

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of	DOCKET UE-250746
AVISTA UTILITIES d/b/a AVISTA CORPORATION'S	ORDER 01
2025 Clean Energy Implementation Plan	APPROVING CLEAN ENERGY IMPLEMENTATION PLAN SUBJECT TO CONDITIONS

BACKGROUND

- 1 Revised Code of Washington (RCW) 19.405, Washington's Clean Energy Transformation Act (CETA) and Washington Administrative Code (WAC) 480-100-640(1) direct electric investor-owned utilities to develop a clean energy implementation plan (CEIP or Plan) every four years. Under CETA, CEIPs must be informed by both a utility's clean energy action plan and its long-term integrated resource plan.¹
- 2 As required by WAC 480-100-640, Avista Corporation d/b/a Avista Utilities (Avista or Company) filed its first CEIP with the Washington Utilities and Transportation Commission (Commission) in Docket UE-210628 on October 1, 2021.² Avista's first CEIP was approved by the Commission in Order 01 subject to 37 conditions.
- 3 On November 1, 2023, Avista filed its first Biennial Update to the 2021 CEIP with the Commission. On March 22, 2024, the Commission approved the Biennial Update in Order 02 in Docket UE-210628 subject to further conditions.
- 4 On October 1, 2025, Avista filed with the Commission its 2025 CEIP, which is Avista's second CEIP since the passage of CETA. Interested parties including Commission staff (Staff), the Attorney General's Office – Public Counsel Unit (Public Counsel), the Northwest Energy Coalition (NWECC), The Energy Project (TEP), and Renewable Northwest (RNW) submitted comments on Avista's 2025 CEIP on or before December 5, 2025.

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

² Per WAC 480-100-640(1).

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

- 2026: 66.0 percent
- 2027: 69.5 percent
- 2028: 73.0 percent
- 2029: 76.5 percent³

6 Avista also sets specific targets for renewable resources, demand response, and energy efficiency in the CEIP. The Company also describes the specific actions it will take to achieve those targets. Next, Avista shows how it will understand if its actions to achieve those targets are demonstrating an equitable distribution of benefits and burdens to customers, in part by proposing customer benefit indicators (CBIs) and associated metrics. These CBIs measure categories such as affordability, environmental benefits, and public health benefits. Avista also shows a projection of the incremental cost of the utility actions associated with CETA.

7 Since Avista filed its 2025 CEIP, Staff has been in regular contact with the Company and interested parties to collaborate on refinements to the 2025 CEIP.⁴ Through this collaborative process, Staff and interested parties recommended several conditions for approval of the 2025 CEIP, which are contained in Appendix A of this Order. Avista agrees to all but three of the conditions, those being Condition 6.b, Condition 8, and Condition 10.⁵

8 Avista facilitated discussions with the Parties by hosting a series of CEIP-focused advisory group meetings in 2025, well before filing its CEIP. Through this process, interested parties were able to review many components of the CEIP, provide feedback, and Avista incorporated much of the feedback in its CEIP.⁶

³ Avista's 2025 CEIP, at p. 62, Table No. 6.2: Renewable Energy | Annual Interim Targets by Retail Load.

⁴ Staff Memo, at p. 2. Staff further comments it appreciates Avista and interested parties for their engagement in the process and clearly working towards advancing the public interest and advancing CETA compliance. Staff Memo, at p. 3.

⁵ Staff's Memo, at p. 3. Staff notes that Avista is in agreement with Condition 6.a but has concerns with Condition 6.b.

⁶ Staff's Memo, at p. 2.

- 9 Staff recommends the Commission approve Avista’s 2025 CEIP subject to the conditions set out in the proposed conditions in Appendix A. Staff briefly provides additional explanation in support of those conditions which are not fully agreed upon.
- 10 For Condition 6.b, Staff notes that Avista currently has 30 MW of demand response and identifies acquiring an additional 25 MW in its CEIP. However, Staff also notes that 40 MW of demand response may soon be added through the Company’s 2025 all source request for proposals (AS RFP or RFP). Based on this update from the RFP, Staff believes Avista should update its demand response target to a level which can be reasonably expected from the RFP, understanding that contracts have not yet been finalized. Staff notes that in Puget Sound Energy’s (PSE) 2021 CEIP, the Commission faced a similar scenario and ordered PSE to update its demand response target to match its actual demand response acquisitions.⁷
- 11 For Condition 8, which proposes accounting for changing CBIs over multiple compliance periods, in consultation with Staff and interested parties, Staff comments that utilities should be able to show long-term trends rather than 4-year snapshots. Staff believes this is consistent with WAC 480-100-610(4)(c)(i)-(iii), which requires utilities show customers are benefiting from the transition to clean energy in both the short- and long-term.
- 12 For Condition 10, which proposes retaining CBI reporting metrics related to disconnection data from the 2021 CEIP, Staff notes that this condition, which was proposed by TEP, is supported by Staff, Public Counsel, NVEC, and RNW.
- 13 On December 5, 2025, Public Counsel, Staff, NVEC, RNW, and TEP filed comments on the 2025 CEIP.
- 14 On December 18, 2025, Avista filed reply comments.
- 15 On March 9, 2026, the Commission heard comments at its recessed open meeting from Staff, Avista, Public Counsel, NVEC, RNW, and TEP.
- 16 Staff reiterated its position outlined in its memo and recommended that the Commission adopt the additional conditions it proposes. Avista presented on its 2025 CEIP and commented on its changing CBIs. Specifically, Avista offered to provide standard, normalized data over time for any metric that has remained consistent. However, Avista notes that it does not believe data related to Named Communities, for example, could be reported over the long term because the data and definitions of Named Communities have

