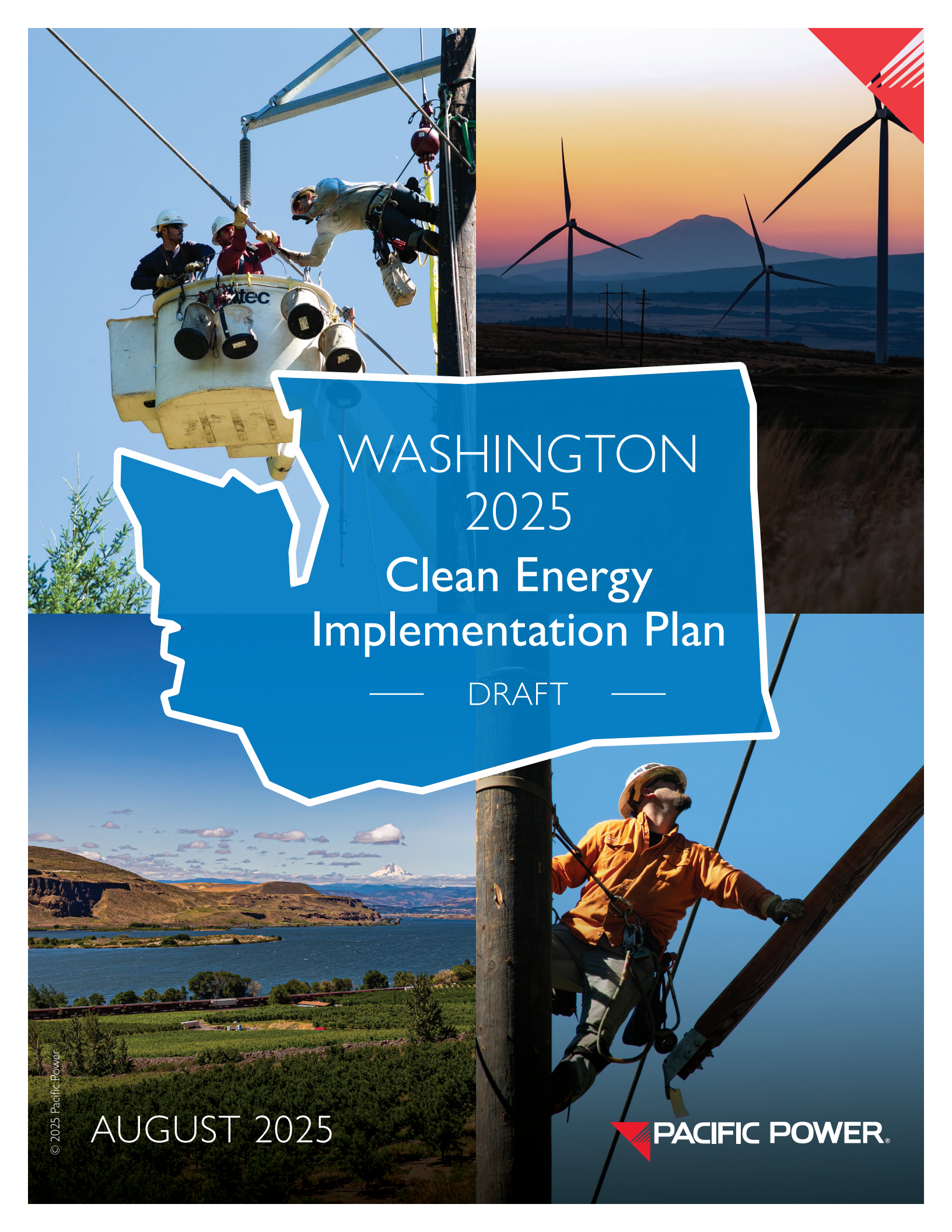




WASHINGTON 2025 Clean Energy Implementation Plan

— DRAFT —

AUGUST 2025

 **PACIFIC POWER.**

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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 certificate
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

I. Introduction

PacifiCorp, doing business as Pacific Power in Washington, presents its Draft 2025 Clean Energy Implementation Plan (CEIP) for review by interested parties.

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 IRP is a roadmap for continual progress in safely, reliably and affordably serving over 2 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 stakeholders.

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.

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 2045 CETA target approaches. 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 policy, 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.

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 projections to meet retail electric sales, and sets specific targets for energy efficiency, demand response, and renewable energy. The CEIP is developed consistently with and based on the utility's most recent IRP and CEAP. PacifiCorp's 2025 IRP,¹ including the CEAP, serve as the starting point to determine the interim and specific targets included in this CEIP.

For renewable energy, PacifiCorp's interim target is the percentage of forecast retail energy sales that PacifiCorp forecasts meeting with renewable and non-emitting generation in each year. 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 optimistic forecasts given uncertainties and fluctuations in climate-driven renewable generation. As PacifiCorp continues to expand its non-emitting and renewable resources on its system this target is expected to trend upward until achieving GHG neutrality by 2030 and 100 percent renewable and non-emitting energy for Washington customers by 2045.

In 2020, the percentage of Washington retail sales served by renewable and non-emitting energy resources was 21.9 percent. Based on the draft 2025 CEIP preferred portfolio, the interim target for this CEIP is 46 percent, to be achieved by 2029, or an average of 36 percent over the four years, 2026-2029. The forecasted interim targets increase to 110 percent by 2030 and 155 percent by 2045 to meet CETA's long run objectives.

¹ PacifiCorp's 2025 Integrated Resource Plan, Docket UE-210821 (Mar. 31, 2025) (available online at: <https://www.utc.wa.gov/casedocket/2023/230812/docsets>).

Next, energy efficiency target setting begins with energy efficiency potential based on cost-effective selections identified by the 2025 IRP. This is then increased by adding other efficiency savings categories (behavioral, cogeneration, and production and distribution efficiency). Further adjustments are made to this savings potential, adjusting for things like economic uncertainty, to determine the two-year Energy Independence Act (EIA) target that is provided in the biennial conservation plan (BCP). PacifiCorp's BCP sets the two-year target and informs the four-year energy efficiency target; this two-year target is repeated for years three and four of the CEIP-reported four-year energy efficiency targets. The energy efficiency targets for years three and four 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.

Providing Benefits

In alignment with the statutory objectives of CETA, PacifiCorp, as described in Chapter VIII – Customer Benefit Indicators, 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.

As an outcome of this engagement, PacifiCorp established a set of customer benefit indicators (CBIs), each accompanied by weighting factors designed 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.

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

To meet near-term capacity and energy needs identified in the draft 2025 CEIP preferred portfolio, and to make progress toward meeting its CETA obligations, PacifiCorp will issue a Washington-specific request for proposals (RFP) this fall. Additionally, the company is committed to maintaining or expanding existing energy efficiency programs, including low-income weatherization and home/business efficiency upgrades, targeting savings of 145,371 megawatt-hour (MWh) over the four-year CEIP period. Demand response programs, launched in Washington during the implementation of the inaugural 2021 CEIP, will grow to 22 MW by 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

PacifiCorp will include forecasts of the incremental cost of additional actions to be taken to comply with and implement the standards and requirements set by CETA. Specifically, PacifiCorp will estimate the annual cost impacts from the long-term modeled portfolio of resource actions under CETA compliance and includes forecasts of other non-modeled costs associated with outreach and engagement, programmatic activities and administrative costs. A significant change in federal policy, particularly with the passage of the One Big Beautiful Bill Act (OBBBA),² and the “Ending Market Distorting Subsidies for Unreliable, Foreign Controlled Energy Sources” Executive Order,³ will significantly impact the cost of certain non-emitting resources and introduces new risks and uncertainties. At the time of filing this draft, PacifiCorp does not yet have an estimate of the total incremental cost of CETA compliance for 2026-2029.

Engaging the Public

PacifiCorp appreciates the participants in its advisory groups, technical workshops and public meetings, each of which serves to illuminate equity challenges and public interest as well as ground the company’s CEIP to the pressing concerns of Washington named communities. PacifiCorp recognizes that engagement is essential to the development of this CEIP.

Ongoing CETA Progress

PacifiCorp filed its inaugural 2021 CEIP on December 30, 2021,⁴ based on the 2021 IRP, which laid out ambitious plans to develop cost-effective renewable and non-emitting resources to serve customers across its six-state service area, while developing a strategy to engage on, and measure, the equitable distribution of burdens and benefits across its Washington customers. PacifiCorp later filed a Revised 2021 CEIP on March 13, 2023,⁵ which was then approved subject to a

² OBBBA, 139 Stat. 72 (Jul. 24, 2025).

³ Exec. Order No. 14315, 90 CFR 30821 (Jul. 10, 2025).

⁴ PacifiCorp’s 2021 Clean Energy Implementation Plan, Docket UE-210829 (Dec. 30, 2021).

⁵ PacifiCorp’s 2021 Revised CEIP, Docket UE-210829 (Mar. 13, 2023).

set of conditions, including direction for the company to file an update to its near-term interim targets in the biennial update if required.⁶ The company has worked diligently through the set of 50 conditions while implementing its planning and reporting over the last few years. More information regarding how PacifiCorp has addressed each condition is included in Appendix B.

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 typical modeling updates that lead to a near-term reduction in the company's forecasted interim targets for 2024-2025.⁷ The Commission subsequently rejected the 2023 Biennial CEIP Update.⁸

PacifiCorp has filed an annual progress report each year since 2022, including updates and progress on the development of its CBIs and reported metrics, demand response and energy efficiency program implementation and customer savings, actual production of CETA-compliant energy, and other key variables that the company is expected to report on every year.

Despite initial delays, 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, 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.

⁶ Docket UE-210829, Commission Order 06, Appendix A: Multiparty Settlement Agreement (Oct. 25, 2023).

⁷ PacifiCorp's 2023 Biennial CEIP Update, Docket UE-210829 (Nov. 1, 2023).

⁸ Docket UE-210829, Order 16 (May 19, 2025).

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 the listed 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 2025.⁹

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

Name	Type	Capacity	Commercial Operation Date
TB Flats I Wind	Wind	306	2/28/2021
Foote Creek I (re-power)	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	12/30/2024-7/25/2025
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 ^a	Solar	300	6/30/2025
Rock Creek II Wind	Wind	400	9/1/2025
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

^aThe Hornshadow Solar contract was executed in conjunction with a renewable energy credit sale to a retail customer under PacifiCorp’s Oregon Schedule 272, meaning while the energy serves all PacifiCorp customers, the renewable energy certificates (RECs) are attributed to the specific customer under Schedule 272. While Washington customers are currently receiving only energy from the contract, and not RECs, Hornshadow Solar was a cost-effective resource under social cost of greenhouse gas (SCGHG) planning assumptions for Washington, and both the energy and associated RECs were carved out for Washington customers starting in 2030, positively contributing toward the 2030 CETA targets.

Moving forward, as described in Chapter V, PacifiCorp identifies an additional near-term resource need of 1,380 MW of new renewable resources and 1,386 MW of batteries before the end of 2029 to help meet Washington customers’ energy and capacity needs while remaining on a

⁹ RCW 19.405.030.

trajectory to meet long-term clean energy targets. In support of these goals, the company filed a draft Washington Situs RFP, with the intent of issuing it to market fall 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.

Greenhouse Gas Emissions

CETA serves as the principal statutory driver of decarbonization within the electric utility sector in Washington. It imposes binding, utility-specific requirements, including the phaseout of coal-fired generation by the end of 2025 and the mandate to supply 100 percent of retail electricity from renewable and non-emitting resources by 2045. These requirements are supported by utility planning and procurement obligations, including this CEIP, which direct resource strategies that balance reliability, affordability, and equity.

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 (CO_{2e}) 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, 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 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 CO_{2e} 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.

While the CCA establishes a broad, market-based framework for statewide GHG reductions, CETA prescribes the specific, enforceable standards that govern utility-sector decarbonization. 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.

II. Energy Equity

CETA mandates the consideration of the equitable distribution of energy and non-energy benefits and burdens across populations.¹⁰ 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.¹¹ The Commission subsequently outlined the four tenets of energy justice: distributional, procedural, recognition and restorative,¹² and the Commission has recently noted that:

Since the Commission issued its preliminary guidance on equity, we have been heartened by the utilities' continued efforts to reduce energy burdens and advance equity issues in their Multi-Year Rate Plan (MYRP) and Clean Energy Implementation Plan (CEIP) dockets, as well as in the Commission's Performance Based Ratemaking (PBR) dockets. The Commission acknowledges the commitment the utilities have shown to promote equity in their services and operations, and we expect this commitment will continue.

PacifiCorp similarly acknowledges a continued commitment to reducing energy burden and advancing equity through the investments and processes that are part of providing an essential service to the communities the company serves 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.

