RESOLUTION NO. 2710

October 28, 2005

A RESOLUTION OF THE COMMISSION OF PUBLIC UTILITY DISTRICT NO. 1 OF BENTON COUNTY REGARDING APPROVAL OF THE 2026-2029 CLEAN ENERGY IMPLEMENTATION PLAN

WHEREAS, the Clean Energy Transformation Act (CETA), Revised Code of Washington (RCW) 19.405, requires Washington electric utilities to eliminate coal-fired resources from their allocation of electricity by the end of 2025, transition to greenhouse gas neutral by 2030, and transition to one hundred percent clean electricity by 2045; AND

WHEREAS, CETA requires by January 1, 2022, and every four years thereafter, consumer owned utilities to develop and submit to the Department of Commerce a Clean Energy Implementation Plan (CEIP) for resources to be acquired and other actions to be undertaken during the next 4-year period to comply with the CETA standards; AND

WHEREAS, the District held five public meetings, including four public hearings, from July through October 2025, that allowed for customers and interested stakeholders to provide input to the 2026-2029 CEIP; AND

WHEREAS, the District developed a "Clean Energy Forecast" to support is 2026-2029 CEIP; AND

WHEREAS, the governing body of the consumer-owned utility must, after a public meeting, adopt the consumer-owned utility's CEIP; AND

WHEREAS, the adopted CEIP must be submitted to Department of Commerce and made available to the public; AND

NOW, THEREFORE, BE IT HEREBY RESOLVED by the Commission of Public Utility District No. 1 of Benton County, that the 2026-2029 Clean Energy Implementation Plan be approved in substantially the form presented, including the attached Clean Energy Forecast and CEIP Reporting Template.

APPROVED AND ADOPTED By the Commission of Public Utility District No. 1 of Benton County at an open meeting, with notice of such meeting given as required by law, this 28th day of October 2025.

Signer ID: IIH5POAK16...

Jeffrey D. Hall, President

ATTEST:

Signer ID: RERIBPME16...

Michael D. Massey, Secretary

Clean Energy Forecast

for 2026-2029 Clean Energy Implementation Plan

	Calendar Year											
	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
BPUD Retail MWh	1,802,580	1,805,809	1,809,127	1,817,278	1,815,392	1,818,732	1,822,186	1,830,945	1,829,512	1,833,390	1,837,390	1,845,909
BPUD Retail Prior 2-Year Avg. MWh	1,823,632	1,805,701	1,804,195	1,807,468	1,813,203	1,816,335	1,817,062	1,820,459	1,826,566	1,830,229	1,831,451	1,835,390
REC Target MWh	273,545	270,855	270,629	271,120	271,980	89,514	89,685	90,119	90,048	90,240	90,438	90,860
REC Target EIA %	15.000%	15.000%	15.000%	15.000%	15.000%							
REC Target CETA %						4.922%	4.922%	4.922%	4.922%	4.922%	4.922%	4.922%
BPUD Retail Non-Clean %	4.922%	4.922%	4.922%	4.922%	4.922%	4.922%	4.922%	4.922%	4.922%	4.922%	4.922%	4.922%
BPUD Retail Clean %	95.078%	95.078%	95.078%	95.078%	95.078%	95.078%	95.078%	95.078%	95.078%	95.078%	95.078%	95.078%
BPUD Retail Renewable %	84.499%	84.499%	84.499%	84.498%	84.498%	84.498%	84.498%	84.497%	84.498%	84.497%	84.497%	84.497%
BPUD Retail Non-emitting %	10.580%	10.580%	10.580%	10.580%	10.580%	10.580%	10.580%	10.581%	10.581%	10.581%	10.581%	10.581%
BPUD Retail Non-Clean MWh	88,715	88,875	89,039	89,442	89,349	89,514	89,685	90,119	90,048	90,240	90,438	90,860
BPUD Retail Clean MWh	1,713,865	1,716,934	1,720,088	1,727,836	1,726,043	1,729,218	1,732,501	1,740,826	1,739,464	1,743,150	1,746,952	1,755,049
BPUD Retail Renewable MWh	1,523,160	1,525,885	1,528,686	1,535,566	1,533,974	1,536,793	1,539,709	1,547,102	1,545,892	1,549,165	1,552,542	1,559,732
BPUD Retail Non-emitting MWh	190,705	191,049	191,402	192,270	192,069	192,424	192,792	193,724	193,572	193,984	194,410	195,317
BPUD Retail Unspecified MWh	88,715	88,875	89,039	89,442	89,349	89,514	89,685	90,119	90,048	90,240	90,438	90,860
BPUD Retail Hydro MWh	1,511,644	1,514,349	1,517,128	1,523,955	1,522,376	1,525,173	1,528,067	1,535,403	1,534,203	1,537,451	1,540,802	1,547,938
BPUD Retail Wind MWh	11,516	11,537	11,558	11,610	11,598	11,620	11,642	11,698	11,689	11,714	11,740	11,795
BPUD Retail Nuclear MWh	190,705	191,049	191,402	192,270	192,069	192,424	192,792	193,724	193,572	193,984	194,410	195,317
BPUD Wholesale Total MWh	1,859,001	1,862,331	1,865,752	1,874,158	1,872,214	1,875,658	1,879,220	1,888,253	1,886,775	1,890,776	1,894,901	1,903,686
BPUD Wholesale BPA MWh	1,847,936	1,851,266	1,854,687	1,863,093	1,861,149	1,864,593	1,868,155	1,877,188	1,875,710	1,879,711	1,883,836	1,892,621
BPUD Wholesale Packwood MWh	11,065	11,065	11,065	11,065	11,065	11,065	11,065	11,065	11,065	11,065	11,065	11,065
BPUD Wholesale BPA %	99.405%	99.406%	99.407%	99.410%	99.409%	99.410%	99.411%	99.414%	99.414%	99.415%	99.416%	99.419%
BPUD Wholesale Packwood %	0.595%	0.594%	0.593%	0.590%	0.591%	0.590%	0.589%	0.586%	0.586%	0.585%	0.584%	0.581%
BPA Non-Clean %	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%
BPA Clean %	95.049%	95.049%	95.049%	95.049%	95.049%	95.049%	95.049%	95.049%	95.049%	95.049%	95.049%	95.049%
BPA Unspecified %	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%	4.951%
BPA Hydro %	83.763%	83.763%	83.763%	83.763%	83.763%	83.763%	83.763%	83.763%	83.763%	83.763%	83.763%	83.763%
BPA Wind %	0.643%	0.643%	0.643%	0.643%	0.643%	0.643%	0.643%	0.643%	0.643%	0.643%	0.643%	0.643%
BPA Nuclear %	10.643%	10.643%	10.643%	10.643%	10.643%	10.643%	10.643%	10.643%	10.643%	10.643%	10.643%	10.643%

