



# **Avista's 2021 Clean Energy Implementation Plan Public Participation Progress Report**

**September 30, 2022**

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## Background

Washington's Clean Energy Transformation Act (CETA) was enacted into law in May 2019. As provided in WAC 480-100-610, CETA requires electric utilities to eliminate coal-fired electricity from their state portfolios by the end of 2025, use a carbon-neutral supply of electricity by 2030, and source 100 percent of their electricity from renewable or non-carbon-emitting sources by 2045. CETA requires Washington investor-owned utilities to file a detailed Clean Energy Implementation Plan (CEIP) that describes the actions it will take towards meeting these states clean energy standards. Washington electric utilities are also required to file a plan with the Commission that outlines its schedule, methods and goals for public participation and education during the development of its CEIP.

In compliance with WAC 480-100-655 (2), on April 30, 2021 Avista filed its first CEIP Public Participation Plan<sup>1</sup> which methodically outlined ways in which Avista intended to collaborate with its existing Advisory Groups to develop meaningful strategies to engage all customers including Vulnerable Populations and Highly Impacted Communities (collectively referred to as Named Communities) and ensuring the equitable distribution of energy and non-energy benefits throughout the Clean Energy Implementation period. On June 30, 2021, the Company filed an update to its Public Participation Plan which included feedback provided by Washington Utilities & Transportation Commission (WUTC or Commission) Staff (Staff) to ensure that all aspects of WAC 480-100-655 were encompassed throughout the entirety of the Public Participation Plan.

On October 1, 2021, Avista filed its final 2021 CEIP. On June 23, 2022 the Commission issued Order 01 approving Avista's 2021 CEIP subject to 38 conditions. Condition 30 directs the Company to:

“On or before October 1, 2022, Avista must file with the Commission:

- a. A progress report on what actions have been taken since October 2021 to reduce barriers to public participation (e.g., steps taken to reduce barriers including but not limited to non-English speaking customers).
- b. An update to the Company's customer engagement plan<sup>2</sup> it will implement during the 2022-2025 timeframe and provide a progress report of this plan in the 2023 Biennial CEIP Update.”

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<sup>1</sup> Docket UE-210628.

<sup>2</sup> See AVA CEIP at pp. 6-9 & 6-10, UE-210628, October 1, 2021.

In compliance with Condition 30, Avista submits this progress report which details the actions the Company has taken since October 2021 to reduce barriers to public participation and provides an update to its Public Participation Plan that will be established during the 2022-2025 implementation period.

## 2021/2022 Public Participation Progress Report

### **Customer Engagement Manager**

Public participation and customer engagement play an integral role in ensuring customers equitably benefit from the transition to a cleaner energy future. As such, in November 2021, Avista hired a Customer Engagement Manager (CEM). The main responsibilities of the CEM include coordinating meetings with the Company's Equity Advisory Group (EAG), facilitating ongoing listening sessions with customers (including Named Communities) to determine customer challenges with energy, affordability, environment, public health, transportation, resiliency, and other concerns for development and refinement of Customer Benefit Indicators (CBIs), develop and implement a customer outreach and communications plan to include tools, methods, and processes for reaching all customers, as well as identifying barriers to public participation including, but not limited to, language, cultural, economic, or other factors, and developing strategies for reducing such barriers to public participation.

During the January 2022 EAG Equity Lens Session, the new CEM was introduced to the members along with an overview of the CEIP progress made to date. As of January 2022, the CEM has been responsible for overseeing the EAG, coordinating internal CETA teams, strategy development for meeting CEIP requirements, public participation strategy development and implementation, managing the CBI tracking and tracking database, and developing the governance for Avista's Named Communities Investment Fund.

Effectively engaging with its customers, especially those designated as residing in a Named Community, is of the utmost importance to Avista. As discussed further below, the Company went through a thorough Request for Quotes (RFQ) process to secure a consultant with extensive experience in the public participation arena to help Avista develop a meaningful and effective

public participation and engagement plan. Avista's CEM is working closing with the selected consultant to develop a meaningful public engagement strategy for the Company.