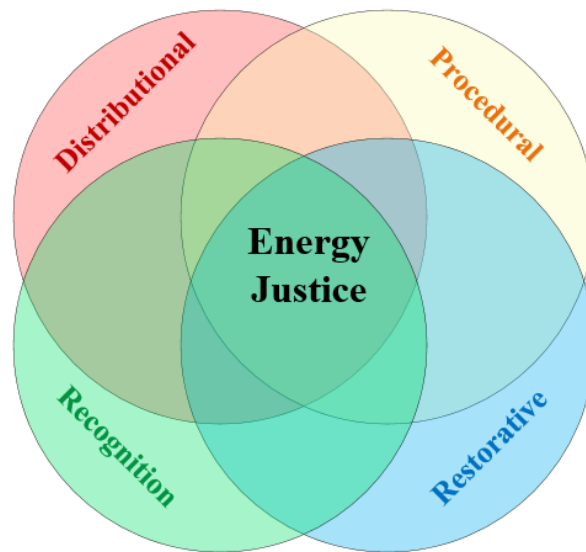
Figure 1, duplicated here from PacifiCorp's 2025 CEAP,¹³ illustrates the interconnected relationship of the four tenets coming together to conceptually realize energy justice. PacifiCorp recognizes that fully integrating the principles and language of energy justice into its processes and investments 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.

¹⁰ E.g., RCW 19.405.060(1)(c)(iii); WAC 480-100-610(4)(5).

¹¹ Docket A-230217 Washington <https://www.utc.wa.gov/documents-and-proceedings/utc-equity-docket>

¹² *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.

¹³ PacifiCorp's 2025 Integrated Resource Plan, Volume II, Appendix O – Clean Energy Action Plan.

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 arena of the 2025 IRP filing. The CEIP retains the 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 to what has been expressed in commission orders.¹⁴

- **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.”

Additional elements of energy equity, summarized below, are discussed throughout this document where relevant.

¹⁴ *E.g.*, Docket UG-210755, Washington Utilities and Transportation Commission v. Cascade Natural Gas Corporation, Final Order 09, at 18.

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 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), demand-side management (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, “Portfolio Development” in 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 “CBIs and Energy Justice” in Chapter VIII.

The following sections highlight several ongoing efforts to promote equity in programs, services and operations as they relate to clean energy planning activities and implementation.¹⁵

PacifiCorp is committed to furthering equity across its practices; creating new efficiencies via the development of an initial Distribution Equity Analysis (DEA) to meet Docket UE - 230172 Settlement Stipulation requirements.¹⁶ This equity work is anticipated to take place fall of 2025 and into 2026, and will be shaped in collaboration with external parties/persons and advisory group members, ensuring work conducted reflects the values, lived experiences, and priorities of the communities the company serves in Washington.

PacifiCorp looks forward to participating with the WUTC and interested parties in Phase 2 of the Equity Docket, and better understand how the four tenets overlap and reinforce each other to achieve energy justice.

¹⁵ The elements listed here indicate particular relevant sections of this document; however, connections between each element and energy equity are mentioned wherever appropriate throughout the 2025 CEIP.

¹⁶ Docket UE - 230172 Order 08/06 Rejecting Tariff Sheet; Approving Settlement with Condition; Authorizing and Requiring Compliance Filing can be accessed at <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=4400&year=2023&docketNumber=230172>.

III. Public Participation

Washington utilities must ensure that all customers served in Washington 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 (2025 Public Participation Plan (PPP)).¹⁷ 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 Language Considerations

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, Outrage, and Engagement” section in Chapter IX – Specific Actions.

¹⁷ 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 website: https://www.pacificpower.net/community/washington-clean-energy-transformation-act-equity.html ¹⁸	The project website provides information about CETA and the company's CEIP in English and Spanish, shares public participation opportunities, hosts customer benefit indicator 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.	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.

¹⁸ WAC 480-100-655(2)(g)(i)-(iv).

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 utilize 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.
PacifiCorp website	PacifiCorp has referenced the CEIP project on its primary website and provided a link to https://www.pacifi-corp.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 email (ceip@pacific-corp.com)	One way input has been collected from interested parties/persons has been via PacificCorp’s project e-mail. Feedback and responses are be included in Appendix A.	PacificCorp will continue to review and consider public comments received through its project email.
CEIP Public Meetings	PacificCorp 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.	PacificCorp is prepared to host additional public meetings and technical conferences in 2026-2029 based on interest level and need.
EAG and Existing Advisory Group Meetings	PacificCorp’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.	PacificCorp plans to continue meeting with the EAG to discuss the implementation of the company’s 2025 CEIP. Details of PacificCorp’s 2025 EAG meeting schedule can be found in Table 3.

Timing

PacificCorp’s existing Washington advisory groups have 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 in 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 (2025 Filing Schedule)	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 (2025 Filing Schedule)	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-Price Scoring	May 15, 2025
EAG May One-on-One Community Visits	May 20-22, 2025
EAG Meeting (#4)	June 12, 2025
<u>DSM Advisory Group Meeting (#2)</u>	<u>June 18, 2025</u>
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 (Joint Session with all Advisory Groups)	August 26, 2025 (morning)
DSM Advisory Group Meeting (#4)	August 26, 2025 (afternoon)
EAG Meeting (#6)	September 11, 2025
IRP Public Input Meeting (2027 Filing Schedule)	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 (2027 Filing Schedule)	November 12, 2025
DSM (#5) / EAG (#8) Advisory Group Joint Meeting	December 11, 2025
IRP Public Input Meeting (2027 Filing Schedule)	December 17, 2025

*Upcoming scheduled meetings subject to change

In addition to specific outreach to Washington interested parties/persons, PacifiCorp maintains a dedicated webpage to provide information to the public regarding how one can participate in the development of the 2025 CEIP and subsequent implementation of this CEIP.¹⁹ The webpage includes information about CETA, the CEIP development processes, links to relevant documents, and:

- A schedule of advisory group meetings and a tentative schedule of topics to be discussed.
- Meeting summaries, materials, and documents, including those from past meetings.
- Data and information provided to support participant education as part of the CEIP process.

¹⁹ Available here: <https://www.pacificorp.com/energy/washington-clean-energy-transformation-act-eq-uity.html>.

- Links to filings and plans associated with CETA compliance (2025 IRP filing that included the CEAP, CEIP filing, etc.) posted no later than thirty days following final action by the Commission.
- Spanish translation of CEIP Engagement Series and EAG meeting materials.

PacifiCorp also maintains a dedicated email address, CEIP@pacificorp.com, that is posted on the company's CETA / CEIP webpage to facilitate timely responses to any interested party/persons questions. 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.

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 its Washington residential customer survey, adding key demographic and household-level questions to assess and cross-verify customers' status within vulnerable populations and cross-tabulate with certain key customer benefit indicator 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 customer benefit indicator metrics and associated reporting. The company plans to conduct its next Washington residential customer survey in the fall of 2025 and subsequently another one in 2027.

Feedback Tracker

PacifiCorp seeks to have an inclusive and accessible process for consultation and collaboration, one in which each participant feels valued for their contributions and time. During the company's first CEIP process, a feedback tracker was developed to capture input received within the company's core engagement spaces related to clean energy implementation planning. 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. This supports more informed decision-making as insights are gathered from direct community representatives and interested parties and the experiences and input shared by them.

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 summarized in Appendix A.

Key Takeaways

Through public and advisory group feedback, several changes were made to public outreach tactics to make meeting information more accessible:

In response to feedback received regarding making information available to customers who do not have access to a computer or the internet, printed bill inserts were sent to customers with call-in information for public meetings. Additionally, newspaper notices ran in local publications with call-in information. These outreach methods were provided in both English and Spanish.

Based on feedback provided during the company's first 2025 CEIP Engagement Series public meeting, English and Spanish radio ads were added to PacifiCorp's outreach tactics for the third and scheduled fourth public meetings.

PacifiCorp received feedback from EAG members about sharing information through trusted community partners in Washington. In response to this feedback, PacifiCorp created a flyer with meeting details in English and Spanish and distributed it to EAG members and through a Hispanic Heritage Month event with the Central Washington Hispanic Chamber of Commerce. PacifiCorp will look for additional opportunities to work with community partners to expand outreach.

During public meetings, attendees may either be asked to participate in a post-meeting survey or are directly asked how they have heard about meetings. Attendees have shared hearing about public meetings through PacifiCorp's various outreach methods, specifically more so since the additional tactics mentioned above were implemented this year from one meeting to the other. PacifiCorp plans to continue using these outreach methods in future public meetings while also considering ongoing recommendations from its advisory groups, including the EAG, and the public.

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, community-based organizations, 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, through its 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.²⁰

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.²¹ 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 community-based organizations, the company is continually learning and working toward accommodating cultural differences. PacifiCorp will continue 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

²⁰ Available here: <https://www.pacificpower.net/community/washington-clean-energy-transformation-act-eq-uity.html> (under the “Washington Feedback Tracker” section).

²¹ Available here: <https://www.pacificpower.net/community/washington-clean-energy-transformation-act-eq-uity.html> (beginning with the section entitled “Nuestra ruta hacia el 100% de energía renovable y distribución equitativa de beneficios en Washington”).

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.

PacifiCorp offers a robust menu of engagement opportunities through its various engagement spaces. Each is unique in its design, group goals, target audience and the prioritization of topics. This ensures there is wide coverage among groups and topics and that PacifiCorp can offer diverse engagement options. Meeting spaces draw a wide array of different audience members from Washington—interested parties, community-based organization representatives and general members of the public. Within each meeting space, the company strives to create an atmosphere where all participants can engage in constructive dialogue, ask questions and provide feedback to PacifiCorp. Participants have the opportunity to learn about different clean energy implementation planning topics and information and can expect several opportunities to collaborate throughout the year.

PacifiCorp’s meeting spaces support an engagement ecosystem that offers an option 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. These engagement spaces will continue to inform how the company approaches long and intermediate-term planning. Input received will inform the development of the 2025 CEIP. 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 Washington-specific Clean Energy Action Plan (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

Input from these advisory groups will continue to be critical throughout the 2026-2029 implementation period.

Incorporating Feedback from the 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 clean energy implementation plan 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 audience access to the company’s clean energy implementation planning process. Within this engagement series, feedback is directly solicited on elements of the company’s developing clean energy implementation plan 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, 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 3 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.

Incorporating Feedback from the 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 the commissions, customers, and other stakeholders in PacifiCorp’s IRP prior to 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.

Stakeholders 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.²² This standardized form allows stakeholders to provide comments, questions, and suggestions. PacifiCorp posts its responses to the feedback forms at the same location.

Volume II of the 2025 IRP includes two key discussions of stakeholder feedback:

- Appendix C – Public Participation
- Appendix M – Stakeholder Feedback Forms

Appendix C details public input objectives, participants and meeting agendas, whereas Appendix M provides the complete listing and contents of all stakeholder submissions and company responses.

The company’s IRP public-input process generates input that directly informs the development of the company’s 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.

²² Feedback forms including PacifiCorp’s responses can be found here:
<https://www.pacificorp.com/energy/integrated-resource-plan/comments.html>.

There were eight requests in the third category, specifically seeking additional studies. A review of these requests and their handling is included in the appendix.

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.

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, least-cost and least-risk.

IRP public-input meetings are open to the public, and to the extent that members of other advisory groups – or anyone interested in the process – would like to attend and provide feedback, PacifiCorp welcomes participation.

Incorporating Feedback from the 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 60 percent of state median income, whichever is greater.

This group discussed the methods by which utilities must make funding available on July 31, 2021, for low-income households with income that do not exceed the higher of 80 percent of area median income or 200 percent of federal poverty level. This change modifies the eligibility threshold of the current low-income bill assistance program, and PacifiCorp held meetings to seek advice from the advisory group on meeting income guidelines.

Members of the Low-Income Advisory Group 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 (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 Low-Income Advisory Group members are also members of PacifiCorp's EAG.

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 Low Income Bill Assistance (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. Community-based organization 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 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 immediate 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 quarterly meetings with Low Income Advisory Group to discuss and provide updates on low-income programs.

Incorporating Feedback from the 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 under the June 16, 2000, Comprehensive Stipulation, in docket UE-991832, which the Commission approved in the August 9, 2000, Third Supplemental Order in that docket. DSM Advisory Group 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 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 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.

Incorporating Feedback from the 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 foundational 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 Customer Benefit Indicators, and informing the CEIP established a durable framework that guides ongoing efforts. Since then, 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’s 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.

Equity Advisory Group Contributions to PacifiCorp’s 2025 CEIP

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.

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 Highly Impacted Communities under CETA and were instrumental in developing the list of vulnerable populations 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 weigh 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 the plan’s leading equity metrics, which PacifiCorp will use to measure the success and fairness of its programs over time.

In summary, 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.

2025 EAG Meeting Schedule & Topics

A total of nine meetings have been scheduled for 2025, including three joint meetings with other advisory groups. Topics include:

- Clean energy implementation plan updates
- Energy efficiency and demand response

- Greenhouse gas emission methodology updates
- Equity metrics
- Community outreach
- Regulatory overviews
- One-on-one community visits and in-person engagement

Meetings are designed to be open, hybrid, and accessible.

EAG input informed:

- PacifiCorp’s 2025 CEIP
- PacifiCorp’s 2025 CEIP PPP
- PacifiCorp’s 2025 IRP
- PacifiCorp’s 2025–2045 Conservation Potential Assessment

There are currently nine EAG members representing sectors including environmental justice, public health, Tribal communities, small businesses, low-income and senior populations, and agricultural workers as summarized 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

Looking Ahead

As PacifiCorp continues its clean energy transition, the role of 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.

