

### 2026-2029 Clean Energy Implementation Plan

Q & A Listening Session

July 17, 2025

**2025 CEIP Advisory Group** 

#### **Agenda & Meeting Etiquette**

#### **Agenda**

- ➤ Advisory Group & Avista Comments
  - 2025 CEIP Content We Haven't Discussed
  - 2025 CEIP Content to Revisit
  - 2021 CEIP or 2023 Biennial CEIP Content
- Timeline

#### **Meeting Etiquette**

- Meetings will be recorded & posted
- Mute speakers & cameras optional
- Questions in the chat or use the "raise hand" feature
- > Respect diverse opinions





2025 CEIP Content We Haven't Discussed

#### **NCIF Awards Prior to 2025 CEIP Determination**



Area	Avista Comment	Proposal
Named Community Investment Fund	<ul> <li>2026-2029 Named Community Investment Fund</li> <li>\$5M Annually</li> <li>\$3M Community &amp; \$2M Energy Efficiency</li> <li>2026 NCIF</li> <li>Accepting applications</li> <li>No awards made</li> </ul>	<ul> <li>2026 Energy Efficiency Awards (EE tariff)</li> <li>Discuss continuity of programs/awards across CEIPs with EEAG in August 2025</li> <li>May commit EE funds prior to CEIP approval</li> <li>2026 Community Awards (CETA tariff)</li> <li>Hold commitments and awards until 2025 CEIP is approved</li> </ul>



# **Metric Reporting in 2025 CEIP**



Area	Avista Comment	Proposal
CBIs	2021 CEIP  No requirement for reporting metric actuals	<ul> <li>2025 CEIP</li> <li>No requirement for reporting metric actuals</li> </ul>
&	<ul> <li>Reported 2020 metric baseline based on 2016-2020 data</li> </ul>	<ul> <li>New baseline will be calculated in 2026 based on 2025 actuals</li> </ul>
Metric Reporting	2023 Biennial CEIP	<ul> <li>Clean Energy Compliance Report</li> </ul>
neporting	<ul> <li>No requirement for reporting metric actuals</li> <li>Reported 2021 (2020 data) against 2022 actuals</li> </ul>	<ul> <li>Due July 1, 2026</li> <li>Requires 2021 baseline for 2022-2025 actuals</li> </ul>



# Addressing Procedural Justice in 2025 CEIP

Area	Comment	Avista's Response
Equity	UTC Policy docket A-230217:  Include discussion in the CEIP of how Avista is considering the interim policy statement regarding procedural justice (issued 5/12/2025), and any other past or future guidance from this docket.	<ul> <li>Avista will include Procedural Justice update in the 2025 CEIP</li> <li>Adding link to dockets for IRP &amp; CEIP pages</li> <li>Add descriptions of intent of filings</li> <li>EEAG and EAAG discussions to determine next steps for compliance</li> <li>Translation services to be discussed under Public Participation section</li> </ul>



#### **CBIs & Tribal Nations Collaboration**

Area	Comment	Avista's Response
Tribal Relations	Is Avista doing separate outreach to and collaboration with the tribal nations in its WA service area about the CEIP?  The Commission recently filed Final Order 16 in the PAC CEIP	<ul> <li>Avista has not conducted specific CEIP outreach to the tribal nations in our Washington service territory: Spokane Tribe &amp; Colville Tribes.</li> </ul>
& CEIP / CBIs	docket (210829) where they encouraged PAC to adopt a tribal recommendation in its 2025 CEIP: "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."  Now is the opportunity to ensure Avista's CBIs and metrics capture the Tribes' interests.	<ul> <li>Avista's EAG includes member of the Spokane Tribe. He participated in 2021 (representing the Spokane Tribe) and 2025 (general member) CBI discussions.</li> </ul>



#### **Grid Scale Generation in the 2025 CEIP**

Area	Comment	A۱	vista's Response
Renewable Generation	Why was there no discussion/review of the grid-scale renewable generation elements from the IRP?	•	The <b>2025 All-Source RFP submissions</b> will determine cost-effective utility scale resources.
&			
Renewable Targets	Why does the CEIP not look at alternative scenarios for accelerating grid scale renewable production with the concurrent benefits/trade-offs?	•	Avista is meeting the requirements of CEIP in the least reasonable cost manner through existing resources.
	What is the roadmap for getting to <b>100% clean energy</b> by 2045?	•	See the <b>2025 Electric IRP</b> for current resource strategy to achieve clean targets. The <b>2027 Electric IRP</b> will provide updated information.