⁷ Docket UE-210795, Order 08, at 14-19.

changed since 2021. Avista also commented that CBIs are expected to change every four years. These comments specifically address, in part, Conditions 8 and 10. Avista also provided that, as of the recessed open meeting, the Company is in negotiations for additional demand response. However, the 40 MW Staff points to is non-firm and may not be available until after 2029, which falls outside this CEIP timeline. Further, Avista spent time highlighting the successes of its last CEIP and programs that include the Named Community Investment Fund. Finally, Avista commented that it opposes Condition 10 because disconnection data is reported elsewhere and providing it in the CEIP results in data that becomes stale between CEIPs and CEIP Updates.

- 17 Public Counsel began by thanking all interested parties for their involvement and participation. Public Counsel stated it does not specifically oppose the CEIP. However, Public Counsel expressed its support specifically for Conditions 8 and 10, noting that continuity of data for known low-income customers and disconnection data is important for measuring progress. Public Counsel noted that despite the availability of disconnection data elsewhere, the issue is really continuity and being able to track trends over time. Public Counsel was also supportive of the Commission requiring Avista and peer utilities to jointly address continuity, standardization, and normalization, so long as it does not impact work with the advisory groups and that any frameworks established should be presented to the advisory groups.
- 18 NWEC commented that the CEIP process and the resulting 2025 CEIP are in a good place. NWEC further expressed its support for Staff's conditions. NWEC also expressed that so long as the known low-income and disconnection data are reported somewhere, NWEC would not necessarily request the Commission make that available in the CEIP as well. RNW expressed its support for NWEC's position. RNW also provided comments that moving forward, it would like Avista to look at modeling earlier procurement in favor of retiring renewable energy credits. Avista modeled such a scenario in its CEIP and RNW encourages looking at both the results of RFPs and independent third-party data sets to ensure early procurement is assessed on an ongoing and continuous basis.
- 19 TEP commented that although Conditions 1 and 2 are not in dispute, TEP provided its support and wanted to highlight the importance of those conditions. For Condition 10, TEP expressed its support for continuing to report disconnection data as part of the CEIP and noted that doing so provides useful comparative data next to other CBIs included in the CEIP. Further, TEP commented that it does not want to lose data, and there are some components of the disconnection data in the CEIP that are duplicative, but there are others that are unique to the CEIP. Accordingly, TEP is supportive of having the data available elsewhere, but emphasized that it would like to have all of the disconnection data points available in the CEIP in that alternate location. Avista responded that it would

be supportive of amending what it is required to report in Docket U-200281 or a similar docket to ensure the data is not lost.

20 Staff expressed its support for Avista's proposal to report disconnection data elsewhere, so long as all interested parties are consulted on where the data should go. For Condition 6.b, Staff responded that a contract of up to 40 MW of demand response through an RFP is demonstrative of what is cost-effective and available, and therefore the entirety should be included as an achievable target.

DISCUSSION

21 We approve Avista's 2025 CEIP subject to the conditions to which the interested parties agree and subject to the amendments we make below to Conditions 6.b, 8, and 10.

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

23 We are pleased that the collaborative and comprehensive discussions between the Company and interested parties resulted in proposed conditions that strengthen Avista's commitments to its customers. We agree with TEP on the importance of Conditions 1 and 2, and we also commend Avista for continuing its Named Community Investment Fund. Conditions 1 and 2 are supported by all interested parties and should further the benefits of the Named Community Investment Fund and extend its impact.

24 For Condition 6.b, we understand the Company's concerns but agree with Staff that the RFP results demonstrate cost-effective demand response targets, which should be pursued by the Company. However, we agree with the Company that additional language is needed to demonstrate that we recognize the entire 40 MW may not in fact be achievable. Further, we agree that while the Company ultimately may achieve 40 MW in demand response, it may not achieve that level of demand response before 2029, with this enrollment period for this non-firm demand response opportunity running from 2027 through 2031, making the last two years outside of the 2025 CEIP period. In short, if Avista exercises good faith efforts in pursuing the demand response target that matches the selected RFP per Condition 6.b, we will take such efforts into account should the Company fall short of the target.