Looking to 2025 and beyond, PacifiCorp envisions a deeper, more integrated role for the EAG one that continues to evolve in response to community needs, program complexity, and the regulatory landscape. 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. Future EAG meetings will not only provide updates on company activities but will also invite EAG members into discussions particularly around outreach design, program delivery, and performance evaluation. PacifiCorp is committed to making the EAG experience meaningful and participatory. 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. In 2025 and beyond, 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.

PacifiCorp also plans to strengthen its outreach and communication practices to ensure broader public participation. Using a variety of channels from email updates to online hubs and public workshops, PacifiCorp will make it easier for community members to stay informed and engaged with EAG's work. These efforts will support the EAG in expanding its reach and impact, especially among historically underrepresented and highly impacted populations.

Part of this increased outreach includes separate engagement with the Yakama Nation and its enterprises to reach Tribal members and households via cross-promotion on their own communication channels and social media platforms.

In parallel, the EAG will be increasingly involved in the development and refinement of community-focused initiatives, such as electric vehicle grant programs, energy efficiency repair funding, and new customer support tools. These efforts reflect the group's long-standing commitment to ensuring that the benefits of the clean energy transition are both equitable and accessible.

Beyond 2025, the EAG's evolution will include:

- Expanded community representation reflects the diversity of PacifiCorp's Washington service area.
- 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.

The EAG will continue to serve not only as an advisory committee but as a platform for building trust, listening authentically, and co-developing how we discuss and consider the adaptation of

policies and programs PacifiCorp’s commitment is clear: the path to a just transition must be forged in partnership with the communities it aims to serve. PacifiCorp anticipates this work will include:

- Building partnerships with Community-Based Organizations (CBOs) and Tribal nations that are well-positioned to advance equitable outcomes and foster the community trust necessary for meaningful engagement.
- 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, we provide alternative avenues for input.
- Supporting interested persons who face barriers to participation, such as people with special needs, through accommodation that allows full engagement in engagement processes.
- Providing information in accessible formats and more than one language to reach a broader audience. 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 Washington Customer Benefit Indicator.
 - 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 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.²³

To facilitate engagement, PacifiCorp’s community engagement manager and TLR traveled to Toppenish, WA on 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 Tribal Liaison Representative met with the General Manager of Yakama Power. He shared his latest report to the Yakama Tribal Council and membership about most 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 hasn’t 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 that provides home weatherization and energy-saving programs to lower income families and seniors. He discussed their funding and client needs, some of whom are Tribal members.
- On May 22, 2025, the TRL 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 their 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.

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.

²³ More information regarding Yakama Nation can be found online at <https://yakama.com/>.

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.²⁴ Neither of these Tribes are in PacifiCorp service area, but we have had prior consultation with them on a variety of projects.

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 Tribal Liaison Representative 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.

Conclusion

PacifiCorp 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 utilize its existing ecosystem of engagement channels for greater inclusion and impact. Additionally, PacifiCorp 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, PacifiCorp 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 ultimately better position the company for a more equitable and inclusive public participation process.

²⁴ More information regarding the Cowlitz Tribe is available online at <https://cowlitz.org/>.

IV. Interim Targets

Note – Analysis and development is ongoing for the final 2025 CEIP preferred portfolio and changes to the interim targets are expected.

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.²⁵ 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 least-cost, least-risk model consistent with PacifiCorp’s most recent IRP, in this case the 2025 IRP.

PacifiCorp’s draft 2025 CEIP preferred portfolio, based on the 2025 IRP, demonstrates a need for supply-side and demand-side projects and programs over the next two decades, optimized under the social cost of greenhouse gases (SCGHG) price-policy assumption. Specifically, Washington’s share of the draft 2025 CEIP preferred portfolio includes 856 MW of wind, 524 MW of solar, and 1,385 MW of batteries by the end of 2029.²⁶ Of these resources, 703 MW of wind, 423 MW of solar, and 406 MW of batteries are added on December 31, 2029. These resources allow Washington to reach compliance with the GHG neutral standard in 2030, with an interim target of 110 percent. Through the end of 2045, Washington’s shares include a total of 1,148 MW of wind, 1,025 MW of solar, and 1,665 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. Demand-side 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.

A summary of the resulting interim targets based on these resource needs over the next 21 years is available in Figure 2. 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 demand-side resources. 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).

²⁵ WAC 480-100-640(2).

²⁶ 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.

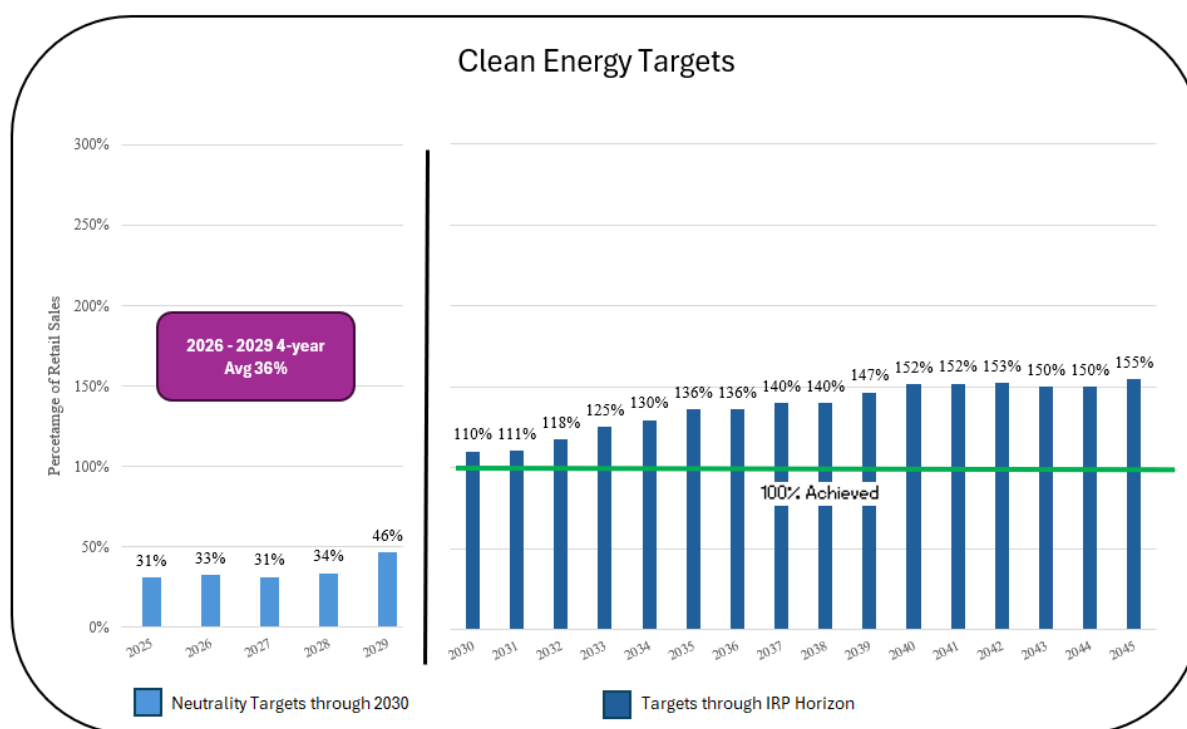
Figure 2 – PacifiCorp's Clean Energy Interim Targets 2025-2045

Table 5 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 5 - 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 Nonemitting Energy	1,310,620	1,306,196	1,443,155	1,978,179	6,038,150
Net Retail Sales	2,713,297	2,854,418	2,854,194	2,290,338	10,712,246
Target Percentage	33%	31%	34%	46%	
Interim Clean Energy Target	1,310,620	1,306,196	1,443,155	1,978,179	6,038,150

Portfolio Development

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:

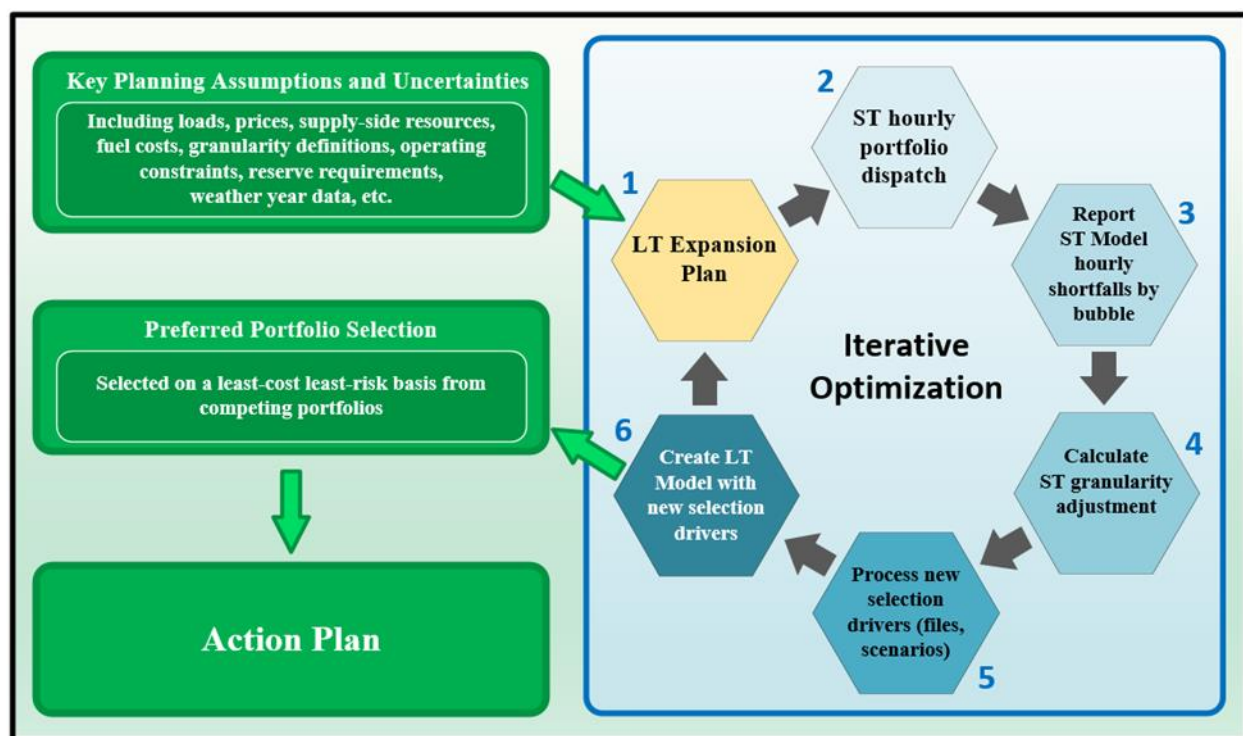
- **Utah/Idaho/Wyoming/California (UIWC):** The four states included in this jurisdictional category in the 2025 IRP incorporate resource requirements driven by the Western Resource Adequacy Program (WRAP) for each jurisdiction. These requirements enforce the selection of sufficient firm capacity (including 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 coal-out-of-rates and 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 analyzed and optimized using the SCGHG price-policy assumption and include clean energy targets consistent with CETA clean energy standards from 2030 onwards and. 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 prices.

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

Modeling

PacifiCorp’s portfolio evaluation uses two models from the PLEXOS platform.²⁷ 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 3 summarizes the modeling and evaluation steps for the 2025 IRP and CEIP.

²⁷ Additional information regarding the PLEXOS platform is available online here: <https://www.energyexplor.com/plexos>.

Figure 3 – 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.

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 at all.
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 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 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 (per the supply-side resource table).
- *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 for PacifiCorp’s six-state system.

Target Development

To develop interim targets in accordance with the 2030 and 2045 clean energy targets, the Washington allocation of the draft 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 Washington Inter-Jurisdictional Allocation Methodology (WIJAM) for existing resources and proxy resources.²⁸

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 are also CETA compliant, namely hydroelectric.²⁹ 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.
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 were defined as total energy served to customers annually, net of distributed generation, existing and optimized energy efficiency and DSM resources. CETA interim targets were 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 were 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.

²⁸ 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.

²⁹ 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".

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.³⁰ 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 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 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.

³⁰ RCW 19.405.040 (1)(b).

V. Key Features of the Draft 2025 CEIP Preferred Portfolio

Note – Analysis and development is ongoing for the final 2025 CEIP preferred portfolio and changes are expected. A discussion of anticipated modeling updates and uncertainty regarding the planning environment are described in Chapter VI.

The current planning environment is increasingly volatile. In particular, the recent passage of the OBBBA and recent federal Executive Orders are discussed further in “Planning Environment Changes” section of this CEIP, introduce significant changes that will affect the cost of renewable resources needed to meet CETA targets along with new implementation risks that were not present when the 2025 IRP was finalized. Consequently, the 2025 IRP preferred portfolio is being used in this *draft* CEIP. PacifiCorp will incorporate these new developments into the final CEIP preferred portfolio by the time it is filed October 1, 2025.