### **Public Participation Consultant**

Avista recognizes the additional effort needed to reach its customers residing in Named Communities in a successful and engaging manner and that this effort would require engagement with public participation experts. Avista sought specialized communications services for its Washington service territory that provided an equitable approach to removing barriers to participation and obtaining the valuable customer input that Avista is seeking. The Company pursued experts that could focus on targeted outreach to underrepresented populations, including those with limited English proficiencies. In May 2022, Avista issued an RFQ to seven public participation agencies and ultimately contracted with Public Participation Partners (P3)<sup>3</sup> in July 2022 based on their previous work and equitable approach to engaging communities.

P3 is a minority and women owned community engagement and communication firm with over 14 years of experience providing cost-effective and specialized outreach services. P3 specializes in reaching "hard to reach" customers in a data driven approach that informs, involves, and empowers all stakeholders in an equitable and inclusive way. It is P3's goal to employ every tool available to dismantle barriers to access and ensure that all who are interested in participating are able to do so.

### **P3's Public Engagement Plan Approach**

P3 values transparency and strives to provide open and clear communication between Avista, stakeholders, and the public. They take into consideration customers barriers to access such as language, sight, hearing, and virtual technology. P3 believes that Avista can make decisions best when the most voices are heard and will employ every tool they can to achieve equitable engagement. Their approach to developing an effective public engagement and outreach plan for Avista will be managed in four phases which are each discussed in further detail below and are included in P3s draft Public Engagement and Communication Plan (PECP) provided in Appendix A.

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<sup>3</sup> <https://publicparticipationpartners.com/>

**Phase One** – The “Planning Phase” consists of a comprehensive demographic analysis of the Company’s Washington service territory, identifying outreach methods, tools, and communication strategies, and defining performance measures to gauge overall success. The demographic analysis will identify Avista’s language needs, enabling P3 to provide translated printed and digital notifications and materials. Phase one took approximately three weeks and resulted in P3 delivering a draft Public Engagement and Communication Plan and a stakeholder database that will provide Avista with updates on P3’s outreach efforts and updates on their progress.

**Phase Two** – Phase two consisted of an assessment of Avista’s current outreach efforts and practices through interviews with key employees within the Company who are responsible for planning and conducting outreach, meeting with the Avista’s EAG, and reviewing existing policies, communication materials and methods, and completing an equity analysis for the Company’s CEIP meetings. This phase took approximately four weeks and P3 is currently developing its equity analysis to provide to the Company.

**Phase Three** – A customer survey, provided in Appendix B, to identify communication preferences will be conducted during Phase three. The customer survey will aim to provide P3 and Avista with data to identify what past experiences with the Company were like, provide customer preferences for communication methods, and ways that customers would like to be engaged with in the future. Paper and digital surveys will be provided to customers and in an effort to reach more customers located in named communities, P3 will print and mail paper surveys to apartment complexes, community organizations, and religious institutions. P3 will also engage with customers located in Named Communities through in-person meetings and virtual meeting options in an attempt to reach more customers. All customers will be invited to attend P3’s community meetings and such meetings will be held in place of CEIP public participation meetings for the remainder of 2022. Community conversations will be hosted in English and other languages as identified through the Phase one analysis. Video’s will be developed in English and six other prevalent languages that introduces Avista’s public engagement efforts. These videos will be used to reach customers who do not speak English as their primary language. Phase three will take approximately seven weeks and Avista will receive comment summary detailing customer feedback received from the survey and public meetings conducted by P3.

**Phase Four** – During the fourth and final phase P3 will develop and deliver a fully executable public participation and communication plan which will utilize the lessons learned through public surveys and in person meetings, incorporating Company and advisory group feedback. P3’s methodology and approach on public preferences will be outlined based on survey results and past experiences and will identify barriers to participation amongst Avista’s customers and provide detailed solutions and tactics the Company can employ to overcome such barriers. Phase four is scheduled to span approximately three weeks.