Clean Energy Implementation Plan Reporting Template

Published: March 10, 2026
Deadline: January 1, 2026
Submission: Submit this workbook and all supporting documentation via Smartsheet.
Questions: Aaron Tam, Austin Scharff, Glenn Blackmon, Energy Office, CETA@commerce.wa.gov.

Washington State Department of Commerce

Enter information in yellow fields
Select drop-down option from list in orange fields
Do not modify grey-shaded fields.

Note: this Excel workbook is macro-enabled to allow for the selection of multiple CETA categories on the Indicators & Forecast tab. If you have security restrictions or have no use for this feature, you do not have to enable macros.

Relevant Clean Energy Transformation Act Statutes and Rules

RCW 19.405.060

Clean energy implementation plan—Compliance criteria—Incremental cost of compliance.

(2)(a) By January 1, 2022, and every four years thereafter, each consumer-owned utility must develop and submit to the department a four-year clean energy implementation plan for the standards established under RCW 19.405.040(1) and 19.405.050(1) that: (i) Proposes interim targets for meeting the standard under RCW 19.405.040(1) during the years prior to 2030 and between 2030 and 2045, as well as specific targets for energy efficiency, demand response, and renewable energy; (ii) Is informed by the consumer-owned utility's clean energy action plan developed under RCW 19.280.030(1) or other ten-year plan developed under RCW 19.280.030(5); (iii) Is consistent with subsection (4) of this section; and (iv) Identifies specific actions to be taken by the consumer-owned utility over the next four years, consistent with the utility's long-range resource plan and resource adequacy requirements, that demonstrate progress towards 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 consumer-owned utility's historic performance under median water conditions and resource capability and by the consumer-owned utility's participation in centralized markets. In identifying specific actions in its clean energy implementation plan, the consumer-owned utility may also take into consideration any significant and unplanned loss or addition of load it experiences.

(b) The governing body of the consumer-owned utility must, after a public meeting, adopt the consumer-owned utility's clean energy implementation plan. The clean energy implementation plan must be submitted to the department and made available to the public. The governing body may adopt more stringent targets than those proposed by the consumer-owned utility and periodically adjust or expedite timelines if it can be demonstrated that such 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 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.

(4)(a) A consumer-owned utility must be considered to be in compliance with the standards under RCW 19.405.040(1) and 19.405.050(1) if, over the four-year compliance period, the average annual incremental cost of meeting the standards or the interim targets established under subsection (2) of this section meets or exceeds a two percent increase of the consumer-owned utility's retail revenue requirement above the previous year. All costs included in the determination of cost impact must be directly attributable to actions necessary to comply with the requirements of RCW 19.405.040 and 19.405.050.

(b) If a consumer-owned utility relies on (a) of this subsection as a basis for compliance with the standard under RCW 19.405.040(1), and it has not met eighty percent of its annual retail electric load using electricity from renewable resources and nonemitting electric generation, then it must demonstrate that it has maximized investments in renewable resources and nonemitting electric generation prior to using alternative compliance options allowed under RCW 19.405.040(1)(b).

WAC 194-40-200

Clean energy implementation plan.

(1) **Specific actions.** Each utility must identify in each CEIP the specific actions the utility will take during the next interim performance period or GHG neutral compliance period to demonstrate progress toward meeting the standards under RCW 19.405.040(1) and 19.405.050(1) and the interim targets under subsection (2) of this section and the specific tar gets under subsection (3) of this section. Specific actions must be consistent with the requirements of RCW 19.405.060 (2)(a)(iv).

(2) **Interim target.** The CEIP must establish an interim target for the percentage of retail load to be served using renewable and nonemitting resources during the period covered by the CEIP. The interim target must demonstrate progress toward meeting the standards under RCW 19.405.040(1) and 19.405.050(1), if the utility is not already meeting the relevant standard.

(3) **Specific targets.** The CEIP must establish specific targets, for the interim performance period or GHG neutral compliance period covered by the CEIP, for each of the following categories of resources:

(a) **Energy efficiency.** (i) The CEIP must establish a target for the amount, expressed in megawatt-hours of first-year savings, of energy efficiency resources expected to be acquired during the period. The energy efficiency target must comply with WAC 194-40-330(1). (ii) A utility may update its CEIP to incorporate a revised energy efficiency target to match a biennial conservation target established by the utility under RCW 19.285.040 (1)(b) and WAC 194-37-070.

(b) **Demand response resources.** The CEIP must specify a target for the amount, expressed in megawatts, of demand response resources to be acquired during the period. The demand response target must comply with WAC 194-40-330(2).

(c) **Renewable energy.** The utility's target for renewable energy must identify the quantity in megawatt-hours of renewable electricity to be used in the period.

(4) **Specific actions to ensure equitable transition.** To meet the requirements of RCW 19.405.040(8), the CEIP must, at a minimum:

(a) Identify each highly impacted community, as defined in RCW 19.405.020(23), and its designation as either: (i) A community designated by the department of health based on cumulative impact analyses; or (ii) A community located in census tracts that are at least partially on Indian country.