**2025 CEIP Content to Revisit** 

## **Demand Response Programs & Target**

Area	Comment	Avista's Response
Demand Response Specific Target	We reiterate our recommendation to have Avista note that if its demand response specific target will be 5MW over this compliance period, it will adjust the target if the current RFP results in a higher amount of DR. This is important especially in light of the presentation in the May advisory group meeting on changing load and how that might mean DR is well positioned to meet some of that increase.	<ul> <li>From the 2025 All-Source RFP, Avista will select all cost-effective submissions.</li> <li>If RFP cost-effective DR solutions provide savings beyond the 55 MW target, Avista will adjust target.</li> </ul>
Demand Response Specific Target & DR Types	In the Feb 18 <sup>th</sup> meeting on slide 20, Avista showed that the DR target for the 2025 CEIP is 5 MW. In the March 18 <sup>th</sup> meeting, you went into more detail in slides 4-7 (in response to a Staff question) about how that 5 MW target came to be and said the hope is that the RFP will identify 5 additional MWs of DR. Would this 5 MW be a mix of both dispatchable and non-dispatchable DR resources? Or would it most likely only be dispatchable resources?	<ul> <li>Assumption is dispatchable, but RFP results will show what's most cost effective.</li> <li>Non dispatchable         <ul> <li>Existing TOU pilots to inform future design</li> </ul> </li> </ul>



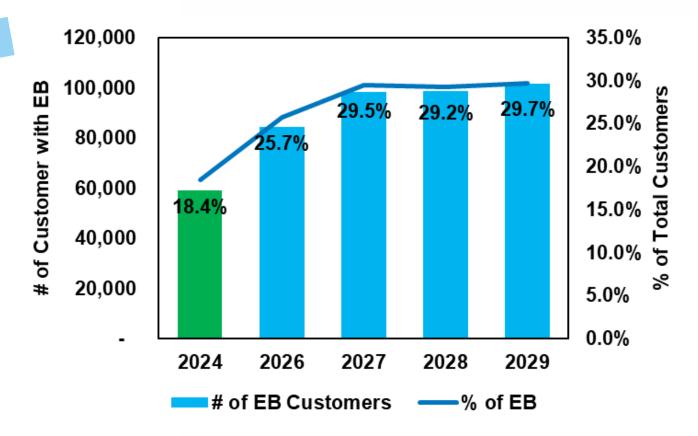
# **Energy Burden & Energy Usage**

Area	Comment	Avista's Response
Named Communities & Energy Burden	In the March 18 <sup>th</sup> meeting on slide 9, Avista responded to a question about the cost impacts for Named Communities in 2026-2029.  Avista's response was that "an analysis of energy burden for all customers and a projection of how their usage may change will be shared at the May CEIP Advisory Group meeting." I didn't see this in the April or May meeting	<ul> <li>Energy Burden Estimates</li> <li>By average income level by census tract</li> <li>Includes electric &amp; dual fuel customers</li> <li>Prior to financial energy assistance</li> <li>Includes CEIP incremental costs</li> <li>Energy Use Estimates</li> <li>Average increase per customer</li> </ul>
	presentations. Could we discuss this?	



#### **Actual & Estimated Customer Energy Burden**

**Draft Data & Analysis** 

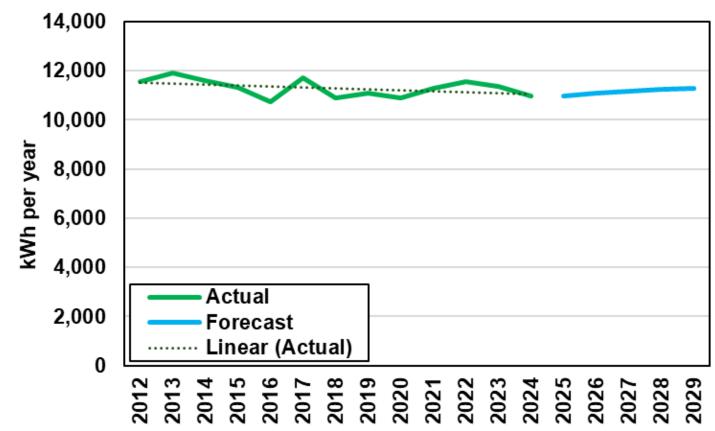


- By average income level by census tract
- Includes electric & dual fuel customers
- Prior to financial energy assistance
- Includes CEIP incremental costs



#### **Actual & Estimated Energy Usage**

Draft Data & Analysis





# **Energy Resiliency Metric**

Area	Comment	Av	vista's Response
Energy Resilience	Consider adding energy resilience CBI/metric(s) related to the "indirect" category of the NARUC Resilience Framework	•	Met with UTC Staff June 11
СВІ	document, on page 23 (attached).	•	NARUC indirect metric options aren't supported with available data
&	The value of lost load for different customer types (Named Communities, NC in deepest need, etc.) may be valuable to		Avista will <b>provide a narrative for how Avista</b>
Metric	track, and this document has some resources starting on page 24.		wholistically approaches resiliency efforts in 2025 CEIP.