The discussion that follows describes the outcomes of the 2025 IRP preferred portfolio in terms of generating resource selections, transmission, and emitting resources, and distributed generation

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 draft CEIP preferred portfolio, PacifiCorp projects increasing Washington-allocated renewable and non-emitting energy to serve electric sales to 46 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 3,838 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 resources, as summarized in Table 6. In the near-term before 2030, Washington customers will require 1,380 MW of new renewable resources, including 856 MW of wind and 524 MW of solar, before the end of 2029, to generate the required CETA-compliant energy in 2030. Additionally, 1,385 MW of batteries are selected to meet resource adequacy needs and is expected to support the generation and value of intermittent CETA-compliant energy, while not directly contributing to the interim targets themselves. Storage resources are an essential part of transitioning to a reliable, zero-GHG emitting portfolio.

Table 6 - Washington Jurisdictional Shares of Draft 2025 CEIP Preferred Portfolio

WA 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
Nuclear	-	-	-	-	-	-	-	32	-	-	-	-	-	-	-	-	-	-	-	-	32
Renewable Peaking	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DSM - Energy Efficiency	-	0	13	16	15	17	18	18	19	19	20	19	19	15	14	12	11	11	10	8	7
DSM - Demand Response	-	0	-	15	2	2	-	-	-	-	-	8	-	6	1	1	1	-	1	-	14
Renewable - Wind	-	-	-	5	148	703	-	-	-	7	87	10	44	9	0	94	12	-	5	-	24
Renewable - Utility Solar	-	-	-	56	45	423	45	60	101	56	3	-	0	0	139	26	3	-	-	49	19
Renewable - Small Scale Solar	-	-	-	-	-	-	-	-	-	-	-	-	0	-	-	-	-	-	-	-	0
Renewable - Battery, < 8 hour	-	-	-	865	114	168	-	-	-	-	-	-	-	129	67	7	12	-	5	-	-
Renewable - Battery, 24+ hour	-	-	-	-	-	238	3	3	4	3	4	4	4	4	4	4	4	5	5	5	5
Total																					

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 upon 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 draft 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 7.^{31,32}

Table 7 - Incremental Transmission Additions to Serve Washington Customers in Draft 2025 CEIP Preferred Portfolio

		Export (MW)	Import (MW)	Interconnec t (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 Area 14: Summer Lake	400	400	400	111	100%	Summer Lake	Hemingway
2028	Cluster 1/2/3: Walla Walla	0	0	393	328	100%	n/a	n/a
2028	Serial/Cluster 1/2: Yakima	0	0	628	64	100%	n/a	n/a
2029	Cluster 2 Area 23: Willamette Valley	0	0	393	2	100%	n/a	n/a
2030	Cluster 2 Area 19: Summer Lake to Central Oregon 500 kV	1,500	1,500	670	1,283	100%	Summer Lake	Central OR
2030	Walla Walla - Yakima 230 kV	400	400	400	142	100%	Walla Walla	Yakima
2039	Walla Walla - Central Oregon 500 kV	1,500	1,500	670	1,463	100%	Walla Walla	Central OR
Grand Total		3,800	3,800	3,753	3,406			

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

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.

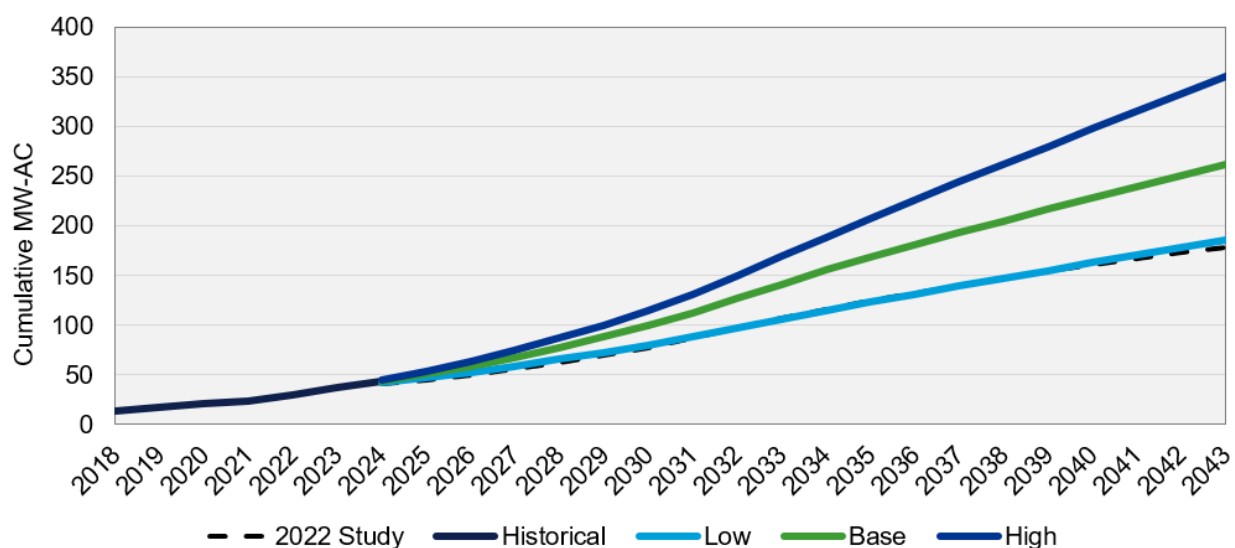
Station (Hermiston) in Hermiston, Oregon. Current modeling assumptions include both Chehalis and Hermiston serving Washington customers through the end of 2044.³³

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.³⁴ 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.

Figure 4 - Washington Distributed Generation Assumptions – All Technologies



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.

³⁴ Available online at https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025_IRP_Vol_2.pdf

VI. Planning Environment Changes

For integrated resource planning, PacifiCorp uses the best information available at the time of its analyses, 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 since PacifiCorp's 2025 IRP was filed and which the draft 2025 CEIP is based on, additional significant regulatory and legislative changes have occurred. These changes are discussed below, and will be reflected in the final 2025 CEIP.

Federal Tax Policy

On July 4, 2025 the OBBBA became law, and materially impacts the costs and benefits of certain renewable and storage resources needed to comply with CETA clean energy targets.³⁵ 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 electricity³⁶ and an investment tax credit (ITC) for a percentage of each dollar invested in the resource.³⁷ There were similar production credits for clean hydrogen resources.³⁸

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.³⁹ 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 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.⁴⁰ Moreover, President Trump issued an executive order on July 7, 2025, that might influence 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.⁴¹ The implementation of these new rules is still ongoing and there is uncertainty regarding how these rules will be enforced and interpreted.

In the 2025 IRP, it was assumed that any 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

³⁵ The One Big Beautiful Bill Act, Pub. L. No. 119-21 (2025).

³⁶ 26 U.S.C. § 45Y(a)(1).

³⁷ 26 U.S.C. § 48E(a)(1).

³⁸ 26 U.S.C. § 45V(a).

³⁹ 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).

⁴⁰ Pub. L. No. 119-21, § 70512.

⁴¹ *Ending Market Distorting Subsidies for Unreliable, Foreign-Controlled Energy Sources*, Exec. Order No. 14,315, 90 Fed. Reg. 30,821 (Jul. 7, 2025).

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

For preparation of the final CEIP, given the significant change in federal policy since the filing of the 2025 IRP, assumption changes regarding new tax credit eligibility will be analyzed in terms of their impact on resource selections and interim targets for Washington customers.

Impacts of the 2026 Protocol

On April 1, 2025, PacifiCorp filed the 2025 Power Cost Only Rate Case (PCORC).⁴² 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 WIJAM. The adoption of the Washington 2026 Protocol, if approved by the Commission later this year, would change the allocation of system costs when establishing rates for Washington customers. The Washington 2026 Protocol is expected to improve progress towards CETA and provide more certainty when establishing and then developing plans to achieve both interim and binding targets. However, the realignment of existing resources may impact the least-cost, least-risk portfolio selections, and will be relevant to the 2025 CEIP preferred portfolio. If the Washington 2026 Protocol is approved it will go into effect when setting rates for Washington customers on January 1, 2026, immediately rendering the interim targets in this draft CEIP incorrect.

The 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 a cost allocation for 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 (including Washington’s system share and a previously un-allocated 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), the company anticipates presenting a variant of the 2025 CEIP preferred portfolio – under the 2026 Protocol and associated clean energy interim targets. The final 2025 CEIP will include these analyses to inform Commission and stakeholder review.

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 will reflect 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

⁴² *WUTC v. PacifiCorp d/b/a Pacific Power & Light Company*, Docket No. UE-250224 (Apr. 1, 2025).

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 historical years with below-average generation.

Additional Modeling Updates

PacifiCorp intends to make the following additional updates and enhancements for the final CEIP preferred portfolio:

- For proxy wind and solar resources that are considered to be eligible for tax credits, the value of production tax credits (PTCs) will be levelized over the life of the asset. This is consistent with the typical structure of a power purchase agreement.
- Removal or change in timing 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 will be updated to reflect the most recent 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 Western Resource Adequacy Program.
- Use of allocation factors for existing resources consistent with the 2025 IRP retail sales forecast.
- Escalation rates for proxy resources will be corrected to align with the commercial operation date assumed in the Supply-Side Resources Table in the 2025 IRP.

Note – additional portfolio sensitivities to analyze how forecasted interim targets and annual costs might change under various changes in the planning environment are being developed for the final CEIP.

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 Demand-Side Management 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

Note – Analysis and development is ongoing for the final 2025 CEIP preferred portfolio and changes to the renewable energy targets is expected.

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 8 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 46 percent of retail electric sales being served with renewable energy by the end of 2029.

The increase in renewable energy from 33 percent in 2026 to 46 percent in 2029 is expected to be driven both by the additions of new renewable and storage resources that PacifiCorp has contracted to come online through mid-2026, as described previously in Table 1, and by the significant addition of new proxy renewable and storage 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 8 - 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	1,310,620	1,306,196	1,443,155	1,978,179	6,038,150
Net Retail Sales	2,713,297	2,854,418	2,854,194	2,290,338	10,712,246
Target Percentage	33%	31%	34%	46%	
Renewable Energy Specific Target	1,310,620	1,306,196	1,443,155	1,978,179	6,038,150

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.

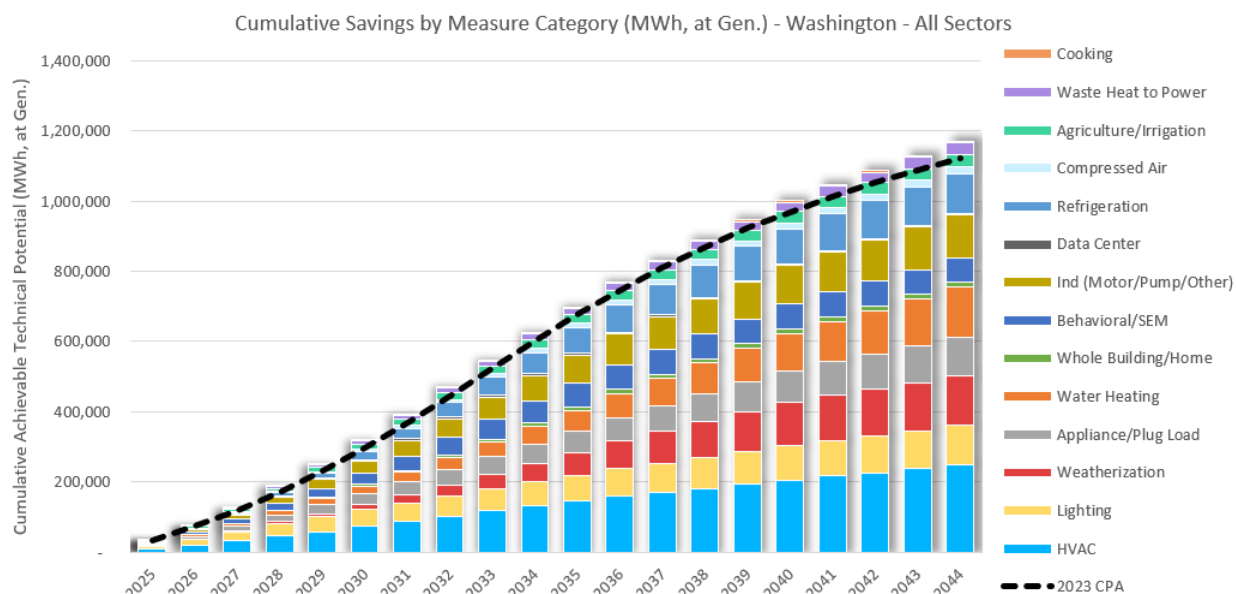
New cost-effective energy efficiency measures were among the new resource selections that were present in every IRP portfolio. These resources were first identified through the development of a CPA. Several measures quantified non-energy impacts netted against measure cost. Examples included health benefits 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 5 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.

