how CEIP settlement conditions are being addressed, and how, if at all, they are linked together and to ongoing efforts.	PacifiCorp plans to incorporate ongoing settlement conditions from its 2021 CEIP proceeding in future presentations. The company plans to weave in these details as information is shared on its developing 2025 CEIP. PacifiCorp appreciates the feedback.

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WA	Clean Energy Implementation Plan (CEIP)	June 2025	CEIP Annual Progress Report	In reference to CBI #1 - Increase culturally and linguistically responsive outreach and program communication, the number of languages for translated materials needs to clearly define what is included in "billing options/customer service." Additionally, PacifiCorp must clearly define the procedure for communicating past due balances and disconnection notices to customers who speak a language other than Spanish or English.	PacifiCorp is working on connecting the appropriate team and individuals to the feedback provided for awareness and to identify existing gaps that may exist. Customers can call the company's hot line to be connected to a representative that can coordinate translation in languages other than Spanish and English where needed. Additionally, customers are mailed late notices, final notices, and then provided shut-off notices (when applicable) to customers directly to ensure there are repeated opportunities to engage the customer and prevent a disconnection.
WA	Clean Energy Implementation Plan (CEIP)	June 2025	CEIP Annual Progress Report	The final filing should include specific percentages as well as absolute numbers in tracking how many known low-income customers are receiving residential appliance and equipment rebates and participating in bill assistance programs. Be explicit about what the denominator is, and which low income needs assessment the data comes from and if it changes over years reported.	PacifiCorp filed its 2025 CEIP Annual Progress Report on July 1, 2025, following requirements specified under WAC 480-100-650. The company appreciates the feedback provided and offers additional details on reported customer benefit indicator data in table footnotes within its available CEIP CBIs Report Card found within the company's Washington Clean Energy Transformation Act & Equitable Distribution of Benefits webpage found here: https://www.pacificpower.net/community/washington-clean-energy-transformation-act-equity.html ."
WA	Clean Energy Implementation Plan (CEIP)	June 2025	CEIP Annual Progress Report	The team should explore a methodology that will allow data around customers experiencing high energy burden in Washington to be collected consistently without any gap years. The energy burden assessment may be useful in supplementing data when the customer survey is not administered.	Although the company's energy burden assessment is handled separately from its CBIs, PacifiCorp staff will discuss how the Energy Burden Assessment data can be used in place of the customer survey during off years.

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WA	Clean Energy Implementation Plan (CEIP)	June 2025	CEIP Annual Progress Report	There is concern that the "just in time" model may cause a significant increase in customer costs from 2029 to 2030 by delaying resource procurement until 1/1/2030. The team should explore procuring resources gradually over time to spread the cost impact.	PacifiCorp is anticipating a change in federal tax credits which the model accounts for and will explore the cost of moving some resource procurement to 2028 or 2029. The goal is to balance the cost impacts.
WA	Clean Energy Implementation Plan (CEIP) Engagement	August 2025	2025 CEIP Draft Filing	Written feedback from Renewable Northwest (RNW) suggested that PacifiCorp clarify how Renewable Energy Credits (RECs) from projects, specifically the Hornshadow Solar project, are allocated by time (pg. 6). Helpful details to include would be: if the RECs are currently being sold under Oregon Schedule 272 retired exclusively on behalf of that retail customer; and if in beginning in 2030, 100% of the RECs from Hornshadow Solar will be retained and used exclusively for WA customers to meet CETA compliance targets.	Through 2029, 100% of output purchased under the 272 contract for the Hornshadow Solar Project, RECs are retired exclusively on behalf of that retail customer. Starting 2030, 90% of output purchased under 272 contract RECs will be retired exclusively on half of that retail customer while the remaining 10% is not specifically designated. Current forecasts assume RECs equivalent to Washington's system allocation factor are retired for Washington customers and CETA compliance.
WA	Clean Energy Implementation Plan (CEIP) Engagement	August 2025	2025 CEIP Draft Filing	Written feedback from Renewable Northwest (RNW), in reference to the share of clean energy serving WA retail load increase from 46% in 2029 to 110% in 2030, noted a lack of clarity in how specific resource additions, changes in planning assumptions, allocation methodologies, REC retirement strategies, and other considerations contributed to the significant year over year increase in clean energy supply relative to WA retail load. (pg. 33)	CETA targets are binding as of 2030, and unless resource prices are expected to be significantly cheaper in the near term, the model generally finds a just-in-time approach to be least-cost. However, the company recognizes the potential risks of this strategy and is open to procuring resources in amounts higher than what is indicated in this CEIP action plan if resources are economic and available to come online before the end of 2029. In response to feedback received on the draft CEIP, PacifiCorp added drivers to the model starting in 2028 to incentivize additional clean energy resource additions to create a smoother path towards 2030 compliance.

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					The latest completed cluster study results show potential of over 1 GW of non-emitting resources in the queue and located in Washington that could readily serve our service area, some of which have commercial operation dates before the end of 2028. These resources include solar, solar and storage, battery storage, and a wind project. More discussion on the specific proxy resource selections, timing, costs and resulting interim targets can be found in Chapters IV, V, and VI. PacifiCorp notes that no specific "REC retirement strategies" or changes to the allocation methodology from what is currently approved in rates are a factor in determining the interim targets. PacifiCorp's modeling strategy is to build just enough resources to generate CETA-compliant energy to meet 100% of Washington's retail sales starts in 2030.
WA	Clean Energy Implementation Plan (CEIP) Engagement	August 2025	2025 CEIP Draft Filing	Written feedback from Renewable Northwest asked that given CETA's requirement to serve retail load with 100% clean electricity beginning in 2045, how does PacifiCorp plan to address the significant capacity and energy gap resulting from the simultaneous removal of these natural gas resources at the start of 2045? It was noted that based on current planning assumptions, it appears that PacifiCorp intends to include Chehalis, Hermiston, and the gas-converted Jim Bridger Units 1 and 2 in the Washington supply portfolio through the end of 2044. (pg. 41)	The 2025 CEIP preferred portfolio includes 392 MW of longer-duration batteries selected in 2044 and 2045 to meet Washington's WRAP resource adequacy requirements as existing gas-units are removed from Washington's allocation of resources. Between the additional batteries and significant renewable resource additions, the Washington-allocated share of the portfolio is determined to meet both CETA energy needs and WRAP capacity needs. However, these requirements are projected to be met on an annual basis only. Additional analysis will be required to determine if the selected resources will be enough to serve Washington customers on an hourly basis, since presumably starting in 2045,

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					Washington customers will no longer have access to unspecified market purchases.
WA	Clean Energy Implementation Plan (CEIP) Engagement	August 2025	2025 CEIP Draft Filing	Written feedback from Renewable Northwest (RNW) suggested further description of the “minor corrections to the modeling of Washington compliance with the Western Resource Adequacy Program.” (pg. 45)	As stated in the 2025 CEIP, minor corrections to the modeling of Washington compliance with WRAP were made, post filing of the 2025 IRP. The allocation of each existing resource to Washington WRAP compliance in PLEXOS was re-evaluated and resource allocations were corrected where appropriate to align with the currently approved cost-allocation methodology and updated forecasted factors.

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WA	Clean Energy Implementation Plan (CEIP) Engagement	August 2025	2025 CEIP Draft Filing	Written feedback from Renewable Northwest (RNW) stated that the resource needs leading up to 2030 identified in the draft CEIP generally aligns with those targeted in the Washington-situs RFP, except for wind resources. Table 14 of the draft CEIP indicates a need for 858 MW of wind by 2030, while the Washington-situs RFP seeks only 466 MW of wind capacity. And asked if PacifiCorp can clarify the reason for this 392 MW discrepancy? Specifically, how does the company plan to meet the remaining wind resource need identified in the CEIP that is not addressed through the current RFP? (pg. 72)	PacifiCorp's 2025 IRP mistakenly presented Washington's share of new proxy wind resources in 2030 as 313 MW instead of 704 MW. This error caused the 392 MW discrepancy RNW has identified between the 2025 IRP and what is presented in Table 14 of the draft CEIP. Table 14 of the draft CEIP presents the correct values for Washington's share of new proxy wind resources in 2030 that should have been presented in the 2025 IRP. This error was identified and discussed at the August 26, 2025, CEIP public engagement meeting (see slide 16). Further, the draft Washington Situs Request for Proposals (RFP) made a reference to the IRP resource values but never explicitly stated it was seeking any set amount of wind capacity RNW has mistakenly inferred that the RFP was seeking the same resource/amounts identified in the IRP. The 2025 WA Situs RFP has since been issued to market and specifies that it is agnostic to resource type in its procurement. The final 2025 CEIP preferred portfolio includes an updated set of resource selections given the modeling updates and enhancements discussed in Chapter IV.
WA	Clean Energy Implementation Plan (CEIP) Engagement	August 2025	2025 CEIP Draft Filing	Northwest Energy Coalition (NVEC) suggested adding the CEIP Docket number to the CETA webpage.	PacifiCorp appreciates this suggestion and added the new 2025 CEIP Docket No. 250617 on September 8, 2025. A link connecting the docket on the WUTC website has also been included.

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WA	Clean Energy Implementation Plan (CEIP) Engagement	August 2025	2025 CEIP Draft Filing	Washington UTC staff asked for more explanation on why interim targets have decreased in comparison to biennial updates.	Updates to inputs and assumptions in every planning cycle will drive changes in forecasted interim targets based on economics. Important characteristics of and changes to the current planning environment have been discussed in the 2025 IRP, Chapter 3, and in the 2025 CEIP, Chapter IV. In response to parties' feedback received in the Draft 2025 CEIP, PacifiCorp included model drivers to incentive additional CETA-compliant resources starting in 2028. Based on pure economics, the model was not resulting in the selection of significant energy-generating resources prior to 2030 when targets become binding, resulting in flat interim targets through the end of 2029 (lower than what was presented in the 2023 Biennial CEIP). But due to concerns that PacifiCorp would not make significant progress in this planning period, the company changed the model to select additional resources sooner, creating a smoother path towards 2030 CETA targets than were presented in the 2025 IRP and draft 2025 CEIP.
WA	Clean Energy Implementation Plan (CEIP) Engagement	August 2025	2025 CEIP Draft Filing	Can PacifiCorp provide more information on the shift away from constraints in the PLEXOS modeling entails and why it is important?	PacifiCorp still uses a number of constraints in its PLEXOS modeling (for example, build and transmission constraints), but PacifiCorp has identified that specifically for modeling certain annual constraints (such as the CETA REC/energy requirement), the Plexos model does a far better job optimizing for the specific constraint in the LT model if a driver is used as opposed to a hard constraint. Annual constraints impose distinct modeling inefficiencies in the PLEXOS LT capacity expansion and ST

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					production cost models. The LT model considers thousands of build/retire decisions for generators, batteries, and transmission lines. As a result, LT granularity will always be more limited than the ST model's granularity to the extent that the LT model is computationally intense.
WA	Clean Energy Implementation Plan (CEIP) Engagement	August 2025	2025 CEIP Draft Filing	WattsMart Home and Low-Income Weatherization program goals need to be defined more clearly in the 2025 Clean Energy Implementation Plan.	Energy Efficiency savings goals are provided for each Energy Efficiency program in Table 21 - Energy Efficiency Programs and Estimated Savings (2026-2029) of the 2025 CEIP.
WA	Clean Energy Implementation Plan (CEIP) Engagement	August 2025	2025 CEIP Draft Filing	Peer utilities like Avista and PSE are beginning to explore microgrids and community resilience hubs in connections to CEIP specific actions, PacifiCorp should plan to take a similar course of action.	PacifiCorp appreciates the feedback provided and is supportive of customers enhancing community resilience. PacifiCorp is committed to exploring these concepts but cannot commit to any specific actions at this time.
WA	Clean Energy Implementation Plan (CEIP) Engagement	August 2025	2025 CEIP Draft Filing	Listing demand response outreach/engagement specific actions clearly in a bulleted list or graphic in the CEIP would be super helpful for the reader.	PacifiCorp has added a numbered list at the beginning of each specific actions subsection. Additionally, please refer to Appendix C for specific actions listed in a tabular format.

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WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from the Asian Pacific Islander Coalition (APIC) expressed that from their perspective PacifiCorp's draft 2025 Clean Energy Implementation Plan misses the mark and will not create any benefit for the existing overburdened communities in South Central Washington State due to a lack of equitable allowance for solar in Yakima County where they reside. APIC expressed an existing inequitable access to return on investment for solar in the state of Washington more generally. APIC expressed differences in Pacific Power's practices in the region to those of other utilities in other areas of the state.	It is unclear what other utility policies are being referred to here. PacifiCorp's 2025 CEIP preferred portfolio includes proxy renewable and battery resources located in its Washington service area, though actual resources and their potential impacts to communities are more appropriately evaluated through an RFP process. Chapter IX includes additional information regarding PacifiCorp's ongoing 2025 WA Situs RFP and how impacts to communities will be evaluated.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from the Asian Pacific Islander Coalition (APIC) expressed a concern with the ending of net metering and the impacts it has had in communities Pacific Power serves in Washington. APIC expressed concerns from the perspective of a business owner in the area.	The decision and impacts of PacifiCorp ending its offering of net metering are not a topic covered in or driven by the CEIP. PacifiCorp filed Advice 25-09-Schedule 135&138 - Net Billing Service Direct Testimony and Exhibits with the Commission on September 5, 2025, in docket UE-250695, proposing revisions to establish Net Billing, a successor program to Net Metering. PacifiCorp engaged with members of the EAG before making this filing to educate members on the impacts and benefits of Net Billing. PacifiCorp believes its proposal promotes affordability, addresses historical inequities and eliminates cost shifting; while still allowing new customer generators to reduce the amount of energy they buy from the grid while receiving compensation for the energy they export onto the grid at a price that is set at its

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					actual value -rather than at the retail energy rate.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from the Asian Pacific Islander Coalition (APIC) stated that there were major flaws in the use of research data that is not specific to the service region in Washington State. In reviewing Equity Advisory Group information, APIC said they did not find access to the data used for decision-making, nor did they find numbers of those polled, and geographic location for clarity and accuracy of information.	This is an opportunity for PacifiCorp to revisit the topic and continue to expand the conversation with the EAG. The company appreciates this feedback.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from the Asian Pacific Islander Coalition (APIC) expressed in reviewing some of the companies used for analysis, there was a corporate view with little to no community input process that associates Customer Benefit Indicators (CBIs) to equitable action in said communities in the future.	PacifiCorp appreciates this feedback and will engage with APIC and other EAG members to address this concern at future EAG meetings and one-on-one meetings with individual members as helpful.

Stakeholder Feedback and Responses					
State	Engagement	Date	Category	Feedback	Response (If Applicable)
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from the Asian Pacific Islander Coalition (APIC) expressed they felt demand response is a symptom of an industry and commercial problem that residents are supposed to make up for in an overburdened designated area of South-Central Washington State.	PacifiCorp is committed to distributing the cost of maintaining the electric grid equitably across customers, and to finding new ways to keep that cost low. Demand response programs are an innovative, cost-effective grid management resource that benefits all customers by helping to keep operation costs low. The only customers curtailed for demand response events are those that are voluntarily participating in a demand response program. These customers receive an incentive in exchange for their participation.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from the Asian Pacific Islander Coalition (APIC) stated that industries and commercial entities have never gone through efficiency programs that their communities are aware of, and that residents are expected to pay for the maintenance and overuse of the industries that continue to grow outside of their original designated permits in Yakima County.	PacifiCorp appreciates the feedback provided on this topic and will continue to hold conversations with the EAG to further understand existing concerns. For more information regarding PacifiCorp's existing energy efficiency programs and how benefits for Named Communities are generated, please refer to Chapter IX.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from the Asian Pacific Islander Coalition (APIC) stated that PacifiCorp's Clean Energy Implementation Plan does not serve the community because it does not include generation from Washington State. Specifically, generation in overburdened communities that have major resilience issues with power outages, and future long-term outages because of lack of generation. Without actual increases in power generation and updates in the distribution system, Yakima residents included in the discussion do not see any	PacifiCorp's 2025 CEIP preferred portfolio includes proxy renewable and battery resources located in its Washington service area, specifically in the Walla Walla and Yakima load bubbles. Actual resource acquisition will depend on what resource bids are received in the ongoing 2025 Situs RFP process, but the non-price scoring methodology allows bids to receive higher scores if a resource created benefits for Named Communities in Washington. Additionally, between 2024 and 2025, the company saw an overall decline in

Stakeholder Feedback and Responses																																						
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				short- or long-term plan to prevent the regular outages we experience in Yakima. Nor is there any large-scale plan if PacifiCorp disconnects the service region due to lack of planning and fires.	Customers Interrupted (CI) and Customer Minutes Interrupted (CMI), including and excluding major events. In particular, outages resulting from the company’s encroachment policy decreased dramatically, with CI dropping from about 75,000 in 2024 to 188 in 2025 (YTD), and CMI falling from approximately 7.3 million to 8,153 over the same period, as shown below. <table><tr><td></td><td>2024</td><td>2025 YTD</td></tr><tr><td colspan="3">Including Major Events</td></tr><tr><td>Total CI</td><td>134,328</td><td>26,080</td></tr><tr><td>Total CMI</td><td>12,885,797</td><td>3,018,16</td></tr><tr><td>CI Encroachment</td><td>75,392</td><td>188</td></tr><tr><td>CMI Encroachment</td><td>7,266,838</td><td>8,153</td></tr><tr><td colspan="3">Excluding Major Events</td></tr><tr><td>Total CI</td><td>113,569</td><td>26,076</td></tr><tr><td>Total CMI</td><td>11,963,403</td><td>3,016,92</td></tr><tr><td>CI Encroachment</td><td>75,392</td><td>188</td></tr><tr><td>CMI Encroachment</td><td>7,266,838</td><td>8,153</td></tr></table>		2024	2025 YTD	Including Major Events			Total CI	134,328	26,080	Total CMI	12,885,797	3,018,16	CI Encroachment	75,392	188	CMI Encroachment	7,266,838	8,153	Excluding Major Events			Total CI	113,569	26,076	Total CMI	11,963,403	3,016,92	CI Encroachment	75,392	188	CMI Encroachment	7,266,838	8,153
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WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from the Asian Pacific Islander Coalition (APIC) recommended PacifiCorp work with the community on the ground in the service area, create local offices where the community can have a place to not only pay their bills in person but also have a place to inquire about programs, assistance, and other benefits.	PacifiCorp offers various options for customers to pay their electric bills. These include options such as through the company's free mobile application, payment by phone (1-800-672-2403) which connects customers to translation services should they require/prefer a language other than English, text to pay option where customers can save their bank account and "text PAY to 722797" to pay their bill, or visit any one of the tens of pay station locations Pacific Power offers through contract with businesses across the counties in Washington some of which accept cash options for payment. PacifiCorp highly encourages customers to connect with																																	

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					its customer call center by calling its toll-free hotline to be connected to information on programs, assistance, and other benefits. This also allows the company to offer the customer additional accessibility tools should they request/need them. The company will continue to engage its EAG to better understand how it can best serve local communities with opportunities and information.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from the Asian Pacific Islander Coalition (APIC) recommended Pacific Power expand access to local customers to energy efficiency program operators. APIC expressed having a difficult time navigating the website to access programs and that there was an ambiguous system of application. Requested a linear demo of how to access programs during Equity Advisory Group meetings.	PacifiCorp will schedule an occurrence of a near-term future meeting of the EAG to include this as an agenda item so that program managers of energy efficiency programs can perform demonstrations of the website navigation for accessing program information and applications.

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State	Engagement	Date	Category	Feedback	Response (If Applicable)
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from Public Counsel on the topic of "interim targets": Public Counsel would appreciate it if PacifiCorp addressed why its interim targets have fallen over time. It also believes that PacifiCorp should address the risk inherited in waiting to acquire Clean Energy Transformation Act (CETA) - compliant resources and how the company plans to address any potential issues in its chosen method of CETA compliance.	Updates to inputs and assumptions in every planning cycle will drive changes in forecasted interim targets based on economics. Important characteristics of and changes to the current planning environment have been discussed in the 2025 IRP, Chapter 3, and in the 2025 CEIP, Chapter IV. In response to parties' feedback received in the Draft 2025 CEIP, PacifiCorp included model drivers to incentive additional CETA-compliant resources starting in 2028. Based on pure economics, the model was not resulting in the selection of significant energy-generating resources prior to 2030 when targets become binding, resulting in flat interim targets through the end of 2029 (lower than what was presented in the 2023 Biennial CEIP). But due to concerns that PacifiCorp would not make significant progress in this planning period, the company changed the model to select additional resources sooner, creating a smoother path towards 2030 CETA targets than were presented in the 2025 IRP and draft 2025 CEIP. Actual resource acquisition decisions will be made in the ongoing RFP process to balance cost impacts and the pace at which progress is made towards clean energy targets. PacifiCorp is open to accelerating progress towards CETA's 2030 clean energy goals if it is cost-effective to do so.