25 Accordingly, we adopt Staff's recommended Condition 6.b with the following amendments to reflect the opportunity for further clarity on what is achievable in subsequent filings:

Condition 6: File a compliance filing that both a) details all the relevant information in WAC 480-100-640(5) and (6) on specific actions related to selected demand response contracts from the 2025 AS RFP, and b) if the Company selects more than 25 MW of additional demand-response in the ongoing RFP, update the demand response target within the 2025 CEIP to match that selection.

Due: Within 90 days of finalizing all demand response contracts in the 2025 AS RFP, with the opportunity for the Company to address in the 2027 BCEIP the opportunity to achieve the updated target.

26 Next, we share the interested parties' concerns over continuity of data and the need for Conditions 8 and 10. We also recognize the underlying concern is one that exists across utilities and that the data is currently shared in multiple places. In an effort to balance these concerns, we adopt Conditions 8 and 10 with the following amendments:

Condition 8: Avista will work with its peer utilities to address concerns of continuity and consistency of CBIs across CEIP periods, and also continue working with advisory groups including, at minimum, Commission Staff and the Equity Advisory Group (EAG). Along with its peer utilities and advisory groups, Avista will work to determine how Avista will account for changing CBI metrics over multiple compliance periods, as well as changing designations of named communities, so that Avista, peer utilities, and other parties can analyze data trends over multiple compliance periods. This may include providing specific information for how metrics that measure numbers of customers will be normalized for changing Named Community population size, and how metrics that have changed over compliance periods can be interpreted and analyzed in relation to one another, to view trends over the long-term. In its 2027 BCEIP, Avista will propose a methodology, where feasible, for analyzing CBI data over multiple compliance periods.

Condition 10: Avista shall provide in its entirety, all of the reporting metrics from the 2021 CEIP, CBI Number Eight, Disconnections for Non-Payment in Docket U-200281, until such time as the Commission identifies a different reporting structure or docket for this data. Reporting will include the number and percentage of disconnections for non-

payment, monthly and by census tract, of All Customers, Named Community customers (collectively), and Known Low Income customers (as a relevant sub-group within Named Communities).

27 We find the amendments to Conditions 8 and 10 strike a balance, addressing the need for collaboration across utilities for continuity (Condition 8) and consolidating and retaining the availability of disconnection data – inclusive of the data reported in the CEIP and not found elsewhere (Condition 10).

28 We recognize that this CEIP is the result of a collaborative process, and we commend the Company and interested parties for working to improve Avista’s CEIP with additional conditions that will benefit all customers. We further commend the Company and interested parties for the work done prior to the filing of the 2025 CEIP, including providing feedback that Avista incorporated, avoiding the need for additional conditions. Accordingly, we approve Avista’s 2025 CEIP subject to the conditions set out in Appendix A to this Order, incorporating the amendments set forth herein.

FINDINGS AND CONCLUSIONS

29 (1) The Commission is an agency of the state of Washington vested by statute with the authority to regulate the rates, rules, regulations, practices, accounts, securities, transfers of property and affiliated interests of public service companies, including electric companies.

30 (2) Avista is an electric company and a public service company subject to Commission jurisdiction.

31 (3) Avista is subject to RCW 19.405.060, which requires investor-owned electric companies to file CEIPs with the Commission every four years beginning January 1, 2022.

32 (4) Avista filed its 2025 CEIP on October 1, 2025, in Docket UE-250746.

33 (5) This matter came before the Commission at its recessed open meeting on March 9, 2026.

34 (6) After reviewing Avista’s CEIP filed on October 1, 2025, and giving due consideration to all relevant matters, the Commission finds that Avista’s CEIP is consistent with the public interest and concludes that it should be approved subject to the conditions set out in Appendix A to this Order and the amendments to Conditions 6.b, 8, and 10, as set forth in paragraphs 25 and 26 of this Order.

ORDER

THE COMMISSION ORDERS:


- 35 (1) Avista Utilities d/b/a Avista Corporation's Clean Energy Implementation Plan meets the requirements of RCW 19.405.060 and WAC 480-100-640 and should be approved subject to the conditions set out in Appendix A to this Order and the amendments to Conditions 6.b, 8, and 10, as set forth in paragraphs 25 and 26 of this Order.
- 36 (2) The Commission retains jurisdiction over the subject matter and Avista Utilities d/b/a Avista Corporation to effectuate the provisions of this Order.