Below is a list of meetings led by P3 along with P3’s deliverables. The following topics and meeting times may change depending on P3, Avista, and stakeholder availability and requests for additional topics from the EAG members. P3’s meetings and deliverables are tentatively scheduled as follows:

**P3 Meeting and Deliverables Timeline**

<i>Phase</i>	<i>Date</i>	<i>Meeting Topic/ P3 Deliverable</i>
<i>Phase 1</i>	August 4, 2022	P3/Avista Kick Off Meeting
	August 8-19, 2022	P3 conduct Avista staff interviews
	September 2, 2022	P3 deliver project database
	September 2, 2022	Draft Public engagement and communications plan deliverable
<i>Phase 2</i>	September 12-13, 2022	Public engagement meeting with advisory groups
	September 21, 2022	P3 meeting with EAG
	September 23, 2022	P3 meeting with EAG
<i>Phase 3</i>	October 3-28, 2022	Public survey comment period
	October 17-28, 2022	Community conversation period
	November 11, 2022	Community meeting/comment summary report due
<i>Phase 4</i>	November 21, 2022	Draft public participation plan due to Avista
	December 16, 2022	Final public participation plan due to Avista

Additionally, Avista with guidance from P3, will consider how to better align its communications in compliance with the Americans with Disabilities Act (ADA) for visual materials (digital and print). P3’s will also provide the Company with feedback on how it can implement measures to

ensure comprehension for those with limited English proficiency, such as translated materials and materials written at an understandable reading level. The Company will be provided with an assessment of its current accessibility of online materials, including whether platforms are mobile-friendly and if hardcopy versions of materials are needed for those without access to or skilled with technology. P3 will review Avista's printed and digit materials to gauge the representation of diverse peoples in project photos, graphics, and videos and provide a report to the Company on its findings.

## Reduce Barriers to Participation

In addition to the activities outlined above, Avista has taken the following steps to reduce barriers to participation and will continue to implement further activities towards removing barriers to participation as the work with P3 is complete.

The Company's CEIP webpage now has a Spanish translation option along with translated CEIP printed materials such as the CEIP and CEIP customer letter in accordance with WAC 480-100-655(3). Avista also offers closed caption options during public participation meetings for those who may be hearing impaired. Promotions pertaining to opportunities for the public to engage with Avista in regard to its CEIP has improved over the year. Previously, emails were sent to all Washington electric customers in Avista's service territory to inform them of the opportunities to participate in public meetings. In addition to sending email communications, Avista included messaging about upcoming public engagement opportunities on its Interactive Voice Recording (IVR) system that customers hear when contacting the Company's customer service line. This tactic increased the number of customers that joined CEIP public participation meetings held in 2022.

In recent outreach efforts directed at customers who might be income qualified, Avista's Energy Efficiency Department has provided printed materials that includes Spanish translation for Spanish speaking customers in three areas within the Company's service territory. These translated materials are provided in areas that have been identified as having Spanish as a second language and is geared towards promoting energy efficiency programs offered by Avista.



Avista identified a resident owned mobile home park in North Spokane County, located in a Named Community, where the Company provided door to door outreach to offer weatherization services to be installed by a local community action agency. This form of communication proved to be successful in reaching customers who primarily do not have broadband access.

Further, the Company held an outreach event at a local food bank in Connell, Washington, to inform attendees of weatherization services available through the local Community Action Agency in the area. Flyers were distributed to attendees the day of the event to promote weatherization programs lead by Avista. The Company also mailed postcards to all residential electric customers in this community with generic messaging about energy efficiency services available. This served as a great way to get in contact with hard-to-reach customers by utilizing a local food bank who communicate with these communities on a regular basis.

## Conclusion

Avista will continue making significant progress in its public engagement endeavors throughout the CEIP implementation period and expects this work will increase significantly once the final Public Engagement and Communication Plan is received from P3. The Company expects to adopt additional ways to effectively communicate with its customers in Named Communities through its work with P3. In addition to P3's support in developing a public engagement plan, Avista's Named Communities Investment Fund will provide additional support in ensuring communication and promotional materials are translated in the prominent languages amongst Avista's service territory, as identified by P3. The final Public Engagement and Communication Plan provided by P3 and implemented by Avista will be filed in the Company's CEIP docket when it is available (December 2022), and a progress update will be provided in the Company's 2023 Public Participation Plan that will be filed in May 2023.