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WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from Public Counsel on the topic of "proposed cost of energy efficiency programs": Public Counsel is concerned that there is a disproportionate increase in general implementation costs for energy efficiency programs, as compared to the cost of incentives. Furthermore, the overall cost of energy efficiency has risen, despite a 32 percent decrease in MWh conserved at generation. In the final 2025 CEIP, PacifiCorp should explicitly define what is included in "general implementation." Furthermore, the Company should justify the disproportionate increase in "general implementation" costs for energy efficiency programs, as well as explain in more detail why targets have fallen while cost projections have risen.	PacifiCorp's forthcoming 2026-2027 Biennial Conservation Plan and 2026-2027 Business Plan (the drafts of which will be delivered to the DSM Advisory Group on October 1, 2025) will provide more detail on targets of company energy efficiency programs and the costs and plans to achieve them.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from Public Counsel on the topic of the "2026 Protocol": Public Counsel shared it appreciated the company's comments during the public engagement hearing explaining the plan to include the 2026 Protocol in the final 2025 Clean Energy Implementation Plan by running an analysis re-dispatching resources with the 2026 Protocol. Public Counsel believes that this is essential for making the 2025 CEIP usable in the future given other pending adjudications that may result in significant changes to the Company's allocation methodology. Public Counsel would prefer a full sensitivity analysis on the 2026 Protocol	PacifiCorp appreciates Public Counsel's interest in a sensitivity including the 2026 Protocol and agrees it is a useful sensitivity to include. PacifiCorp does not believe it is worthwhile to include a fully re-optimized portfolio for the 2026 Protocol sensitivity because the 2026 Protocol allocations for Washington are very similar to the 2020 Protocol allocations and thus, would result in very minor differences in proxy resource selections when considering the need already created by CETA. Additionally, running a fully re-optimized sensitivity was not feasible given time constraints and PacifiCorp's commitments to completing other sensitivity portfolios. The 2025 CEIP includes a sensitivity of the preferred

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				re-optimizing the portfolio but understands the time constraints.	portfolio, re-dispatching the portfolio under the 2026 Protocol, providing useful information regarding how the new allocation methodology would be expected to change near-term interim targets.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback from Public Counsel on the topic of "technical achievable demand response potential": Public Counsel pointed out that there is a large jump in the technical achievable potential of demand response programs from 2027 - 2029, and then a leveling out of potential. PacifiCorp should explain the data and trend underlying this in the final 2025 Clean Energy Implementation Plan.	PacifiCorp added clarifying language in the final 2025 CEIP.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NVEC) recommends that PacifiCorp continue its practice of having a public engagement series or a CEIP advisory group prior to distributing its future Draft CEIPs. NVEC also strongly recommends that future meeting content be structured around specific CEIP content, which will offer more clarity and transparency.	PacifiCorp appreciates this suggestion and will try to offer CEIP Engagement Series meetings leading up to each CEIP and structure content around specific-CEIP content, depending on availability of information. PacifiCorp also acknowledges the important role its various Washington Advisory Groups play in informing specific portions of the company's planning efforts and will work to ensure topic coverage and various avenues for engagement to fit a variety of different needs and levels of technicality.

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WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NVEC) on the topic of "targets": NVEC strongly recommends that PacifiCorp adopt higher interim targets that create a smoother glide path toward 2030. A linear or stepwise approach would provide more certainty and better manage risk than the current plan, which requires a steep jump between 2029 and 2030.	To address the steep jump between 2029 and 2030 in meeting the 2030 CETA clean energy standard, PacifiCorp modeled dollar-per-megawatt-hour drivers starting in 2028 that incentivize the selection of incremental proxy resources to meet CETA clean energy standards. The inclusion of drivers in 2028 and 2029 is a change from modeling in the 2025 IRP/draft 2025 CEIP intended to create a smoother path towards compliance with the 2030 CETA clean energy standard.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NVEC) on the topic of "targets": PacifiCorp should maintain as strong of Energy Efficiency targets as possible and work to expand program participation. NVEC would also like to see more detail on how PacifiCorp plans to grow its energy efficiency programs and recommend that PacifiCorp include the Energy Efficiency target in the "Setting Targets" section of the Introduction to make it quicker for the reader to find all the targets in one place.	PacifiCorp's forthcoming 2026-2027 Biennial Conservation Plan and 2026-2027 Business Plan (the drafts of which will be delivered to the DSM Advisory Group on October 1, 2025) will provide more detail on the energy efficiency targets and efforts to expand participation in company energy efficiency programs. Energy efficiency targets for the 2025 CEIP (2026-2029 period) have been added to the "Setting Targets" section.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NVEC) on "targets": NVEC recommends PacifiCorp adopt a special action item to conduct evaluations of its demand response programs and incorporate findings into program implementation.	The company agrees with NVEC that regular evaluation of program performance is important. PacifiCorp applies a continuous improvement, or "adaptive management", approach to implementation of all of its demand-side management programs. PacifiCorp submits annual performance reports to the WUTC. These reports document aspects of program performance that went well, and aspects that presented obstacles. These reports are filed with the WUTC under docket UE-220550, and are publicly available on PacifiCorp's DSM

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					website, https://www.pacificorp.com/environment/demand-side-management.html . Each year, PacifiCorp uses findings from these reports to create adaptive management strategies for each program, which often include program changes to improve performance.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NVEC) on "specific actions": NVEC stated it was challenging to identify what the specific actions were in the narrative of the CEIP. The demand response section was clearest because its actions were bolded and italicized, but this formatting wasn't used consistently through the other sections. NVEC recommends PacifiCorp include a table in the Specific Actions chapter or provide smaller tables by category (e.g., supply-side resources, demand response, energy efficiency, and outreach/engagement) in each section.	PacifiCorp appreciates the feedback provided and will look to incorporate more consistent tabular formatting in future plans. The company encourages readers to review Appendix C - Specific Actions included with the 2025 CEIP filing for additional details and table format.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NVEC) on "specific actions": NVEC appreciates that PacifiCorp is trying to incorporate CBIs into the RFP through its newly developed non-price scoring methodology. It is unclear whether the company intends to use this methodology for other RFPs that are anticipated to occur in the next four years (e.g., the 2027 DR RFP). If so, we recommend this be clarified in the CEIP.	PacifiCorp does plan to use price and non-price scoring to evaluate bids in the 2027 RFP. The non-price scoring methodology used for the 2025 Washington Situs RFP will be the starting point for this approach, but PacifiCorp may make changes to the methodology based on its experience in 2025. This has been clarified in the CEIP.

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WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NWECC) on "specific actions": NWECC recommends PacificCorp explicitly commit in the CEIP to expanding participation across all Energy Efficiency programs and outline specific plans to achieve this and that there be more information included in the CEIP on how exactly PacificCorp plans to expand Energy Efficiency actions to include Vulnerable Populations.	This explicit commitment language was added to the "Incremental Energy Efficiency Program Utility Actions" section, which outlines more specific plans to expand/increase Named Community participation in programs. Additional details on energy efficiency program activities and actions will be included in PacificCorp's 2026-2027 Biennial Conservation Plan (in Appendix 2, 2026-2027 DSM Business Plan).
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NWECC) on "specific actions": NWECC noted that PacificCorp aligned with Staff's recommendation to establish a minimum threshold of 27% of energy benefits from Demand Response programs going to Named Communities. Staff, NWECC, and Renewable Northwest had each advocated that a minimum designation also be set for Energy Efficiency programs. We recommend that PacificCorp expand this effort to include Energy Efficiency and list it as an Energy Efficiency specific action.	Similar language from the Demand Response section was included for Energy Efficiency (i.e. that the company will engage its DSM Advisory Group to discuss this minimum designation of benefits of energy efficiency programs flow to Named Communities and note the recommendation of 27% from UTC Staff) in the "Incremental Energy Efficiency Program Utility Actions" section of Energy Efficiency.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NWECC) on "specific actions": NWECC recommends that the outreach, communications, and engagement specific actions be listed more clearly and include more details on how exactly the company plans to achieve them.	PacificCorp appreciates the feedback provided by NWECC on its outreach, communications, and engagement specific actions and has edited the subsection to provide clarity.

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WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NVEC) on "specific actions": NVEC recommends PacifiCorp consider what more it can do related to resiliency through distributed generation, storage, and microgrids.	PacifiCorp recently received approval to operate the Wattsmart Battery Program in Washington. This demand response program offers incentives to both residential and commercial customers interested in installing battery storage systems. Additionally, the company is considering future participation in the Community Solar Program and recommends that customers pair battery storage with solar to improve resilience; however, batteries cannot be required.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NVEC) on "conditions & commission guidance": NVEC recommends that PacifiCorp include NVEC, RNW, and TEP's recommendations for an RFP and DER program design in Table B.4.	PacifiCorp will continue to consider recommendations from parties' regarding future RFP and DER program designs.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NVEC) on "conditions & commission guidance": NVEC recommends that the Final CEIP provide more detail on how CRITFC's recommendations are being addressed. Ultimately, we would like to see more concrete actions that address tribal concerns and advance equitable outcomes.	See Appendix B for additional details on how Columbia River Inter-Tribal Fish Commission's (CRITFC) recommendations are planned to be addressed by the company beginning in 2026.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Northwest Energy Coalition (NVEC) on "incremental cost": NVEC recommends that the Company clearly state whether it will exceed this threshold, clearly show the differences in cost between the preferred and alternative portfolios, and explain how the RFP, MSP, and federal policy changes may affect incremental costs.	PacifiCorp's 2025 CEIP, Chapter X, includes estimated incremental costs for 2026-2029 and how these forecasted costs compare to the threshold for alternative compliance and some discussion around what factors are expected to drive actual costs.

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WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp Include a more thorough narrative explanation of the changes to interim targets for the 2026 – 2029 compliance period related to the 2021 CEIP and 2023 update. Provide as much specific information as possible regarding, but not limited to the following: a. Changes to procurement activities and their effects b. Changes to climate/hydro modeling and their effects c. Changes to capacity contribution d. Transmission planning activity impacts	The 2025 CEIP includes a discussion on recent procurement efforts that will impact interim targets in Chapter I. Changes to climate/hydro modeling that apply to this CEIP are detailed in the modeling descriptions included in the 2025 IRP. The 2021 CEIP and 2023 Update both forecasted proxy resource additions in the 2026-2029 compliance period that exceed the resources that the company was able to procure after filing those plans. In the 2025 IRP, modeling of CETA compliance targets started only in 2030, and the model demonstrated a preference for just-in-time compliance in 2030.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) shared that per Commission order 06, CBI condition 9 from the 2021 CEIP (UE-210829), PacifiCorp must include a separate column in the final Appendix C that indicates the desired goal, objective, target or directionality for each Customer Benefit Indicator.	Consistent with Customer Benefit Indicator (CBI) Condition 9, PacifiCorp expanded the CBI and metric summary tables in its 2021 CEIP, CEIP progress report, and CBIs report card filings. Table 6 of the company's 2024 CEIP Progress Report, Table 4 of the company's 2025 CEIP Progress Report filing, the CBI table in the CEIP CBIs Report Card filing, and the Appendix C of the company's 2021 CEIP filing have been expanded to include: • A column specifying the desired goal, objective, target, or direction for each CBI. • A column identifying specific actions relevant to achieving each CBI goal, objective, target, or direction.

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WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) shared that In the Energy Efficiency specific actions section (beginning pg. 78) include a greater level of detail about what has changed from the previous CEIP cycle to this one. Requested PacifiCorp further explain how the specific actions will promote all cost-effective energy efficiency adoption and continuously improve over the duration of this compliance period.	PacifiCorp added clarifying language in the final 2025 CEIP.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp explain in greater detail actual benefits and their values that the Company expects customers to realize in the section on Energy Efficiency specific actions. Examples include: a. 30% of weatherization repair costs reimbursable but no indication of why that value is selected or how it may change. b. No mention of reimbursement for heating upgrades such as heat pumps. c. Specific monetary values assigned to each non-energy impact and to which party they are attributable	PacifiCorp will provide details on the direct benefits and non-energy impacts for energy efficiency specific actions specified in the "Incremental Energy Efficiency Program Utility Actions" section in Appendix C to the CEIP. Additional detail was included in the narrative of the "Incremental Energy Efficiency Program Utility Actions" section regarding the 30% of weatherization repair costs. The "Incremental Energy Efficiency Program Utility Actions" section focuses on the incremental actions to achieve CETA objectives done by energy efficiency programs, which is why there is no mention of some actions such as the reimbursement for heating upgrades, which are standard measure offers of programs, rather than incremental actions; additional detail on standard energy efficiency program offers will be included in the company's forthcoming 2026-2027 DSM Business Plan (Appendix 2 to the company's 2026-2027 Biennial Conservation Plan). As noted, specific monetary values of non-energy impacts from the incremental energy

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					efficiency specific actions will be included in Appendix C of the 2025 CEIP.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp include a section illustrating the potential effects on interim targets of the Company's proposed allocation protocol (2026 protocol).	PacifiCorp included a Washington 2026 Protocol sensitivity in its 2025 CEIP and provided a view of interim targets under the 2026 protocol.

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WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp include a thorough explanation of cost effects stemming from the company's assumptions about the availability of federal Production and Investment tax credits for renewable energy projects.	The 2025 CEIP includes initial discussion on the impact of the One Big Beautiful Bill Act (OBBBA) on resource planning and procurement. Additionally, the 2025 CEIP assumes that new proxy resources are no longer eligible to receive new tax credits and proxy resource costs reflect this change in assumption from the 2025 IRP. In the 2025 IRP with federal tax credits included, the modeled utility scale solar option in Walla Walla, Washington was \$22.17/MWh, utility scale wind in Walla Walla was \$22.22/MWh and utility scale 4-hour lithium-ion battery storage in Walla Walla was \$84.07/MWh. Without federal tax credits, the modeled utility scale solar option in Walla Walla, Washington was \$47.32/MWh, utility scale wind in Walla Walla was \$45.68/MWh and utility scale 4-hour lithium-ion battery storage in Walla Walla was \$112.68/MWh. These proxy resource costs without federal tax credits included were used in the 2025 CEIP. Dollar per megawatt hour proxy resource costs with and without tax credits included may be found in Tables 7.9 through 7.11 of PacifiCorp's 2025 IRP.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) shared regarding the OBBBA, expand on the impacts referenced by the following phrase: “the Ending Market Distorting Subsidies for Unreliable, Foreign Controlled Energy Sources Executive Order (EO) will significantly impact the cost of certain non-emitting resources and introduces new risks and uncertainties.” Include an assessment of	The 2025 CEIP includes initial discussion on the impact of the OBBBA on resource planning and procurement. PacifiCorp tracks how understanding and guidance is evolving regarding the impacts and implementation of OBBBA. As PacifiCorp conducts its ongoing RFP process, the company is not considering development of any owned/built assets and instead, is only considering contracted resources through power purchase agreements (PPAs). Thus,

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				what specific risks the OBBBA/EO create regarding CETA planning.	PacifiCorp is not the developer that will be subject to tax credit eligible or FEOC restrictions, rather the company is interested in what prices/costs of new resources will be available and if there is risk of counterparty default, potentially harming compliance. However, currently, it is hard to quantify that risk.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp include a thorough explanation of cost/risk effects stemming from the changing interpretation of Foreign Entities of Concern.	PacifiCorp's experts are tracking guidance related to new FEOC concerns and restrictions and how it might impact resource development. However, at this time, the company is not exploring any owned/built assets and recognizes that developers bidding resources into the company's ongoing RFP will bear the brunt of the burden regarding the interpretation of FEOC restrictions. It will take time to see how the market adjusts to these new rules and how that impacts resource availability and what risk-sharing for new contracted resources looks like.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp specify if all materials/notes for the Demand-side Management Advisory Group are available on the website for the public. The website only shows notes for the Equity Advisory Group.	All presentation decks from Demand-Side Management (DSM) Advisory Group meetings are posted to the company website at: https://www.pacificpower.net/community/washington-clean-energy-transformation-act-equity.html after each meeting. Currently, notes from DSM Advisory Group meetings are not available on the website for public review.

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WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp include more explanation in plain language about how PacifiCorp arrives at a cost-effective potential for DR Target setting which differs from the technically achievable potential resulting in the 22 MW target for 2029.	The CPA is designed to determine the technically achievable quantity of demand response, but it does not assess whether that capacity is cost-effective. The CPA provides inputs to the IRP, which determines the maximum cost-effective selection of demand response capacity. In the IRP, PacifiCorp modelled demand response capacity at an accelerated acquisition level, to identify the maximum demand response capacity that would be cost-effective over time. However, the IRP selection provides a highly variable level of growth over the 20-year timeframe - with annual incremental capacity ranging from 0 MW in one year, to 15 MW, back to 0 MW a year, in a 5-year span. This is not practical from a program management perspective - implementers need a more consistent workload to maintain an optimal level of skilled, trained staff. The target of 22 MW represents a stretch goal for PacifiCorp, but one the company thinks it can realistically achieve. After 2029, the company will continue to grow capacity in these programs and expects to converge with the IRP selection over a longer timeframe. The company has endeavored to clarify this in the 2025 CEIP narrative.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp include in the final CEIP a brief timeline with explanations regarding why the Demand Response target was higher in 2025 than it is in 2029, including any challenges that may have led to this reduction in Demand Response portfolio capacity. Also, within	PacifiCorp has added more discussion of the considerations impacting the 2029 Demand Response target to the 2025 CEIP.

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				this timeline, please address the update to the IRP Selections for Demand Response. We would recommend this information to be as plain language as possible.	
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp include a section on the changes in assumptions around Demand Response targets between the 2021 CEIP and 2025 CEIP. A more thorough explanation of lessons learned and company efforts to adapt would benefit the assessment by interested parties. Of particular interest would be specific PacifiCorp efforts to maximize participation from the commercial/industrial sector of its service territory.	PacifiCorp has added more discussion of the considerations impacting the 2029 Demand Response target to the 2025 CEIP.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) asked if PacifiCorp has worked collaboratively with other regional utilities on Demand Response program implementation and/or challenges faced? If so, please include detailed lessons learned and how they are being implemented in PAC's portfolio. If not, please describe why not, and how PacifiCorp plans to adaptively manage its Demand Response program implementation for continuous improvement.	PacifiCorp is a founder of the Northwest Energy Efficiency Alliance (NEEA) End-Use Load Flex Program, and a member of the program steering committee, along with 9 other regional utilities. This program has provided a valuable forum for PacifiCorp to learn about other utilities' demand response needs and programs. One finding is that PacifiCorp uses demand response differently than other utilities - valuing both DR for fast-response contingency reserve/frequency response, and for peak management. Other utilities are more exclusively focused on peak management. Also, because PacifiCorp has operated demand response in other states for several years, it has had more experience generally than many other utilities that have not operated any full demand response

Stakeholder Feedback and Responses					
State	Engagement	Date	Category	Feedback	Response (If Applicable)
					programs. As a result, while this collaboration has been interesting, and PacifiCorp sees value in continuing these conversations, there are no concrete lessons learned that PacifiCorp has been able to apply to its own programs.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp include in the final CEIP the equity Plans for PacifiCorp’s Demand Response programs referenced on pg. 88 of the draft. Although provisional without the full input of the EAG, Staff believes they would be useful in exploring the equitable distribution of benefits required under the Clean Energy Transformation Act.	PacifiCorp has not yet developed these plans. Developing equity plans is identified as one of the team's initial specific actions for the 2026-2029 period. Appendix C includes expected impacted CBIs and non-energy impacts of specific actions for DR.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp clearly explain how WA customers (including those in tribal communities or non-English speakers) are engaging with Energy Efficiency and Demand Response outreach programs. Provide clear metrics of contact, survey responses etc. Detail how these outreach efforts have adapted.	PacifiCorp is providing some of this reporting of outreach efforts and responses in Annual Reports (e.g. 2024 Annual Conservation Report in “CEIP - Utility Actions” section). The company appreciates this feedback for future refinement and expansion of reporting on these data points and metrics in future Annual Reports for Energy Efficiency programs (in Annual Conservation Reports) and Demand Response programs (in Demand Response Annual Reports).
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends that when resource additions are discussed, PacifiCorp should clearly delineate in the text of the final CEIP when each resource is considered “system allocated” or “situs allocated” to Washington customers.	All proxy resource additions included in Washington's portfolio are situs-allocated to Washington customers. Only proxy resources selected to serve Washington customers on a situs-allocated basis and installed capacity are reflected in the CEIP. Existing resources and the Natrium demonstration project (which at this time, is

Stakeholder Feedback and Responses					
State	Engagement	Date	Category	Feedback	Response (If Applicable)
					not forecasted to generate CETA-compliant energy) are the only system-allocated resources.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp provide more detail on the results of the biennially scheduled residential customer survey. Of its customer base (138k) how many are participating, does this number amount to a representative sample, and what lessons/adaptations will the company undertake to improve?	The 2023 Residential Survey used both an email and phone survey approach. Washington residents with an active email address received an invitation to participate in the survey. Of the 72,336 residential customers with an active email address, 4,549 responded which resulted in an email survey response rate of 6.3%. The response rate for the phone portion of the survey is unknown as the company does not know the number of customers that were contacted by its survey vendor to obtain the 303 completed phone surveys. As of December 2023, there were a total of 114,013 residential customers in PacifiCorp's Washington service area. The sample of 4,852 results in a margin of error of +/- 1.2 percent at the 90 percent confidence level. The company intends to work with its survey vendor on forthcoming survey efforts to obtain a higher proportion of completed responses.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp, for clarity, consider changing instances of the language "least cost and least risk" to the more accurate language from Washington RCW 19.405.060(c)(ii): Planning to meet the standards "at the lowest reasonable cost, considering risk".	The recommended adjustment was made within PacifiCorp's final 2025 CEIP.