Dated at Lacey, Washington, and effective March 11, 2026.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION



BRIAN J. RYBARIK, Chair



ANN E. RENDAHL, Commissioner



MILTON H. DOUMIT, Commissioner

APPENDIX A

Named Communities

1. In a compliance filing due no later than December 31, 2026, identify the customer characteristics and communities with deepest need within the broader category of named communities in consultation with interested persons and advisory groups.
2. In the 2027 Biennial CEIP Update (BCEIP), build upon the work done in the December 2026 compliance filing to:
 - a. Set a minimum designation of energy benefits (and including non-energy benefits where applicable) to deepest need customers, and;
 - b. Identify additional or modify existing specific actions Avista will take to address the equitable distribution of benefits and reduction of burdens to deepest need customers. These specific actions may span the categories of renewable energy, energy efficiency and demand response, or include other actions outside of those categories.

Specific Targets

3. Avista commits to the 2026-2029 energy efficiency target encompassing the Energy Independence Act target, distribution efficiency, and decoupling commitment totaling 155,712 MWh.
4. Avista's 2027 Integrated Resource Plan (IRP) progress report will include a scenario with accelerated procurement of Clean Energy Transformation Act (CETA) qualifying resources (minimum 60 aMW by 2030) and include an incremental cost analysis comparison of this scenario to both the Alternative Lowest Reasonable Cost (ALRC) and the Preferred Resource Strategy (PRS). Following the IRP update, Avista will issue a request for proposals (RFP) to identify any potential qualifying projects meeting this objective. Avista will have sole discretion to procure or not procure a resource subject to evaluation. Any CETA qualifying resource acquired ahead of need will be included in the Reasonably Available (RA) portfolio for the 2030-2033 CEIP.

Specific Actions

5. If Avista acquires renewable resources in the 2025 All Source RFP (ASRFP) that it will use to fulfill CETA renewable energy targets within the 2025-2029 compliance period, thus resulting in an incremental cost for the 2025 CEIP, Avista will file a compliance filing that details all the relevant information in WAC 480-100-640(5) and (6) on specific actions for renewable energy. Due: Within 90 days of finalizing all renewable energy contracts in the 2025 ASRFP.

6. File a compliance filing that both a) details all the relevant information in WAC 480-100-640(5) and (6) on specific actions related to selected demand response contracts from the 2025 AS RFP, and b) if the Company selects more than 25 MW of additional demand-response in the ongoing RFP, update the demand response target within the 2025 CEIP to match that selection. Due: Within 90 days of finalizing all demand response contracts in the 2025 AS RFP, with the opportunity for the Company to address in the 2027 BCEIP the opportunity to achieve the updated target.
7. File a compliance filing that shows projected CBI values or a designation as nonapplicable, as referenced in WAC 480-100-640 (5) (c), for existing specific actions for the 2025-2029 compliance period. Due: Within 60 days of approval of the 2025 CEIP.

Customer Benefit Indicators (CBIs)

8. Avista will work with its peer utilities to address concerns of continuity and consistency of CBIs across CEIP periods, and also continue working with advisory groups including, at minimum, Commission Staff and the Equity Advisory Group (EAG). Along with its peer utilities and advisory groups, Avista will work to determine how Avista will account for changing CBI metrics over multiple compliance periods, as well as changing designations of named communities, so that Avista, peer utilities, and other parties can analyze data trends over multiple compliance periods. This may include providing specific information for how metrics that measure numbers of customers will be normalized for changing Named Community population size, and how metrics that have changed over compliance periods can be interpreted and analyzed in relation to one another, to view trends over the long-term. In its 2027 BCEIP, Avista will propose a methodology, where feasible, for analyzing CBI data over multiple compliance periods.
9. In future CEIPs and BCEIPs, Avista will provide data values by year for each currently approved CBI metric from the metric's inception up to the most recent data collected by Avista.
10. Avista shall provide in its entirety, all of the reporting metrics from the 2021 CEIP, CBI Number Eight, Disconnections for Non-Payment in Docket U-200281, until such time as the Commission identifies a different reporting structure or docket for this data. Reporting will include the number and percentage of disconnections for non-payment, monthly and by census tract, of All Customers, Named Community customers (collectively), and Known Low Income customers (as a relevant sub-group within Named Communities).
11. Regarding CBI metrics:
 - a. Revise the following CBI metrics to read as follows:

- i. Number of Avista-owned/operated charging stations in NC and for all customers.
- ii. Number and percentage of all customer and NC enrollments in DER programs: energy efficiency, electric transportation, net metering, demand response.
- iii. Total amount and percentage of utility spend in NC and for all customers for DER programs: energy efficiency, electric transportation, net metering, demand response.
- iv. Avista-owned generation plant air emissions, including the census tract each generation plant is in and whether the census tract is a Named Community.

b. Regarding the metric Number of customers and/or CBOs served:

- i. Where applicable, disaggregate the metric to report number of customers and CBOs served separately.

Incremental Cost

12. In its 2027 BCEIP, Avista will update its incremental cost calculation.