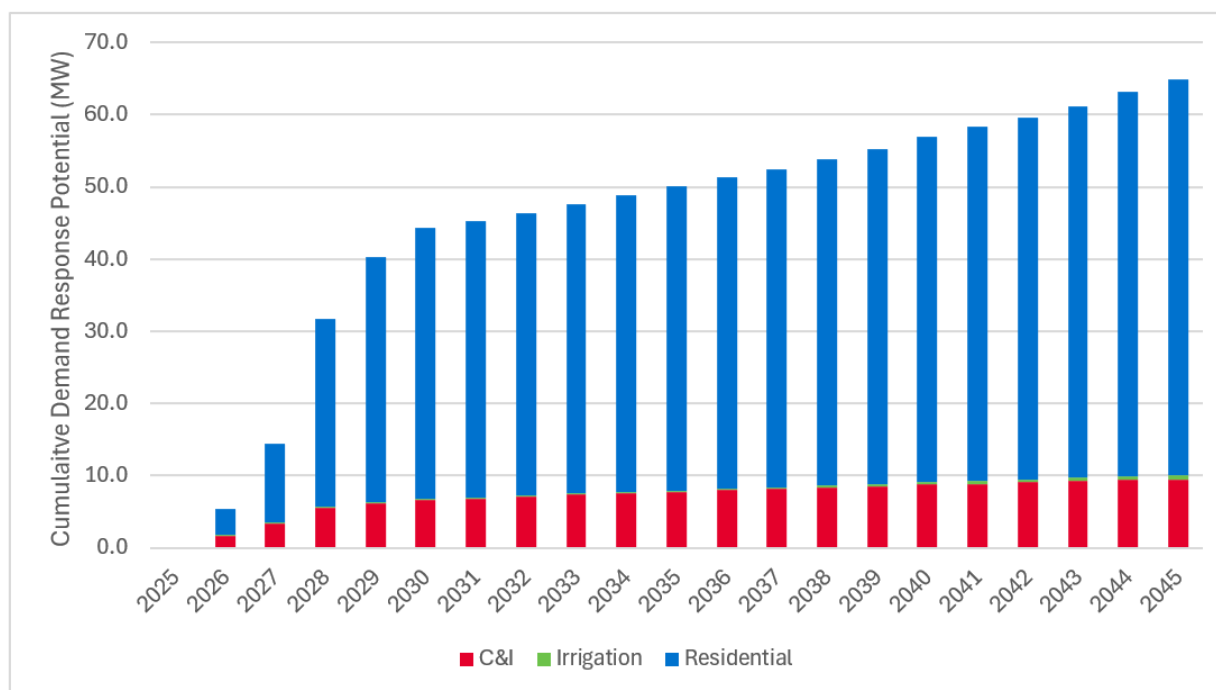
⁴⁶ As of Q4 2024, AEG became a part of ICF.

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

Figure 5 - 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 in a least-cost/least-risk manner. The conservation resources which were selected in the preferred portfolio became the cost-effective conservation potential, informing acquisition of energy efficiency.

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 technical achievable potential is input to the IRP model as a resource option to be selected to meet system adequacy. See Figure 6.

Figure 6 - 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 which were selected in the preferred portfolio became the cost-effective potential, informing acquisition of demand response.

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 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 9 - 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

To establish a four-year target for demand-response resources, the company relied on results from the 2025 CPA and the 2025 IRP, as described above. 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's 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).

Adjusting for these considerations, PacifiCorp's estimated demand-response target for the 2026-2029 CETA planning period is 22.0 MW of available demand response by December 31, 2029.⁴⁸ And estimated forecast of the growth of demand-response capacity to achieve this target is provided in Table 10.

Table 10 - Estimated Growth Forecast for Demand Response

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

⁴⁸ This target includes both summer and winter capacity estimates and does not include line losses.

VIII. Customer Benefit Indicators

As noted in PacifiCorp’s inaugural CEIP, Washington’s transition to a clean electricity system necessitates comprehensive, system-wide changes that impact both utilities and individual customers. These changes have and will continue to 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 highly impacted communities (HICs)⁴⁹ and vulnerable populations (VPs)⁵⁰, 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 13) 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.

As the company continues to engage with its advisory groups to better understand the impacts of its CBIs and how useful or actionable they can be, it will continue to evolve the framework to reflect that understanding and identify areas for improvement. The company anticipates that the work on CBI development and metrics will continue as more is learned about how best to track and measure the distribution of the benefits and burdens of the transition to clean energy.

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

⁴⁹ [RCW 19.405.020](#) defines highly impacted communities as communities identified by the Washington State Department of Health through cumulative impact analyses, as outlined in RCW 19.405.140, or any community located within census tracts that are fully or partially situated on “Indian country,” as defined in 18 U.S.C. § 1151.

⁵⁰ Vulnerable populations refers to communities identified under [CETA](#) as facing a disproportionate cumulative risk from environmental burdens and climate change impacts that stems from adverse socioeconomic conditions (e.g., high unemployment, high housing and transportation costs, limited access to food, health care, and language services) and sensitivity factors (e.g., low birth weight and higher rates of hospitalization).

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:

- In accordance with CBI Condition 10, 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 stakeholder 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, in accordance with CBI Settlement Condition 1, PacifiCorp committed to expanding data availability throughout the 2021 CEIP reporting period and remains dedicated to continuing these efforts. Going forward into the 2025 CEIP reporting period, the company will look into ways that it can streamline its 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>).

In accordance with CBI Settlement Condition 12, the sections that follow offer a comprehensive and transparent explanation detailing: (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 be influenced by the company’s operational decisions and strategic initiatives. This detailed overview is intended to provide 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.

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 equity framework currently in development at the wider company level and goes beyond just clean energy planning.

With that in mind, PacifiCorp recognizes the Energy Equity Project (EEP) framework, developed by the University of Michigan, as 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. Leveraging it as a guide to continuous improvement will support the company’s ongoing efforts to identify, measure, and track equity outcomes related to its CBIs while also meeting regulatory expectations and community-defined priorities.

There are several features of the EEP framework to consider:

- **Sector-Specific Design.** The EEP framework was developed explicitly for application in the energy sector, offering direct relevance to utility operations, regulatory oversight, and community energy outcomes. Its metrics reflect key equity-centered considerations relative to affordability, access, resilience, health impacts, and participation in clean energy programs.

- **Grounding in Energy Justice Principles.** The framework is built around the four tenets of energy justice. Keeping these tenets in mind as the framework continues to evolve will help to ensure that CBIs measure whether the distribution of benefits and burdens between named and all other communities is equitable.
- **Community and Expert Validation.** The framework was developed in collaboration with named communities, energy regulators, researchers, and utilities, which provides both technical rigor and stakeholder legitimacy.
- **Data Accessibility and Integration.** EEP metrics are designed for integration with existing public datasets, such as the U.S. Census Bureau’s American Community Survey and Low-Income Energy Affordability (LEAD) Tool. Notably, the company is already using both of these datasets to track the impact of its CBIs on named communities.

Vulnerable Populations Update

Vulnerable Populations Workshops

CBI condition 14 from the 2021 Revised CEIP settlement conditions, requires that 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.”

In alignment with CBI condition 14, 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 CBI condition 14 itself, 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 incorporates nineteen criteria in addition to the criteria used by 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 11.

Table 11 - Population Vulnerability Factors

Variable	Data Source
Tribal Flag	Internal Data
Rural (RUCA)	<u>United States Department of Agriculture</u>
HUD Qualified Census Tract	<u>Housing and Urban Development</u>
Community in Economic Distress	<u>US Dept. of the Treasury</u>
Older adults (>=65 Years)	<u>American Community Survey</u>
Young Children (<5 Years)	<u>American Community Survey</u>
Single Parents	<u>American Community Survey</u>
Immigrant (Foreign Born)	<u>American Community Survey</u>
Race	<u>American Community Survey</u>
Ethnicity - Hispanic	<u>American Community Survey</u>
Non-English at Home	<u>American Community Survey</u>
Deaths from Cardiovascular Disease	<u>Washington Department of Health – Washington Tracking Network</u>
Low Birth Weight	<u>Washington Department of Health – Washington Tracking Network</u>
Hearing Impairment	<u>American Community Survey</u>
Disabilities	<u>American Community Survey</u>
Hospitalization Rate	<u>Comprehensive Hospital Abstract Reporting System</u>
Deep Poverty (<=50% FPL)	<u>American Community Survey</u>
At or Below Poverty Level (<=200% FPL)	<u>American Community Survey</u>
Fixed Income	<u>American Community Survey</u>
Energy Burdened	<u>Low-Income Energy Affordability Data Tool</u>
Housing Quality	<u>Housing and Urban Development</u>
Transportation Burdened	<u>Not Available</u>
Food Insecurity	<u>United States Department of Agriculture</u>
Unemployment	<u>American Community Survey</u>
Certified MWBE	<u>Certified Business Directory</u>
Agricultural Workers	<u>American Community Survey</u>
Low Education Attainment	<u>American Community Survey</u>
Renters	<u>American Community Survey</u>
Multi-Generational Household	<u>American Community Survey</u>
Multi-Family Household	<u>American Community Survey</u>
Gas-Heated Homes	<u>American Community Survey</u>
Different Land Statuses	Yakima County Assessment Office/Internal Data
Access to Internet	<u>American Community Survey</u>
Access to Healthcare (% Insured)	<u>American Community Survey</u>
PM2.5	Washington Department of Health – Washington Tracking
Private Generation	Internal Data

As described in PacifiCorp’s 2025 CEIP Progress Report,⁵³ the change in the company’s vulnerable populations methodology did impact how it reports out on its CBIs. 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, 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 utilizes 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.”

Pursuant to this settlement condition, 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. While no formal decisions were made during this initial discussion, 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 12.

Table 12 - 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

⁵³ 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>).

Additionally, in keeping with CBI condition 13, the company will assess, in collaboration with the EAG, at what granularity it would be appropriate and valuable to track the vulnerability factors identified in Table 12.

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.

CBI Development

PacifiCorp developed and has refined its CBIs through an iterative, stakeholder engagement process that leveraged the voices, perspectives, expertise, and creativity of internal subject matter experts and external stakeholders, including:

- EAG
- Low-Income Advisory Group (LIAG)
- DSM Advisory Group
- IRP interested parties
- WUTC Staff
- The Washington Attorney General's Office of Public Counsel, and
- Interested members of the public.

PacifiCorp led a stakeholder-oriented process to develop the ten CBIs and associated metrics that make up its 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 13.

Table 13 - 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. a. Number of programs for which PacifiCorp provides translation services or translated material. b. 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.

No.	CBI Category	CBI	Metric(s)
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. - 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.

No.	CBI Category	CBI	Metric(s)
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).

To develop the CBI framework, PacifiCorp employed an outcome-oriented approach designed to align community benefits with measurable, equity-centered outcomes. This section provides a detailed overview of the key steps undertaken in that process, highlighting how each stage was shaped by an intentional focus on outcomes that reflect community priorities and long-term impact.

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) is a measurement of the percentage of customers who experience and outage more than a specified number of outages in 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.

1. **Identify named communities and the challenges they face:** To monitor the equitable distribution of benefits, PacifiCorp took input from stakeholders 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 stakeholders were able to offer feedback on the proposed CBIs.
4. **Align CBIs with regulation:** Guidance from Commission Staff also 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 stakeholders and the EAG through a series of public meetings.
6. **Incorporate stakeholder input on CBIs:** PacifiCorp conducted a comprehensive review of the Joint Comments on CBIs submitted by 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, stakeholders, peer utilities, advocates, and the EAG to refine and validate the proposed metrics. PacifiCorp prioritized metrics that were reliable, repeatable, and representative of the communities and 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 stakeholder 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.

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.

By offering greater granularity, companion metrics disaggregate CBIs into specific, measurable components, enabling more refined and insightful analyses relative to the impacts of company programs. This level of detail allows for 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 inclusion in 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 four 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 pursuant to CBI Settlement Condition 4 in docket UE-210829.
- 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 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 Settlement 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 pursuant to CBI Settlement Condition 5 in docket UE-210829.
- 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, also in alignment with CBI Settlement Condition 5.

As part of the company's efforts to meet the requirements stipulated in Settlement 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 greenhouse gas emissions, though there are other air pollutants that are also byproducts of the electricity generation process. Greenhouse gas 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 greenhouse gas 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.⁵⁹

⁵⁹ 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.

Additionally, pursuant to CBI Settlement Condition 7, 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.
- 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 greenhouse gases, 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.

Consistent with CBI Settlement Condition 6, PacifiCorp continues to engage its Demand-Side Management (DSM) Advisory Group, EAG, and Low-Income Advisory Group, 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 the Energy Efficiency Action - Incremental Energy Efficiency Program Utility Actions section below.

Public Health

Community-level adaptation to environmental health risks and energy-related vulnerabilities is essential to protect public health and well-being, 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.

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 Tool⁶⁰, 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, pursuant to Appendix A of Commission Order 04 in docket U-200281, and in alignment with CBI Settlement Condition 2.
- Residential arrearages as reported pursuant to Appendix A of Commission Order 04 in docket U-200281 and in alignment with CBI Settlement Condition 3.

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 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 CEMI (Customers Experiencing Multiple Interruptions) 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.⁶¹ 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.

⁶⁰ Available here: <https://lead.openei.org/>.

⁶¹ 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.