Stakeholder Feedback and Responses					
State	Engagement	Date	Category	Feedback	Response (If Applicable)
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Utilities & Transportation Commission Staff (WUTC) recommends PacifiCorp include information if available that participants in the Bill Discount Program are specifically targeted with outreach for other programs such as EE/DR. Does PacifiCorp track participants of multiple programs?	PacifiCorp marketing and outreach to Low Income Bill Assistance (LIBA) program customers does not currently include energy efficiency or demand response outreach or information. Energy Efficiency or Weatherization program customer outreach is currently handled by local community action agencies and is focused on Weatherization program information. PacifiCorp does not currently track participants across multiple programs.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Conservation Action (WCA) recommends PacifiCorp to increase all interim clean energy targets for 2026-2029.	In response to feedback received and to address the steep jump between 2029 and 2030 in meeting the 2030 CETA clean energy standard, PacifiCorp modeled dollar-per-megawatt-hour drivers starting in 2028 that incentivize the selection of incremental proxy resources to meet CETA clean energy standards. The inclusion of drivers in 2028 and 2029 is a change from modeling in the 2025 IRP/draft 2025 CEIP intended to create a smoother path towards compliance with the 2030 CETA clean energy standard.
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Conservation Action (WCA) shared that since Pacific Power is launching its newly redesigned bill discount program this October, the company should set specific enrollment targets moving forward (e.g., X% of eligible low-income households enrolled), in line with what other Investor-Owned Utilities (IOUs) have done: • A clear arrearage management program should be part of the CEIP. • Add measurable goals for reducing shutoffs.	As part of the newly redesigned bill discount program, PacifiCorp has included a targeted arrearage management program for customers in the form of hardship grants. These grants are relative to the bill discount tiers and will be administered by the community agencies that work closely with our customers.

Stakeholder Feedback and Responses					
State	Engagement	Date	Category	Feedback	Response (If Applicable)
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Conservation Action (WCA) recommends Pacific Power conduct the following activities related to residential energy efficiency: • Increase energy efficiency targets across the board. • Establish robust goals for participation in your customer energy efficiency programs, especially Low-Income Weatherization. • Pacific Power should explicitly plan to layer its efficiency and weatherization programs with HOMES and HARP to maximize impact for low-income customers. • Ensure staff are ready to coordinate with Commerce and community partners once the rebates launch. • Expand programs for HVAC upgrades, smart thermostats, and insulation, so that rebates translate into actual bill relief in your service territory. • Partner with community groups to deliver these programs where uptake has historically lagged.	PacifiCorp's forthcoming 2026-2027 Biennial Conservation Plan and 2026-2027 Business Plan (the drafts of which will be delivered to the DSM Advisory Group on October 1, 2025) will provide more detail on energy efficiency target development, program savings goals, costs, and planned efforts and activities to achieve the goals of and expand participation in company energy efficiency programs. The Wattsmart Homes (WSH) program has actively engaged and collaborated with Washington State Department of Commerce staff on HEAR and HARP programs including regular participation in Utility Working Group sessions to provide input on program design and addressing barriers and opportunities. At the invitation of WSH Commerce Staff have presented updates on Home Electrification and Appliance Rebate (HEAR) and Home Affordable Refinance Program (HARP) at annual trade ally events held in Walla Walla and Yakima. WSH has actively recruited and informed trade allies on contractor eligibility as well as engaged energy raters on how to meet the requirements to serve the Home Efficiency Rebates (HOMES) Program under the Inflation Reduction Act (IRA). WSH has modified its enrollment applications to specifically address stacked or braided funding that will occur with HEAR, HARP, and HOME programs. PacifiCorp provided a coordination and update meeting with Commerce Staff to ensure program implementers are current with program opportunities and timing.

Stakeholder Feedback and Responses					
State	Engagement	Date	Category	Feedback	Response (If Applicable)
WA	Clean Energy Implementation Plan (CEIP) Engagement	September 2025	2025 CEIP Draft Filing	Written feedback by Washington Conservation Action (WCA) recommends Pacific Power • Graduate from tracking metrics to setting measurable goals with a clear, accountable chain of command for achieving those goals. Ultimately, tracking is a means to an end – the real end is strengthening equity. • Consider creating a Named Community Investment Fund modeled after Avista's, or at minimum setting a dollar target for programs that directly serve named communities.	PacifiCorp appreciates this feedback and will engage internally to establish targets for its CBIs where it is feasible and appropriate to do so. PacifiCorp will explore whether it is feasible and appropriate to set dollar targets for programs that serve named communities. The company will continue engaging to explore the feasibility of establishing a Named Community Investment Fund (like Avista's) or expansion of its Oregon Community-Based Renewable Energy (resilience hub, community solar) pilot to its Washington service area.

APPENDIX B – WASHINGTON REGULATORY COMPLIANCE

Introduction

This appendix describes how PacifiCorp’s 2025 CEIP complies with Washington Utilities and Transportation Commission (WUTC) standards, guidelines, and specific analytical requirements. The 2025 CEIP is based on methods and data developed for the 2025 IRP, with updates as appropriate. Relevant IRP regulatory requirements are included below.

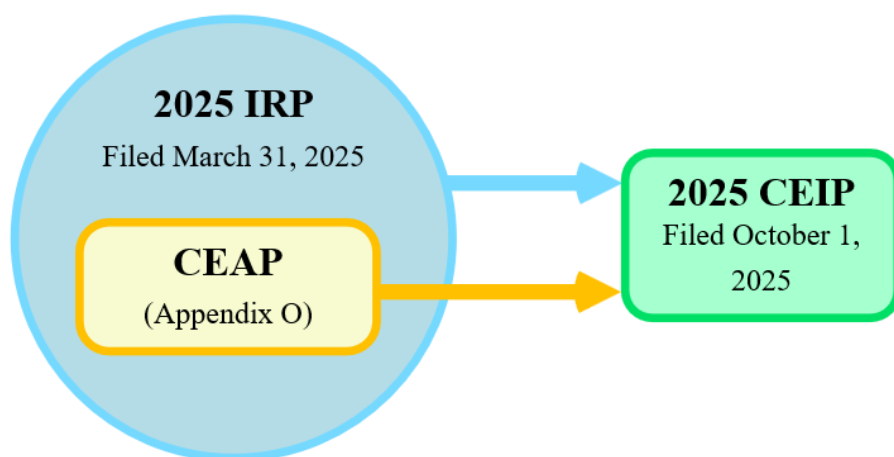
General Compliance

This 2025 CEIP is submitted to the Washington Utilities and Transportation Commission (WUTC) in compliance with its required four-year filing cadence.

PacifiCorp prepares the IRP, which underlies the CEIP, on a four-year filing cadence, with a two-year progress report filed at the two-year midpoint. The IRP provides a framework and plan for future actions to ensure PacifiCorp continues to provide reliable and least-cost electric service to its customers. The IRP evaluates, over a twenty-year planning period, the future load of PacifiCorp customers and the resources required to meet this load.

As illustrated in Figure B.1, the 2025 CEIP is supported by the totality of the 2025 IRP, inclusive of the IRP’s Appendix O (Washington Clean Energy Action Plan).

Figure B.1 – 2025 IRP, CEAP, and CEIP Relationship



Regulatory Components

Regulatory requirements for PacifiCorp’s CEIP come from several sources and provide an overlapping framework relevant to CETA statute and regulations and requirements specific to the IRP, the CEAP, and CEIP (as diagramed above). All requirements are separated into four distinct tables as follows:

Table B.1 – Integrated Resource Planning Standards and Guidelines Summary

Table B.2 - Washington CETA Standards, Rules and Guidelines

Table B.3 – IRP and CEIP Requirements and Handling

Table B.4 – 2023 Biennial CEIP Guidance

Table B.1 – Integrated Resource Planning Standards and Guidelines Summary

IRP Guidelines - Source
WAC 480-100-620 Content of an integrated resource plan.
WAC 480-100-625 Integrated resource plan development and timing.
WAC 480-100-630 Integrated resource planning advisory groups.
IRP Guidelines - Frequency
Unless otherwise ordered by the commission, each electric utility must file an integrated resource plan (IRP), including a Clean Energy Action Plan, with the commission by January 1, 2021, and every four years thereafter.
At least every two years after the utility files its IRP, beginning January 1, 2023, the utility must file a two-year progress report.
IRP Guidelines – Commission Response
The plan will be considered, with other available information, when evaluating the performance of the utility in rate proceedings.
WUTC no longer acknowledges IRPs.
IRP Guidelines - Process
In consultation with WUTC staff, develop and implement a public involvement plan.
PacifiCorp is required to submit a work plan for informal commission review not later than 15 months prior to the due date of the plan.
The utility must file its draft IRP with the commission four months prior to the filing of an IRP. (a) The commission will hear public comment on the draft IRP at an open meeting once filed. (b) The utility must file draft IRP presentation materials at least five business days prior to the open meeting.
IRP Guidelines - Focus
20-year plan, which describes mix of resources sufficient to meet current and future loads and CETA standards at “lowest reasonable” cost. Resource cost, market volatility risks, demand-side resource uncertainty, resource dispatchability, rate-payer risks, policy impacts, environmental risks, and equitable distribution of benefits must be considered. Utilities must develop a ten-year clean energy action plan for implementing RCW 19.405.030 through 19.405.050.

IRP Guidelines - Elements

Basic elements include:

A range of forecasts that examine the effect of economic forces on the consumption of electricity.

An assessment of conservation and load management, and policies and programs to achieve conservation.

Assessment of a wide range of generating technologies.

Assessment of transmission system capability and reliability.

Evaluation of energy supply resources (including transmission and distribution) using “lowest reasonable cost” criteria.

Resource adequacy metrics.

Energy and nonenergy benefits and reductions of burdens to vulnerable populations and highly impacted communities; health and environmental benefits, costs, and risks.

Long-range plan (10+ years).

Progress report compared to the previously filed plan.

Clean energy action plan for implementing RCW 19.405.030 through 19.405.050.

Summary of changes to modeling methodologies or inputs compared to the utility's previous IRP.

Analysis and summary of avoided costs; list of nonenergy costs and benefits and how they accrue.

Summary of public comments and utility responses.

Resource adequacy metrics.

Energy and nonenergy benefits and reductions of burdens to vulnerable populations and highly impacted communities; health and environmental benefits, costs, and risks.

Long-range plan (10+ years).

Progress report compared to the previously filed plan.

Clean energy action plan for implementing RCW 19.405.030 through 19.405.050.

Summary of changes to modeling methodologies or inputs compared to the utility's previous IRP.

Analysis and summary of avoided costs; list of nonenergy costs and benefits and how they accrue.

Summary of public comments and utility responses.

Clean Energy Transformation Act Requirements

The 2025 CEIP and the underlying 2025 IRP align with Washington’s four-year cadence for filing a full integrated resource plan, inclusive of IRP requirements stemming from CETA rules. Table B.2 reports CETA requirements for RCW 19.280.030 and WAC 480-100-620 through WAC 480-100-630, per Commission General Order R-601.

Table B.2 - Washington CETA Standards, Rules and Guidelines

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
RCW 19.405.030(1)(a)	On or before December 31, 2025, each electric utility must eliminate coal-fired resources from its allocation of electricity. This does not include costs associated with decommissioning and remediation of these facilities.	The 2025 CEIP is consistent with this requirement.
RCW 19.405.040(1)	It is the policy of the state that all retail sales of electricity to Washington retail electric customers be greenhouse gas neutral by January 1, 2030. (a) For the four-year compliance period beginning January 1, 2030, and for each multiyear compliance period thereafter through December 31, 2044, an electric utility must demonstrate its compliance with this standard using a combination of nonemitting electric generation and electricity from renewable resources, or alternative compliance options, as provided in this section. To achieve compliance with this standard, an electric utility must: (i) Pursue all cost-effective, reliable, and feasible conservation and efficiency resources to reduce or manage retail electric load, using the methodology established in RCW 19.285.040 , if applicable; and (ii) use electricity from renewable resources and nonemitting electric generation in an amount equal to one hundred percent of the utility's retail electric loads over each multiyear compliance period. An electric utility must achieve compliance with this standard for the following compliance periods: January 1, 2030, through December 31, 2033; January 1, 2034, through December 31, 2037; January 1, 2038, through December 31, 2041; and January 1, 2042, through December 31, 2044.	The 2025 CEIP preferred portfolio was developed consistently with this requirement.

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	(b) Through December 31, 2044, an electric utility may satisfy up to twenty percent of its compliance obligation under (a) of this subsection with an alternative compliance option consistent with this section. An alternative compliance option may include any combination of the following: (i) Making an alternative compliance payment under RCW 19.405.090(2); (ii) Using unbundled renewable energy credits, provided that there is no double counting of any nonpower attributes associated with renewable energy credits within Washington or programs in other jurisdictions, as follows: (A) Unbundled renewable energy credits produced from eligible renewable resources, as defined under RCW 19.285.030, which may be used by the electric utility for compliance with RCW 19.285.040 and this section as provided under RCW 19.285.040(2)(e); and (B) Unbundled renewable energy credits, other than those included in (b)(ii)(A) of this subsection, that represent electricity generated within the compliance period; (iii) Investing in energy transformation projects, including additional conservation and efficiency resources beyond what is otherwise required under this section, provided the projects meet the requirements of subsection (2) of this section and are not credited as resources used to meet the standard under (a) of this subsection; or (iv) Using electricity from an energy recovery facility using municipal solid waste as the principal fuel source, where the facility was constructed prior to 1992, and the facility is operated in compliance with federal laws and regulations and meets state air quality standards. An electric utility may only use electricity from such an energy recovery facility if the department and the department of ecology determine that electricity generation at the facility provides a net reduction in greenhouse gas emissions compared to any other available waste management best practice. The determination must be based on a life-cycle analysis comparing the energy	

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	recovery facility to other technologies available in the jurisdiction in which the facility is located for the waste management best practices of waste reduction, recycling, composting, and minimizing the use of a landfill. (c) Electricity from renewable resources used to meet the standard under (a) of this subsection must be verified by the retirement of renewable energy credits. Renewable energy credits must be tracked and retired in the tracking system selected by the department. (d) Hydroelectric generation used by an electric utility in meeting the standard under (a) of this subsection may not include new diversions, new impoundments, new bypass reaches, or expansion of existing reservoirs constructed after May 7, 2019, unless the diversions, bypass reaches, or reservoir expansions are necessary for the operation of a pumped storage facility that: (i) Does not conflict with existing state or federal fish recovery plans; and (ii) complies with all local, state, and federal laws and regulations. (e) Nothing in (d) of this subsection precludes an electric utility that owns and operates hydroelectric generating facilities, or the owner of a hydroelectric generating facility whose energy output is marketed by the Bonneville power administration, from making efficiency or other improvements to its hydroelectric generating facilities existing as of May 7, 2019, or from installing hydroelectric generation in pipes, culverts, irrigation canals, and other man-made waterways, as long as those changes do not create conflicts with existing state or federal fish recovery plans and comply with all local, state, and federal laws and regulations. (f) Nonemitting electric generation used to meet the standard under (a) of this subsection must be generated during the compliance period and must be verified by documentation that the electric utility owns the nonpower attributes of the electricity generated by the nonemitting electric generation resource. (g) Nothing in this section prohibits an electric utility from	

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	purchasing or exchanging power from the Bonneville power administration.	
RCW 19.405.040(2)-(5)	(2) Investments in energy transformation projects used to satisfy an alternative compliance option provided under subsection (1)(b) of this section must use criteria developed by the department of ecology, in consultation with the department and the commission. For the purpose of crediting an energy transformation project toward the standard in subsection (1)(a) of this section, the department of ecology must establish a conversion factor of emissions reductions resulting from energy transformation projects to megawatt-hours of electricity from nonemitting electric generation that is consistent with the emission factors for unspecified electricity, or for energy transformation projects in the transportation sector, consistent with default emissions or conversion factors established by other jurisdictions for clean alternative fuels. Emissions reductions from energy transformation projects must be: (a) Real, specific, identifiable, and quantifiable; (b) Permanent: The department of ecology must look to other jurisdictions in setting this standard and make a reasonable determination on length of time; (c) Enforceable by the state of Washington; (d) Verifiable; (e) Not required by another statute, rule, or other legal requirement; and (f) Not reasonably assumed to occur absent investment, or if an investment has already been made, not reasonably assumed to occur absent additional funding in the near future. (3) Energy transformation projects must be associated with the consumption of energy in Washington and must not create a new use of fossil fuels that results in a net increase of fossil fuel usage.	PacifiCorp does not currently intend to use investments in energy transformation projects to comply with CETA.

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	(4) The compliance eligibility of energy transformation projects may be scaled or prorated by an approved protocol in order to distinguish effects related to reductions in electricity usage from reductions in fossil fuel usage. (5) Any compliance obligation fulfilled through an investment in an energy transformation project is eligible for use only: (a) By the electric utility that makes the investment; (b) if the investment is made by the Bonneville power administration, by electric utilities that are preference customers of the Bonneville power administration; or (c) if the investment is made by a joint operating agency organized under chapter 43.52 RCW, by a member of the joint operating agency. An electric utility making an investment in partnership with another electric utility or entity may claim credit proportional to its share invested in the total project cost.	
RCW 19.405.040(6)	(a) In meeting the standard under subsection (1) of this section, an electric utility must, consistent with the requirements of RCW 19.285.040, if applicable, pursue all cost-effective, reliable, and feasible conservation and efficiency resources, and demand response. In making new investments, an electric utility must, to the maximum extent feasible: (i) Achieve targets at the lowest reasonable cost, considering risk; (ii) Consider acquisition of existing renewable resources; and (iii) In the acquisition of new resources constructed after May 7, 2019, rely on renewable resources and energy storage, insofar as doing so is consistent with (a)(i) of this subsection. (b) Electric utilities subject to RCW 19.285.040 must demonstrate pursuit of all conservation and efficiency resources through compliance with the requirements in RCW 19.285.040.	The 2025 CEIP is developed consistently with this requirement.

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
RCW 19.405.040(8)	In complying with this section, an electric utility must, consistent with the requirements of RCW 19.280.030 and 19.405.140 , ensure that all customers are benefiting from the transition to clean energy: Through the equitable distribution of energy and nonenergy benefits and reduction of burdens to vulnerable populations and highly impacted communities; long-term and short-term public health and environmental benefits and reduction of costs and risks; and energy security and resiliency.	The 2025 CEIP is developed consistently with this requirement.
RCW 19.405.040(11)	To reduce costs for utility customers or avoid exceeding the cost impact limit in RCW 19.405.060 (3)(a), a multistate electric utility with fewer than two hundred fifty thousand customers in Washington may apply the total amount of megawatt-hours of coal-fired resources eliminated from the utility's allocation of electricity before December 31, 2025, as an equivalent amount of megawatt-hours of nonemitting electric generation or electricity from renewable resources required to comply with subsection (1)(a) of this section. The utility must demonstrate that for every megawatt-hour of early action compliance credit there is a real, permanent reduction in greenhouse gas emissions in the western interconnection directly associated with that credit. A multistate electric utility must request to use early action compliance credit in its clean energy implementation plan that is submitted under RCW 19.405.060 . The multistate electric utility must specify in its clean energy implementation plan the compliance years to which the early action compliance credit will apply, but in no event may the multistate electric utility use the early action compliance credits beyond 2035. The commission must establish conditions for use of early action compliance credits, including a determination of whether action constitutes early action, before the multistate electric utility's use of early action compliance credits in a clean energy implementation plan.	Not applicable.
RCW 19.405.050(1)	It is the policy of the state that nonemitting electric generation and electricity from renewable resources supply one	The 2025 CEIP preferred portfolio was developed consistently with this requirement.

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	hundred percent of all sales of electricity to Washington retail electric customers by January 1, 2045. By January 1, 2045, and each year thereafter, each electric utility must demonstrate its compliance with this standard using a combination of nonemitting electric generation and electricity from renewable resources.	
RCW 19.405.050(2)	Each electric utility must incorporate subsection (1) of this section into all relevant planning and resource acquisition practices including but not limited to: Resource planning under chapter 19.280 RCW; the construction or acquisition of property, including electric generating facilities; and the provision of electricity service to retail electric customers.	CETA regulations and requirements have been and continue to be applied to PacifiCorp's relevant planning and resource acquisition practices.
RCW 19.405.050(3)	In planning to meet projected demand consistent with the requirements of subsection (2) of this section and RCW 19.285.040 , if applicable, an electric utility must pursue all cost-effective, reliable, and feasible conservation and efficiency resources, and demand response. In making new investments, an electric utility must, to the maximum extent feasible: (a) Achieve targets at the lowest reasonable cost, considering risk; (b) Consider acquisition of existing renewable resources; and (c) In the acquisition of new resources constructed after May 7, 2019, rely on renewable resources and energy storage, insofar as doing so is consistent with (a) of this subsection.	The 2025 CEIP is developed consistently with this requirement.
RCW 19.405.060(1)	a) By January 1, 2022, and every four years thereafter, each investor-owned utility must develop and submit to the commission: (i) A four-year clean energy implementation plan for the standards established under RCW 19.405.040 (1) and 19.405.050 (1) that proposes specific targets for energy efficiency, demand response, and renewable energy; and	The 2025 CEIP is submitted in compliance with this requirement.