#### **Data Center Load Growth**

Area	Comment	Avista's Response
<b>Data Centers</b>	We recommend that in the final CEIP document, Avista include a section discussing the impacts of potential or actual	<ul> <li>The CEIP is a four-year action plan of specific actions Avista will take based on what is known</li> </ul>
&	data centers on load growth, and thus the possible impacts within this or future compliance periods on any specific	today.
Load Growth	targets/actions, if any.	<ul> <li>If load increases, proposed 4-year annual targets remain.</li> </ul>



### **CBIs & KLI Metrics**

Area	Comment	Avista's Response
& Disconnects for KLI Customers	The slide deck from your Apr. 22, 2025 CEIP advisory group meeting: On slide 19, you proposed to modify the CBIs to omit the number of disconnection and disconnection for known-low-income customers.  The Energy Project does not support such a change and would like to request that Avista continue report the CBI for "Number and percentage of disconnects for nonpayment by month census tract, All, KLI, NC."  NWEC: Similar to The Energy Project, we respectfully ask that Avista continue report the CBI for "Number and percentage of disconnects for nonpayment by month census tract, All, KLI, NC."	<ul> <li>Avista will continue to report this in the Annual Disconnection Reduction Report</li> <li>Total number of KLI disconnections for non-payment</li> <li>Total number of KLI disconnects for any reason other than non-payment</li> <li>Total number of KLI customers remotely disconnected</li> <li>Total number of KLI customers who made a payment to a service representative in the field to avoid disconnection.</li> </ul>



# **Named Community Rebate Metrics**

Area	Comment	Avista's Response
& Named Community Rebates	On slide 12, Avista proposes to discontinue a CBI for "Named Community residential rebates and those in rental units," and noted that this information was available in its annual conservation report.  I did a quick review of Avista's 2023 Annual Conservation Report and could not find this info in that report. Could you please point me to where this information can be found outside of the CBIs?	<ul> <li>NC Residential Rebates:         <ul> <li>2024 Annual Conversation Report</li> <li>Portfolio level distribution of incentives, savings, NEIs (page 7)</li> <li>Program level distribution of incentives, savings, NEIs (page 30)</li> <li>Percentage that benefitted Named Communities</li> </ul> </li> <li>NC Residential Rebates in Rental Units         <ul> <li>Only reported in the CEIP CBIs</li> <li>Not an energy efficiency program</li> <li>To be reported in 2026 Clean Energy Compliance Report</li> </ul> </li> </ul>





2021 CEIP or 2023 Biennial CEIP Content

#### **2021 CEIP Conditions**

#### Avista

Area	Avista Topic	Proposal
CEIP	2021 CEIP – 38 Conditions	Remove Conditions #1, 6, 13, 17, 18, 20, 22, 26, 38
Conditions	2023 Biennial CEIP – Modification (#5), 1 New Condition (#39)	Modify Condition #35

2021 CEIP & 2023 Biennial Conditions	Count	Condition #s
Complete; no further action required	23	2, 3, 4, 7, 8, 9, 10, 14, 15, 16, 21, 23, 24, 27, 29, 30, 31, 32, 33, 34, 36, 37, 39
Included in the 2025 CEIP	6	5 (qualitative & quantitative analysis), 11 (TOU pilots), 12 (NEEA water heaters), 19 (CBI translation services), 25 (CBI by statutory benefit), 28 (EAG list)
Remove for 2025 CEIP	8	1 (Use Rules), 6 (Risk), 13 (DPAG), 17 (CBI NC EE rebates), 18 (CBI KLI), 20 (CBI wood heat), 26 (NC DERs), 38 (CBI 2x5)
Modify	2	22 (CBI disc/arrear), 35 (CBIs w/IRP & Progress Report)
Total	39	



Condition	Description	Avista's Response
1	Once the Commission has adopted final "use" rules in Docket UE-210183, in its Clean Energy Implementation Plan (CEIP) docket, if different than Table 2.1 on page 2-3 in the CEIP, Avista shall update its CEIP to reflect the percentage of retail sales of electricity supplied by non-emitting resources and renewable resources in 2020 within 30 days.	<ul> <li>Recalculating 2020 isn't relevant to current targets proposed in the 2025 CEIP</li> </ul>