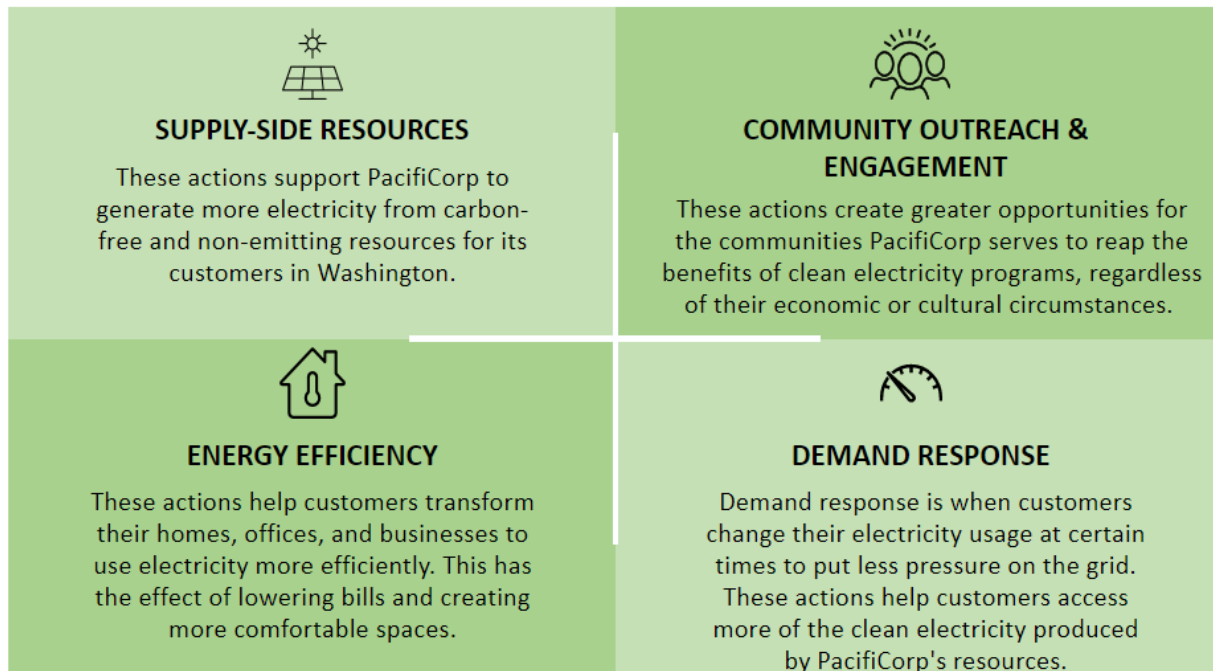
- CAIDI scores (seven-year rolling average) at area level including major events.
- CEMI-4 index at area level.

Pursuant to CBI Settlement Condition 8, 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.

IX. Specific Actions

This chapter on specific actions 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.

The company is proposing actions that fall into four categories: supply-side resources, energy efficiency, demand response and community outreach and engagement.



CETA specific actions must:

- (a) Pursue all cost-effective, reliable, and feasible conservation and efficiency resources, and demand response;
- (b) Maintain and protect the safety, reliable operation, and balancing of the electric system; and
- (c) Ensure that all customers are benefiting from the transition to clean energy through:
 - (i) The equitable distribution of energy and nonenergy benefits and reduction of burdens to vulnerable populations and highly impacted communities;
 - (ii) Long-term and short-term public health and environmental benefits and reduction of costs and risks; and
 - (iii) Energy security and resiliency.⁶²

The supply-side resource actions describe the near-term capacity and energy need that PacifiCorp identified in the draft 2025 CEIP preferred portfolio to meet Washington customers' energy, and capacity needs and to make progress towards CETA obligations. PacifiCorp expects to

⁶² WAC 480-100-610(2)-(3).

issue the 2025 Washington Situs RFP 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, 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 its initial 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 it 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. PacifiCorp will continue to leverage lessons learned through public engagement channels to assess opportunities to improve outreach and engagement efforts and will make a concerted effort to expand access to educational materials. PacifiCorp also plans to ensure feedback opportunities are clearly communicated early, where possible, to support broader public participation and awareness which in turn will better inform the company's programs and specific actions. PacifiCorp will continue to nurture its relational partnerships in Washington with community-based organizations and other key community partners to identify opportunities for proactive community outreach and engagement activities. 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

Irrespective of how tax credits applicable to wind, solar, and battery resources are modeled in this CEIP, as PacifiCorp implements the pending 2025 Washington Situs RFP, it will seek every opportunity to procure prudent CETA-eligible projects. Moreover, if there are projects with timelines that necessitate faster processing than timelines in the RFP will allow, PacifiCorp will use available regulatory tools, such as requests for waivers, to procure the best possible resources based on the facts and circumstances available at the time.

Washington's Resource Need

Based on PacifiCorp's most recent CETA progress report for 2024 actual generation of CETA-compliant energy, forecasts of new renewable generating resources that have or will come online by the end of 2025, and forecasted Washington retail sales, PacifiCorp estimates a need for an additional 2,024,669 – 2,875,789 MWh of CETA-compliant energy by the end of 2030 to meet 80-100% of electric retail sales in alignment with the GHG neutrality standard (assuming that if only 80% of electric retail sales were served with long-term resources, then up to 20% would be met with alternative compliance like the purchase of unbundled RECs). This energy need can be

translated 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.

To that end, the draft 2025 CEIP preferred portfolio results in a set of resource selections to optimally fill this energy and capacity need based on the IRP topology and proxy resource technology characteristics and costs that further inform future supply-side procurement decisions.

Table 14 describes the proxy supply-side resources selected for Washington customers to be built by the end of each year for 2026-2029, resulting in 1,380 MW of installed capacity of wind and solar resources and 1,385 MW of batteries by 2030. While the IRP-based selections are useful in indicating what types of resources, and when, would be most valuable to meet energy and capacity needs, selections based on proxy resources are not final. The following section describes how PacifiCorp will evaluate resource selection in an RFP process to meet these identified supply-side resource needs.

Table 14 - 2026-2029 Proxy Supply-Side Resource Selections

Proxy Resource	Type	Washington-allocated Installed Capacity Built (MW)*				
		2026	2027	2028	2029	Total
PV_PX.COR._.PTC.Util- ity Scale	Solar - Photo Voltaic	0	0	9	29	38
PV_PX.SUM._.PTC.Util- ity Scale	Solar - Photo Voltaic	0	25	25	50	101
PV_PX.WMV._.PTC.Util- ity Scale	Solar - Photo Voltaic	0	0	0	28	28
PV_PX.WWA._.PTC.Util- ity Scale	Solar - Photo Voltaic	0	5	10	183	199
PV_PX.YAK._.PTC.Util- ity Scale	Solar - Photo Voltaic	0	25	0	132	157
WD_PX.COR._.PTC.Util- ity Scale	Wind	0	0	0	17	17
WD_PX.SUM._.PTC.Util- ity Scale	Wind	0	0	0	101	101
WD_PX.WMV._.PTC.Util- ity Scale	Wind	0	0	149	0	149
WD_PX.WWA._.PTC.Util- ity Scale	Wind	0	5	0	263	268
WD_PX.YAK._.PTC.Util- ity Scale	Wind	0	0	0	323	323
BAT.PX.CHE._.ITC.Li ion 4hr	Battery	0	100	0	0	100
BAT.PX.WWA._.ITC.IronAir_1 00hr	Battery	0	0	0	103	103
BAT.PX.WWA._.ITC.Li ion_4 hr	Battery	0	100	1	2	103
BAT.PX.WWA._.ITC.Li ion_4 hr Local	Battery	0	297	49	39	385
BAT.PX.WWA._.ITC.Li ion_8 hr	Battery	0	0	0	0	0
BAT.PX.YAK._.ITC.IronAir_10 0hr	Battery	0	0	0	135	135
BAT.PX.YAK._.ITC.Li ion 4hr	Battery	0	131	52	100	284
BAT.PX.YAK._.ITC.Li ion_4hr Local	Battery	0	237	12	27	276

*Note "installed capacity built" in-year represents total capacity of resources expected online by the end of that year which in PLEXOS is reported as built on January 1 of the following year. For example, a resource selected to come online 1/1/2030 in PLEXOS is being reported as a resource need to come on-line by 12/31/2029.

Long-Term CETA-Eligible Resource Procurement

Based on the outcome of the 2025 IRP, PacifiCorp identified a near-term resource need to serve Washington customers to make progress towards CETA's clean energy standards and require-

ments under the WRAP. PacifiCorp filed the draft RFP (2025 WA Situs RFP) with the Commission on June 10, 2025.⁶³ This RFP is situs to Washington meaning that acquired resources will specifically support and be assigned in rates to PacifiCorp’s Washington customers and no other jurisdictions. PacifiCorp anticipates releasing the RFP to the market shortly after the Commission issues a decision on the draft RFP, expected on August 28, 2025.

The PacifiCorp 2025 WA Situs RFP will accept and evaluate cost-competitive bids for resources that have a minimum nameplate capacity of 1 MW and have a Guaranteed Commercial Operation Date (GCOD) 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.⁶⁴ 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.

Resource Adequacy in Supply-side Resource Selection

As part of the 2025 IRP, PacifiCorp developed a multifaceted approach to modeling 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. 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 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.

⁶³ 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).

⁶⁴ WAC 480-100-610(2)-(3).

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.⁶⁵ 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 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. In the interim, 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. Discussion on PacifiCorp’s investigation of short-term, CETA-compliant resources will be developed in the final 2025 CEIP.

CBI/Action Mapping: Supply Side Specific Actions

As discussed above, the non-price scoring questionnaire included in the 2025 WA Situs RFP intentionally incorporates the four core tenets of energy justice: distributional justice (ensuring equitable allocation of benefits and burdens), procedural justice (providing fair and inclusive decision-making processes), recognition justice (acknowledging and addressing the needs of historically marginalized communities), and restorative justice (remedying past inequities and fostering long-term community resilience). In applying the four tenets, the questionnaire was intentionally structured to align with the company’s CBI framework wherever applicable, ensuring that each CBI could be meaningfully connected to relevant questionnaire items where it was possible to do so. Table 15 summarizes how each CBI is represented within the questionnaire and the RFP itself. Where a CBI was not applicable to the non-pricing scoring, it is noted and a justification for why is included.

Table 15 - 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 draft 2025 Washington Situs RFP solicitation does not include or consider DSM resources. For discussion regarding CBI mapping and DSM resources, see subsequent sections.

⁶⁵ 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>

No.	CBI	Application/ Representation in Non-Price Scoring
4	Increase efficiency of housing stock and small businesses, including low-income housing.	Not applicable. The scope of the draft 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 development, community resilience, and environmental impacts in named communities affected by the project.

PacifiCorp is committed to improving its incorporation of CBIs and CBI mapping in supply-side resource procurement for future RFPs and resource acquisition decisions.

Energy Efficiency Actions

Existing Customer Programs in Washington

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 VIII, 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 to 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 (LIBA) 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 Program Utility Actions

PacifiCorp will use the energy efficiency programs described in Table 16 and more fully described in the 2026-2027 DSM Business Plan, to deliver the energy efficiency targets. PacifiCorp programs in combination with market transformation savings delivered by the Northwest Energy Efficiency Alliance are projected to deliver 186,196 MWh at site which exceeds the target of 135,256 MWh at site (or 145,371 MWh at generation). 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 16 - 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	
Wattsmart Homes	5,665	5,686	5,665	5,686	
Home Energy Reports	2,616	2,328	2,616	2,328	
Total Residential Programs	8,353	8,086	8,353	8,086	
Wattsmart Business - Commercial	25,461	23,981	25,461	23,981	
Wattsmart Business - Industrial	8,838	7,713	8,838	7,713	
Wattsmart Business - Irrigation	1,241	1,251	1,241	1,251	
Total Business Programs	35,540	32,945	35,540	32,945	
Northwest Energy Efficiency Alliance	3,748	4,362	3,748	4,362	
Distribution Efficiency	63	-	63	-	
Production Efficiency	-	-	-	-	
Total Other Conservation Initiatives	3,811	4,362	3,811	4,362	
Total Conservation	47,704	45,394	47,704	45,394	186,196

*All savings values are at site.

PacifiCorp will continue to adaptively manage residential and non-residential customer energy efficiency programs to both achieve BCP Plan targets with a cost-effective portfolio of programs⁶⁶ and CETA objectives including a focus on delivery of program services and benefits to Named Communities. Starting January 1, 2026, PacifiCorp will expand its energy efficiency utility actions to include the company's geographically defined VP census tracts. The energy efficiency utility actions 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
- Improve indoor air quality

Details are available in PacifiCorp's 2026-2027 Biennial Conservation Plan (see Appendix 2, 2026-2027 DSM Business Plan).⁶⁷ The incremental utility actions for this CEIP are described below.

⁶⁶ In compliance with WAC 480-109-100, 10c, the Low Income Weatherization program is excluded from portfolio-level cost-effectiveness calculations.

⁶⁷ 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.