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	(ii) Proposed interim targets for meeting the standard under RCW 19.405.040(1) during the years prior to 2030 and between 2030 and 2045. (b) An investor-owned utility's clean energy implementation plan must: (i) Be informed by the investor-owned utility's clean energy action plan developed under RCW 19.280.030; (ii) Be consistent with subsection (3) of this section; and (iii) Identify specific actions to be taken by the investor-owned utility over the next four years, consistent with the utility's long-range integrated resource plan and resource adequacy requirements, that demonstrate progress toward meeting the standards under RCW 19.405.040(1) and 19.405.050(1) and the interim targets proposed under (a)(i) of this subsection. The specific actions identified must be informed by the investor-owned utility's historic performance under median water conditions and resource capability and by the investor-owned utility's participation in centralized markets. In identifying specific actions in its clean energy implementation plan, the investor-owned utility may also take into consideration any significant and unplanned loss or addition of load it experiences. (c) The commission, after a hearing, must by order approve, reject, or approve with conditions an investor-owned utility's clean energy implementation plan and interim targets. The commission may, in its order, recommend or require more stringent targets than those proposed by the investor-owned utility. The commission may periodically adjust or expedite timelines if it can be demonstrated that the targets or timelines can be achieved in a manner consistent with the following: (i) Maintaining and protecting the safety, reliable operation, and balancing of the electric system; (ii) Planning to meet the standards at the lowest reasonable cost, considering risk; (iii) Ensuring that all customers are benefiting from the transition to clean energy: Through the equitable distribution of	

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	energy and nonenergy benefits and the reduction of burdens to vulnerable populations and highly impacted communities; long-term and short-term public health and environmental benefits and reduction of costs and risks; and energy security and resiliency; and (iv) Ensuring that no customer or class of customers is unreasonably harmed by any resulting increases in the cost of utility-supplied electricity as may be necessary to comply with the standards.	
WAC 480-100-625(1) and (4)	Integrated resource plan updated every four years, with a progress report at least every two years.	The PacifiCorp IRP is published every two years with updates in the off cycles. This exceeds Washington State requirements. The mid-cycle report is filed as the “Two-year Progress Report” in Washington.
WAC 480-100-620(1)	Unless otherwise stated, all assessments, evaluations, and forecasts comprising the plan should extend over the long-range (e.g., at least ten years; longer if appropriate to the life of the resources considered) planning horizon.	PacifiCorp's 2025 (and prior) IRPs span a 20-year long-term planning horizon. Additional analysis may extend or be extrapolated beyond the 20-year horizon under exceptional circumstances based on available data and model performance.
WAC 480-100-620(2)	Plan includes range of forecasts of projected customer demand that reflect effects of economic forces on electricity consumption.	The range of load forecast cases includes high load, low load, 1-in-20 load, high distributed generation, low distributed generation, and large metered load growth scenarios.
WAC 480-100-620(2)	Plan includes a range of optimistic and pessimistic assumptions of forecast load growth that address changes in the number, type, and efficiency of electrical end-uses, and electrification adjustments made to the forecast.	PacifiCorp conducts a variety of load forecast scenarios. Also, to account for changes in the number, type and efficiency of end-uses, the company updates its statistically adjusted end-use model used in the load forecast. See PacifiCorp’s 2025 IRP, Volume II, Appendix A (Load Forecast) for details regarding alternative load forecast scenarios. Specifically, the company’s base forecast includes expected climate change impacts on loads, while the 20-year normal load forecast scenario provides the load forecast without explicitly accounting for climate change temperatures. Further, the company does produce both optimistic and pessimistic load forecast scenarios. Please refer to Appendix A (Load Forecast) for details regarding transportation and building electrification adjustments made to the load forecast.

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
		PacifiCorp has provided details on load forecasts in Appendix A (Load Forecast). Information can also be found in the 2025 IRP, Volume I, Chapter 6 (Load and Resource Balance).
WAC 480-100-620(3)	Plan includes load management assessments that are cost-effective and commercially available, including current and new policies and programs to obtain:	The 2025 IRP is informed by the company's current conservation potential assessment, which is available on PacifiCorp's website. Additional information on the load management assessments can be found in Volume II, Appendix D (Demand-Side Management Programs).
WAC 480-100-620(3)	- all cost-effective conservation, efficiency, and load management improvements; - all demand response (DR) at the lowest reasonable cost;	IRP modeling optimally selects all cost-effective energy efficiency and demand response in each portfolio as a part of core model functionality. Results are reported for portfolios in the 2025 IRP, Volume I, Chapter 9 (Modeling and Portfolio Selection Results) and Appendix O (Clean Energy Action Plan).
WAC 480-100-620(3)	- ten-year conservation potential used in the concurrent biennial conservation plan consistent with RCW 19.285.040(1);	The 2025 IRP and CEIP were informed by the most current conservation potential assessment, which is available on PacifiCorp's website. Volume I, Chapter 6 (Load and Resource Balance) provides additional detail.
WAC 480-100-620(3)	- identification of opportunities to develop combined heat and power as an energy and capacity resource; and	Combined heat and power are addressed as a component of the Distributed Generation Study, which is included in the 2025 IRP, Volume II, Appendix L (Distributed Generation Study).
WAC 480-100-620(3)(b)	Distributed energy resource (DER) potential assessments (WAC 480-100-620(3)(b)) Sub-section (iii) (energy assistance potential assessment): The IRP must include distributed energy programs and mechanisms identified pursuant to RCW 19.405.120, which pertains to energy assistance and progress toward meeting energy assistance need. Sub-section (iv) (other DER potential assessments) – The IRP must assess other DERs that may be installed by the utility or the utility's customers including, but not limited to, energy storage, electric vehicles, and photovoltaics. Any	The company assesses various levels of DER through a variety of methods in its IRP planning process. PacifiCorp evaluates distributed generation by considering varying levels of technology costs and electricity rate assumptions, which are considered within the company's high and low distributed generation load forecast sensitivities. Regarding the energy assistance potential assessment, PacifiCorp evaluates energy efficiency potential by income level to inform how energy efficiency resources can meet energy assistance needs. The 2025 IRP also assesses other DERs such as energy storage, which is considered within the company's distributed generation study and the CPA as a demand response resource for acquisition is subsequently

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	such assessment must include the effect of DERs on the utility's load and operations. DER potential assessment(s) must go beyond the utility's legacy approach showing DERs as simply a load forecast decrement	incorporated into PacifiCorp's load forecast and IRP modeling. Further, utility scale battery storage is considered as a resource option within the context of portfolio analysis. The company incorporates electric vehicle demand within the load forecast along with the control of electric vehicle load as a demand response resource in the IRP model.
WAC 480-100-620(3)(b)	Plan includes assessments of distributed energy programs and mechanisms pertaining to energy assistance and progress toward meeting energy assistance need, including but not limited to the following: - Energy efficiency and CPA, - Demand response potential, - Energy assistance potential	IRP modeling considers and selects energy efficiency and demand response potential, and distributed energy programs. Evaluation is detailed in Chapter 8 (Modeling and Portfolio), and Chapter 9 (Modeling and Portfolio Selection Results). See Appendix L for the Distributed Generation study and the IRP Studies webpage for the CPA report, as well. Since at least the 2021 CPA, EE potential has been estimated at the income segmentation level, including for Washington (see CPA Volume 2 Appendix F). Since the 2021 IRP, PacifiCorp has contracted with Empower Dataworks to conduct an energy assistance assessment in compliance with WAC 480-100-620(3) guidelines. PacifiCorp shared the findings with Washington stakeholder groups in June 2022, including the Low-Income Advisory Group, the DSM Advisory Group, and the EAG. The findings are posted online.¹ PacifiCorp has also discussed this assessment in prior CEIP filings and submits annual reports to the Washington State Department of Commerce.
WAC 480-100-620(3)(b)	Plan assesses a forecast of distributed energy resources (DER) that may be installed by the utility's customers via a planning process pursuant to RCW 19.280.100(2).	PacifiCorp has worked with DNV Consulting to prepare a Distributed Generation Study, which assesses private and customer-sited resources. Customer preference resources are also assessed as part of the portfolio selection process. Additional details can be found in the 2025 IRP, specifically Appendix L (Distributed Generation Study) and Chapter 8 (Modeling and Portfolio Evaluation).
WAC 480-100-620(3)(b)	Plan includes effect of DERs on the utility's load and operations.	The impacts of DERs on PacifiCorp's utility load and operations are assessed as part of Chapter 8 (Modeling and Portfolio Evaluation).

¹ The 2022 Energy Burden Assessment is available online: https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificcorp/energy/ceip/DSM_Advisory%20Group_Meeting_June_Energy_Burden_Assessment_Slides.pdf

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
		Inputs are assessed as part of Appendix L (Distributed Generation Study).
WAC 480-100-620(3)(b)	If a utility engages in a DER planning process, which is strongly encouraged, IRP should include a summary of the process planning results.	PacifiCorp summarizes relevant activities in Appendix O (Clean Energy Action Plan). Also, summaries of our DER planning processes can be found in the conservation potential assessment and distributed generation studies posted on our website.
WAC 480-100-620(4)	Plan assesses wide range of conventional generating resources.	PacifiCorp considered a wide range of resources including renewables, demand-side management, energy storage, distributed energy resources, power purchases, thermal resources, and transmission. Chapter 7 (Resource Options) provides relevant detail on conventional generating resources.
WAC 480-100-620(5)	An assessment of integrating renewable resources addressing overgeneration.	Cost and performance data for all resource types is evaluated and entered as a model input for the optimal selection of resources. The impacts of integration, saturation and curtailments are evaluated in each study as part of model functionality. Additional information can be found in Chapter 8 (Modeling and Portfolio Evaluation) and Chapter 9 (Modeling and Portfolio Selection).
WAC 480-100-620(5). Also see WA-UTC energy storage policy statement (UE-151069 & UE-161024 consolidated)	Plan assesses energy storage resources. Include an assessment of battery and pump storage for integrating renewable resources. The assessment may consider ancillary services at the appropriate granularity required to model such storage resources.	Energy storage resources are considered as part of the supply-side resource table, found in Chapter 7 (Resource Options). Energy storage potential is assessed as part of Appendix N (Energy Storage Potential Evaluation). The 2025 IRP incorporates multiple storage options including lithium-ion, flow and iron-air batteries, and pumped hydro storage. Modeling was conducted at appropriate granularity in the PLEXOS LT and ST models. See Chapters 7 and 8.
WAC 480-100-620(5)	Plan assesses nonconventional generating, integration, and ancillary service technologies.	Compressed air storage and nuclear resources are represented in the Supply Resource Table, which is posted on PacifiCorp's IRP website and included as Chapter 7 (Resource Options). All resource types are appropriately subject to integration and ancillary services determination, including transmission upgrade costs, reserve holding capability and additional reserve requirements that are particular to technologies. These factors are inherent to every portfolio optimization run.
WAC 480-100-620(6)	Plan assesses the availability of regional generation and transmission capacity for purposes of delivery of electricity to customers.	Regional generation is incorporated into market availability and price forecasts, which are described and analyzed in Chapter 3 (Planning Environment), Chapter 5 (Reliability and Resiliency).

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
		Transmission and resource options are described in Chapter 4 (transmission) and Chapter 7 (Resource Options).
WAC 480-100-620(6)	Plan assesses utility's regional transmission future needs, and the extent transfer capability limitations may affect the future siting of resources.	Regional transmission is represented through markets and region-based price forecasting, while PacifiCorp's transmission system is represented by firm transmission rights and endogenous transmission upgrade options. These factors are discussed in the Chapter 7 (Resource Options) and Chapter 8 (Modeling and Portfolio Evaluation).
WAC 480-100-620(7)	Plan compares benefits and risks of purchasing power or building new resources.	As a component of core modeling functionality, all competing resources, including purchases, are evaluated to determine each optimal portfolio. Additional information can be found in Chapter 8 (Modeling and Portfolio Evaluation) and Chapter 9 (Modeling and Portfolio Selection Results).
WAC 480-100-620(7)	Compare and evaluate all identified resources and potential changes to existing resources for achieving the clean energy transformation standards in WAC 480-100-610 at the lowest reasonable cost, including a narrative of the decisions it has made. Plan compares all identified resources according to resource costs, including:	The 2025 IRP compares all resource options in its optimized evaluation and provides narratives of comparative analysis of outcomes in Chapter 9, and details regarding resource attributes in Chapter 7. The comparison of resources on a cost-risk basis is the core functionality of PacifiCorp's optimization modeling. Additional information can be found in Chapter 8 (Modeling and Portfolio Evaluation).
WAC 480-100-620(7)	- transmission and distribution delivery costs;	PacifiCorp's transmission system is represented by firm transmission rights and endogenous transmission upgrade options. Transmission dependencies implying additional resource costs are included in the optimization, resulting in a reasonable comparison of resource costs. Additional information can be found in Chapter 7 (Resource Options), Chapter 8 (Modeling and Portfolio Evaluation), and Chapter 9 (Modeling and Portfolio Selection Results).
WAC 480-100-620(7)	- risks, including environmental effects and the social cost of GHG emissions;	All variant studies eligible for the preferred portfolio were evaluated under a social cost of greenhouse gases price-policy scenario and evaluated for environmental considerations. A range of additional price future impacts and environmental considerations are examined in the 2025 IRP. Refer to Chapter 8 (Modeling and Portfolio Evaluation) and Appendix O (Washington Clean Energy Action Plan).

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
WAC 480-100-620(7)	- benefits accruing to the utility, customers, and program participants (when applicable); and	Benefits are characterized by present value revenue requirement differentials, emissions, reserve and load deficiencies, robustness across stochastic variances and additional factors as may emerge from modeling results. In addition to modeling outcomes presented in Chapter 8 (Modeling and Portfolio Evaluation), incremental costs, community benefits and energy justice are addressed in Appendix O (Clean Energy Action Plan).
WAC 480-100-620(7)	- resource preference public policies adopted by WA State or the federal government.	The preferred portfolio selected in the 2025 IRP process meets all anticipated policy requirements and considers alternative futures. A summary of the federal and state policy environment is included as Chapter 3 (Planning Environment), and a description of compliance policy strategy is included as Chapter 8 (Modeling and Portfolio Evaluation) and supplemented by Appendix O (Clean Energy Action Plan).
WAC 480-100-620(7)	Plan includes methods, commercially available technologies, or facilities for integrating renewable resources, including but not limited to battery storage and pumped storage, and addressing overgeneration events.	IRP modeling endogenously considers "overgeneration" in dispatch and curtails resources appropriately. These curtailments are an inherent component of the cost and risk valuation of each portfolio, and is a driver for the optimal size, type, timing and location of selected resources.
WAC 480-100-620(8)	Plan assesses and determines resource adequacy metrics.	For the 2025 IRP, resource adequacy is evaluated as a core model function, where each portfolio is obligated to meet reliability requirements including varying degrees of quality of operating reserves. In addition, intermodal reliability is considered as long-term and short-term modeling lead to different measures of reliability. See Chapter 8 (Modeling and Portfolio Evaluation).
WAC 480-100-620(8)	Identify an appropriate resource adequacy requirement (i.e., loss of load probability) and complete the assessment.	PacifiCorp has addressed this requirement as described in Chapter 6 (Load and Resource Balance) and Appendix K (Capacity Contribution).
WAC 480-100-620(8)	Plan measures corresponding resource adequacy metric consistent with prudent utility practice in eliminating coal-fired generation by 12/31/2025 (RCW 19.405.030), attaining GHG neutrality by 1/1/2030 (RCW 19.405.040), and achieving 100 percent clean electricity WA retail sales by 1/1/2045 (RCW	PacifiCorp has addressed this requirement as pertains to requirements for the Clean Energy Transformation Act and the 2025 IRP as described in Chapter 6 (Load and Resource Balance), Chapter 8 (Modeling and Portfolio Evaluation), and Chapter 9 (Modeling and Portfolio Selection Results), and Appendix O (Clean Energy Action Plan).

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	19.405.050).	
WAC 480-100-620(9)	Plan reflects the cumulative impact analysis conducted under RCW 19.405.140, and includes an assessment of: - energy and nonenergy benefits; - reduction of burdens to vulnerable populations and highly impacted communities; - long-term and short-term public health and environmental benefits, costs, and - long-term and short-term public health and environmental risks; and - energy security and risk.	The 2025 IRP fulfills this requirement, please see Appendix O.
WAC 480-100-620(10)	Utility should include a range of possible future scenarios and input sensitivities for testing the robustness of the utility's resource portfolio under various parameters, including the following required components:	A wide range of cases and sensitivities under various price-policy futures have been included, as discussed in Chapter 8 (Modeling and Portfolio Evaluation).
WAC 480-100-620(10)	<i>CETA counterfactual scenario</i> - describe the alternative least reasonable cost and reasonably available portfolio that the utility would have implemented if not for the requirement to comply with RCW 19.405.040 and RCW 19.405.050, as described in WAC 480-100-660(1).	PacifiCorp has met this requirement – additional detail can be found in Chapter 8 (Modeling and Portfolio Evaluation).
WAC 480-100-620(10)	<i>Climate change scenario</i> - incorporate the best science available to analyze impacts including, but not limited to, changes in snowpack, streamflow, rainfall, heating and cooling degree days, and load changes resulting from climate change.	PacifiCorp has met this requirement by incorporating climate change in its base assumptions for the 2025 IRP and CEIP, including future climate impacts on the load forecast, energy efficiency potential, and the hydro generation forecast. The base load forecast for the 2025 IRP is based on a Bureau of Reclamation median projection of climate impacts through time on heating and cooling degree days, resulting in increasing divergence from the 20-year normal weather further in the IRP planning horizon. The hydro forecast similarly relies on projected seasonal changes in stream flows in response to climate impacts that evolve across the IRP planning horizon. Refer to Chapter 8 (Modeling and Portfolio Evaluation) and Appendix A (Load Forecast).

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
WAC 480-100-620(10)	<i>Maximum customer benefit sensitivity</i> - model the maximum amount of customer benefits described in RCW 19.405.040(8) prior to balancing against other goals.	PacifiCorp's 2025 IRP – additional detail on studies can be found in Chapter 8 (Modeling and Portfolio Evaluation) and Appendix O
WAC 480-100-620(11)	Integrate the demand forecasts and resource evaluations into a long-range IRP solution describing the mix of resources that meet current and projected resource needs, abiding by a variety of constraints pursuant to statute and per Commission rule	PacifiCorp has met this requirement – additional detail can be found in Chapter 6 (Load and Resource Balance). The PLEXOS models were used to evaluate resources on a comparable basis following the requirements in statute. See Chapter 8 and Appendix O.
WAC 480-100-620(11)	IRP solution or preferred portfolio must describe the resource mix that meets current and projected needs.	PacifiCorp has met this requirement – additional detail can be found in Chapter 9 and Appendix O.
WAC 480-100-620(11)(a)	Preferred portfolio must include narrative explanation of the decisions made, including how the utility's long-range IRP solution:	See individual entries below.
WAC 480-100-620(11)(a)	- achieves requirements for eliminating coal-fired generation by 12/31/2025 (RCW 19.405.030);	PacifiCorp's 2025 IRP preferred portfolio removes coal-fired generation from Washington's allocation of electricity as required. Additional information can be found in Chapter 9 (Modeling and Portfolio Selection Results).
WAC 480-100-620(11)(a)	- attains GHG neutrality by 1/1/2030 (RCW 19.405.040); and	PacifiCorp has met this requirement. Additional information can be found in Chapter 8 (Modeling and Portfolio Evaluation), and Chapter 9 (Modeling and Portfolio Selection Results), and Appendix O (Clean Energy Action Plan).
WAC 480-100-620(11)(a)	- achieves 100 percent clean electricity WA retail sales by 1/1/2045 (RCW 19.405.050) at lowest reasonable cost,	This requirement is met as described in Chapter 8 (Modeling and Portfolio Evaluation), and Chapter 9 (Modeling and Portfolio Selection Results), and Appendix O (Clean Energy Action Plan).
WAC 480-100-620(11)(a)	- achieves 100 percent clean electricity WA retail sales by 1/1/2045 (RCW 19.405.050), considering risk.	This requirement is met as described in Chapter 8 (Modeling and Portfolio Evaluation), and Chapter 9 (Modeling and Portfolio Selection Results), and Appendix O (Clean Energy Action Plan).
WAC 480-100-620(11)(c)	Consistent with RCW 19.285.040(1), preferred portfolio shows pursuit of all cost-effective, reliable, and feasible conservation and efficiency resources, and DR.	PacifiCorp has met this requirement. Additional information can be found in Chapter 8 (Modeling and Portfolio Evaluation), and Chapter 9 (Modeling and Portfolio Selection Results), and Appendix O (Clean Energy Action Plan).