(b) Identify vulnerable populations based on the adverse socioeconomic factors and sensitivity factors developed through a public process established by the utility and describe and explain any changes from the utility's previous CEIP, if any;

(c) Report the forecasted distribution of energy and nonenergy costs and benefits for the utility's portfolio of specific actions, including impacts resulting from achievement of the specific targets established under subsection (3) of this section. The report must: (i) Include one or more indicators applicable to the utility's service area and associated with energy benefits, nonenergy benefits, reduction of burdens, public health, environment, reduction in cost, energy security, or resiliency developed through a public process as part of the utility's long-term planning, for the provisions in RCW 19.405.040(8); (ii) Identify the expected effect of specific actions on highly impacted communities and vulnerable populations and the general location, if applicable, timing, and estimated cost of each specific action. If applicable, identify whether any resource will be located in highly impacted communities or will be governed by, serve, or otherwise benefit highly impacted communities or vulnerable populations in part or in whole; and (iii) Describe how the specific actions in the CEIP are consistent with, and informed by, the utility's longer-term strategies based on the analysis in RCW 19.280.030 (1)(k) and clean energy action plan in RCW 19.280.030(1)(l) from its most recent integrated resource plan, if applicable.

(d) Describe how the utility intends to reduce risks to highly impacted communities and vulnerable populations associated with the transition to clean energy.

(5) **Use of alternative compliance options.** The CEIP must identify any planned use during the period of alternative compliance options, as provided for in RCW 19.405.040 (1)(b).

(6) The CEIP must be consistent with the most recent integrated resource plan or resource plan, as applicable, prepared by the utility under RCW 19.280.030.

(7) The CEIP must be consistent with the utility's clean energy action plan developed under RCW 19.280.030(1) or other ten-year plan developed under RCW 19.280.030(5).

(8) The CEIP must identify the resource adequacy standard and measurement metrics adopted by the utility under WAC 194-40-210 and used in establishing the targets in its CEIP. (9) If the utility intends to comply using the two percent incremental cost approach specified in WAC 194-40-230, the CEIP must include the information required in WAC 194-40-230(3) and, if applicable, the demonstration required in WAC 194-40-350(2).

(10) Any utility that is not subject to RCW 19.280.030(1) may meet the requirements of this section through a simplified reporting form provided by commerce.

Utility Name & Contact Information

Note: if you list multiple contacts, please separate their information by a comma and a space.

Report Year	**2026**
Compliance Period	**2026-2029**
Utility Name	Benton County PUD #1
Report Date	10/28/2025
Contact Name	Blake Scherer
Phone Number	509-585-5361
Email	schererb@bentonpud.org
Web address of published CEIP	https://www.bentonpud.org/about-benton-pud/planning-performance/resource-planning?tab=Clean_Energy
Are you a "qualifying utility" under the EIA?	Yes
Are you a BPA "full requirements" customer?	Yes

Targets

Interim targets: percentage of retail load to be served using renewable and nonemitting resources (WAC 194-40-200(2))

Utilities with less than 25,000 customers only need to complete cells H8 and H9 in the interim targets table below.

Clean Energy Type	Units	2026	2027	2028	2029	4-year Period
Renewable	%	84%	84%	84%	84%	84%
Nonemitting	%	11%	11%	11%	11%	11%
Total		**95%**	**95%**	**95%**	**95%**	**95%**

Describe how the target demonstrates progress toward meeting the 2030 and 2045 CETA standards (WAC 194-40-200(2)).	Benton PUD's interim target of 95% clean energy exceeds the 80% minimum required by 2030 and is an increase over its average of 86% from 2021-2024. Benton PUD's clean energy forecast has increased from recent actuals primarily due to Benton PUD's conversion of its BPA Power Sales Agreement from Slice/Block to Load Following, effective October 1, 2023. The clean energy forecast is also more favorable than recent actuals due to recent low water years reducing hydroelectric production, whereas the forecast assumes average water. Having recent actuals above 80% and a 95% clean energy forecast demonstrates progress toward meeting the CETA standards. Furthermore, it demonstrates that no incremental specific actions are needed at this time to meet the CETA standards, except for the specific actions to ensure an equitable transition.

Specific targets (WAC 194-40-200(3))

Utilities with less than 25,000 customers only need to complete cells H17-19 in the specific targets table below.

Resource Category	Units	2026	2027	2028	2029	4-year Period
Renewable Energy	MWh to be used over the interim performance period	1,525,885	1,528,686	1,535,566	1,533,974	6,124,111
Energy Efficiency	MWh to be acquired over the interim performance period	4,555	5,120	5,800	7,191	22,666
Demand Response	MW to be acquired over the interim performance period	-	-	-	-	-

Energy efficiency assessment methodology details

Conservation Assessment Method	Conservation Potential Assessment
Hyperlink to Relevant Assessment	https://www.bentonpud.org/about-benton-pud/planning-performance/resource-planning?tab=Conservation
Notes	Benton PUD prepares a Conservation Potential Assessment (CPA) every 2 years, as required by the Energy Independence Act (RCW 19.285). Benton PUD's most recent CPA was approved by Commission Resolution No. 2700 on 8/12/2025 and is available for download at the website linked above.

