

CEIP Advisory Group

Meeting Date: April 22, 2025

Time: 9:00am – 10:30am

Location: Zoom Meeting

Attendees:

Avista:	Members:
<i>Kelly Dengel</i>	<i>Jerrold Estell</i>
<i>Amanda Ghering</i>	<i>Jean Marie Dryer</i>
<i>Shawn Bonfield</i>	<i>Sofya Atitstogbe</i>
<i>Heather Webster</i>	<i>Carol Weltz</i>
<i>Kristine Meyer</i>	<i>Lisa Stites</i>
<i>Mikaela Terpkio</i>	<i>Cindy Kimmet</i>
<i>Mike Magruder</i>	<i>Margee Chambers</i>
<i>Christine Tasche</i>	<i>Soumya Keefe</i>
<i>James Gall</i>	<i>Nora Hawkins</i>
<i>Dan Blazquez</i>	<i>Nathan South</i>
<i>Tamara Bradley</i>	<i>Molly Morgan</i>
<i>Ariana Barry</i>	<i>John Hoover</i>
	<i>Mark Vaughn-Sellers</i>
	<i>Lynn Suksdorf</i>
	<i>Natasha Jackson</i>

Agenda

- I. Welcome & Introductions
 - Overview of Meeting: Rules and Intent
- II. Comment Review from March Meeting
- III. 2025 Proposed Customer Benefit Indicators
- IV. CBI Aspirational Goals
- V. CEIP Meetings through 2025

Facilitator

Kelly Dengel

Kelly Dengel

Kelly Dengel

Kelly Dengel

Kelly Dengel

Meeting Notes

Welcome & Introductions

Introductions and Meeting Rules and Intent and review of today's agenda.

Review 2025 CEIP Advisory Group Comments from March meeting

Reviewed comments received from Washington Staff and Avista's response to each comment for transparency. (Slides 3 & 4)

Area	Comment	Avista's Response
Energy Efficiency & Energy Burden	<ul style="list-style-type: none"> This (energy burden) made me think about the <i>intersection between energy efficiency and energy burden for Named Communities.</i> Is there discussion or intent to target those with high energy burden within the LIRAP umbrella? <ul style="list-style-type: none"> Low-income weatherization? Targeted outreach strategy? 	<ul style="list-style-type: none"> Existing Process <ul style="list-style-type: none"> Customer Action Agencies (CAA) get a weekly report of high usage customers which is 125% of normal or 939 kWh/month Refer those customers to weatherization programs New Programs <ul style="list-style-type: none"> Q4 2025 – Direct install insulation for NC with targeted social media promotion
Named Community Population	<ul style="list-style-type: none"> Because the number of people in <i>highly impacted communities is so high, and over half of your electric customers</i>, are you considering doing something like PSE has done in <i>identifying their deepest need customers</i>? 	<ul style="list-style-type: none"> Avista will evaluate a deepest need designation internally and if applicable, work with advisory groups to determine characteristics.
Area	Comment	Avista's Response
Public Participation	<ul style="list-style-type: none"> Looking at the <i>demographics of who filled out the [CEIP] survey</i> and thinking about Named Communities increasing to 58%, it seems like you are only getting responses from one segment of the community. You should look at a <i>strategy to reach more Named Community populations.</i> 	<ul style="list-style-type: none"> Existing Process <ul style="list-style-type: none"> Offer paper survey in Spanish, Russian, Ukrainian, Marshallese & Arabic at public events and CBO distribution & collection Future Process <ul style="list-style-type: none"> Discuss additional distribution channels and community partnership opportunities with EAG for increased Named Community survey response

Please open and review the attached spreadsheet that was sent with the slide deck last week.

Member: Can you tell us whether you are planning on using the data from the CEIP data survey in anyway.

Company: The survey is collecting customer sentiment, and we want to be aware of that sentiment. We will continue to share those results with the EAG and others.

Member: I am more wondering about the conclusion of how you will use this information in your CEIP. The actions may influence the whole community, but you are not hearing from the whole community.

Company: There was a lack of customer response across the board. We will be talking about the proposed actions of the plan during a public meeting and that is an additional way we hear from customers, not just through surveys.