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
WAC 480-100-620(11)(d) and I	Preferred portfolio considers acquisition of existing renewable new resources and relies on renewable resources and energy storage, insofar as doing so is at lowest reasonable cost.	PacifiCorp has met this requirement. Additional information can be found in Chapter 8 (Modeling and Portfolio Evaluation), and Chapter 9 (Modeling and Portfolio Selection Results), and Appendix O (Clean Energy Action Plan).
WAC 480-100-620(11)(d) and (e)	Preferred portfolio considers acquisition of existing renewable new resources and relies on renewable resources and energy storage, considering risks.	PacifiCorp has met this requirement. Additional information can be found in Chapter 8 (Modeling and Portfolio Evaluation), and Chapter 9 (Modeling and Portfolio Selection Results), and Appendix O (Washington Clean Energy Action Plan).
WAC 480-100-620(11)(f)	Preferred portfolio maintains and protects the safety, reliable operation, and balancing of the utility's electric system, including mitigating over-generation events and achieving identified resource adequacy requirements.	PacifiCorp has met this requirement. In addition to inherent modeling functionality, additional information can be found in Chapter 6 (Load and Resource Balance).
WAC 480-100-620(11)(g)	Preferred portfolio ensures all customers are benefiting from the transition to clean energy through the:	The 2025 IRP fulfills this requirement, please see Appendix O.
WAC 480-100-620(11)(g)	- equitable distribution of energy and nonenergy benefits; reduction of burdens to vulnerable populations and highly impacted communities; demonstrate a wider incorporation of non-energy impacts (NEIs) in addition to those applied during conservation potential assessment (CPA) development.	The 2025 IRP fulfills this requirement, please see Appendix O.
WAC 480-100-620(11)(g)	- long-term and short-term public health and environmental benefits; reduction of costs and risks; and	The 2025 IRP fulfills this requirement, please see Appendix O.
WAC 480-100-620(11)(g)	- energy security and resiliency.	The 2025 IRP fulfills this requirement, please see Appendix O.
WAC 480-100-620(11)(h)	- Assess the environmental health impacts to highly impacted communities;	The 2025 IRP fulfills this requirement, please see Appendix O.
WAC 480-100-620(11)(i)	- analyzes and considers combinations of DER costs, benefits, and operational characteristics (incl. ancillary services) to meet system needs,	Details are included in Chapter 8 (Modeling and Portfolio Evaluation), Appendix L (Distributed Generation Study) and discussion in Appendix O (Washington Clean Energy Action Plan).
WAC 480-100-620(11)(j)	- incorporates the social cost of GHG emissions as	Details are included in Chapter 8 (Modeling and Portfolio Evaluation)

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	a cost adder.	and Appendix O (Washington Clean Energy Action Plan).
WAC 480-100-620(12)	Utility must develop a ten-year clean energy action plan (CEAP) for implementing RCW 19.405.030 through 19.405.050 at the lowest reasonable cost, and at an acceptable resource adequacy standard. The CEAP will:	PacifiCorp's 2025 CEAP is provided as Appendix O (Washington Clean Energy Action Plan). See individual entries below.
WAC 480-100-620(12)(b)	- identify and be informed by utility's ten-year CPA per RCW 19.285.040(1);	Please see Appendix O (Washington Clean Energy Action Plan).
WAC 480-100-620(12)(c)	- demonstrate that all customers are benefiting from the transition to clean energy;	Please see Appendix O (Washington Clean Energy Action Plan).
WAC 480-100-620(12)(d)	- establish a resource adequacy requirement;	PacifiCorp establishes resource adequacy at a system level, and the resource adequacy requirement is explained in Chapter 6 (Load and Resource Balance).
WAC 480-100-620(12)(e)	- identify the potential cost-effective DR and load management programs that may be acquired;	This requirement is met in Chapter 9 (Modeling and Portfolio Selection Results) and Appendix O (Washington Clean Energy Action Plan).
WAC 480-100-620(12)(f)	- identify renewable resources, nonemitting electric generation, and DERs that may be acquired and evaluate how each identified resource may be expected to contribute to meeting the utility's resource adequacy requirement;	PacifiCorp meets this requirement. Please refer to Chapter 7 (Resource Options), Chapter 8 (Modeling and Portfolio Evaluation), and Chapter 9 (Modeling and Portfolio Selection). Also see Appendix L and Appendix O with reference to DERs.
WAC 480-100-620(12)(g)	- identify any need to develop new, or expand or upgrade existing, bulk transmission and distribution facilities;	This is described at the system level in Chapter 4 (Transmission) and within PacifiCorp's Chapter 10 (Action Plan). As with generating resources, the IRP's identification of needed transmission is considered indicative and proxy, with the need to be re-examined in light of actual project information which becomes available in downstream process, such as procurement.
WAC 480-100-620(12)(h)	- identify the nature and possible extent to which the utility may need to rely on alternative compliance options, if appropriate.	Please see Appendix O (Washington Clean Energy Action Plan).

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
WAC 480-100-620(12)(i)	Plan (both IRP and CEAP) considers cost of greenhouse gas emissions as a cost adder equal to the cost per metric ton of carbon dioxide emissions, using the two and one-half percent discount rate, listed in Table 2, Technical Support Document: Technical update of the social cost of carbon (SCC) for regulatory impact analysis under Executive Order 12866, published by the interagency working group on social cost of greenhouse gases of the United States government, August 2016, as adjusted by the Commission to reflect the effect of inflation.	PacifiCorp updated its social cost of greenhouse gas pricing consistent with DOCKET U-190730 ORDER 03, which updates this specification.
WAC 480-100-620(13)	Plan must include an analysis and summary of the estimated avoided cost for each supply- and demand-side resource, including (but not limited to): - energy, - capacity, - transmission, - distribution, and - GHG emissions.	An updated estimate of avoided costs is included in the 2025 CEIP. Please refer to workpaper “250617-PAC-CEIP-WP-Tbl-27-Incremental-Cost-Workbook-10-01-2025.xlsx” for the avoided cost methodology and calculation.
WAC 480-100-620(13)	Listed energy and non-energy impacts should specify to which source party they accrue (e.g., utility, customers, participants, vulnerable populations, highly impacted communities, general public).	The file labeled “2025 CPA - Appendix E - WA Non-Energy Impact Mapping”, as part of the CPA supplemental materials posted on the website, maps the accrual of NEIs to various groups consistent with WAC 480-100-620(13).
WAC 480-100-620(14)	To maximize transparency, the utility should submit data input files supporting the plan in native file format (e.g., supporting spreadsheets in Excel, not PDF file format).	PacifiCorp will make data available in the native file format consistent with practice in prior IRPs.
WAC 480-100-620(15)	Information relating to purchases of electricity from qualifying facilities. Each utility must provide information and analysis that it will use to inform its annual filings required under chapter 480-106 WAC. The detailed analysis must include, but is not limited to, the following components:	See individual entries that follow.
WAC 480-100-20(15)(a)	- A description of the methodology used to calculate es-	An updated estimate of avoided costs is included in the 2025 CEIP.

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	timates of the avoided cost of energy, capacity, transmission, distribution and emissions averaged across the utility; and	
WAC 480-100-20(15)(b)	- Resource assumptions and market forecasts used in the utility's schedule of estimated avoided cost required in WAC 480-106-040 including, but not limited to, cost assumptions, production estimates, peak capacity contribution estimates, and annual capacity factor estimates.	An updated estimate of avoided costs is included in the 2025 CEIP.
WAC 480-100-620(16)	Plan must summarize substantive changes to modeling methodologies or inputs that change the utility's resource need, as compared to the utility's previous IRP.	A comprehensive discussion of modeling methodology updates is included in Chapter 8 (Modeling and Portfolio Evaluation); however, a brief list of highly impactful changes and updates is as follows: • Model must meet WRAP compliance. • Existing thermal units can operate indefinitely with maintenance. • IRA Tax Credits are extended through the whole horizon. • States are only able to impact the disposition of resources in which they have an active share.
WAC 480-100-620(17)	Utility must summarize: - public comments received on the draft IRP, - utility's responses to public comments, and - whether final plan addresses and incorporates comments raised.	PacifiCorp has maintained compliance with this requirement by publishing all stakeholder comments received and associated responses in a centralized location externally and additionally provides this feedback with PacifiCorp responses in Appendix M, including a summary matrix of pertinent information.
WAC 480-100-625(4)	Two-year progress report. At least every two years after the utility files its IRP, beginning January 1, 2023, the utility must file a two-year progress report. (a) In this report, the utility must update its: (i) Load forecast; (ii) Demand-side resource assessment, including a new conservation potential assessment; (iii) Resource costs; and (iv) The portfolio analysis and preferred portfolio. (b) The progress report must include other updates that are	Not applicable. The 2025 IRP aligns with Washington's four-year IRP filing cadence. The next two-year progress report is anticipated to be filed in 2027.

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	necessary due to changing state or federal requirements, or significant changes to economic or market forces. (c) The progress report must also update for any elements found in the utility's current clean energy implementation plan, as described in WAC 480-100-640.	
WAC 480-100-630(1)	The utility must demonstrate and document how it considered input from advisory group members in the development of its IRP and two-year progress report.	PacifiCorp meets this requirement in the 2025 IRP in Appendix C and Appendix M and also references stakeholder feedback in footnotes throughout the 2025 IRP document.
WAC 480-100-630(2)	The utility must make available completed presentation materials for each advisory group meeting at least three business days prior to the meeting. The utility may update materials as needed.	PacifiCorp has met this requirement throughout the 2025 IRP public input meeting series, and as documented in Appendix C and Appendix M.
WAC 480-100-630(3)	The utility must make all its data inputs and files used to develop its IRP available to the commission in native file format, per RCW 19.280.030 (10)(a) and (b), and in an easily accessible format.	PacifiCorp carefully manages its workpaper filing to adhere to this requirement within the limits of technology. Context is provided by the accompanying listing of file names with a description of the file's content or purpose. This information is provided with the supporting workpapers.
WAC 480-106-040	Plan provides information and analysis used to inform annual purchases of electricity from qualifying facilities, including a description of the:	See individual entries below:
WAC 480-106-040	- avoided cost calculation methodology used;	The estimated avoided cost is based on the values determined through the IRP modeling process. Values can be found in Chapter 8 (Modeling and Portfolio Evaluation) and Chapter 9 (Modeling and Portfolio Selection).
WAC 480-106-040	- avoided cost methodology of energy, capacity, transmission, distribution, and emissions averaged across the utility; and	The estimated avoided cost will be based on the values determined through the IRP modeling process. Values can be found in Chapter 8 (Modeling and Portfolio Evaluation) and Chapter 9 (Modeling and Portfolio Selection).
WAC 480-106-040	- resource assumptions and market forecasts used in the utility's schedule of estimated avoided cost, including (but not	The estimated avoided cost will be based on the values determined through the IRP modeling process. Values can be found in Chapter 8 (Modeling and Portfolio Evaluation) and Chapter 9 (Modeling and

B.2 – CETA Standards, Rules and Guidelines		
Reference	Requirement	2025 IRP/CEIP Approach
	limited to); cost assumptions, production estimates, peak capacity contribution estimates, and annual capacity factor estimates.	Portfolio Selection). However, resource assumptions, capacity factors and price forecasts are included in workpapers. PacificCorp would note that its 2025 IRP uses forward market prices from September 2024, which is the same vintage as PacificCorp’s October 30, 2024, avoided cost filing in docket number 240817.

Integrated Resource Planning and Clean Energy Implementation Plan Requirements

The 2025 CEIP and the related 2025 IRP are subject to numerous underlying requirements for analysis and reporting. Table B.3 lists these requirements and describes how they are met by the respective reports.

Table B.3 – IRP and CEIP Requirements and Handling

B.3 - IRP and CEIP Requirements and Handling		
Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 6	CBI Condition 1. PacifiCorp agrees to track and report CBIs and metrics included in its Revised CEIP and this Settlement in future CEIP progress and compliance reports. PacifiCorp commits to expand data availability during this CEIP period. The Company does not have to duplicate data collection efforts if it is collecting the same data in other dockets, but it may use that data for CBI and metric reporting: Due date: 2024 Filing and 2025 CEIP.	In accordance with CBI Settlement Condition 1, PacifiCorp committed to expanding data availability throughout the 2021 CEIP reporting period. Going forward into the 2025 CEIP reporting period, the company remains dedicated to continuing these efforts and exploring ways that it can streamline them. To promote operational efficiency, the company anticipates that it will continue to leverage data collected through other regulatory dockets where appropriate, to ensure that its efforts do not duplicate other data collection activities. All CBI associated metrics reporting data is available publicly online as part of the CBI Report Card that is updated annually: https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/washington-ceip/CEIP_CBIs_Report_Card.xlsx .
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 6	CBI Condition 2. For its CBI – Residential customer disconnections – PacifiCorp agrees to replace its metric (“number of residential customer disconnections including disconnections within named communities”) with the following metric: Number and percentage of residential electric disconnections for nonpayment by month, measured by location and demographic information (zip code/census tract, KLI customers, Vulnerable Populations (where known), Highly Impacted Communities, and for all customers in total). If residential disconnections are not required to be reported quarterly to the Commission in any other docket (e.g., U-200281 or U-210800) or rule, PacifiCorp will report residential disconnections as reported pursuant to	PacifiCorp adopted the following metric: number and percentage of residential customer disconnections including disconnections for all communities and within named communities. Refer to Chapter VIII for additional discussion.

B.3 - IRP and CEIP Requirements and Handling		
Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
	Commission Order 04 (Appendix A Third Revised Term Sheet, Section J, Part 2 a), in Docket U-200281, on a quarterly basis through the end of this CEIP implementation period (December 31, 2025). Due Date: 2024 Filing and 2025 CEIP.	
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 6	CBI Condition 3. For its CBI – Residential customer disconnections – PacifiCorp agrees to add the following metric: Residential arrearages as reported pursuant to Commission Order 04 (Appendix A Third Revised Term Sheet, Section J, Part 8 a-c) in Docket U-200281 (arrearage data for Section J, Part 2 is reported quarterly by zip code). If residential arrearages are not required to be reported to the Commission in any other docket (e.g., U-200281 or U-210800) or rule, PacifiCorp will track the following residential electric data by month, measured by location and demographic information (zip code/census tract, KLI customers, Vulnerable Populations (where known), Highly Impacted Communities, and for all customers in total) and report the data to the Commission on a quarterly basis through the end of this CEIP implementation period (December 31, 2025) The number of customers with past-due balances (arrearages); and, the amount of past-due balances that are 30+, 60+, and 90+ days past due, and the total amount of arrearages. Due Date: 2024 Filing and 2025 CEIP.	PacifiCorp adopted the following metric: number of residential arrearages, the amount of past due balances at 30+, 60+, and 90+ days past due, and the total amount of arrearages for all communities and within named communities. Additional detail on the specific actions that contribute to these CBI metrics can be found in Chapter VIII.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 7	CBI Condition 4. For its CBI – Households experiencing high energy burden – PacifiCorp agrees to revise its metrics to include the following: Number and percent of households with high energy burden, with high energy burden defined as greater than or equal to six percent of household annual income; and average excess burden per household. This CBI will be separately tracked and reported	PacifiCorp tracks the number and percent of households with high energy burden for all PacifiCorp customers, known low-income (KLI) customers, and named communities. Additionally, the company also adopted the standard definition of high energy burden as greater than or equal to six percent of household annual income. Additional detail on the specific actions that contribute to these CBI metrics can be found in Chapter VIII.

B.3 - IRP and CEIP Requirements and Handling		
Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
	for all PacifiCorp customers, known low income (KLI) customers and Named Communities. KLI customers are defined as those who have received energy assistance during the prior two years. Due Date: 2024 Filing and 2025 CEIP.	
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p.7	CBI Condition 5. For its CBI – Culturally and linguistically responsive outreach and program communication – PacifiCorp agrees to add “including increased availability of translation services for all PacifiCorp programs, including credit, collection, and payment”, and to add the following metrics: Number of programs for which PacifiCorp provides translation services or translated material; and Number of languages PacifiCorp uses for translated material. PacifiCorp will also provide a list of all programs for which it provides translation services or translated material and the format of the service or material (e.g., telephone translation, brochure, notice, website). Due Date: 2024 Filing and 2025 CEIP.	PacifiCorp adopted the metrics below to monitor whether its outreach to customers is both culturally and linguistically responsive: • Number of programs for which PacifiCorp provides translation services or translated material pursuant to CBI Settlement Condition 5 in docket UE-210829. • Number of programs for which PacifiCorp provides translation services or translated material. • Number of languages PacifiCorp uses for translated material. Additional detail on the specific actions that contribute to these CBI metrics can be found in Chapter VIII.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 7	CBI Condition 6. For its CBI – Participation in company energy efficiency programs and billing assistance programs – PacifiCorp agrees to track both “number and percentage” for its metrics for participation in energy efficiency and bill assistance programs. PacifiCorp agrees to add the following metrics: Number of residential appliance and equipment rebates provided to Named Community customers (where known); Number of residential rebates provided to customers residing in rental units; and Investment and/or energy efficiency savings in rental residential housing stock. PacifiCorp agrees to discuss strategies to increase the number of participating households in Named Communities with its EAG, LIAC, and DSMAG,	PacifiCorp continues to engage its DSM Advisory Group, EAG, and Low-Income Advisory Group, to surface strategies to increase the number of participating households in named communities in energy efficiency and billing assistance programs. Additional details on the specific actions that contribute to these CBI metrics can be found in Chapter IX, subsection Energy Efficiency Actions.

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Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
	and will move forward with feasible strategies, if identified. Due Date: 2024 Filing and 2025 CEIP.	
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 7	CBI Condition 7. PacifiCorp agrees to add the following CBI and metrics to the CETA category of Energy Benefits CBI: Increase named community clean energy. Metrics: (1) Total MWh of distributed energy resources 5 MW and under, where benefits and control of the resource accrue to members of named communities; (2) Total MWs of energy storage resources 5 MW and under, where benefits and control of the resource accrue to members of named communities; (3) Number (i.e., sites, projects, and/or households) of distributed renewable generation resources and energy storage resources, where benefits and control of the resource accrue to members of named communities, including storage/backup/emergency powered centers for emergencies; and (4) Total MWh of energy savings from EE programs, where benefits and control of the savings accrue to members of named communities. ; and (5) Where known, for 1, 2, 3, and 4 above, PacifiCorp will specify whether the named community resources are HIC and/or VP and/or known LI. For vulnerable populations, where known, PacifiCorp will specify named community resources broken down by the sensitivity factors and/or socioeconomic factors that led the customer or community to be designated vulnerable. Due Date: 2024 Filing and 2025 CEIP.	The company enhanced its framework for monitoring and evaluating the environmental impacts of its activities by adding the five metrics below: - Total MWh of distributed energy resources 5 MW and under, where benefits and control of resource accrue to members of named communities. - Total MWs of energy storage resources 5 MW and under, where benefits and control of the resource accrue to members of named communities. - Number (i.e., sites, projects, and/or households) of distributed renewable generation resources and energy storage resources, where the benefits and control of the resource accrue to members of named communities, including storage/ backup/ emergency powered centers for emergencies. - Total MWh of energy savings from energy efficiency programs, where benefits and control of the savings accrue to members of named communities. - Where known, for a), b), c), and d) above, whether the named community resources are in HICs, VPs, and/or KLI. Refer to Chapter VIII – Customer Benefit Indicators and Chapter V, subsection Greenhouse Gas Emissions, for additional discussion.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 8	CBI Condition 8. PacifiCorp agrees that the metric, “SAIDI, SAIFI, and CAIDI* at area level including and excluding major events” for the CBI “Frequency and duration of energy outages” will also include data for the frequency of customer outages for Vulnerable Populations (where available).	PacifiCorp added data for named communities to its SAIDI, SAIFI, and CAIDI at the area level, including major events, resilience and reliability metrics. In addition, after engagement with stakeholders and comparison of the metric with other utilities, PacifiCorp also adopted the IEEE Customers Experiencing Multiple Interruptions (CEMI-4) index, which it agrees can capture customer-specific reliability impacts often masked by system averages.

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Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
	PacifiCorp will also measure the frequency of outages using the IEEE index Customers Experiencing Multiple Outages (CEMI) “0” as this is more specific to customer outages than a system level metric. The Company will report CEMI values after discussing relevant threshold values with its stakeholders and comparison to peer utilities. Due Date: 2024 Filing and 2025 CEIP.	Refer to Chapter VIII for more in-depth information about the company’s resilience and reliability metrics.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 8	CBI Condition 9. After coordinating with PacifiCorp’s stakeholders, PacifiCorp will create a separate column in Table 2.3 of the 2021 PacifiCorp CEIP that indicates the desired goal, objective, target or directionality for each CBI, and another separate column that indicates specific actions that are relevant to meeting each CBI goal (as referenced in Appendix C), objective, target, or directionality. PacifiCorp will include the specific metrics agreed to in this Settlement in a separate column in Table 2.3 in the July 2024 filing, and 2025 CEIP.	Consistent with CBI Condition 9, PacifiCorp expanded the CBI and metric summary tables in its 2021 CEIP, CEIP progress report, and CBIs report card filings. Table 6 of the company’s 2024 CEIP Progress Report , Table 4 of the company’s 2025 CEIP Progress Report filing, the CBI table in the CEIP CBIs Report Card filing, and the Appendix C of the company’s 2021 CEIP filing have been expanded to include: • A column specifying the desired goal, objective, target, or direction for each CBI. • A column identifying specific actions relevant to achieving each CBI goal, objective, target, or direction.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 8	CBI Condition 10. PacifiCorp recognizes that not all CBIs and metrics will be relevant or applicable to resource selection. PacifiCorp will develop, in conjunction with relevant advisory groups (including but not limited to the DSMAG, EAG, and LIAC) and stakeholders, a transparent methodology for applying CBIs and metrics that are appropriate for future resource planning and acquisition decisions. This will include changes to its weighting and scoring processes for future resource acquisition processes. Due Date: 2025 CEIP.	Refer to Chapter IX, subsection CBI/Action Mapping: Supply Side Specific Actions for information on how the company has incorporated the requirements set forth CBI Condition 10 into its non-price scoring methodology for the 2025 Washington Situs RFP.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 8	CBI Condition 11. PacifiCorp will incorporate CEIP CBIs and metrics into a publicly accessible comprehensive report card that includes all metrics and baseline data that the Company reports to the	PacifiCorp maintains a publicly available CBI Report Card, updated annually, online at https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/washington-ceip/CEIP_CBIs_Report_Card.xlsx .