Condition	Description	Avista's Response
13	Avista will initiate its <b>Distribution Planning Advisory Group</b> (DPAG) no later than the end of 2022, and it must invite all existing advisory groups to participate in the new group. Avista acknowledges that stakeholders have limited resources and will consult between existing advisory groups and stakeholders regarding streamlining.	<ul> <li>Continue 2025 DPAG sessions (2 remaining)</li> <li>Future: Combine the DPAG &amp; Electric IRP TAC sessions for a combined system plan</li> </ul>



Condition	Description	Avista's Response	
18	Avista agrees that the CBI: Number of Households with a High Energy Burden (>6%), will be separately tracked for all Avista electric 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.	<ul> <li>Proposed for removal at the April CEIP Meeting</li> <li>Replace with PBR: Average energy burden after energy assistance by census tract for all customers and NC</li> <li>Replace with PBR: Number and percentage of high energy burden after energy assistance for all customers and NC</li> </ul>	



Condition	Description	Avista's Response
26	For the CBI – Named Community Clean Energy Avista agrees to eliminate the current metric on "percent non-emitting renewable energy located in Named Communities," and instead measure the following in Named Communities:  (1) total MWh of distributed energy resources 5 MW and under; (2) total MWs of energy storage resources 5 MW and under; and, (3) number (i.e., sites, projects, and/or households) of distributed renewable generation resources and energy storage resources.	<ul> <li>Proposed for removal at the April CEIP Meeting</li> <li>Replace with PBR: Number and percentage of NC enrollments in DER programs – EE, Electric Transportation, Net Metering, DR</li> <li>Replace with PBR: Percentage of NC utility spend in DER programs – EE, Electric Transportation, Net Metering, DR</li> </ul>



Condition	Description	Avista's Response	
38	Avista must choose at least <b>two of its current CBIs which it will track for at least five subsets of Named Communities</b> , at a granularity to be determined by agreement with Staff, stakeholders, and the Company's Equity Advisory Group. Avista will incorporate relevant updates in its 2023 Biennial CEIP update.	<ul> <li>Proposed for removal at the April CEIP Meeting</li> <li>Under CBI Energy Burden – adopt PBR energy burden metric</li> <li>Under CBI Energy Availability – remove and retain existing outage metrics</li> </ul>	



### 2021 CEIP Condition #35 Proposed for Modification

Condition	Description	Avista's Response
22	Avista agrees to add the following CBI and metrics related to Energy Security:  CBI: Residential Arrearages and Disconnections for Nonpayment Measurement:  1. Arrearages	<ul> <li>Proposed for removal at the April CEIP Meeting</li> <li>Remove arrearages; continue to report in Docket U-200281, U-21800</li> <li>Keep disconnections for all customers and</li> </ul>
	2. Disconnections	NC; but remove KLI



### **Address 2021 CEIP Condition 5**

Area	Comment	Avista's Response
Interim Renewable Targets	<b>2021 CEIP Condition 5:</b> We reiterate our recommendation to provide clear discussion in the final CEIP that illustrates how the <b>proposed interim targets balance both cost and progress towards the CETA renewable energy goals</b> .	<ul> <li>Avista will address in the 2025 CEIP and explain the gradualism making progress, while trying to maintain customer cost impacts.</li> </ul>



## **Address Named Community Deepest Need**

Area	Comment	Avista's Response	
Deepest Need	At Staff's request, in the May advisory group meeting, Avista agreed to identify characteristics of Named Communities in deepest need and propose action(s) to address inequities.	<ul> <li>Avista will address in the 2025 CEIP and in the 2027 Biennial CEIP.</li> </ul>	
& Named Communities	We look forward to any updates Avista has on this topic.	<ul> <li>Avista does not want to adopt the Deepest Need title, but allow the advisory group process to determine population title, characteristics and actions to reflect needs of Avista's service territory</li> </ul>	
		<ul> <li>Avista will reference PSE's Deepest Need characteristics but may not adopt.</li> </ul>	



### 2026-2029 CEIP Proposed Timeline

	1 1 20 2025
Q & A Listening Session	July 15
✓ ■ Incremental Cost Analysis	June 23
<ul><li>Company Initiatives: Aspirational Goals   NCIF</li></ul>	May 20
<ul><li>Customer Benefit Indicators</li></ul>	April 22
<ul><li>2025-2027 Public Participation Plan   Named Communities</li></ul>	March 18
✓ ■ Targets & Specific Actions	February 18
Review of 2022-2025 CEIP	January 14
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Draft CEIP available for public comment

Compile public comments & finalize

File 2026-2029 CEIP

August 1-29, 2025

September 2025

October 1, 2025



# **Questions & Discussions**