Member: I am concerned that if you are stretching the feedback from the survey feedback from a smaller group onto the larger group, that should be discussed and addressed.

Company: We understand and thank you for your feedback.

Member: For the deepest need, Staff is pushing for that, looking for some things in particular such as Avista's CEIP condition 10, the Named Community designation is already lumping highly impacted with vulnerable populations and there are a lot of nuances with those two groups, and they can be expanded and looked at more granularly. PSEs order was not addressing Deepest Need, so they were tasked with coming up with that and this sounds similar here. We would encourage you to talk with PSE as a resource.

Company: We will talk with PSE and continue these conversations internally and come back in a future meeting with a discussion.

Member: Thank you, and Staff believes this will be a very important topic coming into the CEIP.

Member: What is PSE and the condition Molly spoke about?

Company: PSE stands for Puget Sound Energy, and the Commission's order of approval of Avista's 2021 CEIP reads as follows: By December 1, 2022, in collaboration with its EAG and EAAG and per WAC 480-100-640(5)(a) and (c), Avista agrees to identify at least one specific action that will serve a designated subset of Named Communities, to be funded by the Named Communities Investment Fund, 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.

Member: It is great that the regulatory agency is giving you direct advice on what they need from Avista. It would be great that when the UTC staff gives advice in this group, they give background info and do not speak in acronyms to help the members of the public on this committee that do not work in the electric utility sector. That will help us follow what they are talking about. Thanks!

Member: Thank you for the reminder, we will make sure to be more mindful of that.

2025 CEIP - Proposed Customer Benefit Indicator Review

Discussed Metric history and CBI EAG and advisory group/public journey (Slides 6 & 7)

2026-2029 CEIP CBI Metric Discussions Timeline*



In December 2024, the Commission provided an order on Performance Based Regulatory (PBR) metrics as follows (slide 8):

2024 WA GRC PBR Metrics Outcome

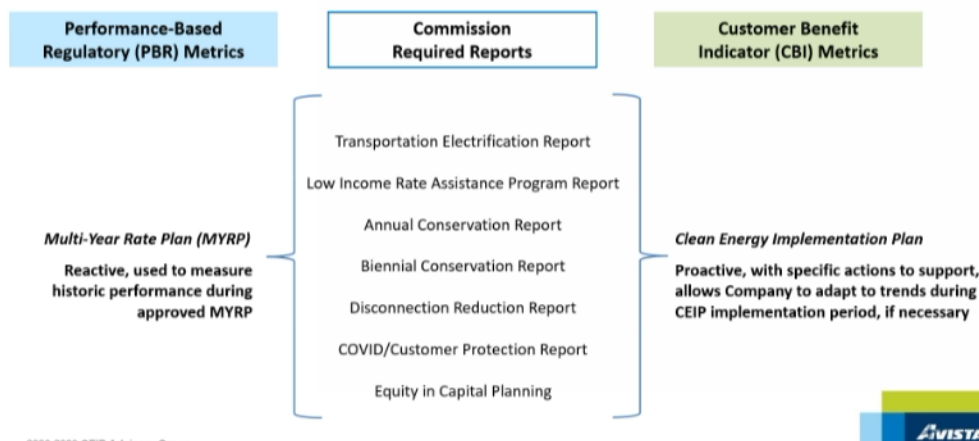
...the Commission has *reduced the number of PBR metrics on which Avista will be required to report to 33*. These metrics consist of 12 metrics that have been refined or proposed during this proceeding and the 21 metrics contained in the Commission's Policy Statement Addressing Initial Reported Performance Metrics, including the metrics established pursuant to RCW 80.28.425(7).

In many cases, *metrics were removed because the same information can be found in other reporting required by the Commission*, such as information reported as part of Customer Benefit Indicators or were already incorporated into other required PBR metrics.

Similarly, the Commission *declined to require a metric if the proposed measurement involved too many factors outside Avista's control* because the metric would provide limited insight into the effect of Avista's operational decisions.