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Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
	Commission, available on the Company’s CEIP website within 60 days of the final order. If data for all metrics is not available for any final approved metrics, PacifiCorp will list the metric and indicate in the report card “data coming soon”. PacifiCorp also agrees to prepare and file with the Commission in the CEIP docket a comprehensive list of all Customer Benefit Indicators, related metrics, and baseline data. Due Date: Within 60 days of final order in Docket UE-210829 for CBIs and metrics from the initial CEIP, and in the 2024 Filing to incorporate additional CBIs and metrics required by these Conditions.	
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 8	CBI Condition 12. In its 2025 CEIP, PacifiCorp will provide a clear explanation of how it arrived at each CBI and metric, and how those metrics will be impacted by PacifiCorp’s specific actions. Due Date: 2025 CEIP.	Please refer to Chapter VIII and Chapter IX for a full discussion of how the company arrived at each of its CBIs and metrics, as well as a discussion of how those metrics will be impacted by the company’s specific actions.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 9	CBI Condition 13. PacifiCorp must choose at least two of its current CBIs and work with stakeholders to determine which five subsets of PacifiCorp’s named communities in its system, and at what granularity, should be tracked and reported for the chosen CBIs. Due Date: 2024 Filing, or 2025.	PacifiCorp held a listening session with its EAG in July 2025, to solicit input on which five subsets of named communities within its service area should be prioritized for tracking, as well as the appropriate level of granularity at which they should be tracked. In the session, EAG members emphasized the importance of tracking named communities of Hispanic/Latino/a/e ethnicity, low-income migrants, multi-generational households, renters, agricultural workers, and non-English-speaking communities. At the September 2025 EAG meeting, the company presented a summary of its conclusions from the listening session. There, the company specifically identified Hispanic/Latino/a/e ethnicity, low-income migrants, multi-generational households, renters, agricultural workers, and non-English-speaking communities as critically vulnerable populations (the chosen named community subsets) and census tracts as the appropriate level of granularity for tracking. Refer to Chapter VIII for more in-depth discussion of the company’s vulnerable populations update.
Docket UE-210829, Order 06 Appendix A:	CBI Condition 14. PacifiCorp will convene interested stakeholders for up to two workshops to review and improve the Company’s approach to	PacifiCorp convened three workshops with Washington interested parties and advisory group members to review and refine its methodology for identifying and monitoring vulnerable populations. The resulting vulnerable populations geographic

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Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
Full Multi-Party Settlement Agreement, p. 9	identifying and tracking vulnerable populations. These workshops will consider the vulnerability factors listed below (including reasonable alternatives or additions) and determine the extent to which the Company should incorporate each into the 2025 CEIP. Due Date: Workshops will be initiated no later than July 1, 2024, and findings from these workshops shall be incorporated and reported on within the Company's 2025 CEIP. Factors include: o Sensitive populations (disability, cardiovascular disease, low birth weights, higher rates of hospitalization, home care); o Energy security/insecurity (arrearage/disconnections, estimated energy burden, housing burden); o Other socioeconomic factors (access to digital/internet resources, access to food, access to health care, educational attainment level, historical redline influence, linguistic isolation, race, transportation expense, unemployment, poverty, deep poverty, renter status, seniors with fixed income, housing quality); o Geographic areas that PacifiCorp identified as "high needs" or "underserved" in the most recent Biennial Conservation Plan; o Geographic areas with an average home energy burden of 6% or more for income for households with annual income less than 200% of the federal poverty level; o Qualified Census Tracts as defined by HUD for purposes of the Low-Income Housing Tax Credit program; and o Geographic areas considered to be a "community in economic distress" as defined by the U.S. Department of Treasury for purposes of the New Markets Tax Credit program.	methodology included the vulnerability criteria informed by Settlement Condition 14. Notably, it is also modeled after the WDOH HIC framework in that it applies a percentile ranking approach to census tracts within the company's Washington service territory. However, unlike the WDOH methodology, PacifiCorp's approach incorporates nineteen criteria in addition to the criteria used by WDOH. Refer to Chapter VIII for a more in-depth discussion of the company's vulnerable populations workshops.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 9	Transparency Condition 1. PacifiCorp will provide a copy of its PLEXOS model database files in native file format upon request by any intervenor with a signed confidentiality agreement, subject to	PacifiCorp is streamlining the process to provide these materials and has confirmed with Energy Exemplar that a version of the .xml formatted database can be made available on a highly confidential basis in future filings.

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	relevant and appropriate confidentiality concerns. The compressed version will include the PLEXOS database file (with a .xml extension) or the functional equivalent, and all data input files (with .csv extensions), organized using a structure that will allow a party knowledgeable in PLEXOS to load, execute, and run the Company's CEIP portfolio model via PLEXOS. Additionally, PacifiCorp will include a "readme" file with instructions for how interested parties that are knowledgeable in PLEXOS can load, execute, and run the compressed CEIP portfolio model using the PLEXOS long-term capacity expansion software. PacifiCorp will also file a version of the same PLEXOS input and output files in an easily accessible format, such as Excel. Due Date: 2025 CEIP.	PLEXOS implementation is complex, and each implementation is unique. PacifiCorp has, and will continue to, advise knowledgeable parties as regards the company's implementation, and will provide a readme file with instructions. These instructions are expected to include the possibility of contacting PacifiCorp to schedule further assistance, if required. An accessible version of PLEXOS inputs will be included with filed workpapers.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 10	Transparency Condition 2. PacifiCorp will make a meaningful effort to review each workpaper file for sensitive commercial information and to the extent reasonable ensure that any non-confidential information within a workpaper designated as confidential is also provided in a non-confidential workpaper. With this understanding, PacifiCorp will not file with confidential designation any information that is not commercially sensitive, including (but not limited to) information filed with the Commission in other dockets without confidential designation, and information reported to the Commission or any other regulatory body that is reported without confidential designation. Due Date: 2025 CEIP.	PacifiCorp is committed to transparency and continues the commitments to provide an expanded set of public workpapers in which commercially sensitive data has either been aggregated or removed in both its 2025 IRP and CEIP.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 10	Transparency Condition 3. PacifiCorp's workpaper index will include a parenthetical, naming convention, taxonomy, or other description that is intuitive and makes it easy to tell what is in each file and how one file connects with another. Due Date: 2025 CEIP.	PacifiCorp's 2025 IRP and CEIP meet this condition.

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Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 10	Transparency Condition 4. PacifiCorp will provide non-disclosure agreements (NDAs) for interested parties to sign in future CEIP dockets subject to relevant and appropriate confidentiality objections, even if the CEIP is not being adjudicated, so that those individuals can view confidential data filed in the docket. Due Date: 2025 CEIP.	PacifiCorp's 2025 IRP and CEIP meet this condition.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 10	Transparency Condition 5. PacifiCorp will include a read-me tab at the beginning of each summary report Excel workpaper that explains what information or data is in each subsequent tab, and PacifiCorp's workpaper index will crosswalk how that data flows through to other tabs and other workpapers (i.e., analytic files) that may depend on data from the given file. Due Date: 2025 CEIP.	PacifiCorp's 2025 IRP and 2025 CEIP meet this condition.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 10	Transparency Condition 6. PacifiCorp will: (1) fund the purchase of four (4) full or partial licenses for Staff to use the PLEXOS model, including reasonable development, training, and support provided by Energy Exemplar to train Staff how contract negotiations with Energy Exemplar; and (3) provide live PLEXOS support to Staff regarding PacifiCorp's CEIP modeling, not to exceed 4 hours each month, that includes but is not limited to, live demonstration of portfolio runs, and review of file inputs for all relevant models used in PacifiCorp's CEIP (if relying on screen shots of PLEXOS files or email question-and-answer support is not sufficient). This support provided by PacifiCorp shall not include general PLEXOS development, training, or support. The parties do not object to the Company seeking full cost-recovery of these PLEXOS-related licensing costs, expenses, and support. Due Date: Contract discussions to begin	PacifiCorp has entered into an agreement with Washington Commission staff and Energy Exemplar to fulfill a modified version of this condition.

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	within 60 days of the date of the Commission’s final order in this case.	
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 10	Transparency Condition 7. As part of its CEIP workpapers, PacifiCorp will provide a list of all the resources (including generating units, conservation, demand response, and any other resource types) that it allocates to serve Washington customers throughout that CEIP, the fuel source for each resource, and a yearly breakdown of the forecasted MWh allocated to Washington from that resource. Due date: 2024 Filing and 2025 CEIP.	The 2025 CEIP meets this condition, please refer to workpaper “250617-PAC-CEIP-WP-Fig-9,-Tbl-8,11-Interim-Targets-2025-CEIP-PP-10-01-2025.xlsx” which includes all Washington-allocated resources (aggregated by technology type) in the 2025 CEIP preferred portfolio and forecasted energy to meet CETA targets. Please refer to the highly confidential version of the workpaper for resource-specific detail, “250617-PAC-CEIP-WP-Fig-9,-Tbl-8,11-Interim-Targets-2025-CEIP-PP-10-01-2025-(HC).xlsx”.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 11	Transparency Condition 8. PacifiCorp will clearly identify an allocation of resources from both the 2020 RFP and 2022 RFP that the Company is specifically forecasting as dedicated for Washington CETA compliance, subject to applicable confidentiality concerns. Due Date: 2025 CEIP.	To the extent that resources were contracted and brought online as a result of the 2020 AS RFP, those resources and their allocation to Washington customers are reflected in this CEIP. PacifiCorp terminated the 2022 AS RFP, thus not acquiring any resources from that process.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 11	DSP Condition 1. PacifiCorp will conduct distribution system planning for Washington, including incorporating relevant learnings from the Company’s similar efforts in Oregon, and evaluate Washington-specific costs and benefits, including the equitable distribution of benefits and burdens to vulnerable populations and highly impacted communities. During this process, PacifiCorp will solicit stakeholder input regarding options and priorities for various strategies, including resources that are not owned or controlled by PacifiCorp. The parties do not object to the Company seeking full cost-recovery of these DSP costs and expenses. Due Date: 2025 CEIP.	PacifiCorp addressed DSP Condition 1 by continuing work under its Biennial Conservation Plan and CEIP process, incorporating lessons learned from Oregon’s Distribution System Planning and applying them in Washington. This builds on work already completed in the 2024–2025 Biennial Conservation Plan by reviewing Volt Var Optimization opportunities and extends efficiency to forecasts for through 2026–2027. In 2024, PacifiCorp held four CEIP workshops and participated in an Equity Advisory Group (EAG) one-on-one local workshops to address gather stakeholder input regarding DSP challenges and opportunities, including nontraditional solutions, technological barriers, and equity impacts. Based on this feedback, PacifiCorp determined that continuing DSP efforts within the Biennial Conservation Plan framework is the most effective approach. Future CEIP filings will document Washington specific costs, benefits, and equity considerations, with stakeholder input gathered through the EAG and CEIP engagement. In addition, the DSP Team will support development of the Distributional Equity Analysis (DEA) framework for capital projects.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 11	Stakeholder Engagement Condition 1. For the 2025 CEIP, after consultation with the LIAC, DSMAG, and EAG, PacifiCorp will file a draft CEIP on a	At a CEIP Engagement Series meeting on August 6, 2024, this requirement was first shared verbally, and time was given for attendees to weigh in on the initial proposed timeframe for PacifiCorp’s Draft 2025 CEIP and feedback process. Attendees, including parties and advisory group members, did not object to a draft filing date of

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Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
	timeline the Company and parties to this CEIP determine sufficient to incorporate comments from the advisory groups on the draft CEIP into the final CEIP. PacifiCorp must offer at least one joint consultation session in which all advisory group members are invited to attend and converse with members of other advisory groups with the purpose of sharing feedback on both the draft CEIP and the consultation process itself. Due date: To be determined in consultation with parties to the CEIP.	45 days before the final filing, which resulted in PacifiCorp filing the Draft 2025 CEIP on August 15, 2025. The filing was concurrently posted publicly and distributed to all interested parties and Washington Advisory Groups. The company then held an advertised CEIP Engagement Series meeting inviting the public, Washington-interested parties, Commission staff and Washington advisory group members on August 26, 2025. PacifiCorp collected and responded to feedback received prior to September 5, 2025, which is summarized in Appendix A.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 11	Incremental Cost Condition 1. PacifiCorp will only report the results of the incremental cost calculation required by rule, or Commission order in related docket(s) (e.g., UE-220376). Due Date: 2025 CEIP.	The 2025 CEIP meets this condition.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 11	Incremental Cost Condition 2. The workpapers that PacifiCorp supplies to support its incremental cost calculation will list all investments and expenses that the utility plans to make during the period in order to comply with the requirements of RCW 19.405.040 and 19.405.050, and demonstrate that those investments and expenses are directly attributable to actions necessary to comply with, or make progress towards, the same RCW provisions. Due Date: 2025 CEIP.	The 2025 CEIP meets this condition but PacifiCorp notes that the 2025 CEIP preferred portfolio includes proxy resource selections, and all forecasted resource-specific investments and expenses are only proxies for actual resource selections and associated costs that will be made through a resource acquisition process like the ongoing 2025 Washington Situs RFP process.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 11	Incremental Cost Condition 3. PacifiCorp will participate in any further discussions and/or workshops regarding incremental cost calculations and incorporate any changes necessary to their methodology. Due Date: As applicable.	PacifiCorp is not aware of additional discussions or workshops applicable to this requirement at this time.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 11	Interim Target Condition 1. The parties agree that the Commission should approve PacifiCorp's 2022-2025 Revised CEIP interim targets that were based on then reasonable information and permit the Company to update these targets as necessary in the 2023 Biennial CEIP Update. Due Date: N/A	Not applicable.

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Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 12	Interim Target Condition 2. In accordance with WAC 480-100-610(4)(c) and WAC 480-100-640(2)(a)(ii), PacifiCorp will demonstrate how its interim targets ensure that all customers are benefiting from the transition to clean energy through: the equitable distribution of energy and nonenergy benefits and reduction of burdens to vulnerable populations and highly impacted communities; long-term and short-term public health and environmental benefits and reduction of costs and risks; and energy security and resiliency. Due Date: 2024 Filing.	PacifiCorp met this requirement in its CEIP 2024 Annual Progress report but continues to build a narrative describing how its utility actions support equitable outcomes for customers. For more information see Chapter VIII – Customer Benefit Indicators and Chapter IX – Specific Actions.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 12	Interim Target Condition 3. PacifiCorp will optimize its resource portfolio at lowest reasonable cost, when accounting for risk, using its long-term capacity expansion portfolio optimization software (PLEXOS) to model its CEIP targets for the entire compliance period through 2045, and not linearly interpolate its 2041-2045 targets from its modeling of the 2021-2040 time period. Due Date: 2025 CEIP.	Both the 2025 IRP and CEIP meet this requirement by running 21-year models.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 12	Interim Target Condition 4. In future CEIPs, PacifiCorp will continue to include descriptions of quantitative (i.e., cost based) and qualitative (e.g., equity considerations) analyses that support interim targets to comply with CETA's 2030 and 2045 clean energy standards. Due Date: 2025 CEIP.	The 2025 CEIP meets this condition to the extent possible, but PacifiCorp notes that all supply-side resource selections in the 2025 CEIP are based on proxy resources and costs, and therefore equity considerations in terms of direct impacts to customers are not readily quantifiable. However, as discussed throughout the 2025 CEIP, PacifiCorp continues to consider both cost and energy equity throughout its planning and decision-making process.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 12	Interim Target Condition 5. In its 2025 CEIP, PacifiCorp will continue to advance the application of Non-Energy Impacts and Customer Benefit Indicators to all resource and program selections in determining its Washington resource strategy and will incorporate any guidance given by the Commission on how to best utilize CBIs in CEIP planning and evaluation. PacifiCorp agrees to engage and consult with its applicable advisory groups (including the IRP, demand-side management, and Equity advisory groups) regarding an appropriate methodology for including	In 2025, Advisory Groups were provided with a review of updated NEI research and studies and recommended updates to NEIs and NEI values for the 2026-2027 biennium, to continue to include all quantifiable and attributable NEIs in cost-effectiveness analysis. A similar review and update will take place in 2027 for the 2028-2029 biennium.

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	NEIs and CBIs in its resource selection. Due Date: 2025 CEIP.	
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 12	Interim Target Condition 6. PacifiCorp will update its CEIP with accurate and up-to-date cost information for all its specific actions, including incorporating applicable provisions of the Inflation Reduction Act (IRA). At a minimum, PacifiCorp should incorporate, from the IRA, assumptions pertaining to bonus tax credits for replacement generation in “energy communities,” the availability of low-cost financing from the U.S. Department of Energy under the Energy Infrastructure Reinvestment (EIR) program, and make adjustments to the Company’s load forecast to account for the Greenhouse Gas Reduction Fund and the High-Efficiency Electric Home Rebate Program, if warranted. Due Date: 2025 CEIP.	Federal funding has changed significantly since the advent of this condition. The future of federal funding under the IRA and EIR programs has been reduced and remains in flux. PacifiCorp has implemented its best understanding of these changes in its modeling. The 2025 IRP provided sensitivities regarding high and low potential for federal legislative impacts including IRA impacts. These sensitivities provide bookends around a range of possible outcomes and are considered in the context of alternative path analysis. PacifiCorp continues to pursue available cost savings for customers and expects savings opportunities to be reflected in resource acquisition processes, such as impacts on RFP resource bids. See PacifiCorp’s 2025 IRP, Volume I, Chapter 8 and 9. Additionally, Chapter IX of PacifiCorp’s 2025 CEIP, subsection Federal and State Grant and Loan Opportunities, addresses this provision to the extent relevant.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 12	Interim Target Condition 7. PacifiCorp will rewrite its specific actions chapter to demonstrate how each specific action clearly addresses each provision of WAC 480- 100-640(5) and (6), including each specific action's general location, proposed timing and estimated cost; whether it will be located in a highly impacted community; whether a supply-side or demand-side resource will be governed by, serve, or benefit highly impacted communities or vulnerable populations; how each action impacts applicable CBIs (including direction and magnitude); how each action demonstrates progress toward or is consistent with the standards in WAC 480-100-610; how each action is consistent with the proposed interim and specific targets, the utility's IRP, and its resource adequacy requirements; and how each action helps the	This condition was completed and included as part of PacifiCorp’s 2024 CEIP Progress Report filed July 1, 2024.

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Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
	utility meet the clean energy transformation standards at the lowest reasonable cost. Due Date: 2024 Filing.	
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 13	Interim Target Condition 8. PacifiCorp will demonstrate, through its CEIP narrative and associated workpapers, how its chosen specific actions are designed to impact its chosen CBIs, and how its chosen CBIs influenced how it chose its specific actions. Due Date: 2025 CEIP.	PacifiCorp's 2025 WA Situs RFP incorporates the CBI framework in its bid ranking methodology through the development of non-price scoring. Chosen CBIs directly influence the development and selection of specific actions for each demand-side program, as described in detail in Chapter IX.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 13	Interim Target Condition 9. PacifiCorp will clearly express its 2022-2025 renewable energy target as a percent of the Company's Washington retail sales of electricity supplied by renewable resources. Due Date: 2024 Filing.	This condition is met.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 13	Interim Target Condition 10. If PacifiCorp does not update in its 2023 Biennial CEIP Update, PacifiCorp will update its demand response target, and the steps it has taken since the filing of the original CEIP to implement demand response programs, and evaluate methods to acquire additional demand response outside of the responses it received in its 2021 request for proposals. Due Date: 2025 CEIP.	The 2025 CEIP meets this condition.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 13	Interim Target Condition 11. PacifiCorp will provide a sensitivity analysis from the CEIP portfolio that removes the Natrium demonstration project from the preferred portfolio in 2028 that identifies resource alternatives and system impacts. Inclusion of the Natrium demonstration project in the CEIP portfolio in no way pre-determines the prudence of the Company's decision to invest in the Natrium plant. Due Date: 2024 Filing.	This condition was completed and included as part of PacifiCorp's 2024 CEIP Progress Report filed July 1, 2024.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 13	Interim Target Condition 12. Regarding PacifiCorp's specific actions in the category of community outreach and engagement, PacifiCorp will include details in the CEIP about the Company's marketing	PacifiCorp's marketing plans, as outlined in the 2025 CEIP, focus on improvements to the delivery of programs and communications to customers including those in named communities (see Chapter IX). PacifiCorp will continue working directly with community partners to assess needs for additional outreach and will develop

B.3 - IRP and CEIP Requirements and Handling		
Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
	plans, including any measurable targets, goals, or objectives such as number of events or customers and small businesses that they hope to reach. Due Date: 2025 CEIP.	materials based on those conversations. Additionally, considerations will be made for customers without access to a computer or the internet. Digital and printed materials in Spanish will be available to customers and community organizations to provide information about program offerings. PacifiCorp will also continue to identify and expand outreach to nonprofits that provide services to named communities more directly.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 13	Miscellaneous Condition 1. PacifiCorp will fully and actively engage with all of its advisory groups, including the LIAC and DSM Advisory Group, in developing future CEIPs and CEIP updates. PacifiCorp will offer at least one joint consultation session in which all advisory group members are invited to attend and converse with members of other advisory groups with the purpose of sharing feedback on the CEIP, CEIP updates, and the consultation process itself. PacifiCorp will also, in future CEIPs and CEIP updates, describe how feedback is incorporated both from its advisory groups and the public into its CEIP. Due Date: 2025 CEIP	PacifiCorp held a joint engagement session on August 26, 2025, to review its Draft 2025 CEIP and solicit feedback. The company also communicated that it would accept written feedback over a period of three weeks, which is summarized in Appendix A, including how the company incorporated this feedback if applicable. For more information regarding the overall engagement strategy, please refer to Chapter III and Chapter IX, subsection Communications, Outreach and Engagement.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 14	Miscellaneous Condition 2. PacifiCorp will include a publicly available and regularly updated list of its EAG members and their organization or community affiliations on its website and in future Biennial CEIP Updates and CEIPs. Due Date: 2024 Filing and 2025 CEIP.	This condition is met. Please refer to PacifiCorp's website at https://www.pacificpower.net/community/washington-clean-energy-transformation-act-equity.html
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 14	Miscellaneous Condition 3. In collaboration with its EAG, and LIAC, and per WAC 480-100-640(5)(a) and (c), PacifiCorp agrees to identify at least one specific action that will serve a designated subset of Named Communities, and to identify and track all CBIs relevant to this specific action. The location identified for the specific action will be at the granularity of the designated Named Communities subset. Due Date: 2025 CEIP.	Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, CBI Condition 13 requires PacifiCorp to select at least two CBIs and work with stakeholders to determine which five subsets of its named communities, and at what level of granularity, they should be tracked and reported on. PacifiCorp selected CBI 1 (increase culturally and linguistically responsive outreach and program communication) and CBI 6 (decrease households experiencing high energy burden) for this effort. In July 2025, PacifiCorp held a listening session with its Equity Advisory Group

B.3 - IRP and CEIP Requirements and Handling		
Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
		(EAG) to gather input on prioritizing named community subsets and determining the appropriate tracking granularity. EAG members emphasized the importance of including Hispanic/Latino/a/e communities, low-income migrants, multi-generational households, renters, agricultural workers, and non-English-speaking populations. The company identified census tracts as the appropriate level of tracking granularity because of the diminishing returns associated with reporting at a higher-level of granularity with regard to these CBIs specifically. Refer to Chapter VIII for more in-depth discussion of the company’s vulnerable populations update and its chosen CBIs.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 14	Miscellaneous Condition 4. PacifiCorp will evaluate methods to improve the alignment of the Company's planning and procurement processes and provide a narrative description of how it plans to align the planning and procurement processes in the 2025 CEIP. Due Date: 2025 CEIP.	The CEIP process is rooted in the IRP outcomes, and timing is such that the company primarily relies on market signals delivered by IRP outcomes for procurement planning. To the extent that the CEIP provides materially different signals regarding the type, timing and location of resources, compared to the IRP, this will be used in the evaluation of resources in procurement decisions. Refer to Chapter IX, subsection Supply-Side Resource Actions for more information regarding PacifiCorp’s resource acquisition process.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 14	Miscellaneous Condition 5. PacifiCorp will incorporate its ongoing climate analysis into the 2025 CEIP and future CEIPs. Due Date: 2025 CEIP.	The 2025 IRP and CEIP meet this condition with the inclusion of climate change as a base assumption.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 14	Miscellaneous Condition 6. PacifiCorp will prepare a sensitivity PLEXOS model run that excludes non-commercialized resources from the candidate resource list and relies upon clean resources, including offshore wind, demand response, enhanced geothermal, iron-air batteries or similar long duration storage, and high-capacity factor solar plus storage (among other resources), to meet identified reliability gaps. Due Date: 2025 CEIP.	The 2025 IRP met this condition with its ‘no nuclear’ and ‘no future technology’ variants, as described in PacifiCorp’s 2025 IRP, Volume I, Chapter 8.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 14	Miscellaneous Condition 7. While inclusion in the CEIP could factor into a prudence determination, PacifiCorp agrees not to rely solely on the 2021 CEIP to justify prudence of utility scale renewable resource acquisitions made on or after January 1, 2022. While the CEIP may include specific actions	The CEIP will never be the sole driver or determinant of resource acquisition decisions, and prudency determinations will be made through the appropriate rate case proceeding.