Residential:**Wattsmart Homes⁶⁸**

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 participation. Examples of this include:

- Enhanced incentives for windows in multi-family units on residential rate schedules. Initial focus on buildings in highly impacted communities.
- Continued LED bulb distribution offer to VP customers through named community CBOs that include customers on Tribal land. This offer replaced the direct-install lighting and discount retail lighting offers that were discontinued by the Regional Technical Forum and allows us the program to continue supporting named community customers. Continue direct install residential lighting in multi-family units. Continue focus in highly impacted communities.
- 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.
- Continued promotion of new construction offerings for multifamily and single-family units with an emphasis on HICs. Outreach efforts include engaging with local building permitting departments to ensure customers are identified and engaged.
- 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. 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 multi-family residences. Customers in highly impacted communities will be eligible for this incentive and customer eligibility criteria will be available on the program website. The standard ductless heat pump measure replacing electric forced air furnace or zonal electric primary heating systems is still available for all residential customers.
- The program will continue to use RTF deemed values for ductless heat pump installations that assume a zonal electric resistance baseline since RTF does not have any measures for alternative fuel source replacement or conversions. Highly impacted community determination will be included in customer data provided by PacifiCorp.
- Continue offering no-cost tree planting to customers in highly impacted communities.

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% in 2022).
- 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.

⁶⁸ More information available online: <http://wattsmartsavings.net/washington-residential/>.

Non-residential:**Wattsmart Business**⁶⁹

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 (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.
- 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 (Highly Impacted Community and, starting in 2026, Vulnerable Population census tracts) and Very Small Businesses.
- Targeted outreach
 - 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.
- 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 highly impacted community and/or Vulnerable Population census tract
 - Vulnerable Populations:

⁶⁹ More information available online: <http://pacificpower.net/savings-energy-choices/business/wattsmart-efficiency-incentives-washington.html>.

- 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
- o Participants living in a manufactured home
- Wattsmart Homes
 - o Participants located in a highly impacted community and/or Vulnerable Population census tract
 - 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 highly impacted community and/or Vulnerable Population 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 17, 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.

Table 17 - 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.

Measurement & Verification Protocols for Energy Efficiency

Appendix 3 of the 2026-2027 DSM Business Plan provides the measurement and verification (M&V) framework for energy efficiency.

Equity and Customer Impacts

Measurements of energy efficiency impacts go beyond kilowatt-hour reductions in an effort to adequately represent the impacts of energy efficiency among other customer types, particularly in named communities.

Energy impacts

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 yet but are expected to be similar since the annual energy savings are comparable.

Non-energy impacts (NEIs)

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 non-energy impacts. 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 18 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 NEI's over the lifetime of measures installed during the 2026-2029 period.

Table 18 - DRAFT Non-Energy Impacts by Program for 2026-2029*

Program	NEI (\$)
Low Income Weatherization	\$1,438,088
Home Energy Savings	\$618,173
Home Energy Reports	\$0
Wattsmart Business	\$3,132,301
Northwest Energy Efficiency Alliance	\$871,814
Total Conservation	\$6,060,376

*These are draft values and could be updated before the final filing.

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). In total, there are five CBIs related to energy efficiency specific actions. These CBIs, the 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, as discussed below.

The company proposes five separate CBIs for energy efficiency actions – 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.

The CBI specific to 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.

Specific to energy efficiency actions, the company will document its progress regarding the CBI of participation in company energy and efficiency programs and billing assistance programs, by tracking the number of energy efficiency program participants, the number of demand response program participants, and the number and percent of participants converting from gas to electric heating under the low-income weatherization program.

Specific to energy efficiency actions, the company will document its progress regarding the CBI of “households experiencing high energy burden,” by tracking energy burden for low-income bill assistance program participants, low-income weatherization program participants, HICs, vulnerable populations and for all customers.

The CBI of “community focused efforts and investments” is intended to demonstrate the company’s increased focus on investment of energy efficiency programming so that communities more equitably receive energy efficiency program 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 High Impacted Communities targeting Vulnerable Populations. 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. The program leverages these services as generate awareness of other program offers, they can take advantage of. 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.

Specific to energy efficiency actions, the company will document its progress regarding the CBI of “community-focused efforts and investments”, by tracking workshops on energy related programs and the headcount of minorities, women and other disadvantaged program delivery staff in Washington.

Within the context of energy efficiency specific actions, 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.

Specific to energy efficiency actions, the company will document its progress regarding the CBI of “indoor air quality,” 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.

Within the context of energy efficiency specific actions, 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. The 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.

Specific to energy efficiency actions, the company will document its progress regarding the CBI of “efficiency of housing stock and small business, including low-income housing,” by tracking expenditures⁷⁰ 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.

⁷⁰ 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.

Actions to support demand response have included:

- Initiated three time-of-use pilot programs to study to 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 launch demand response programs based on bids received in the 2021 DR 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 DR 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 DR 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 DR, and progress against the CEIP DR specific target.

As of 2025, PacifiCorp has five active demand response programs.⁷¹ 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 utilized. 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 DLC 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, par-

⁷¹ The Cool Keeper program has been filed and became effective on March 28, 2025. The program is currently in a start-up phase, and is expected to open enrollment to customers in late 2025 or early 2026.

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 utilize 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 Specific Action Plan

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

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's possible the 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 DR target. Figure 7 shows the expected growth forecast by program over the 2026-2029 period.

PacifiCorp anticipates that the more mature Irrigation Load Control and Wattsmart Business DR programs will continue to provide the majority of available capacity over the plan period.

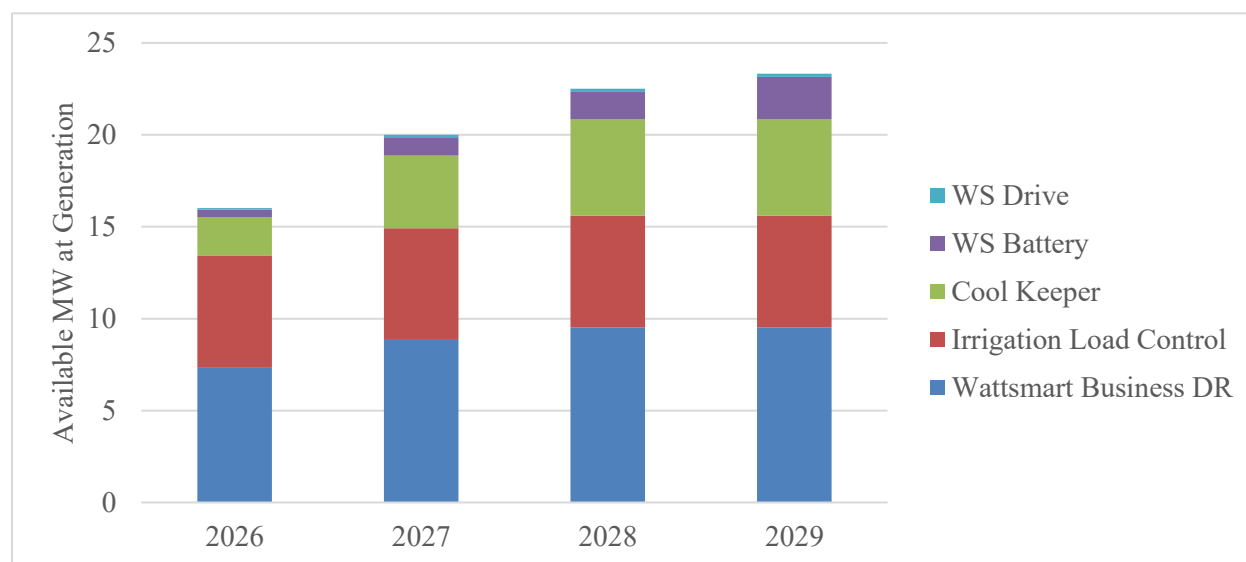
Figure 7 - Estimated Capacity by Program, 2026-2029

Table 19 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 DR resources in Washington in 2027. The results of this RFP could result in a significant change to the portfolio budget.

Table 19 - 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 Equity Advisory Group 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 DR portfolio.

One of PacifiCorp’s first actions in 2026 will be to work with the DSM Advisory Group and the Equity Advisory Group to identify the key consideration for evaluating equity in DR programs. One approach to assessing whether programs are distributing benefits equitably is look at the distribution of benefits – in the case of DR, benefits are primarily incentive dollars – across all customers. However, DR 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 WUTC Staff, that PacifiCorp adopt a minimum threshold of 27%, as a discussion point.

Also in 2026, PacifiCorp will develop an equity plan for each DR program that will incorporate the equity considerations identified with stakeholders. 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. As a starting point, for each residential program, PacifiCorp will:

- Publish the program webpage and all print marketing in Spanish
- 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 Equity Advisory Group 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 Vulnerable Populations, as these data are already tracked as CBI metrics. PacifiCorp will also continue to report results to the DSM Advisory Group and the Equity Advisory Group, 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.”⁷² 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 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 will work with these two bodies to develop a scoring framework that appropriately incorporates CBI impacts.

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

⁷² WAC 480-100-610(4)(a).

Table 20 - 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.
Wattsmart 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 protocol⁷³ for evaluating expected distribution of cost and benefits for demand response programs. 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 non-energy impacts 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 likely exist, they are difficult to quantify or translate into a monetary value. The most significant non-energy impact 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%, 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.

⁷³ E.g., <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-costs/demand-response-dr/demand-response-cost-effectiveness>

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 1-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 core 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 Vulnerable Populations, 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 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

The company envisions a number of CEIP actions that are not explicitly demand-side or supply-side actions. Generally, these “other” actions focus improvements on delivery of programs and communications to customers including to named communities (as defined in Chapter VIII). 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. In response to this feedback, PacifiCorp has implemented the following other actions as part of the CEIP:

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 interest and feedback (e.g., on Distribution System Planning and Transportation Electrification).

	• PacifiCorp conducts targeted outreach to Highly Impacted Communities 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.). Company 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 community-based organizations 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 • And others... 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. • Providing educational tools, such as 101-level presentations and recordings, to demystify utility planning processes.

- | | |
|--|--|
| | <ul style="list-style-type: none"> Enhancing web presence and usability to make meeting materials, updates, and engagement opportunities more accessible. |
|--|--|

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, and is engaged in continuous improvement of these efforts. The company has existing marketing plans for its various programs that broadly target its customer base in Washington, while also focusing outreach efforts on highly impacted communities 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,⁷⁴ enables the company to provide direct information at in-person events and meetings. The company continues to explore additional opportunities and tactics for sharing printed materials, including at centers of the community where customers can easily access information.

PacifiCorp will continue working directly with community partners to assess needs for additional outreach and will develop materials based on those conversations. This could include, but is not limited to, informational flyers, brochures, and posters, and will be calibrated based on that work with community partners. PacifiCorp also received feedback through public meeting outreach and during EAG meetings about the importance of information being accessible to and representative of our customer base. From this feedback, the company plans to adjust strategies to include more direct outreach to customers through emails, bill inserts and handouts provided to community partners and organizations. Additionally, considerations will be made for customers without access to a computer or the Internet. Energy efficiency-focused marketing plans are shared with the Washington energy efficiency advisory group annually in December. LIBA plans are shared with the low-income advisory group annually.

To demonstrate and document the company’s commitment to inclusive language outreach and access, PacifiCorp filed an initial Language Access Plan in Washington in January 2025.⁷⁵ The plan’s goal is to ensure that effective communication is taking place at all points of contact between PacifiCorp and the diverse customers and communities the company serves.

PacifiCorp recognizes the specific importance of expanding Spanish-language outreach in the company’s Washington service area. The company continues to increase the number of Spanish-language ads and direct outreach initiatives. This includes creating additional Spanish-language program webpages, materials, and resources on the company’s website. Spanish ads will tie directly to these Spanish webpages. 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.

⁷⁴ https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/washington-ceip/2025_CEIP_Meeting_Infographic_Bilingual-ES.pdf

⁷⁵ <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=4162&year=2019&docketNumber=191024> (PDF)

Non-energy impacts that may result from these outreach activities are expected to include increased awareness and participation of PacifiCorp programs such as Home Energy Savings. Non-energy impacts associated with subsequent participation in PacifiCorp programs are expected to be counted and attributed to non-energy impacts specific to programs.

Examples of non-energy impacts resulting from better outreach and increased participation in programs 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 actions specific to program outreach and communications can be implemented with existing marketing funds. Additional outreach costs are expected to be modest and will be used for enhanced outreach and materials for EAG and public meetings.

Establish an Electric Vehicle (EV) Grant Program

PacifiCorp offers an Electric Vehicle (EV) 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 territory, and 2) ensure expansion of education and learning of what transportation electrification can mean for named communities. The program was designed alongside the EAG stakeholders 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 with EAG and WUTC stakeholders in regular stakeholder meetings for improving the communities grant program design and education and outreach program components.

The company details all its programs in its Transportation Electrification Plan. The Transportation Electrification Plan also discusses regional and national trends in transportation electrification and identifies potential costs and benefits of its EV 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 Clean Energy Implementation Plan, CEIP proposes five specific actions for community outreach and engagement (see Appendix C for a detailed listing of PacifiCorp's community outreach and engagement actions). In total, there are two Customer Benefit Indicators related to these outreach and engagement actions.

The company proposes two separate CBIs for Community Outreach and Engagement Actions: one focused on culturally and linguistically responsive outreach and program communication,

and the other 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. c

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 Clean Energy Transformation Act (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.

X. Incremental Cost

Note – Analysis and development is ongoing to quantify the incremental cost and is forthcoming in the final 2025 CEIP.