Avista reports many metrics and information to the Commission already through several reporting mechanisms and we want to better align with the PBR/CBIs and additional existing reports. We do not have significant overlap between what is currently reported in CBIs, PBRs and other reports. (slide 9)

PBRs, CBIs & Other Required Reporting



The 2021 CBIs include 6 equity areas, 14 CBIs and 84 metrics (slide 10)

2021 Customer Benefit Indicators

6 Equity Areas | 14 CBIs | 84 Metrics



Here is a summary of the proposed 2025 CBIs (slide 11)

2025 CEIP CBI Metric Change Summary

2021 CEIP CBIs/Metrics	2025 Proposed CBIs/Metrics
<ul style="list-style-type: none"> 6 Equity Areas 14 CBIs 84 Metrics 	<ul style="list-style-type: none"> 6 Equity Areas 13 CBIs* 54 Metrics <ul style="list-style-type: none"> Retain 2021 Metric No Change – 29 Retain 2021 Metric Modification – 7 Remove 2021 Metric – 46 Add New 2025 Metric – 18

Focus

Discussed affordability metrics. Proposing to remove condition 17 as the data is reported in the ACR/BCR. (slide 12)

Affordability Metrics		
CBI	2021 Metrics 8	2025 Proposed Metrics 6
1. Participation in Company Programs	Participation in weatherization & energy assistance programs All & NC 4	Retain 2021 metrics 4
	Condition 17: NC residential rebates* and those in rental units 2 X	
	Saturation of energy assistance programs All & NC 2	Retain 2021 metrics 2
	*NC residential rebates reported in ACR/BCR	
2026-2029 CEIP Subsequent Review		AVISTA

Member: Condition 17, in the order, do you foresee any issues with the legality of it, removing it?

Company: No, the condition is specific to the “current CEIP implantation period” we have learned more throughout this period and will propose to have it removed in our 2025 CEIP.

Discussed additional affordability metrics. Would like to remove the word “high” from energy burden title and just report energy burden to align with the new PBR. (slide 13)

Affordability Metrics		
CBI	2021 Metrics 16	2025 Proposed Metrics 6
2. Households with High Energy Burden (>6%)	Condition 18: Number & percentage of households by All, NC & KLI* 6 X	PBR: Average energy burden after energy assistance** by census tract for All & NC 2
	Condition 38: High energy burden by census tract, highest/lowest median NC, KLI, over 65, homes built before 1980, owner/renter status 7 X	PBR: Number & percentage of high energy burden after energy assistance** for All & NC 4
	Average excess burden by All, NC, KLI* 3 X	
	*Reported in the Low-Income Rate Assistance Program	**Direct financial assistance for utility bills
2026-2029 CEIP Subsequent Review		AVISTA

Member: For Condition 18, we would like to have the Known Low-Income (KLI) tracking as it is slightly different from Named Community populations, so having both is helpful.

Company: It is important to understand that the KLI information is still available in our annual LIRAP report, which is where we think it should live and the CEIP should continue to just look at Named Communities and all customers.

Member: We do understand that, but having all of the information in one place is nice to have especially when you are supposed to have all the equity considerations here in the CEIP.

Company: We are trying to make the CEIP more specific and aligned with the law for highly impacted and vulnerable instead of subsets of named community characteristics.

Member: Can you clarify the energy burden PBR?

Company: This is the new PBR from the Commission.

Member: Are you just planning on copying the PBR?

Company: Yes, and to clarify, where it makes sense for us to have consistency, we would like to have that consistency for internal data reporting and external data review, so information matches across the board.


Member: PBR and CEIP are separate things and may not have the same goal, CEIP has specific equity provisions and with the word “average” as outlined in the PBR, we may lose some folks that are on the tail ends of this distribution that may slip through the cracks and we do not want that to happen, we should be looking at the folks on each end of the spectrum.

Company: We don’t disagree, but the commission has asked for consistency in their policy statements and orders and we want to align and be more consistent with the high energy burden calculation and this gets to what you are speaking to and finding the deepest need which we are doing through our tiered My Energy Discount rate and we are on track for doing what you are asking us.

Member: Hard to talk about it without the data present yet.