B.3 - IRP and CEIP Requirements and Handling		
Reference	Requirement or Recommendation	2025 IRP/CEIP Approach
	PacifiCorp may take to comply with CETA's clean energy targets, prudence determinations of utility scale renewable resource acquisitions will be made through the general rate case process. Due Date: N/A.	
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 14	Miscellaneous Condition 8. PacifiCorp must demonstrate or describe the steps it is taking or plans to take to make it easier for customers to self-report status as a member of a vulnerable population; how it has used census data to identify vulnerable populations, and how it has taken other steps to identify customers who are members of vulnerable populations in connection with the CBIs in its Revised CEIP and this Settlement Document, which should target vulnerable populations and not just Highly Impacted Communities. Due Date: 2025 CEIP.	As discussed at length in Chapter VIII, PacifiCorp adopted an updated vulnerable populations geographic methodology in January 2025 that applies quantifiable vulnerability criteria to identify named communities in its service area. Program enrollment and tracking data are then merged with these classifications (at the census tract level) to estimate the share of program participants from named communities for its CBI reporting. In addition, PacifiCorp reports out on CBIs for vulnerable populations separately from Highly Impacted Communities, as demonstrated in its 2024 CEIP Progress Report , Table 4 of the company's 2025 CEIP Progress Report filing, the CBI table in the CEIP CBIs Report Card . While this methodology relies primarily on publicly available data that does not allow for customers to self-identify as vulnerable, PacifiCorp does provide opportunities for customers to self-identify as vulnerable through its Medical Certificate and Access and Functional Needs Self-Certification programs.
	Miscellaneous Condition 9. PacifiCorp must specify whether it has sold any Washington-allocated renewable energy credits (RECs) from renewable resources identified for CEIP compliance. Due Date: 2024 Filing and 2025 CEIP.	Not applicable. PacifiCorp does not sell any RECs associated with Washington's allocation of renewable resources or for renewable resources identified for CEIP compliance.
Docket UE-210830, Order 01, Attachment A, condition 11a	During CPA development, demonstrate progress towards identifying, researching, and properly valuing NEIs. Docket UE-210830, Order 01, Attachment A, condition 11a	Starting with the 2021 IRP cycle, PacifiCorp has been discussing with the DSM Advisory Group and EAG its research, findings, and ongoing progress with NEIs. Since that time, PacifiCorp has also been incorporating NEIs into planning: specifically, the 2023 and 2025 CPAs have both included measure-specific NEI adjustments. Please see PacifiCorp's 2025 IRP, Volume II, CPA Appendix E for further information.

Clean Energy Implementation Guidance

On May 19, 2025, the WUTC issued Order 16, rejecting PacifiCorp’s 2023 Biennial CEIP Update.² In rejecting PacifiCorp’s update, the Commission stated that there is “no need for the Commission to consider whether to impose conditions on acceptances as proposed by Staff and other parties,” however the Commission “encourages the Company to adopt many of the proposed conditions as their own in the 2025 CEIP, 2027 BCEIP, and other filings.”³

PacifiCorp acknowledges the Commission’s encouragement to fulfill many of Staff and parties suggested changes in future CEIP filings. Given that the order on the 2023 Biennial CEIP Update was received days before the 2025 IRP was filed, and while preparation for the 2025 CEIP was well underway, PacifiCorp recognizes not all suggested conditions can or should be fully incorporated into this CEIP. However, PacifiCorp remains committed to improvements across all its planning and implementation activities and processes related to clean energy planning. Table B.4 below summarizes suggested changes made by Commission Staff and other parties during the adjudication of the 2023 Biennial CEIP as noted in Commission Order 16.

Table B.4 – 2023 Biennial CEIP Guidance

B.4 – Party Suggested Changes Final Order 16		
Reference	Suggestion	2025 CEIP Approach
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 1-2	The Commission expects PacifiCorp to submit new interim targets for years 2026-2029 in their 2025 CEIP.	The 2025 CEIP implements this recommendation.
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 33	Staff’s Proposed Condition 1: Public Participation Plan (PPP) - PacifiCorp will provide an updated public participation plan that includes the action items in the Suggested Actions section of Staff’s January 11, 2024, comments filed in the docket, due by May 1, 2025, in the PPP.	PacifiCorp’s 2025 PPP largely implemented this suggestion.

² Docket UE-210829, Order 16 (May 29, 2025).

³ *Id.* at 1.

B.4 – Party Suggested Changes Final Order 16		
Reference	Suggestion	2025 CEIP Approach
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 33	Staff’s Proposed Condition 2: Allocation Methodology – PacifiCorp agrees to use only the allocation methodology approved by the Commission, which is currently the Western Interjurisdictional Methodology or WIJAM, beginning with the 2025 Integrated Resource Plan (IRP) and any future planning documents.	The 2025 CEIP implements this recommendation in the determination of the CEIP preferred portfolio. The 2025 CEIP also includes sensitivity results for the preferred portfolio under PacifiCorp’s currently proposed Washington 2026 Protocol. See Chapter VI more detail.
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 33	Staff’s Proposed Condition 2(a): Moreover, in its upcoming general rate case (GRC), PacifiCorp will submit several new allocation methodology options. Each option will include an increase in the proportion (from what the WIJAM currently allocates) of renewable and non-emitting resources to Washington. This new methodology must be incorporated into the next GRC, implemented by the beginning of 2026, and approved before its application in a planning docket.	Not applicable to the 2025 CEIP.
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 33	Staff’s Proposed Condition 2(b): In addition to presenting several different methodology options for increasing the allocation of renewable and non-emitting resources to Washington, the company shall provide power cost modeling for each methodology option presented to allow for the evaluation of the potential rate impact of each.	Not applicable to the 2025 CEIP.
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 33	Staff’s Proposed Condition 3: IRA and IIJA Modeling – PacifiCorp will follow the Commission’s policy statement in Docket U-240013 regarding the Inflation Reduction Act (IRA) and Infrastructure Investment Jobs Act (IIJA) implementation into the planning process. Due: Starting in the 2025 IRP (due March 31, 2025), CEIP (due October 1, 2025) and beyond.	The 2025 CEIP implements this recommendation.

B.4 – Party Suggested Changes Final Order 16		
Reference	Suggestion	2025 CEIP Approach
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 33	Staff’s Proposed Condition 4: Resource Acquisition – PacifiCorp shall submit a plan detailing how – and on what timeline – resource needs will be met including: (a) How PacifiCorp is going to meet 2030 CETA standards; (b) How it intends to acquire resources to fulfill that plan outside of the 2022 all-source request for proposals (ASRFP); (c) What resources the company has already acquired, in nameplate MWs and projected annual MWh (both total and Washington customer allocated per WI-JAM); (d) When the projected resources are expected to be online (i.e., commercial operation dates) for new resources, or contract start dates for existing resources; (e) An outline of all steps taken to ensure that the acquisition of resources occur at the lowest reasonable cost; and (f) The plan shall be due 90 days after the final order is issued.	Not applicable to the 2025 CEIP.
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 33	Staff’s Proposed Condition 5: 2025 Resource Acquisition – PacifiCorp shall not cancel, suspend, or terminate an RFP that originates from resource needs identified in the 2025 IRP. All prudency decisions will be determined by the Commission in a general rate case or other appropriate filing such as annual power cost adjustment filings.	The 2025 CEIP includes the 2025 Washington Situs RFP as a specific action, and will adhere to this condition.
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 33	Staff’s Proposed Condition 6: Interim Targets – PacifiCorp’s 2025 CEIP will include a 2029 interim target of at least 73 percent of retail sales supplied by non-emitting and renewable resources, as modeled in its Revised 2021 CEIP. Due: 2025 CEIP, on or before October 1, 2025.	The 2025 CEIP proposes interim targets based on least-cost modeling, after consideration of risk, and current planning conditions. Based on these conditions, the model results in a selection of resources that contribute to a relatively flat trajectory of progress in interim targets before 2030. In response to stakeholder feedback, PacifiCorp included model drivers starting in 2028 to incentivize additional build of CETA-compliant resources. This results in a 71 percent interim target for the percent of retail sales supplied by non-emitting and renewable resources for 2029.

B.4 – Party Suggested Changes Final Order 16		
Reference	Suggestion	2025 CEIP Approach
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 33	Staff’s Proposed Condition 7: Minimum Designation and Program Design – The company will work with advisory groups to designate at minimum 27% of benefits measured across each component of distributed energy resources to flow to named communities during the 2026-2029 compliance period. Due: 2025 CEIP, on or before October 1, 2025.	PacifiCorp will begin engaging its DSM Advisory Group, and other Advisory Groups, in its September 2025 DSM Advisory Group meeting, and continue engaging through 2026, to discuss a non-binding minimum threshold of energy efficiency and demand response program benefits to flow to customers in Named Communities. The company plans to note UTC Staff’s recommended minimum threshold of 27% and work with Advisory Groups to define and plan for a non-binding minimum threshold.
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 33	Staff’s Proposed Condition 8: Resource Adequacy – PacifiCorp will provide additional narrative and any supporting work papers on capacity calculation regarding any resources for which effective load carrying capacity (ELCC) is not used. The company must include a qualitative and quantitative analysis showing how the other method improves the time dynamics aspects of its firm capacity calculations and explain if there are any other incremental improvements to the company’s previous methods and metrics. Due: This directive applies to all subsequent CEIP-related documents and IRPs 2025 and beyond.	For the purpose of portfolio development and assessing planning reserve margin requirements in the 2025 IRP, PacifiCorp used capacity contribution inputs based on ELCC analysis performed by the WRAP-based on the combined loads and resources of WRAP participants. Because WRAP data is based on near-term loads and resource mix, PacifiCorp also developed long-term projections of the WRAP contributions for solar, wind, and energy storage that help capture the expected increasing penetration of these resource types across the WRAP footprint. This analysis is presented in Appendix K (Capacity Contribution) of the 2025 IRP. Because the WRAP analysis doesn’t identify specific periods of risk, the 2025 IRP also assesses PacifiCorp’s loss of load risk under a range of weather conditions developed based on historical data. A description of these stochastic inputs was provide in Appendix H (Stochastics) of the 2025 IRP, and analysis of the availability of various resource options during those at risk periods was included in Appendix K.
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 55	CRITFC Proposed Condition 1: Full potential for energy efficiency, weatherization, demand response, and distributed generation resource development assessment.	PacifiCorp, through its Tribal Liaison, will engage with the Yakama Nation and affected Tribal communities to ensure that they are involved in the Public Input process for the company’s 2027 IRP, which will begin engagement in 2026 and include these topics.
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 55	CRITFC Proposed Condition 2: Develop a five-year development plan and budget for energy efficiency, weatherization, demand response, and distributed generation resource development identified in its assessment.	PacifiCorp, through its Tribal Liaison, will engage CRITFC to ensure it is aware of and engages with the company’s Washington Advisory Group meetings in which energy efficiency, weatherization, and demand response program plans and budgets are discussed and developed.

B.4 – Party Suggested Changes Final Order 16		
Reference	Suggestion	2025 CEIP Approach
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 55	CRITFC Proposed Condition 4: Work with the Yakama Nation and CRITFC to develop Community Benefit Indicators that reasonably reflect the Yakama Nation’s treaty rights and the lives of its people, as expressed through their traditions, culture, and needs.	PacifiCorp, through its Tribal Liaison, will work with the Yakama Nation and CRITFC to ensure they are included in the company’s Equity Advisory Group (EAG) and Demand-Side Management (DSM) Advisory Group meetings, at which the company’s Community Benefit Indicators are developed, discussed, and refined.
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 50	Intervenor Parties (Renewable Northwest, Northwest Energy Coalition, and The Energy Project) Proposed Condition 1: Mandate a Request for Proposals (RFP). Recommend that the Commission require PacifiCorp to conduct near-term resource procurement through an RFP to address PacifiCorp’s reduction in interim targets and concerns for whether PacifiCorp can meet Clean Energy Transformation Act (CETA) targets.	PacifiCorp issued a Washington situs RFP to market on September 2, 2025, to solicit near-term resources to serve Washington customers. For more information refer to Chapter IX – subsection, Supply-Side Resource Actions.
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 54	Intervenor Parties (Renewable Northwest, Northwest Energy Coalition and The Energy Project) Proposed Condition 2: Distributed Energy Resource (DER) Program Design. Recommend the Commission to provide guidance to PacifiCorp as it relates to energy equity. Recommend the Commission require PacifiCorp to set minimum designations for each of its DER program offerings for its Named Communities. (Recommended a 30 percent minimum designation, consistent across Washington utilities.)	PacifiCorp will begin engaging its Demand-Side Management (DSM) Advisory Group, and other Advisory Groups, in its September 2025 DSM Advisory Group meeting, and continue engaging through 2026, to discuss a non-binding minimum threshold of energy efficiency and demand response program benefits to flow to customers in Named Communities. The company plans to note UTC Staff’s recommended minimum threshold of 27% and work with Advisory Groups to define and plan for a non-binding minimum threshold.

B.4 – Party Suggested Changes Final Order 16		
Reference	Suggestion	2025 CEIP Approach
Docket UE-210829, Order 16: Final Order – Rejecting Clean Energy Implementation Plan Biennial Update p. 50	Intervenor Parties (Renewable Northwest, Northwest Energy Coalition, and The Energy Project) Proposed Condition 2a-d: a) Allocation of a specified portion of each DER program budget for named community outreach, recruitment, and participation; b) 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; c) Dedicated outreach, education, and recruitment strategies which clearly establish how PacifiCorp will target named communities – including vulnerable populations – for involvement in its DER programs; d) Expansion of existing incentives beyond highly impacted populations to include low-income and vulnerable populations.	PacifiCorp will begin engaging its DSM Advisory Group, and other Advisory Groups, in its September 2025 DSM Advisory Group meeting, and continue engaging through 2026, to discuss appropriate steps to ensure named communities are able to engage in DER programs. Discussion will address desired outcomes and targets, and whether there is need for additional administrative or program design adjustments. PacifiCorp will share the language of this recommendation from Order 16 with stakeholders.

APPENDIX C – SPECIFIC ACTIONS

Introduction

This appendix summarizes all PacificCorp’s specific actions described in this 2025 CEIP, in tabular format.

Supply-Side Resources

Specific Actions	Location	Description	Nameplate Capacity (MW) By 2030	Projected Cost ¹	Benefit Area	Impacted CBIs	Non-Energy Impacts	Named Community Impact	Reference
Proxy WMV Solar	Willamette Valley	Proxy solar - photo voltaic resource selection located in Willamette Valley load bubble	23	\$28,744,101	energy benefits	Increase renewable energy resources; Reduce global and local pollution emissions	Offset emitting generation, potentially create economic opportunities	Proxy Resource - Actual Location/Impact Unknown	2025 CEIP Preferred Portfolio
Proxy WWA Solar	Walla Walla	Proxy solar - photo voltaic resource selection located in Walla Walla load bubble	711	\$881,927,061	energy benefits	Increase renewable energy resources; Reduce global and local pollution emissions; Increase named community clean energy	Offset emitting generation, potentially create economic opportunities	Proxy Resource - Actual Location/Impact Unknown	2025 CEIP Preferred Portfolio
Proxy YAK Solar	Yakima	Proxy solar - photo voltaic resource selection located in Yakima load bubble	157.25	\$185,118,486	energy benefits	Increase renewable energy resources; Reduce global and local pollution emissions; Increase named community clean energy	Offset emitting generation, potentially create economic opportunities	Proxy Resource - Actual Location/Impact Unknown	2025 CEIP Preferred Portfolio
Proxy WWA Wind	Walla Walla	Proxy wind resource selection located in Walla Walla load bubble	709	\$1,048,692,819	energy benefits	Increase renewable energy resources; Reduce global and local pollution emissions; Increase named community clean energy	Offset emitting generation, potentially create economic opportunities	Proxy Resource - Actual Location/Impact Unknown	2025 CEIP Preferred Portfolio

¹ Upfront build cost in initial build year nominal dollars

Specific Actions	Location	Description	Nameplate Capacity (MW) By 2030	Projected Cost ¹	Benefit Area	Impacted CBIs	Non-Energy Impacts	Named Community Impact	Reference
Proxy WWA 4-hr Battery	Walla Walla	Proxy 4-hour battery resource selection located in Walla Walla load bubble	445	\$678,657,568	energy benefits	Increase renewable energy resources; Reduce global and local pollution emissions; Increase named community clean energy	Offset need for additional utility-scale resources, resiliency	Proxy Resource - Actual Location/Impact Unknown	2025 CEIP Preferred Portfolio
Proxy YAK 4-hr Battery	Yakima	Proxy 4-hour battery resource selection located in Yakima load bubble	17	\$25,754,919	energy benefits	Increase renewable energy resources; Reduce global and local pollution emissions; Increase named community clean energy	Offset need for additional utility-scale resources, resiliency	Proxy Resource - Actual Location/Impact Unknown	2025 CEIP Preferred Portfolio

Energy Efficiency

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity (MW)	Incremental Energy Savings (kWh @gen)	Projected Incremental Cost	Total Expenditures	Non-energy Impacts	Reference
Home Energy Savings Program										
Multifamily window incentives	High	Enhanced incentives for windows in multi-family units on residential rate schedules with focus on buildings in Highly Impacted Communities.	Reduction of burdens Non-energy benefits Energy benefits	Increase participation in Company energy and efficiency programs Increase efficiency of housing stock and small businesses, including low-income housing Decrease households experiencing high energy burden Increase community-focused efforts and investments Increase Named Community clean energy	0.16	650,578	\$0	\$600,000	\$ 108,756	2026-2027 DSM Business Plan - Docket TBD

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity (MW)	Incremental Energy Savings (kWh @gen)	Projected Incremental Cost	Total Expenditures	Non-energy Impacts	Reference
Direct install duct sealing	High	Continued direct install duct sealing in highly impacted communities. The emphasis on this program offer originally focused on customers in manufactured homes and the effort was so successful reaching this customer segment that the program shifted to single family homes in highly impacted communities	Reduction of burdens Non-energy benefits Energy benefits	Increase participation in Company energy and efficiency programs Increase efficiency of housing stock and small businesses, including low-income housing Decrease households experiencing high energy burden Increase community-focused efforts and investments Increase Named Community clean energy	0.20	825,003	\$13,845	\$4,133,760	\$ 182,434	2026-2027 DSM Business Plan - Docket TBD
Enhanced HVAC incentives	High	Enhanced incentives for customers in Vulnerable Population Communities for the following HVAC measures: Ductless Heat Pump replacing electric heating; Federal Standard	Reduction of burdens Non-energy benefits Energy benefits	Increase participation in Company energy and efficiency programs Increase efficiency of housing stock and small businesses,	0.22	868,520	\$264,584	\$636,400	\$ 25,519	2026-2027 DSM Business Plan - Docket TBD