Demand response assessment methodology details

Did your utility conduct a demand respon	Yes
Please briefly describe your demand response assessment findings. Please describe if there are DR opportunities for particular customer classes or barriers to utilizing DR in your service territory. Please describe which DR technologies were found to be cost-effective, reliable, and feasible.	At this time, Benton PUD has not found demand response (DR) to be cost-effective, reliable, and feasible. Benton PUD's DR target of 0 MW, same as the 2022-2025 CEIP, remains sufficient for Benton PUD to meet its obligation to comply with the CETA Standards and is consistent with Benton PUD's resource plan. If meeting the CETA standards required pursuing new resources in the future, Benton PUD would reference its latest Demand Response Potential Assessment (DRPA) to identify cost-effective DR product candidates that would then be subjected to further evaluation to determine if pursuing DR is cost-effective, reliable and feasible and if pursuing DR achieves the CETA targets and resource plan needs at the lowest reasonable cost, considering risk. Benton PUD's DRPA should be considered an initial screening of the relative cost-effectiveness between DR products rather than a final conclusion that a particular DR product is or is not cost-effective. The 2025 DRPA identified DR opportunities across a mix of residential, commercial, industrial, and agricultural irrigation. Referring to Table 1-1, the top three cost-effective summer DR candidates were: 1) 15 MW of Residential Critical Peak Pricing, 2) 14 MW of Large Farm Irrigation Demand Curtailment, and 3) 1 MW of Industrial Demand Curtailment. Referring to Table 1-2, the top three cost-effective winter DR candidates were: 1) 1 MW of Industrial Demand Curtailment, 2) 6 MW of Residential Space Heating Switch, and 3) 2 MW of Residential Critical Peak Pricing. Refer to Section 7 of the 2025 DRPA for a discussion on barriers to pursuing DR, which includes the recognition that the District has already implemented residential time-of-day demand rates, independent of any CETA requirements. Furthermore, Benton PUD's DR target is derived from other considerations beyond its DRPA, including, but not limited to, the following: whether or not DR is needed to meet the CETA standards or resource planning needs, whether or not BPA's current or future contracts and rate structures incentivize demand response, and whether or not it's feasible for Benton PUD to stand-up a DR program within a given time period. Lastly, DR as defined in CETA, is more closely aligned with utilities facing wholesale power market price volatility and capacity needs related to resource adequacy, which are not drivers for a BPA full requirements utility with a BPA load following contract, like Benton PUD.
Hyperlink to Relevant Assessment	https://www.bentonpud.org/about-benton-pud/planning-performance/resource-planning?tab=Demand_Response
Notes	Benton PUD prepares a Demand Response Potential Assessment every two years to support the Clean Energy Transformation Act requirement to assess the amount of demand response resource that is cost-effective, reliable, and feasible. Benton PUD's most recent DRPA was completed 6/20/2025 and is available for download at the website linked above.

Indicators & Forecast

Specific actions to ensure equitable transition (WAC 194-40-200(1)(4))

Enter information in the yellow fields below. Each indicator should correspond with the

Index	Ind_ID	Indicator	CETA Category	Specific Action 1	Specific Action 2	Specific Action 3	Specific Action 4	Outcome Metric 1	Outcome Metric 2	Outcome Metric 3	Outcome Metric 4	Outcome Metric 5	How will the indicator and its associated metrics look different across the service territory in four years after taking the specific actions?
1	**2026_4_1**	Reduce household energy burden	Reduction of Burdens to Vulnerable Populations and Highly Impacted Communities; Reduction of Costs and Risks	Offer a residential low-income conservation program to reduce energy burden	n/a	n/a	n/a	Amount ($) of energy assistance need by utility service area *Derived from Department of Commerce data & Department of Energy Low-Income Energy Affordability Data (LEAD) tool.*	Count (#) of late payment event history	n/a	n/a	n/a	Reducing energy burden should lead to long-term improvements in the outcome metrics. However, attributing changes in these metrics solely to this action may be difficult, given other external influences such as changes in the economy, household income, non-electricity energy costs and weather.

Specific Actions & Equity

Specific actions to ensure equitable transition (WAC 194-40-200(1)(4))

Click "Data">"Refresh All" to auto-populate the specific actions list below with the specific actions

Please enter "N/A" where the question is not applicable to the specific action.

SA_ID	Specific Action	Long Description	Resource Category	Program Type	Program Name	Input Metric 1	Input Metric 2	Input Metric 3	Output Metric 1	Output Metric 2	Output Metric 3	What is the expected effect of this specific action on highly impacted communities and vulnerable populations?	How will the specific action and its resources be governed by (if applicable), serve, or benefit highly impacted communities or vulnerable populations, if at all?	What are the risks to highly impacted communities and vulnerable population associated with the clean energy transition? How does the utility intend to reduce these risks through this specific action (if applicable)?	Will resources be located in highly impacted communities or vulnerable populations? (Y/N/Not Applicable)	What is the general location of this specific action and its resources (if applicable)?	What is the timing of this specific action?	What is the estimated cost of this specific action?	What other benefits does the specific action bring that isn't covered by the listed metrics? (optional)
2026_4_1_1	**Offer a residential low-income conservation program to reduce energy burden**	n/a	Energy Efficiency	Energy Efficiency and Weatherization	Residential low-income conservation	Budget ($) for internal program	Budget ($) for third-party program	n/a	Count (#) & map of customers served	Amount ($) of energy assistance provided	Amount (kWh) of energy savings achieved	Reduction of energy burden and late payments events	Reduction of energy burden and late payment events	The clean energy transition will likely increase energy bills for all customers. This program helps protect energy-burdened households by lowering their cost risk, particularly for highly impacted communities and vulnerable populations who may be disproportionately affected.	N/A	Benton PUD service territory	Offer annually	$2.8M total budget forecast for 2026-2029 ($700K per year)	This program not only lowers electricity bills for low-income customers, but also improves household comfort, health, and weather resilience. At the same time, the energy savings reduces system demand and helps delay costly investments in new resources and transmission and distribution facilities, keeping power reliable and affordable for the entire community.

Highly Impacted Communities & Vulnerable Populations

Highly impacted communities (WAC 194-40-200(4))

Highly Impacted Community is defined in RCW 19.405.020(23) as:
(23) "Highly impacted community" means a community designated by the department of health based on cumulative impact analyses in RCW 19.405.140 or a community located in census tracts that are fully or partially on "Indian country" as defined in 18 U.S.C. Sec. 1151.