WAC 480-100-660(1) states that to determine the “incremental cost of the actions taken to comply with RCP 19.405.040 and 19.405.050” the utility must compare its lowest reasonable cost portfolio (the 2025 CEIP preferred portfolio) to the Alternative Lowest Reasonable Cost Portfolio (“Alternative Portfolio”) that would have resulted in the absence of CETA requirements. The rule also states that the utility should use a portfolio optimization model consistent with the most recent integrated resource plan as the basis for calculating the lowest and alternative lowest reasonable cost portfolios. The utility must also show the difference between portfolio choices and investment decisions between the two portfolios to demonstrate which investments and expenses are directly attributed to meet the requirements of RCW 19.405.040 and 19.405.050.

As described in Chapters IV and V, the 2025 CEIP preferred portfolio was developed consistently with the recently filed 2025 IRP. The same underlying modeling assumptions and tools as were used to develop the 2025 CEIP preferred portfolio will be used to develop the Alternative Portfolio that would have resulted, but for CETA. A comparison of the two portfolios will yield any incremental costs of CETA compliance associated with long-term supply-side proxy actions as selected in the 2025 CEIP preferred portfolio.

Additionally, PacifiCorp describes forecasted incremental costs that are not captured through IRP long-term modeling, but 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 to further progress towards CETA’s objectives.

The Alternative 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 social cost of greenhouse gases in the resource acquisition decision.

To create the Alternative Portfolio consistent with rule, PacifiCorp determines 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.

Revenue Requirement Methodology

RCW 19.405.060(3)(a) states that a utility must be considered in compliance with CETA 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.”

PacifiCorp interprets this to indicate that, if *after* a four-year compliance period has ended, an 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 an incremental cost that exceeds a two percent increase of the utility’s weather-adjusted sales revenue year-over-year for the four the years, a utility would be found in compliance with CETA regardless of whether or not the specific clean energy standards were met in those years.

To indicate whether such a situation will arise where PacifiCorp might exceed this incremental cost, the company forecasts incremental costs based on both modeled IRP outcomes and non-modeled estimated cost of additional actions taken to comply with CETA, and translates it into a 2026-2029 forecast of revenue requirement, and applies the formulaic approach described in WAC 480-100-660(2) to determine if forecasted incremental costs will pass the annual threshold for alternative means of compliance.

Revenue Requirement for 2026 – 2029

PacifiCorp estimates incremental costs identified based on methodologies described in this report and calculates an annual revenue requirement using the standard revenue requirement formula:

$$\text{Revenue Requirement} = \text{Rate of Return} \times (\text{Net Rate Base}) + \text{Operating Costs}$$

Annual Threshold for Alternative Means of Compliance

Per WAC 480-100-660(2), a utility must calculate the average annual threshold amount for determining eligibility for reliance on RCW 19.405.050(3) as a means of compliance. For a compliance period consisting of four years, the mathematical formula for the Annual Threshold Amount is as follows:

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

Applying the company’s forecast of weather-adjusted sales revenues for the applicable years to this compounding formula, the company’s four-year cost threshold is \$101.9 million as shown in Table 21. This translates to an Annual Threshold Amount of \$25.5 million. Forecasted, weather-adjusted sales revenues were developed by applying approved rates (\$/MWh) in Washington to weather-adjusted forecast sales (MWh) in Washington.

Table 21 - Forecasted Annual Threshold Amount for Alternative Compliance with CETA for 2026-2029

	(\$ million)	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>

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 Conservation Potential Assessment (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 least-cost electric service to its customers. 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.⁷⁶
- **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, includ-

⁷⁶ 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.

ing unemployment, high housing and transportation costs relative to income, linguistic isolation, and access to 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: Stakeholder Feedback

Note – A summary of all stakeholder feedback received throughout the development of the 2025 CEIP, including the draft, will be included in the final CEIP for review. The most recent archive of this feedback is available online:

[https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/washington-ceip/feedback/Washington CEIP Feedback Tracker 2025-Cycle.pdf](https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/community/washington-ceip/feedback/Washington_CEIP_Feedback_Tracker_2025-Cycle.pdf)

Appendix B: Regulatory Compliance

Note – PacifiCorp is preparing additional information to be included in Appendix B in the final 2025 CEIP filing that includes a summary of how the company addressed each of the regulatory requirements described here.

Introduction

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

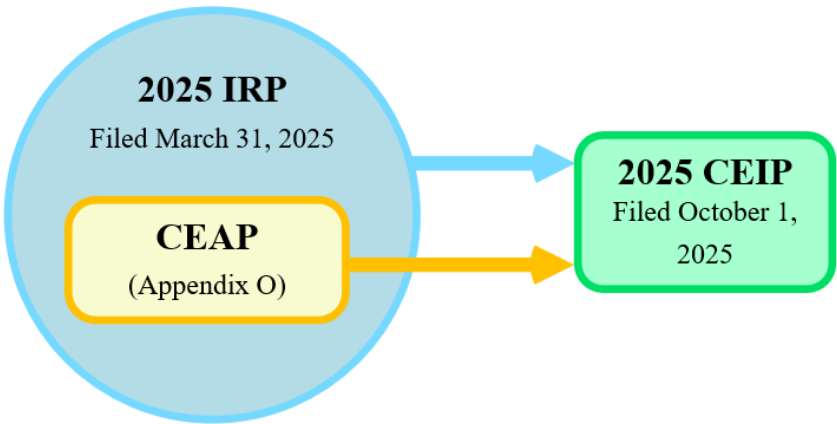
General Compliance

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 three distinct tables as follows:

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

Table B.2 – IRP and CEIP Requirements and Handling

Table B.3 – Washington CETA Standards, Rules and Guidelines

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, ratepayer 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.

Table B.2 – IRP and CEIP Requirements and Handling

Reference	Requirement or Recommendation
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.
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 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.
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 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.

Reference	Requirement or Recommendation
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, 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.
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 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.
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.
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.

Reference	Requirement or Recommendation
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 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.
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.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 9	CBI Condition 14. PacifiCorp will 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. 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.
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 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.

Reference	Requirement or Recommendation
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.
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.
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.
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.
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 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.
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.
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.

Reference	Requirement or Recommendation
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 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.
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.
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.
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.
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
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.
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.
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.
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 NEIs and CBIs in its resource selection. Due Date: 2025 CEIP.

Reference	Requirement or Recommendation
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.
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 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.
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.
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.
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.
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 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.
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

Reference	Requirement or Recommendation
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.
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, 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.
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.
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.
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 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.
Docket UE-210829, Order 06 Appendix A: Full Multi-Party Settlement Agreement, p. 14	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.
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

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.5 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.3 – Washington CETA Standards, Rules and Guidelines

Reference	Requirement
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.
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. (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 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,

Reference	Requirement
	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 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. (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

Reference	Requirement
	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.
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.
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.
RCW 19.405.050(1)	It is the policy of the state that nonemitting electric generation and electricity from renewable resources supply one 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.
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:

Reference	Requirement
	(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.
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 (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 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.
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.
WAC 480-100-620(2)	Plan includes range of forecasts of projected customer demand that reflect effects of economic forces on electricity consumption.
WAC 480-100-	Plan includes a range of optimistic and pessimistic assumptions of forecast load growth that

Reference	Requirement
620(2)	address changes in the number, type, and efficiency of electrical end-uses, and electrification adjustments made to the forecast.
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:
WAC 480-100-620(3)	- all cost-effective conservation, efficiency, and load management improvements; - all demand response (DR) at the lowest reasonable cost;
WAC 480-100-620(3)	- ten-year conservation potential used in the concurrent biennial conservation plan consistent with RCW 19.285.040(1);
WAC 480-100-620(3)	- identification of opportunities to develop combined heat and power as an energy and capacity resource; and
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 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
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
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).
WAC 480-100-620(3)(b)	Plan includes effect of DERs on the utility's load and operations.
WAC 480-100-620(3)(b)	If utility engages in a DER planning process, which is strongly encouraged, IRP should include a summary of the process planning results.
WAC 480-100-620(4)	Plan assesses wide range of conventional generating resources.
WAC 480-100-620(5)	An assessment of integrating renewable resources addressing overgeneration.
WAC 480-100-620(5). Also see WA-UTC energy storage policy statement (UE-151069 & UE-161024	Plan assesses energy storage resources. Include an assessment of battery and pumped storage for integrating renewable resources. The assessment may consider ancillary services at the appropriate granularity required to model such storage resources.

Reference	Requirement
consolidated)	
WAC 480-100-620(5)	Plan assesses nonconventional generating, integration, and ancillary service technologies.
WAC 480-100-620(6)	Plan assesses the availability of regional generation and transmission capacity for purposes of delivery of electricity to customers.
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.
WAC 480-100-620(7)	Plan compares benefits and risks of purchasing power or building new resources.
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:
WAC 480-100-620(7)	- transmission and distribution delivery costs;
WAC 480-100-620(7)	- risks, including environmental effects and the social cost of GHG emissions;
WAC 480-100-620(7)	- benefits accruing to the utility, customers, and program participants (when applicable); and
WAC 480-100-620(7)	- resource preference public policies adopted by WA State or the federal government.
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.
WAC 480-100-620(8)	Plan assesses and determines resource adequacy metrics.
WAC 480-100-620(8)	Identify an appropriate resource adequacy requirement (i.e., loss of load probability) and complete the assessment.
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 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.
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:

Reference	Requirement
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).
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.
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.
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
WAC 480-100-620(11)	IRP solution or preferred portfolio must describe the resource mix that meets current and projected needs.
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:
WAC 480-100-620(11)(a)	- achieves requirements for eliminating coal-fired generation by 12/31/2025 (RCW 19.405.030);
WAC 480-100-620(11)(a)	- attains GHG neutrality by 1/1/2030 (RCW 19.405.040); and
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,
WAC 480-100-620(11)(a)	- achieves 100 percent clean electricity WA retail sales by 1/1/2045 (RCW 19.405.050), considering risk.
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.
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.
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.
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.
WAC 480-100-620(11)(g)	Preferred portfolio ensures all customers are benefiting from the transition to clean energy through the:
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.
WAC 480-100-620(11)(g)	- long-term and short-term public health and environmental benefits; reduction of costs and risks; and

Reference	Requirement
WAC 480-100-620(11)(g)	- energy security and resiliency.
WAC 480-100-620(11)(h)	- Please see Appendix O (Clean Energy Action Plan).
WAC 480-100-620(11)(i)	- analyzes and considers combinations of DER costs, benefits, and operational characteristics (incl. ancillary services) to meet system needs,
WAC 480-100-620(11)(j)	- incorporates the social cost of GHG emissions as a cost adder.
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 lowest reasonable cost, and at an acceptable resource adequacy standard. The CEAP will:
WAC 480-100-620(12)(b)	- identify and be informed by utility's ten-year CPA per RCW 19.285.040(1);
WAC 480-100-620(12)(c)	- demonstrate that all customers are benefiting from the transition to clean energy;
WAC 480-100-620(12)(d)	- establish a resource adequacy requirement;
WAC 480-100-620(12)(e)	- identify the potential cost-effective DR and load management programs that may be acquired;
WAC 480-100-620(12)(f)	- identify renewable resources, non emitting 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;
WAC 480-100-620(12)(g)	- identify any need to develop new, or expand or upgrade existing, bulk transmission and distribution facilities;
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.
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.
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.
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,

Reference	Requirement
	general public).
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).
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:
WAC 480-100-20(15)(a)	- A description of the methodology used to calculate estimates 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.
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.
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.
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 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.
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.
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.
WAC 480-106-040	Plan provides information and analysis used to inform annual purchases of electricity from qualifying facilities, including a description of the:
WAC 480-106-040	- avoided cost calculation methodology used;
WAC 480-106-	- avoided cost methodology of energy, capacity, transmission, distribution, and emissions

Reference	Requirement
040	averaged across the utility; and
WAC 480-106-040	- resource assumptions and market forecasts used in the utility's schedule of estimated avoided cost, including (but not limited to): cost assumptions, production estimates, peak capacity contribution estimates, and annual capacity factor estimates.

Clean Energy Implementation Guidance

On May 19, 2025, the WUTC issued Order 16, rejecting PacifiCorp’s 2023 Biennial CEIP Update.⁷⁷ In rejecting PacifiCorp’s update, the Commission stated that there “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.”⁷⁸

PacifiCorp acknowledges the Commission’s encouragement of fulfilling 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

Reference	Suggestion
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.
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.

⁷⁷ Docket UE-210829, Order 16 (May 29, 2025).

⁷⁸ *Id.* at 1.

Reference	Suggestion
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 Inter-jurisdictional Methodology or WIJAM, beginning with the 2025 Integrated Resource Plan (IRP) and any future planning documents.
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 an planning dockets.
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.
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.
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 s 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 WIJAM); (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.
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 and 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.

Reference	Suggestion
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.
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.
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.
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.
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.
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.

Appendix C: Specific Actions

Note – PacifiCorp is preparing a tabular format to summarize all specific actions, as described in Chapter IX – Specific Actions to be included in the final 2025 CEIP filing.

Appendix D: Supporting Workpapers and References

Note – PacifiCorp is preparing a list of all supporting workpapers and references to the narrative to be included in the final 2025 CEIP filing.