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity (MW)	Incremental Energy Savings (kWh @gen)	Projected Incremental Cost	Total Expenditures	Non-energy Impacts	Reference
		Heat Pump Conversion; 9.0+ HPSF Heat Pump Conversion		including low-income housing Decrease households experiencing high energy burden Increase Named Community clean energy						
New construction offerings	Low	Continued promotion of new construction offerings for multifamily and single-family units with an emphasis on Highly Impacted Communities.	Reduction of burdens Non-energy benefits Energy benefits	Increase participation in Company energy and efficiency programs Increase efficiency of housing stock and small businesses, including low-income housing Decrease households experiencing high energy burden Increase community-focused efforts and investments Increase Named Community clean energy	0	0	\$0	\$0	\$0	2026-2027 DSM Business Plan - Docket TBD

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity (MW)	Incremental Energy Savings (kWh @gen)	Projected Incremental Cost	Total Expenditures	Non-energy Impacts	Reference
Assistance for non-electric, non-gas heating, replacement with ductless heat pumps	High	Serve named community residential customers who use non-electric and non-natural gas fuel sources in their primary heating systems by decommissioning these systems and installing ductless heat pumps. This measure will be offered at the same incentive rate as the typical ductless heat pumps measure, and will be available in single family, manufactured homes, and multifamily residences.	Reduction of burdens Non-energy benefits Energy benefits	Increase participation in Company energy and efficiency programs Increase efficiency of housing stock and small businesses, including low-income housing Decrease households experiencing high energy burden Improve indoor air quality Increase Named Community clean energy	0.04	144,440	\$0	\$108,800	\$8,703	2026-2027 DSM Business Plan - Docket TBD

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity (MW)	Incremental Energy Savings (kWh @gen)	Projected Incremental Cost	Total Expenditures	Non-energy Impacts	Reference
Wattsmart Business Program										
Higher incentives	High	Continue the small business enhanced incentive lighting and non-lighting offers targeting Small Businesses located in a Named Community (Highly Impacted Community and, starting in 2026, Vulnerable Population census tracts) and the smallest businesses using less than 30,000 kilowatt-hours per year (very small businesses) on Schedule 24. Continue to offer higher customer incentives than the regular small business offer with incentives capped at 100% (rather than 90%) of project costs for lighting to reduce the customer out-of-pocket cost barrier. Continue to offer approved small business lighting vendors a higher vendor incentive for completed lighting retrofit	Reduction of burdens Non-energy benefits Energy benefits	Increase participation in company energy and efficiency programs Increase efficiency of housing stock and small businesses, including low-income housing Increase Named Community clean energy	3.53	14,203,464	\$621,720	\$6,347,000	\$ 202,266	2026-2027 DSM Business Plan - Docket TBD

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity (MW)	Incremental Energy Savings (kWh @gen)	Projected Incremental Cost	Total Expenditures	Non-energy Impacts	Reference
		projects with Small Businesses in Named Communities (Highly Impacted Community and, starting in 2026, Vulnerable Population census tracts) and Very Small Businesses.								
Targeted small business delivery and outreach	High	Continue to target a portion of company-initiated proactive outreach to Small Businesses in Named Communities (Highly Impacted Community and, starting in 2026, Vulnerable Population census tracts) and Very Small Businesses; continue to tie proactive outreach to approved small business vendor capacity to respond to customer inquiries. Target a portion of company-initiated proactive outreach to business customers located on Tribal land.	Reduction of burdens Non-energy benefits Energy benefits	Increase participation in company energy and efficiency programs Increase efficiency of housing stock and small businesses, including low-income housing Increase community-focused efforts and investments Increase Named Community clean energy	0	0	\$0	\$0	\$0	2026-2027 DSM Business Plan - Docket TBD

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity (MW)	Incremental Energy Savings (kWh @gen)	Projected Incremental Cost	Total Expenditures	Non-energy Impacts	Reference
Low Income Weatherization										
Repair funds increase	High	Continuing to allow reimbursement for repairs up to 30 percent of the annual reimbursement on energy efficient measures received (increased from 15% in 2022).	Reduction of burdens Non-energy benefits Energy benefits	Increase efficiency of housing stock and small businesses, including low-income housing Increase participation in company energy and efficiency programs Decrease households experiencing high energy burden Increase Named Community clean energy Improve indoor air quality	0	0	\$208,000	\$3,317,088	\$ 1,438,088	2026-2027 DSM Business Plan - Docket TBD
Electric heat installations	High	Continuing to allow installation of electric heat to replace permanently installed electric heat, space heaters or any fuel source except natural gas with adequate combustion air as determined by the Agency	Reduction of burdens Non-energy benefits Energy benefits	Increase efficiency of housing stock and small businesses, including low-income housing Increase participation in company energy and						

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity (MW)	Incremental Energy Savings (kWh @gen)	Projected Incremental Cost	Total Expenditures	Non-energy Impacts	Reference
				efficiency programs Decrease households experiencing high energy burden Improve Indoor air quality Increase Named Community clean energy Improve indoor air quality						

Note: Home Energy Savings: Non-energy impacts are the product of estimated energy savings multiplied by \$/kWh value identified for the energy efficiency measure in DNVGL study and ICF update. For measures without a value, non-energy impacts are zero. Where there is zero incremental cost, but incremental savings, this is due to the specific action having less costs than the lowest comparable action.

Note: Wattsmart Business: Non-energy impacts are the product of estimated energy savings multiplied by \$/kWh value identified for the energy efficiency measure in DNVGL study and ICF update. For measures without a value, non-energy impacts are zero.

Note: Low Income Weatherization: No additional energy savings were attributed to repair investments and non-energy impacts could be set to zero using the rationale applied to the other two programs. In the case of low-income customers, the alternate approach assumed repair expenditure increased property values dollar for dollar after removing 15% administrative cost payments. Expenditures and NEIs listed are for the totality of the Low Income Weatherization program, rather than on the specific action.

Demand Response

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity (MW)	Energy	Projected Cost	Potential Non-energy/CBI Impacts	Reference
Grow available DR capacity	Low	Ongoing. PacifiCorp will continue to invest time and resources into growing the existing available capacity in all 5 of the demand response programs that are currently active in Washington, in order to achieve the specific target of 22 MW of available demand response capacity by 2029. These include Wattsmart Business Demand Response, Irrigation Load Control, Wattsmart Drive, Wattsmart Battery, and Cool Keeper.	Cost Reduction	Increase participation in company energy and efficiency programs.	22 MW	n/a	\$10,000,000	• Convenience/comfort losses • Productivity losses • Changes in water use • Improved energy security/resilience • Greenhouse gas (GHG) mitigation benefits • Improved air quality • Improved asset value	Docket No. UE-220550, UE-220848
Create an equity plan for each program in the DR portfolio.	Medium	In development. PacifiCorp will work with stakeholders to develop a plan for how to integrate named communities into each program. The plans will describe the key equity considerations for the program, and identify steps PacifiCorp will take to maximize the equitable distribution of benefits for the program.	Cost Reduction	Increase participation in company energy and efficiency programs.	TBD	n/a	TBD	• Convenience/comfort losses • Productivity losses • Changes in water use • Improved energy security/resilience • Greenhouse gas (GHG) mitigation benefits • Improved air quality • Improved asset value	
Establish and implement a formal competitive procurement framework for demand response.	Low	To provide clarity and transparency for how PacifiCorp is ensuring it is procuring resources for the least reasonable cost, PacifiCorp will develop a formal procurement framework with stakeholders. PacifiCorp will also issue an RFP for its entire demand response portfolio in 2027.	Cost Reduction	n/a	TBD	n/a	n/a	n/a	n/a

Community Outreach/Other

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity	Energy	Projected Cost	Potential Non-energy/CBI Impacts	Reference
Focus improvements on delivery of programs and communications to customers including Named Communities	High	Outreach in non-English languages and continued expansion of resources and content transcribed into Spanish and made available online and through printed materials.	Reduction of burdens/ Non-energy benefit	Culturally and linguistically responsive outreach and program communication	N/A	N/A	\$1.18 million	• Increased participation in and awareness of PacificCorp programs	N/A
Improve language accessibility	High	PacificCorp filed an inaugural Language Access Plan in Washington in early 2025 to describe and document the company's commitment to language access. The company continues to expand the volume of content available in print and online in both English and Spanish. The company plans to continue improving language accessibility by assessing needs, reviewing current programs, identifying gaps, and developing clear plans and processes for action.	Reduction of burdens/ Non-energy benefit	Culturally and linguistically responsive outreach and program communication	N/A	N/A	Total cost combined in cell I3	• Increased participation in and awareness of PacificCorp programs	N/A

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity	Energy	Projected Cost	Potential Non-energy/CBI Impacts	Reference
Expand outreach to Named Communities	High	PacifiCorp will identify and track communications to customers in Named Communities, has expanded its outreach, and will continue looking for opportunities to further expand outreach.	Reduction of burdens/ Non-energy benefit	Culturally and linguistically responsive outreach and program communication	N/A	N/A	Total cost combined in cell I3	• Increased participation in and awareness of PacifiCorp programs	N/A
Establish EV Grant Program	Medium	PacifiCorp plans to establish an Electric Vehicle (EV) Supply Equipment Grant program that provides additional support for low income and customers living in multi-family dwellings.	Reduction of burdens/ Non-energy benefit / Public health	Community-focused efforts and investments	TBD	TBD	\$1 million	• Reduced carbon emissions • O&M savings	Forthcoming TE plan
Improve educational resources	Medium	PacifiCorp developed a comprehensive CEIP infographic used during in-person events, shared with stakeholders and partners, and made available online. The company plans to develop further webpages and/or additional content on existing webpages to host educational resources.	Reduction of burdens/ Non-energy benefit	Culturally and linguistically responsive outreach and program communication	N/A	N/A	Total cost combined in cell I3	• Increased participation in and awareness of PacifiCorp programs	N/A

Specific Actions	Named Community Impact	Description	Benefit Area	Impacted CBIs	Capacity	Energy	Projected Cost	Potential Non-energy/CBI Impacts	Reference
EAG Outreach and Member Recruitment	High	PacifiCorp will expand community representation in terms of EAG membership to reflect the diversity of the service area and continue to build on ongoing collaboration and engagement.	Reduction of burdens/ Non-energy benefit	Increase culturally and linguistically responsive outreach and program communication/Increase community-focused efforts and investments.	N/A	N/A	\$370,300	• Increased participation in and awareness of PacifiCorp programs	N/A
Tribal Engagement and potential CBI development	High	Continue outreach and engagement with Tribes and leaders to build understanding and trust, support opportunities to collaborate, and potentially, to create additional CBIs specific to Tribes, for the company to track and analyze.	Reduction of burdens/non-energy benefit	Increase culturally and linguistically responsive outreach and program communication/Increase community-focused efforts and investments.	N/A	N/A	TBD	• Increased participation in and awareness of PacifiCorp programs	N/A

APPENDIX D – SUPPORTING WORKPAPERS AND REFERENCES

Introduction

This appendix summarizes all supporting workpapers by chapter and includes certain table and figure references. Workpapers with file names notated in blue lettering are designated highly confidential.

Chapter V – Key Features of the Draft 2025 CEIP Preferred Portfolio

Chapter V - Key Features of the Draft 2025 CEIP Preferred Portfolio			
File Name	Description	Tables	Figures
250617-PAC-CEIP-WP-Tbl-5,-7,-19, Fig-3,6-8--Comparison-CETA-shares-10-01-2025.xlsx	Supporting Documentation for Tables 5,7,9 and Figures 3, 6-8 – Includes Washington-allocated proxy resource selections for CEIP preferred portfolio and alternative portfolio.	Table 5 and 7	Figures 3, 6-8
250617-PAC-CEIP-WP-Fig-5-25-CEIP-Stochastic-Interim-Targets-10-01-2025.xlsx	Supporting Documentation for Figure 5 – Includes resulting clean energy interim target for each year from each stochastic run for the CEIP preferred portfolio.	-	Figure 5
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.sST.21.CETA.2506SC.MN.Stoc2006.213486-(LT.-213486-214427)-v37.1-10-01-2025.xlsb	Each individual ST stochastic report for the 2025 CEIP	-	-

Chapter V - Key Features of the Draft 2025 CEIP Preferred Portfolio			
File Name	Description	Tables	Figures
250617-PAC-CEIP-WP-ST-Cost-Summary-- 25W.IR.sST.21.CETA.2506SC.MN.Stoc2007.213486- (LT.-213486-214449)-v37.1-10-01-2025.xlsb	Preferred Portfolio (each file has a highly confidential version)		
250617-PAC-CEIP-WP-ST-Cost-Summary-- 25W.IR.sST.21.CETA.2506SC.MN.Stoc2008.213486- (LT.-213486-214471)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary-- 25W.IR.sST.21.CETA.2506SC.MN.Stoc2009.213486- (LT.-213486-214493)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary-- 25W.IR.sST.21.CETA.2506SC.MN.Stoc2010.213486- (LT.-213486-214515)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary-- 25W.IR.sST.21.CETA.2506SC.MN.Stoc2011.213486- (LT.-213486-214995)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary-- 25W.IR.sST.21.CETA.2506SC.MN.Stoc2012.213486- (LT.-213486-214559)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary-- 25W.IR.sST.21.CETA.2506SC.MN.Stoc2013.213486- (LT.-213486-214581)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary-- 25W.IR.sST.21.CETA.2506SC.MN.Stoc2014.213486- (LT.-213486-215019)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary-- 25W.IR.sST.21.CETA.2506SC.MN.Stoc2015.213486- (LT.-213486-214951)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary-- 25W.IR.sST.21.CETA.2506SC.MN.Stoc2016.213486- (LT.-213486-214647)-v37.1-10-01-2025.xlsb			

Chapter V - Key Features of the Draft 2025 CEIP Preferred Portfolio			
File Name	Description	Tables	Figures
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.sST.21.CETA.2506SC.MN.Stoc2017.213486-(LT.-213486-214669)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.sST.21.CETA.2506SC.MN.Stoc2018.213486-(LT.-213486-214973)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.sST.21.CETA.2506SC.MN.Stoc2019.213486-(LT.-213486-214713)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.sST.21.CETA.2506SC.MN.Stoc2020.213486-(LT.-213486-214735)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.sST.21.CETA.2506SC.MN.Stoc2021.213486-(LT.-213486-214757)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.sST.21.CETA.2506SC.MN.Stoc2022.213486-(LT.-213486-214779)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.sST.21.CETA.2506SC.MN.Stoc2023.213486-(LT.-213486-214801)-v37.1-10-01-2025.xlsb			
250617-PAC-CEIP-WP-Tbl-6--Transmission-tables-10-01-2025.xlsx	Supporting Documentation for Table 6 – Transmission selections from the CEIP preferred portfolio	Table 6	-
250617-PAC-CEIP-WP-LT-25W.IR.bLT.4bm.21.CETA.2506SC.SC.213486-v36.4-10-01-2025.xlsx	LT Portfolio Summary for the 2025 CEIP	-	-

Chapter V - Key Features of the Draft 2025 CEIP Preferred Portfolio			
File Name	Description	Tables	Figures
	Preferred Portfolio		
250617-PAC-CEIP-WP-LT-25W.IR.bLT.4bm.21.CETA-Alt.2506SC.SC.213642-v36.5-10-01-2025.xlsx	LT Portfolio Summary for the Alternative Portfolio	-	-
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.dST.21.CETA.2506SC.MN.213486-(LT.-213486-213643)-v36.6-10-01-2025.xlsb 250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.dST.21.CETA.2506SC.MN.213486-(LT.-213486-213643)-v36.6-10-01-2025-(HC).xlsb	ST Portfolio Summary results for the 2025 CEIP Preferred Portfolio	-	-
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.dST.21.CETA-Alt.2506SC.MN.213642-(LT.-213642-213709)-v36.6-10-01-2025.xlsb 250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.dST.21.CETA-Alt.2506SC.MN.213642-(LT.-213642-213709)-v36.6-10-01-2025-(HC).xlsb	ST Portfolio Summary results for the Alternative Portfolio	-	-

Chapter VI – Interim Targets

Chapter VI – Interim Targets			
File Name	Short Description	Tables	Figures
250617-PAC-CEIP-WP-Fig-9,-Tbl-8,11-Interim-Targets-2025-CEIP-PP-10-01-2025.xlsx 250617-PAC-CEIP-WP-Fig-9,-Tbl-8,11-Interim-Targets-2025-CEIP-PP-10-01-2025-(HC).xlsx	Supporting documentation for Table 8, 11 and Figure 9 – Summary of Washington-allocated energy for the preferred	Table 8	Figure 9

	portfolio and resulting interim and renewable energy targets.		
250617-PAC-CEIP-WP-Fig-10,-Tbl-9-Interim-Targets-2025-CEIP-PP-26P-10-01-2025.xlsx 250617-PAC-CEIP-WP-Fig-10,-Tbl-9-Interim-Targets-2025-CEIP-PP-26P-10-01-2025-(HC).xlsx	Supporting documentation for Table 9 and Figure 10 – Summary of Washington-allocated energy for the preferred portfolio dispatched under the Washington 2026 Protocol allocations and resulting interim targets.	Table 9	Figure 10
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.dST.21.CETA.2506SC.MN.26P.213486-(LT.-213486-213863)-v36.8-10-01-2025.xlxb 250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.dST.21.CETA.2506SC.MN.26P.213486-(LT.-213486-213863)-v36.8-10-01-2025-(HC).xlxb	ST Portfolio Summary results of CEIP preferred portfolio dispatched under Washington 2026 Protocol allocation assumptions.	-	-
250617-PAC-CEIP-WP-Fig-11,Tbl-10-Interim-Targets-2025-CEIP-PP-LowOutput-10-01-2025.xlsx 250617-PAC-CEIP-WP-Fig-11,Tbl-10-Interim-Targets-2025-CEIP-PP-LowOutput-10-01-2025-(HC).xlsx	Supporting documentation for Table 9 and Figure 10 – Summary of Washington-	Table 10	Figure 11

	allocated energy for the preferred portfolio dispatched under low renewable output conditions and resulting interim targets.		
250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.dST.21.CETA.2506SC.MN.LowRenewables2023.213486-(LT.-213486-213841)-v36.7-10-01-2025.xlsb 250617-PAC-CEIP-WP-ST-Cost-Summary--25W.IR.dST.21.CETA.2506SC.MN.LowRenewables2023.213486-(LT.-213486-213841)-v36.7-10-01-2025-(HC).xlsb	ST Portfolio Summary results of CEIP preferred portfolio dispatched under low renewable output conditions	-	-

Chapter VII – Specific Targets

Chapter VII – Specific Targets			
File Name	Short Description	Tables	Figures
250617-PAC-CEIP-WP-Fig-9,-Tbl-8,11-Interim-Targets-2025-CEIP-PP-10-01-2025.xlsx 250617-PAC-CEIP-WP-Fig-9,-Tbl-8,11-Interim-Targets-2025-CEIP-PP-10-01-2025-(HC).xlsx	Supporting documentation for Table 8, 11 and Figure 9 – Summary of Washington-allocated energy for the preferred portfolio and resulting interim and renewable energy targets.	Table 11	-
250617-PAC-CEIP-WP-EIATargets-10-01-2025 (C).xlsx	Shows PacifiCorp’s energy efficiency target setting data under the EIA.	Table 14 - 2026-2029 Energy Efficiency Targets	-

Chapter IX – Specific Actions

Chapter IX – Specific Actions			
File Name	Short Description	Tables	Figures
250617-PAC-CEIP-WP-Tbl-5,-7,-19, Fig-3,6-8--Comparison-CETA-shares-10-01-2025.xlsx	Supporting Documentation for Tables 5,7,9 and Figures 3, 6-8 – Includes Washington-allocated proxy resource selections for CEIP preferred portfolio and alternative portfolio.	Table 19	-

Chapter X – Compliance Costs

Chapter X – Compliance Costs			
File Name	Short Description	Tables	Figures
250617-PAC-CEIP-WP-Incremental-Cost-10-01-2025.xlsx	Shows forecasted incremental resource and administrative/general costs of CETA compliance and compares against the annual threshold for alternative compliance.	Table 27, Table 28, Table 29, Table 30	
250617-PAC-CEIP-WP-Tbl-27-Incremental-Cost-Workbook-10-01-2025.xlsx	Shows calculation for cost of incremental resources for CETA compliance.	Table 27	-
250617-PAC-CEIP-WP-Fig-15-WA-Alloc-Compare-ST-Cost-Summary--CETA.PP-less-ST-Cost-Summary--CETA-Alt.v36.6-10-01-2025.xlsx		-	Figure 15
250617-PAC-CEIP-WP-CEIP-Incremental-Cost-SCCT-and-CCCT-10-01-2025.xlsx	Supports resource incremental cost of compliance calculation.	-	-
250617-PAC-CEIP-WP-25-IRP-Flexible.Reserve.Study-	Integration costs from the 2025 IRP.	-	-

Chapter X – Compliance Costs			
File Name	Short Description	Tables	Figures
Tbl.F2.and.Fig.F11.25IRP.Wind.Solar.Integration-10-01-2025.xlsx			
250617-PAC-CEIP-WP-WA-25CEIP-Incr-Resource-Capacity-Contribution-10-01-2025.xlsx	Capacity contribution of incremental resources, supports calculation of cost of incremental resources.	-	-
250617-PAC-CEIP-WP-WA-Allocated-ST-Cost-Summary--25W.IR.dST.21.CETA.2506SC.MN.213486-(LT.-213486-213643)-v36.6-10-01-2025.xlsb	Washington-allocated ST Cost Summary results for 2025 CEIP Preferred Portfolio	-	-
250617-PAC-CEIP-WP-WA-Allocated-ST-Cost-Summary--25W.IR.dST.21.CETA-Alt.2506SC.MN.213642-(LT.-213642-213709)-v36.6-10-01-2025.xlsb	Washington-allocated ST Cost Summary results for Alternative Portfolio	-	-