Department of Health has designated Highly Impacted Communities as those ranking 9 or 10 on the Environmental Health Disparities (EHD) map.

Link to Instructions to Identify Highly Impacted Communities (HIC)
Link to the Environmental
Health Disparities (EHD) Map

Which methodology did you use to identify highly impacted communities (HIC)?	Highly Impacted Communities Data Table
# of census tracts that are HIC (Rank 9 or 10 under EHD v2.0 or at least partially on "Indian Country")	8
# of census tracts that are at least partially on "Indian Country"	-
Average EHD v2.0 rank for service territory	6

What are the top 1-3 EHD factors in your highly impacted communities? What are the rankings for these EHD factors and the associated metrics?	Details of the EHD data for Benton PUD's service territory, including identification of highly impacted communities, was included in the "Draft Review Presentation" (see slides 15-16) presented at Public Hearing #2 on September 23, 2025. Of the eight census tracts identified as HIC, one tract has an overall EHD rank of 10 and the other seven tracts have an overall EHD rank of 9. Summarized below are the four EHD themes sorted by their HIC tract count by highest ranking: **1) Socioeconomic Factors:** Rank of 10 = 4 tracts; 9 = 3 tracts; 8 = 1 tract **2) Sensitive Populations:** Rank of 10 = 1 tract; 9 = 2 tracts; 8 = 3 tracts; < 8 = 2 tracts **3) Environmental Effects:** Rank of 9 = 2 tracts; 8 = 5 tracts; < 8 = 1 tract **4) Environmental Exposures:** Rank of 8 = 4 tracts; < 8 = 4 tracts Summarized below are the highest ranking EHD metrics by EHD theme and their HIC tract count: **1) Socioeconomic Factors** *(Top 3 of 7 metrics in theme)* *1.a) No High School Diploma* : Rank of 10 = 4 tracts; 9 = 3 tracts; < 8 = 1 tract *1.b) Population Living in Poverty* : Rank of 10 = 4 tracts; 9 = 1 tract; 8 = 3 tracts *1.c) Primary Language other than English* : Rank of 10 = 2 tracts; 9 = 3 tracts; 8 = 2 tracts; < 8 = 1 tract **2) Sensitive Populations** *(Top 2 of 2 metrics in theme)* *2.a) Death from Cardiovascular Disease* : Rank of 10 = 2 tracts; 9 = 2 tracts; 8 = 1 tract; < 7 = 3 tracts *2.b) Low Birth Weight* : Rank of 10 = 1 tract; 8 = 3 tracts; 7 = 1 tract; < 7 = 3 tracts **3) Environmental Effects** *(Top 3 of 5 metrics in theme)* *3.a) Proximity to Risk Management Plan Facilities* : Rank of 10 = 4 tracts; 9 = 1 tract; 8 = 2 tracts; 6 = 1 tract *3.b) Lead Risk from Housing* : Rank of 10 = 1 tract; 8 = 1 tract; 7 = 4 tracts; < 7 = 2 tracts *3.c) Proximity to Hazardous Waste Facilities* : Rank of 8 = 1 tract; 7 = 2 tracts; 6 = 2 tracts; 5 = 3 tracts **4) Environmental Exposures** *(Top 3 of 5 metrics in theme)* *4.a) Ozone Concentration* : Rank of 10 = 8 tracts *4.b) PM2.5 Concentration* : Rank of 9 = 5 tracts; 6 = 3 tracts *4.c) Diesel Exhaust PM2.5 Emissions* : Rank of 6 = 4 tracts, 5 = 2 tracts, 3 = 2 tracts
How do your planned specific actions address the EHD factors for HICs (if applicable)?	For highly impacted communities (HIC) that may be living in poverty, Benton PUD's planned specific action to offer a residential low-income conservation program will help to reduce energy burden. "Populations Living in Poverty" is one of the metrics within the "Socioeconomic Factors" theme of the EHD Map and it contributes to the overall EHD Map rank that is used to identify HIC.

Vulnerable populations (WAC 194-40-200(4))

Please list all socioeconomic factors and sensitivity factors developed through a public process and used to identify Vulnerable Populations based on the definition in RCW 19.405.020(40):

(40) "Vulnerable populations" means communities that experience a disproportionate cumulative risk from environmental burdens due to:

(a) Adverse socioeconomic factors, including unemployment, high housing and transportation costs relative to income, access to food and health care, and linguistic

Please describe how your utility identified vulnerable populations through a public process (e.g., surveys, focus groups, public forums, etc.)	Benton PUD's public process for identifying vulnerable populations began with a description of its proposed methodology at Public Hearing #1 on slides #17-21 of its "Introduction Presentation". Benton PUD described its methodology to identify vulnerable populations as those census tracts served by Benton PUD having a theme rank of 9 or 10 in either the "Socioeconomic Factors" or "Sensitive Populations" themes of the Environmental Health Disparities Map (EHD Map). Slide #21 described the change in methodology from the previous CEIP. Benton PUD's public process continued at Public Hearing #2 with a "Draft Presentation" that described the methodology on slides #12-16 and specifically identified 13 census tracts as vulnerable populations on slides #15-16, including their EHD Map rankings. Public Hearing #2 also included a "Draft Review Reporting Template" describing how vulnerable populations are identified. The public process continued at Public Hearing #3 where Benton PUD shared its "Preliminary Review Reporting Template" and at Public Hearing #4 where the "Final Reporting Template" was shared with the public.
How does your utility's planned specific actions address the vulnerable population factors (if applicable)?	For vulnerable populations that may be living in poverty, Benton PUD's planned specific action to offer a residential low-income conservation program will help to reduce energy burden. "Populations Living in Poverty" is one of the metrics within the "Socioeconomic Factors" theme of the EHD Map that is used to identify vulnerable populations.