Discussed Accessibility metrics. Propose to remove the words “availability of methods and modes” so the CBI would be called “Outreach and Communication” instead of the lengthy “availability of methods and modes of outreach and community” but we are proposing retain all of the metrics within this CBI. (slide 14)

Accessibility Metrics		X Available in required reporting X Not available in required reporting
CBI	2021 Metrics 4	2025 Proposed Metrics 4
3. Availability of Methods/Modes of Outreach & Communication	Number of outreach contacts 1	Retain 2021 metric 1
	Number of marketing impressions 1	Retain 2021 metric 1
	Condition 19: Number of translation services 1	Retain 2021 metric 1
	Condition 19: Number of unique languages translated 1	Retain 2021 metric 1



Continued discussions on Accessibility metrics. Also proposing to retain all of these metrics but would like to remove the word “public” for the last metric as the data is overly burdensome to obtain the “public” status of each charging station. (slide 15)

Accessibility Metrics

CBI		2021 Metrics 3	2025 Proposed Metrics 3
4. Transportation Electrification		Number of trips provided by CBOs 1	Retain 2021 metric 1
		Number of miles driven provided by CBOs 1	Retain 2021 metric 1
		Number of <i>public</i> charging stations in NCs 1	Modify 2021 metric: Number of charging stations in NCs 1

X Available in required reporting
X Not available in required reporting

Member: I need greater clarification of what “public” means, and why if something is difficult, is it a reason to get rid of it. It seems to me that if a charging station is available for public use, those should be tracked and a valuable bit of information as we look to improve public charging stations across the state.

Company: Many times the charging station is not fully accessible to the public, but it looks as if it is accessible, sometimes it is behind a fence and requires a lot of research to determine if it is really public or not. Reporting the accuracy is difficult and requires a lot of manual inspection

Member: When you say not totally accessible, what do you mean? Like a charging station at a Kroger, a store would be open to public.

Company: We do not offer a program for public charging. Businesses may provide charging to their own fleet vehicle which is not available to the public but looks available to the public, or open to their employees but not the public. It’s also possible the use of their station has changed, so it started with just their fleet vehicles and has since opened to the public, so it is hard to know the actual status of these charging stations.

Member: Will knowing the public charging stations count help to determine if we need more?

Member: Can you have all charging stations report upon installation if they are available to public?

Company: We have a lot of information shared within our transportation electrification reporting including all of our investments in charging infrastructure.

Member: That is helpful Shawn, I am good with removing the word “public”.

Member: To confirm, there are known charging stations where it would not be business adjacent.

Company: The only stand-alone stations are major DC chargers on major travel corridors

Member: I have ongoing questions and will try to put them in the chat. I see a conflict between the increasing demand along highways, and city and county roads for charging availability and not tracking everything that is out there may be concerning. Then you may not have a good idea of what the need is. Just because it is complex does not mean we should stop trying to gather accurate data to know what is out there and have a clear picture of demand and available access.

Company: You make a great point and that is what we are doing, it is all analyzed and reported in our transportation electrification annual reporting. We have a 5-year plan and

will file a new 5-year plan later this year. That 5-year plan outlines exactly what you just talked about, the need in the area, the availability, and how we will support that need. Here is the link to our 2024 transportation electrification report that was recently filed with the WUTC: [UTC Case Docket Document Sets | UTC](#)

Discussed additional Accessibility metrics. Proposing to combine two CBIs, update to align the metric from condition 26 to align with the PBR. Trading 3 metrics for 12 metrics as these are more indicative of what is going on in named communities for program offerings instead of the previous metrics. (slide 16)

It is fair to say that there are additional conversations that need to take place between Avista and others on how metrics are calculated. Those conversations are forthcoming and will be adopted into the future.

Accessibility Metrics		
CBI	2021 Metrics 3	2025 Proposed Metrics 12
5. Named-Community Clean-Energy Investments in Named Communities	Condition 26: Total MWh of distributed energy resources 5 MW and under in NC 1	<div> <div>X Available in required reporting</div> <div>X Not available in required reporting</div> </div> PBR: Number and percentage of NC enrollments in Distributed Energy Resource programs: Energy Efficiency, Electric Transportation, Net Metering, Demand Response 8 PBR: Percentage of NC utility spend in Distribution Energy Resource programs: Energy Efficiency, Electric Transportation, Net Metering, Demand Response 4
	Condition 26: Total MWh of energy storage 5 MW and under in NC 1	
	Condition 26: Number of distributed renewable energy resources and energy storage resources in NC 1	

Member: What are you referring to for conversations to align on calculations and definitions?

Company: The commission, in its PBR docket policy statement, said the next phase was intended to discuss the definitions and calculations of the various PBR metrics and we hear they are initiating that phase soon. So we expect more conversations throughout 2025.

We want to remove the quantification of the energy and non-energy benefits on the NCIF investments as the Energy Efficiency quantification is reported in the ACR/BCR and the named community portion is reported in the CEIP and cost recovery tariff. We will be reporting what CBI metrics influence and are supported through the spend in our CEIP. (slide 17)

We will have a total of 14 metrics in the Named Community CBI bucket.

Accessibility Metrics

CBI		2021 Metrics 5		2025 Proposed Metrics 2
6. Investments in Named Communities				
		Incremental spending each year in NC 1		Retain 2021 metric 1
		Number of customers and or CBOs served 1		Retain 2021 metric 1
		Quantification of energy/non-energy* benefits from investments (if applicable) 3	X	
		<small>*NCIF EE reported in Annual Conservation Report, NCIF Community reported in CEIP & CETA Cost Recovery Tariff</small>		

Discussed Energy Resiliency metrics. Avista would like to retain condition 21 metrics, average duration of outages, and modify the planning reserve margin to just reserve margin to match what we are actually reporting which is actual reserve margin and not the future planned reserve margin. We propose to remove condition 38. (slide 18)

Energy Resiliency Metrics

CBI		2021 Metrics 13		2025 Proposed Metrics 6
7. Energy Availability				
		Average duration w/o major events for All and NC 2		Retain 2021 metrics 2
		Planning reserve margin for winter/summer 2		Modify 2021 metric Reserve margin for winter/summer 2
		Condition 21: Frequency of outages (CEMIO) w/o major events for All & NC 2		Retain 2021 metrics 2
		Condition 38: Frequency of outages (CEMIO) by census tract, NC highest/lowest median, KLI, over 65, homes built before 1980, owner/renter status 7	X	

Member: Energy resiliency would speak to something that happens very rarely. The metrics seem like they are on “energy reliability” rather than “resiliency”. Not sure if people would want to discuss?

Company: For energy availability, you would like to something that addresses resiliency over what we have?

Member: The name at the top of the slide is the equity area and “energy availability” sounds like available in the extreme events, like planning reserve margin for winter and summer.

Company: Would you like us to think more about customer resiliency, or system resiliency, or both?

Member: I wonder. We are looking at the way the law frames system resilience and customer resiliency and we are not sure how to distinguish between the two.

Company: We have examples of system resiliency in the 2025 IRP, but would be helpful to know the desired outcome and helping customers understand the difference between resiliency and reliability.

Member: Should talk about it in a future meeting, resiliency vs reliability

Company: We have mobile substations that we can bring to certain communities to support community needs, among many other resiliency actions.

Member: Didn't we live through this in Ice Storm?

Company: Yes, it is those types of severe weather events

Member: I think making these resiliency plans available on your website is good but seems to be outside the scope of the clean energy plans.

Company: We have a lot of actions in our wildfire resiliency plan on our website that outlines mutual aid. That is a good suggestion and may be outside the scope of the CEIP itself.

Member: Just an FYI. As a person who lives in a forest interface area, I do appreciate the increasing information about wildfire preparedness very valuable.

Discussed Energy Security metrics. We track arrears and disconnections for non-payment, and we would like to only focus on the disconnections as the arrears are fully reported in the COVID docket (U-200281) currently and may be reported in the customer protections rulemaking docket (U-210800), and would like to focus on the percent of disconnections in NC and all customers. (slide 19)

Energy Security Metrics		
CBI		
2021 Metrics 17		2025 Proposed Metrics 4
8. Energy Generation Location	Percent of generation located in WA or connected to Avista transmission 1	Retain 2021 metric 1
9. Arrearages & Disconnections for Nonpayment	Residential arrearages reported in Docket U-200281, U-210800 8 X	
	Condition 22: Number and percentage of disconnects for nonpayment by month census tract, All, KLL, NC 8	Modify 2021 metric Percentage of disconnects for nonpayment by month by census tract for All & NC 3

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Available in required reporting
Not available in required reporting

AVISTA

Discussed Environmental metrics. Remove weighted days, discuss with advisory groups, already reported on the department of ecology and reported in near real time, and would like to remove the wood heating metric as the program no longer runs through SRCA. GHG emissions is also reported by the department ecology and what we do report we would like to align with the Climate Commitment Act calculations. (slide 20)

Environmental Metrics

CBIs	2021 Metrics 8	2025 Proposed Metrics 5
10. Outdoor Air Quality	Weighted average days exceeding healthy levels* 1	X
	Avista plant air emissions 4	Retain 2021 metric 4
	Decreased use of wood heat for home heating 1	X
11. Greenhouse Gas Emissions	Regional GHG emissions* 1	X
	Avista GHG emissions 1	Modify 2021 metric adopt CCA calculation Avista GHG emissions 1
*Reported by the WA Department of Ecology; discussed removal with EAG, EEAG and EAAG		

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Member: This issue of wood heat for homes is one that I am becoming keenly aware of moving back to Washington. A lot of people still use wood to heat their homes and part of that is because there is no natural gas available where we are and so many have electric heating only. Cost comes into play for many. Is there an impact on areas of concern for Avista related to continuing to use wood for heating homes?

Company: We support customer choice and the ability to choose the type of heating that works for them and their individual situation. What is in our control vs what is not – so we support customer choice.

Member: The wood stove changeout grant is ending this May. It's funded by a grant with Ecology rather than a grant with Avista....But I agree to remove the CBI. You are an electric/gas utility, not a wood stove retailer. With this last round of wood stove changeouts, about 50% kept with wood heating and 50% switched to natural gas devices.

Discussed Public Health metrics. We propose to retain all metrics for our employee and supplier diversity and indoor air quality. (slide 21)

Public Health Metrics

CBIs	2021 Metrics 6	2025 Proposed Metrics 6
12. Employee Diversity	Employee diversity representative of communities served by 2035 1	Retain 2021 metrics 1
13. Supplier Diversity	Supplier diversity at 11% by 2035 1	Retain 2021 metrics 1
14. Indoor Air Quality	Condition 24: Rank the causes of indoor air quality for All & NC 2	Retain 2021 metrics 2
	Percentage of weatherization indoor air quality measures All & NC 2	Retain 2021 metrics 2

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Reviewed the summary of the 2025 CEIP CBI proposal again (slide 22)

2025 CEIP CBI Metric Change Summary

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*Combine NC Clean Energy & NC Investments CBIs to "Named Community Investments"

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AVISTA

Reviewed directionality of CBIs that was not proposed or discussed in the 2021 CEIP and will be discussed and proposed in the 2025 CEIP. (slide 23)

Desired CBI Directionality



Overall proposal for 2025 CBIs, keep 6 equity areas, combine 2 CBIs to move from 14 CBIs in 2021 to 13 CBIs for 2025, and reduce the number of metrics from 84 to 54. (slide 24)

2025 Customer Benefit Indicators

6 Equity Areas | 13 CBIs | 54 Metrics



Member: Staff would like to see the desired directionality in CBIs, so thanks for including that.

CBI Directionality and Aspirational Goals

We were not able to discuss this topic during the meeting and will follow up with this topic during the next meeting in May.

Wrap Up

2026-2029 CEIP Proposed Timeline

✓	▪ Review of 2022-2025 CEIP	January 14
✓	▪ Targets & Specific Actions	February 18
✓	▪ 2025-2027 Public Participation Plan Named Communities	March 18
✓	▪ Customer Benefit Indicators Aspirational Goals	April 22
	▪ NCIF Incremental Costs & Alternative Compliance Analysis	May 20
	▪ TBD	June 17
	▪ TBD	July 15
	▪ Draft CEIP available for public comment	August 2025
	▪ Compile public comments & finalize	September 2025
	▪ File 2026-2029 CEIP	October 1, 2025