Factor Category	Factor	Details	Source	Date Last Updated
E.g., Employment	*Unemployment*	*% unemployed over 16 years old*	*American Community Survey*	*12/15/2019*
Other	Socioeconomic Factors EHD Rank	Census tracts served by Benton PUD having a "Socioeconomic Factors" theme rank of 9 or 10 in the EHD map.	Washington Environmental Health Disparities (EHD) Map	4/26/2023 (EHD v2.0)
Health	Sensitive Populations EHD Rank	Census tracts served by Benton PUD having a "Sensitive Populations" theme rank of 9 or 10 in the EHD map.	Washington Environmental Health Disparities (EHD) Map	4/26/2023 (EHD v2.0)

Describe and explain any changes to the factors from your utility's previous Clean Energy Implementation Plan (CEIP), if any:

At Public Hearing #1, Benton PUD described and explained the changes, from its previous CEIP, to the factors used to identify vulnerable populations. The proposed methodology was described within slides #17-21 of its "Introduction Presentation" and the changes were explained on slide #21. The explanation of changes included that the new methodology allows for identification by EHD map data, is consistent with the Revised Code of Washington (RCW) definition and Department of Health EHD data, and allows for mapping Benton PUD's actions to the EHD map census tracts.

Vulnerable populations in the 2022-2025 CEIP were identified based on the following factors:
1) Population Living <=185% Federal Poverty Level (FPL)
2) Percentage Share of Low Income (<125% of FPL)
3) Population of Limited English Speaking
4) Percentage Share of Population Seniors (age 65 or older)
5) Percentage Share of Veterans
6) Percentage Share of Individuals with Disability

Public Participation

Public participation (WAC 194-40-200(4), -220(1))

Provide a summary of the public input process conducted in compliance with WAC 194-40-220.	For its 2024 Resource Plan (2024 RP), inclusive of a 10-year action plan for complying with the Clean Energy Transformation Act, Benton PUD provided opportunities for its customers and interested stakeholders to provide input during the development of, and prior to the adoption of, the plan. The 2024 RP was initiated on June 25, 2024, with an agenda item at Benton PUD's public Commission meeting where an "Introduction Presentation" was reviewed. On August 13, 2024, at Benton PUD's public Commission meeting, a "Draft Plan" was reviewed and then the Commission passed a motion setting a Public Hearing for final approval on August 27, 2024. At the Public Hearing on August 27, 2024, after receiving public comment, the Commission approved a resolution adopting the final plan. All presentations and materials were made available electronically throughout the process and they continue to be available on Benton PUD's resource planning webpage: https://www.bentonpud.org/about-benton-pud/planning-performance/resource-planning?tab=Resource_Plan For its 2026-2029 Clean Energy Implementation Plan (CEIP), Benton PUD provided opportunities for its customers and interested stakeholders to provide input during the development of, and prior to the adoption of, the plan. Benton PUD's public input process included several public meetings, public advertisement requesting input, and a newly created, dedicated CEIP webpage (https://www.bentonpud.org/ceip) for accepting public input and for providing electronic access to related materials and presentations. All public hearings included the opportunity for public input prior to any subsequent Commission action. All presentations and materials were made available electronically throughout the process and they continue to be available on Benton PUD's resource planning webpage: https://www.bentonpud.org/about-benton-pud/planning-performance/resource-planning?tab=Clean_Energy The CEIP process was initiated on July 22, 2025, when the Benton PUD Commission passed a motion setting Public Hearing #1 on August 26, 2025 and the CEIP webpage and input form were live. At Public Hearing #1, an "Introduction Presentation" was reviewed and then the Commission passed a motion setting Public Hearing #2 on September 23, 2025. Prior to the next public hearing, low-income advocacy groups were invited to a workshop hosted by Benton PUD on September 17, 2025, to learn more about Benton PUD's low-income energy assistance programs and the CEIP input process, including the upcoming Public Hearing #2. At Public Hearing #2, a "Draft Review Presentation" and a "Draft Review Reporting Template" were reviewed and then the Commission passed a motion setting Public Hearing #3 on October 14, 2025. At Public Hearing #3, a "Preliminary Review Presentation" and a "Preliminary Review Reporting Template" were reviewed and then the Commission passed a motion setting Public Hearing #4 on October 28, 2025. The public comment period ended on October 16, 2025, to allow time for Benton PUD to incorporate any public comments into the final CEIP template. At Public Hearing #4, after accepting public comment, the Commission passed a resolution adopting the final plan.

What barriers to public participation does your utility's community face due to language, cultural, economic, technology, or other factors?	Benton PUD considered the following barriers to public participation faced by our customers and community: **1) Language**: Access to information for non-English speaking, predominantly Spanish speaking **2) Cultural**: May be a lack of familiarity with Benton PUD's public processes or information **3) Economic**: Inability to attend Benton PUD's public meetings due to work or travel expense **4) Technology**: Lack of access to technology may prevent access to information or participation **5) Disability**: Accommodations may be needed for individuals with a disability
What reasonable accommodations has your utility provided to reduce barriers to public participation?	Benton PUD provided the following reasonable accommodations to reduce barriers to public participation: **1) Language** 1.a) Spanish translation is continually provided for Benton PUD's main website (www.bentonpud.org) 1.b) Spanish translation was provided for a newly created CEIP webpage (www.bentonpud.org/CEIP) 1.c) Spanish translation was provided for a newly created CEIP input form, available on the CEIP webpage 1.d) Ran radio ads in English and Spanish over a three month period **2) Cultural** 2.a) Hosted a workshop for low-income advocacy groups and invited their representation in the CEIP process 2.b) Advertised CEIP public input process across a variety of media platforms to reach different audiences **3) Economic** 3.a) No travel costs for public meetings, as all meetings included virtual and phone attendance options 3.b) Hosted multiple public meetings with prior notice over a four month period, to increase participation opportunities 3.c) CEIP webpage enabled independent review of public meeting materials and submitting CEIP input **4) Technology** 4.a) All public meetings included a virtual and phone option in addition to in-person attendance 4.b) Advertised CEIP process on multiple technology platforms: website, newspaper, radio, social media (Facebook, Instagram, X) 4.c) Provided other contact options for questions or to request assistance with participating in the public feedback process: Email power@bentonpud.org or Call Blake Scherer, Senior Engineer at (509) 585-5361 **5) Disability** 5.a) Per Commission Resolution No. 2324, approved September 8, 2015, it is Benton PUD's policy that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of its services, programs, or activities, or be subjected to discrimination. The policy and the Request for Reasonable Accommodation Form are available online (https://www.bentonpud.org/ada-accommodation), or contact: Benton PUD Human Resources Manager, 2721 W 10th Avenue, Kennewick, WA 99336, Fax to (509) 582-1246 or email to dunlapk@bentonpud.org

Describe how public comments were reflected in the specific actions under WAC 194-40-200(4), including the development of one or more indicators and other elements of the CEIP and your utility's supporting integrated resource plan or resource plans, as applicable.	For the 2024 Resource Plan, public comments were clarifying questions on ancillary topics, rather than direct input to be reflected in the plan. The only public comments received were the following two comments from the August 27, 2024, public hearing, copied here from the minutes: 1) *"Comment one from the public - Why does BPA have a constraint of a 20 year contract and why is there is no flexibility there? Answer - Senior Director Jon Meyer responded and stated the requirement for BPA to limit contracts to 20 years is in federal statute."* 2) *"Comment two from the public – Would the District serve a new 3-5 MW load at BPA's Tier 2 pricing or not?* *Answer - Senior Director Jon Meyer responded and stated that at this time, loads under 10 aMW are served with established rate schedules that meld all power costs including BPA Tier 1 and Tier 2, with one exception for Electricity Intensive Loads over 3.5 aMW that would be served with rates based on the marginal cost of power."* For the 2026-2029 CEIP, public comments were reflected in the CEIP by 1) ensuring that Benton PUD's low-income energy assistance funding assessment considered potential changes to the federal Low-Income Home Energy Assistance Program (LIHEAP), and 2) by including within the CEIP a description of how the clean energy forecast is based on average water and how Benton PUD's conversion of its BPA Power Sales Agreement from Slice/Block to Load Following improved the forecast, and 3) by emphasizing in the CEIP how Benton PUD is already meeting the CETA standard and that no incremental resource actions are necessary. Below is a summary of all public input received through October 16, 2025: 1) August 26, 2025, Public Hearing #1, as copied from the minutes: *"Chuck Torelli raised concern that the federal Low-Income Energy Initiative (LIEI) program had been discontinued. Director Johnson acknowledged the concern and confirmed that staff were actively monitoring the issue."* 2) August 26, 2025, Public Hearing #1, as copied, in part, from the minutes: *"Roger Ovic raised questions regarding the energy category labeled "Unspecified" and its drop after 2024. He also inquired about potential impacts of the Columbia River Treaty between the United States and Canada. Engineer Blake Scherer explained that the reduction was due to low water years and the transition in 2024 to Benton PUD's first year operating under load following rather than the previous "slice" customer block arrangement. General Manager Dunn explained that an agreement in principle on the Columbia River Treaty had been reached..."* (See minutes for the full response on this ancillary topic.) 3) September 11, 2025, CEIP webpage input from Richard Stemson: *"we are over 80% clean energy from the dams This law is a waste of what money we have left."* (The comment was shared publicly at the September 23, 2025, Public Hearing #2).

Long-term Plans

Integrated resource plan & clean energy action plan compliance (WAC 194-40-200(6-7), WAC 194-40-200(4)(c)(iii))

Is your clean energy implementation plan (CEIP) consistent with the most recent integrated resource plan or resource plan, as applicable, prepared by your utility under RCW 19.280.030?	Yes
Is your CEIP consistent with your utility's clean energy action plan developed under RCW 19.280.030(1) or other 10-year plan developed under RCW 19.280.030(5)?	Yes
How are the specific actions consistent with your utility's resource plan and clean energy action plan?	Benton PUD's most recent resource plan, the 2024 Resource Plan for 2025-2034 (2024 RP), prepared under RCW 19.280.030(5), was approved by Commission Resolution No. 2681 on 8/27/2024 and is available for download from the website linked below. Benton PUD's specific actions are consistent with the resource strategy described within Section 5 (Pages 9-11) of the 2024 RP and summarized here: 1) continuing to pursue cost-effective, reliable, and feasible conservation, consistent with the requirements of the Energy Independence Act and CETA, 2) continuing with Packwood hydroelectric as a dedicated resource, per the BPA contractual commitment, 3) continuing with BPA's load following contract. Benton PUD's specific actions are consistent with the 10-year plan to implement the CETA standards described within Section 7 (Pages 14-15) of the 2024 RP. In the 2024 RP, Benton PUD's clean energy forecast was 4% non-clean. For the 2026-2029 CEIP, Benton PUD's clean energy forecast has been updated to 5% non-clean, derived from a 13-year average of BPA's fuel mix from 2012-2014 and a 5-year average of Packwood hydroelectric. Consistent with the 2024 RP, the 2026-2029 CEIP includes procuring unbundled renewable energy credits to offset its 5% non-clean energy, which is an allowable alternative compliance option (up to a maximum of 20%), to meet the CETA greenhouse gas neutral standard, while also satisfying the renewable energy requirements of the Energy Independence Act. Benton PUD's actions follow Department of Commerce guidance that a CEIP should only include incremental steps taken to comply with CETA, not actions the utility would undertake regardless. Consistent with the 2024 RP, the 2026-2029 CEIP requires no additional actions to meet CETA. As noted in the submitted "Targets" worksheet, Benton PUD's recent actuals exceed 80% clean and its forecast of 95% already meets the greenhouse gas neutral standard. Therefore, the 2026-2029 CEIP aligns with the 2024 RP in that no incremental specific actions are included, aside from those supporting an equitable transition.
Hyperlink to Relevant Assessment/Resource P	https://www.bentonpud.org/about-benton-pud/planning-performance/resource-planning?tab=Resource_Plan

Resource Adequacy Standard

Resource adequacy standard (WAC 194-40-200(8))

Identify the resource adequacy standard and measurement metrics adopted by the utility under WAC 194-40-210 and used in establishing the targets in the CEIP. Identify and explain any changes to your resource adequacy standard.

Resource adequacy standard (e.g., peak load standards, loss of load probability or loss of load expectation)	Benton PUD's resource adequacy standard has changed since its 2022-2025 CEIP due to the conversion of its BPA Power Sales Agreement from Slice/Block to Load Following, effective October 1, 2023. Under the load following contract, BPA is responsible for resource adequacy. BPA provides resource adequacy for Benton PUD and supplied the following language as of July 9, 2025: *"BPA assures its power supply is available to meet its firm power supply obligation on a long term planning, forecast, basis. As directed by the Pacific Northwest Electric power planning and Conservation Act, a fundamental statutory purpose for BPA is to assure it has an adequate supply of power, which BPA meets through its power planning function, as guided by the Northwest power and Conservation Council power Plan.* *BPA's firm power supply obligation under the Northwest power Act means BPA supplies all the power a customer needs to serve their retail consumer demands on a continuous basis except for reasons of force majeure. This obligation takes into account and is adjusted by the amount of non-federal power/resources Benton County PUD #1 uses to serve their load and by the type of product the Benton County PUD #1 elects to purchase from BPA. BPA's currently effective Regional Dialogue load Following Contracts obligates BPA to supply all the electricity required to meet the second to second variation in the Benton County PUD #1's load net of the Benton County PUD #1's non-federal resources."*
Methods of measurement (e.g., probabilistic assessments of resource adequacy)	BPA provides resource adequacy for Benton PUD and supplied the following language as of July 9, 2025: *"BPA uses its Resource Program, which includes a Needs Assessment that examines on a 20-year forecast basis the uncertainty in customer loads, expected water conditions affecting federal hydro production (including Biological Opinion requirements), resource availability, natural gas prices, and electricity market prices to develop a least-cost portfolio of resources that meet Bonneville's obligations. The goal of the Needs Assessment, which is one of the early steps in the Resource Program, is to measure Bonneville's existing system, in relative isolation, against Bonneville's obligations to supply power to show whether any long-term energy and/or capacity shortfalls may occur over the 20-year study horizon. The Needs Assessment forecasts Bonneville's needs for long-term energy and capacity based on resource capabilities and projected obligations to serve power. The Needs Assessment informs later steps of the Resource Program, where resource optimization techniques are used to evaluate and select potential solutions for meeting Bonneville's long-term needs based on cost and risk.* *The Needs Assessment uses the following metrics to assess Bonneville's long-term energy and capacity needs:* *1. Annual Energy: Evaluates the annual average energy surplus/deficit under p10-by-month critical water conditions.* *2. Monthly p10 Average (AVG) Energy: Evaluates the monthly average surplus/deficit over all hours under p10-by-month critical water conditions.* *3. Monthly p10 Heavy Load Hour (HLH) Energy: Evaluates the monthly average surplus/deficit over heavy load hours (hours ending 7-22, Monday-Saturday, excluding holidays) under p10-by[1]month critical water conditions.* *4. Monthly p10 Superpeak (SPK) Energy: Evaluates the monthly average surplus/deficit over the six peak HLH each weekday (Monday-Friday) under p10-by-month critical water conditions. The roughly 120 superpeak hours per month are a subset of the roughly 384 heavy load hours per month.* *5. 18-Hour Capacity: Evaluates the monthly average surplus/deficit over six peak load hours each day across three-day extreme weather load events under median water (p50) conditions. Winter events used actual temperatures from the January 2024 event for Dec/Jan/Feb, while summer events relied on actual temperature from the June 2021 event for July/August."*

Incremental Cost

Incremental cost calculation (WAC 194-40-230)

Do not complete this section unless the utility intends to comply using the 2% incremental cost approach specified in WAC 194-40-230.

Please upload separately documentation and detailed reporting necessary to comply with the CEIP incremental cost reporting requirements in WAC 194-40-230.

You may use the calculator below to help estimate incremental costs; however, submission of detailed reporting is still required to comply with WAC 194-40-230. Delete the example numbers provided in the

Summary of Results	
Total Incremental Cost	$ -
Average annual incremental cost	$ -
Annual threshold amount	$ -
Meets threshold?	Yes

Year	Retail revenue requirement	Annual amount from revenue increase equal to 2% of prior year revenue requirement	Number of years in effect	Threshold amount over four years	Sum of threshold amounts	Annual threshold amount
0						
1		$ -	4	$ -	$ -	$ -
2		$ -	3	$ -		
3		$ -	2	$ -		
4		$ -	1	$ -		
Annual threshold amount as a percentage of average retail revenue requirement						#DIV/0!

Itemize all lowest reasonable costs the utility intends to incur during this interim period in order to comply with the requirements of the Clean Energy Transformation Act (CETA), RCW 19.405.040 and 19.405.050. Also, provide the alternative lowest reasonable cost if the utility did not have to comply with CETA. If a resource included in an actual or alternative portfolio has a useful life or contract duration of greater than one year, the cost of that resource must be allocated over the expected useful life or contract duration using a levelized cost or fixed charge factor.

Benton PUD does not intend to comply using the 2% incremental cost approach, therefore, this entire worksheet is not applicable.

	With-CETA Resource Portfolio				No-CETA Resource Portfolio				Incremental Cost				
Item Name	2026	2027	2028	2029	2026	2027	2028	2029	2026	2027	2028	2029	Total
					$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
									$ -	$ -	$ -	$ -	$ -
									$ -	$ -	$ -	$ -	$ -
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Total	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -