



Clean Energy Implementation Plan for 2026-2029

Introduction

August 26, 2025

Agenda

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1. CETA

What are the **CETA standards**
and the **CEIP requirements**?

Clean Energy Transformation Act (CETA)

- **CETA Enacted in 2019**

- Revised Code of Washington (RCW) [19.405](#)
- Washington Administrative Code (WAC) [194.40](#)

- **CETA Standards**

1. **No coal by December 31, 2025**

2. **Greenhouse Gas (GHG) Neutral**

- Must be at least [80% clean by 2030](#)
- Up to 20% alternative compliance

3. **100% Clean Electricity**

- Must be [100% clean by 2045](#)

- **“Clean” = Using renewable or nonemitting resources**

RCW: [19.405.030](#)



2025
NO COAL
STANDARD

[19.405.040](#)



2030
GHG NEUTRAL
STANDARD

[19.405.050](#)



2045
100% CLEAN
STANDARD

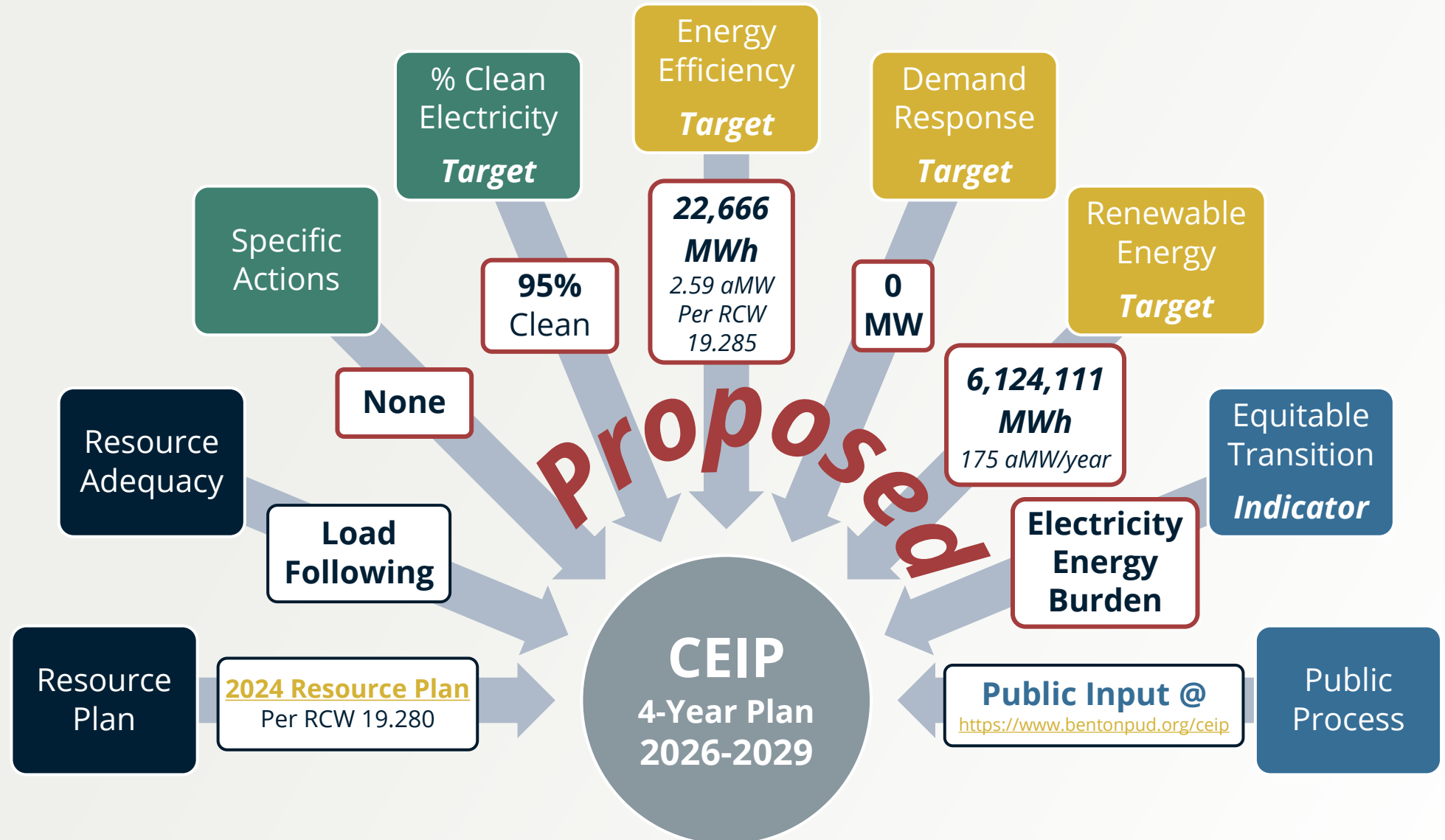
Clean Energy Implementation Plan (CEIP)

Each utility must submit by January 1, 2022, and **every four years** thereafter, a **CEIP** for **resources to be acquired** and **other actions** to be undertaken during the next 4-year period to comply with the **CETA Standards**.

Previous:

2022-2025 CEIP

Approved by Resolution No. 2585 on 11/9/2021



2. % Clean

What is Benton PUD's **Resource Plan**
and **% clean electricity target**?

Resource Plan

- **Resource Plan**

- **CEIP** must be consistent with the most recent **Resource Plan**
 - **2024 Resource Plan**
Approved by Resolution No. 2681 on 8/27/2024
 - **Resource planning** RCW 19.280.030(5)(d) requires a **10-year plan** to meet the **CETA Standards**

- **Resource Adequacy**

- **CEIP** must identify the **resource adequacy standard** relied on,
 - Resource adequacy is **provided by BPA** under load following contract
 - **Change** from last CEIP under Slice/Block contract

Figure 1-1 from 2024 Resource Plan

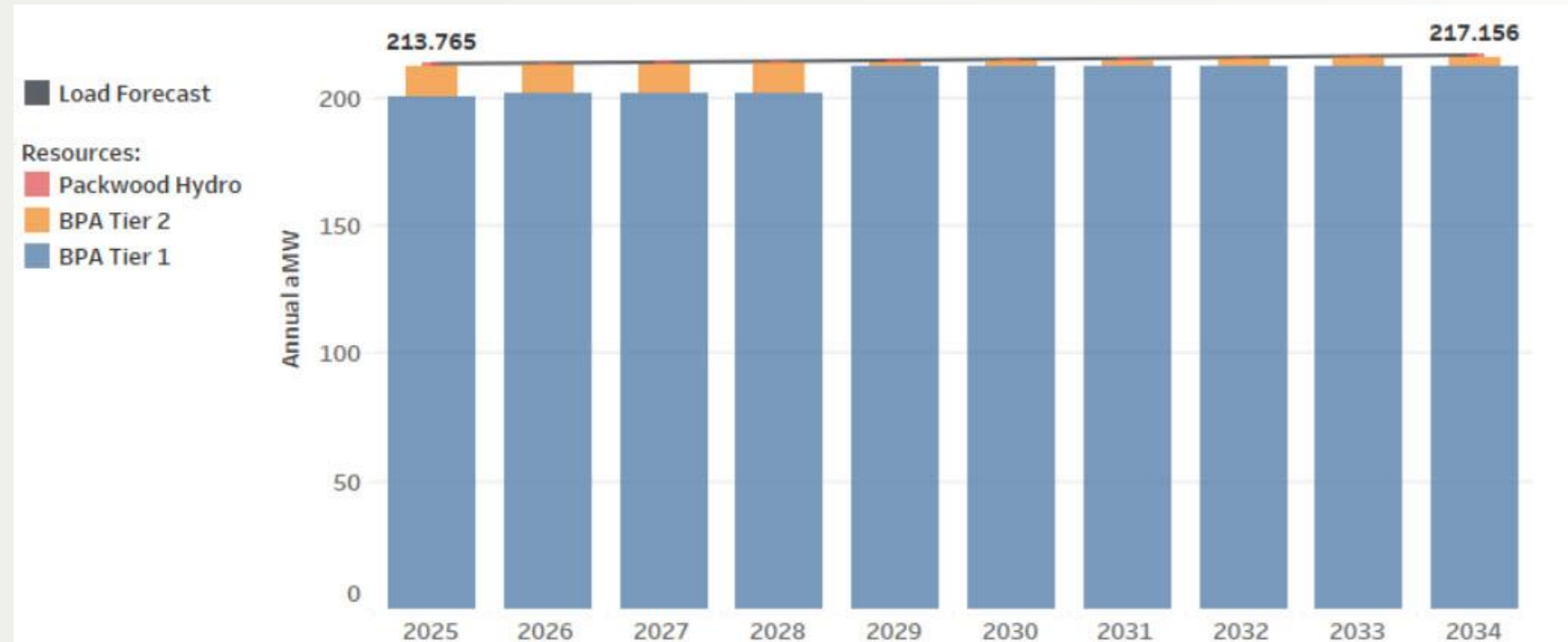
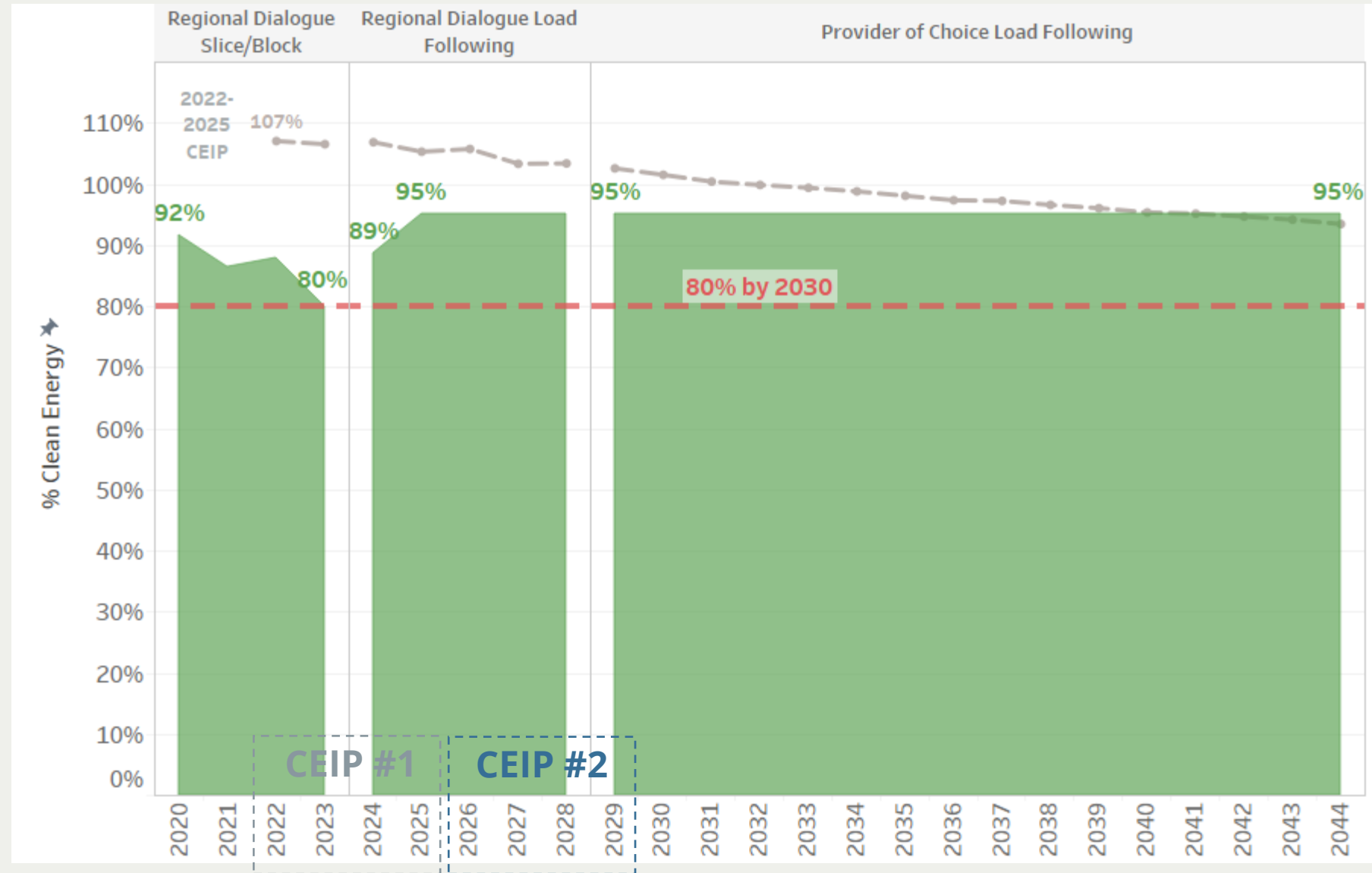


Figure 1-1 – 10-Year Resource Plan

**** For the final 2026-2029 CEIP, this figure will be updated with the latest estimates ****
(e.g. 2025 load forecast, Packwood forecast, BPA Contract High Water Mark)

% Clean Electricity Use

- 2022-2025 CEIP
% clean forecast
 - Above 100% due to forecast of *"Procurement"*
- 2020-2024 actual was 80%-92%
 - Increased % **clean** due to load following
- 2026-2029 CEIP
Proposed target
is 95% clean



Clean Energy Fuel Mix

	Fuel Type	Actual					Forecast					
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	
Mix %	Hydroelectric	80%	75%	76%	68%	75%	84%	84%	84%	84%	84%	< % Clean
	Nuclear	10%	10%	10%	10%	13%	11%	11%	11%	11%	11%	
	Wind	1%	1%	2%	2%	0%	1%	1%	1%	1%	1%	
	Subtotal	92%	86%	88%	80%	89%	95%	95%	95%	95%	95%	
	Natural Gas	1%	4%	2%	0%	0%	0%	0%	0%	0%	0%	
	Unspecified	7%	10%	11%	20%	11%	5%	5%	5%	5%	5%	
	Subtotal	8%	14%	12%	20%	11%	5%	5%	5%	5%	5%	
Mix MWh	Hydroelectric	1,394,349	1,361,896	1,378,307	1,259,232	1,363,896	1,511,644	1,514,349	1,517,128	1,523,955	1,522,376	< Renewable MWh
	Nuclear	179,034	174,623	177,100	181,434	232,636	190,705	191,049	191,402	192,270	192,069	< Non-emitting MWh
	Wind	22,371	24,854	31,184	29,918	7,202	11,516	11,537	11,558	11,610	11,598	< Renewable MWh
	Subtotal	1,595,754	1,561,374	1,586,591	1,470,584	1,603,735	1,713,865	1,716,934	1,720,088	1,727,836	1,726,043	< Clean MWh
	Natural Gas	20,402	64,543	28,736	0	0	0	0	0	0	0	< "Non-Clean" MWh
	Unspecified	123,278	181,399	191,057	367,857	205,087	88,715	88,875	89,039	89,442	89,349	
	Subtotal	143,679	245,941	219,793	367,857	205,087	88,715	88,875	89,039	89,442	89,349	
Mix %	Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	< ~90,000 MWh/year
Mix MWh	Total	1,739,433	1,807,315	1,806,384	1,838,441	1,808,822	1,802,580	1,805,809	1,809,127	1,817,278	1,815,392	< Retail Sales MWh

**** For the final 2026-2029 CEIP, this table will be updated with the latest estimates ****

Notes:

1. For 2024 and beyond, Benton PUD's clean energy forecast is determined by BPA's fuel mix.
2. The BPA fuel mix forecast is derived from a 13-year average of BPA's fuel mix (2012-2024).
3. Packwood generation forecast is based on recent 5-year average (11,065 MWh/year, 1.2 aMW)
4. Frederickson natural gas contract ended in 2022.

3. Actions

What **specific actions** is Benton PUD planning during the **next 4-year period** to comply with the **CETA Standards?**

GHG Neutral Standard

Primary + Alternative = 100%

- Primary Compliance

- ☒ • At least 80% clean by 2030

- Alternative Compliance

- From 2030-2044, may satisfy up to 20% with **alternative compliance**
- CEIP must identify planned use of these **alternatives**:

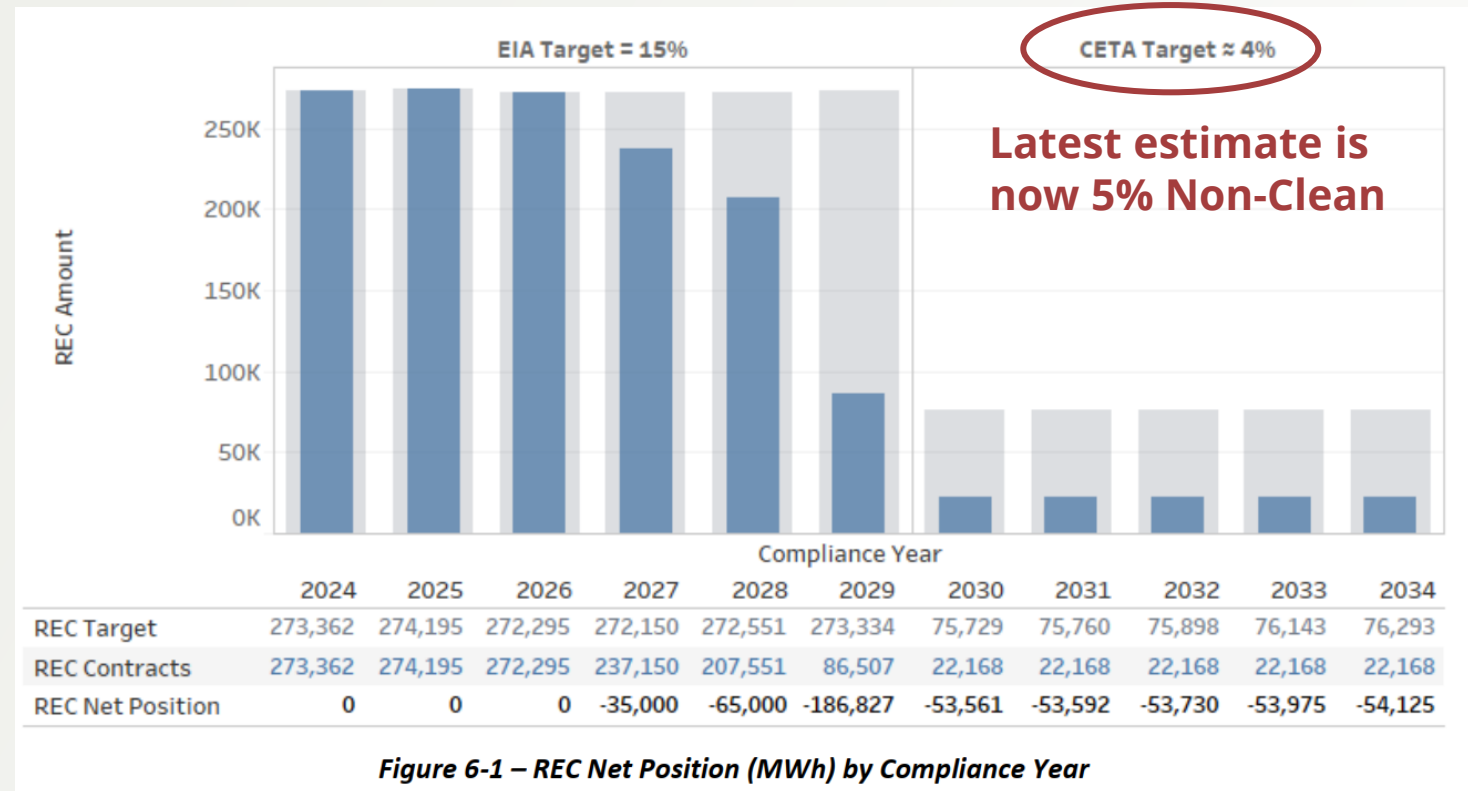
1. Pay the Penalty Amount
2. Energy Transformation Projects
3. Municipal Solid Waste

- ☒ 4. Renewable Energy Credits (REC)

- Already procuring for Energy Independence Act (EIA) compliance
- CETA reduces EIA from 15% to 5%

- CEIP Actions? No incremental resource actions are planned

Figure 6-1 from 2024 Resource Plan



**** For the final 2026-2029 CEIP, this figure will be updated with the latest estimates ****
(e.g. 2025 load forecast, Packwood forecast, REC forecast, BPA fuel mix forecast)

Compliance Penalty

RCW 19.405.090

- (1)(a) An electric utility or an affected market customer that fails to meet the standards established under RCW 19.405.030(1) and **19.405.040(1)** must pay an **administrative penalty** to the state of Washington in the amount of **one hundred dollars, times the following multipliers, for each megawatt-hour** of electric generation used to meet load that is **not** electricity from a **renewable resource or nonemitting** electric generation:
 - (i) **1.5** for coal-fired resources;
 - (ii) **0.84** for gas-fired peaking power plants; and
 - (iii) **0.60** for gas-fired combined-cycle power plants.
- (b) Beginning in 2027, this **penalty** must be adjusted on a biennial basis according to the rate of change of the inflation indicator, gross domestic product implicit price deflator, as published by the bureau of economic analysis of the United States department of commerce or its successor.

No multiplier for BPA unspecified,

$\$100/\text{MWh} \times \text{Null} \times 90,000 \text{ MWh/year} = \0

GHG Neutral by 2030

RCW 19.405.040 (1)(g) Nothing in this section prohibits an electric utility from purchasing or exchanging power from the Bonneville power administration.

100% Clean by 2045

Currently no penalty under RCW 19.405.090

RCW 19.405.050 (6) Nothing in this section prohibits an electric utility from purchasing or exchanging power from the Bonneville power administration.

Benton PUD expects no CETA penalty is applicable for its non-clean MWh attributed to BPA's unspecified fuel mix.

Still need to comply with EIA.

4. Targets

What are Benton PUD's specific targets for **energy efficiency, demand response, and renewable energy**?

Energy Efficiency Target

WAC 194.40.200(3)(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.

WAC 194-40-330(1) Energy efficiency resources.

(a) Assessment of potential:

(i) Any utility that is a **qualifying utility under chapter 19.285 RCW** must assess the amount of energy efficiency and conservation that is available using the conservation methodology established in RCW 19.285.040(1) and the rules implementing that subsection. The analysis must include the social cost of greenhouse gas emissions as specified in WAC 194-40-110.

(b) **Target**. The energy efficiency **target** for any interim performance period or GHG neutral compliance period must equal or exceed the **target** that would be calculated using the pro rata share approach specified in RCW 19.285.040 (1)(b) and must be sufficient to ensure that the utility meets its obligation under **RCW 19.405.040(6)** to pursue all cost-effective, reliable, and feasible conservation and energy efficiency resources.

(c) **Measurement and verification**. All energy efficiency and conservation resources used to meet an energy efficiency **target** must be measured and verified using the measurement and verification requirements of WAC 194-37-080 (3) and (4).

Benton PUD is already complying with Energy Independence Act

**Proposed
Target:**

22,666 MWh
(2.59 aMW)

Target set equal to the 2026-2029 cumulative savings from:

**2025
Conservation
Potential
Assessment**

Approved by
Resolution No. 2700
on 8/12/2025

Demand Response Target

"Demand response" means changes in electric usage by demand-side resources from their normal consumption patterns in response to changes in the price of electricity, or to incentive payments designed to induce lower electricity use, at times of high wholesale market prices or when system reliability is jeopardized. "Demand response" may include measures to increase or decrease electricity production on the customer's side of the meter in response to incentive payments.

WAC 194.40.200(3)(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)**.*

Proposed
Target:
0 MW

WAC 194.40.330(2) – Demand response resources.

- (a) **Assessment of potential.** Each utility must assess the amount of demand response resource that is cost-effective, reliable, and feasible.*
- (b) **Target.** The demand response **target** for any compliance period must be sufficient to meet the utility's obligation under **RCW 19.405.040(6)** and must be consistent with the utility's integrated resource plan or resource plan and any distributed energy resource plan adopted under RCW 19.280.100.*
- (c) **Measurement and verification.** Each utility must maintain and apply measurement and verification protocols to determine the amount of capacity resulting from demand response resources and to verify the acquisition or installation of the demand response resources being recorded or claimed. The utility must document the methodologies, assumptions, and factual inputs used in its measurement and verification of demand response resources."*

2025 Demand
Response Potential
Assessment

District expects to
meet the **GHG**
Neutral Standard
without any DR

GHG Neutral by 2030

Renewable Energy Target

"Renewable resource" means: (a) Water; (b) wind; (c) solar energy; (d) geothermal energy; (e) renewable natural gas; (f) renewable hydrogen; (g) wave, ocean, or tidal power; (h) biodiesel fuel that is not derived from crops raised on land cleared from old growth or first growth forests; or (i) biomass energy.

WAC 194-40-200(3)(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.



Proposed Target:
6,124,111 MWh
(175 aMW/year)

		Actual					Forecast				
		2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Mix %	Hydroelectric	80%	75%	76%	68%	75%	84%	84%	84%	84%	84%
	Nuclear	10%	10%	10%	10%	13%	11%	11%	11%	11%	11%
	Wind	1%	1%	2%	2%	0%	1%	1%	1%	1%	1%
	Subtotal	92%	86%	88%	80%	89%	95%	95%	95%	95%	95%
	Natural Gas	1%	4%	2%	0%	0%	0%	0%	0%	0%	0%
	Unspecified	7%	10%	11%	20%	11%	5%	5%	5%	5%	5%
	Subtotal	8%	14%	12%	20%	11%	5%	5%	5%	5%	5%
Mix MWh	Hydroelectric	1,394,349	1,361,896	1,378,307	1,259,232	1,363,896	1,511,644	1,514,349	1,517,128	1,523,955	1,522,376
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	Natural Gas	20,402	64,543	28,736	0	0	0	0	0	0	0
	Unspecified	123,278	181,399	191,057	367,857	205,087	88,715	88,875	89,039	89,442	89,349
	Subtotal	143,679	245,941	219,793	367,857	205,087	88,715	88,875	89,039	89,442	89,349
Mix %	Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Mix MWh	Total	1,739,433	1,807,315	1,806,384	1,838,441	1,808,822	1,802,580	1,805,809	1,809,127	1,817,278	1,815,392

2026-2029 Renewable Energy

< 6,077,808 MWh

< + 46,303 MWh

6,124,111 MWh

5. Equity

How is Benton PUD ensuring an **equitable transition** to clean energy?

Equitable Transition in CEIP (1 of 2)

WAC 194-40-200(4)

- (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.

Identify
Named
Communities

CETA's Named Communities

Highly Impacted Community

Definition per RCW 19.405.020:

- 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.

Vulnerable Populations

Definition per RCW 19.405.020:

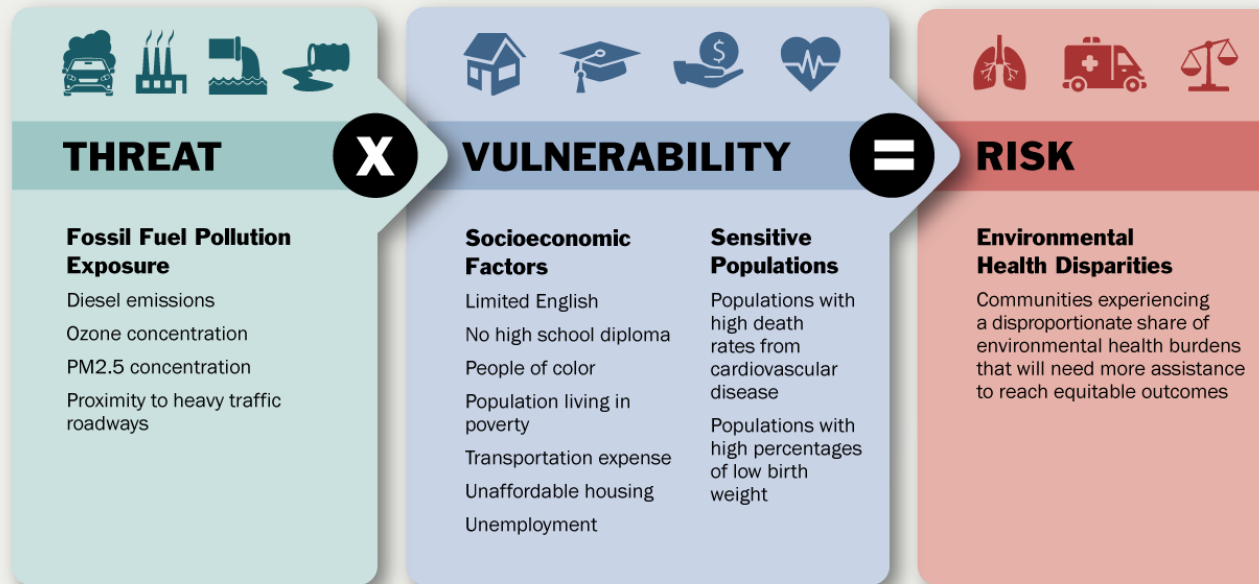
- means communities that experience a **disproportionate cumulative risk** from environmental burdens due to:
- (a) **Adverse socioeconomic factors**, including unemployment, high housing and transportation costs relative to income, access to food and health care, and linguistic isolation; and
- (b) **Sensitivity factors**, such as low birth weight and higher rates of hospitalization.



Department of Health EHD Map: <https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map>

Environmental Health Disparities (EHD) Map

Threat x Vulnerability = Risk

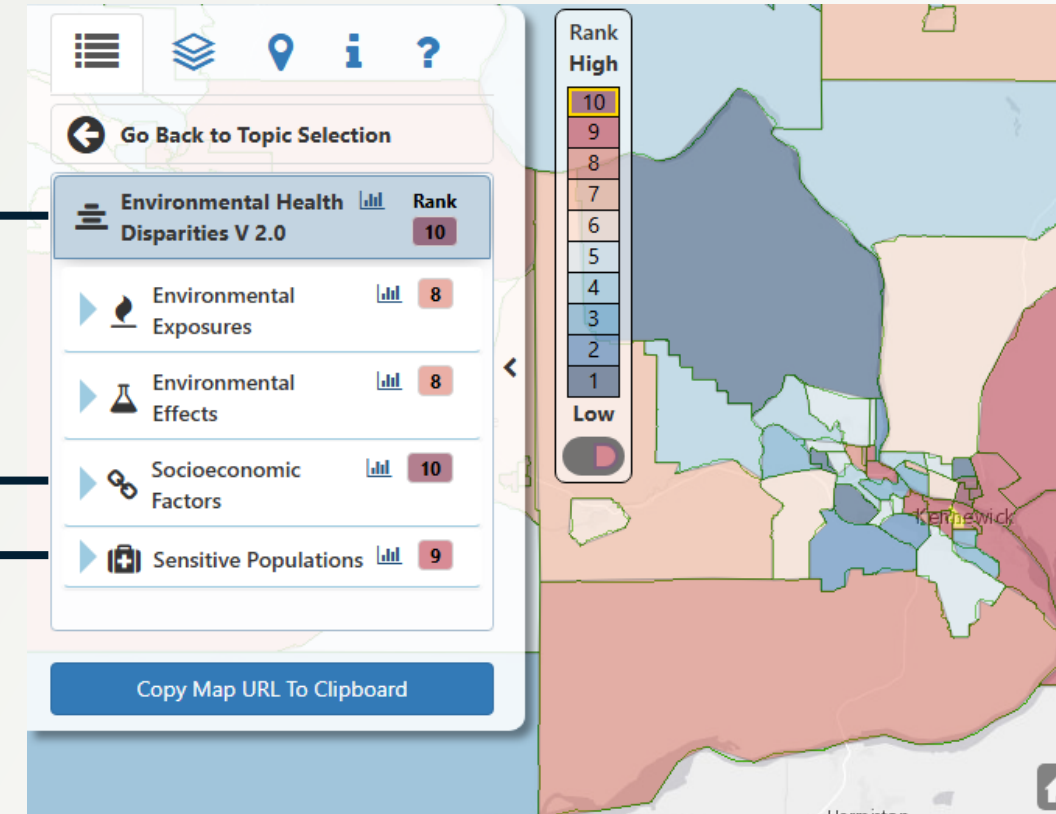


- **Identification of Highly Impacted Community:**

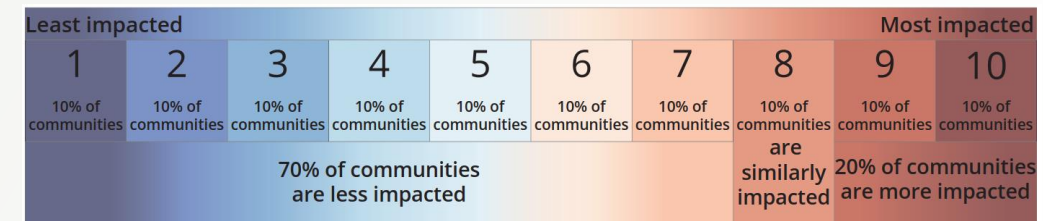
- Tribal Land or Overall EHD Rank = **9 or 10**
- **Highly Impacted Communities Data Table**

- **Identification of Vulnerable Populations:**

- Socioeconomic Factors Rank = **9 or 10**
- Or Sensitive Populations Rank = **9 or 10**



Census Tract Rank



Vulnerable Populations

WAC 194-40-200 (4)(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;

- **Previous 2022-2025 CEIP:**

- Low-income
- Seniors (62+)
- Health Disabilities/Disabled
- Veterans/Active Military
- Language

- **Proposed 2026-2029 CEIP:**

- **Identification per EHD data**
- Consistent with RCW definition and Department of Health
- Allows for mapping Benton PUD's actions to the EHD map census tracts

Equitable Transition in CEIP (2 of 2)

WAC 194-40-200(4)

- (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.

Equity Indicator

No Resource Specific Actions

Not applicable

Residential low-income conservation program

Equity Indicator

- **"Indicator"** means an attribute, either quantitative or qualitative, of a condition, resource, program or related distribution investment that is tracked for the purpose of evaluating change over time.
- **RCW 19.405.040 (8)** In complying with this section, an electric utility must, consistent with the requirements of RCW 19.280.030 and 19.405.140, **ensure that all customers are benefiting from the transition to clean energy: Through the equitable distribution of energy and nonenergy benefits and reduction of burdens to vulnerable populations and highly impacted communities**; long-term and short-term public health and environmental benefits and reduction of costs and risks; and energy security and resiliency.
- CEIP requires one or more **indicators** from one or more categories:
 1. Reduction of burdens to vulnerable populations and highly impacted communities →
 2. Long-term and short-term public health benefits
 3. Long-term and short-term environmental benefits
 4. Reduction of costs and risks →
 5. Energy security and resiliency

Proposed Indicator:

Reduce household **electricity energy burden**

Other CETA Equity Definitions

- **"Energy burden"** means the share of annual household income used to pay annual home energy bills.
- **"Energy assistance"** means a program undertaken by a utility to reduce the household **energy burden** of its customers.
 - (a) **Energy assistance** includes, but is not limited to, weatherization, conservation and efficiency services, and monetary assistance, such as a grant program or discounts for lower income households, intended to lower a household's **energy burden**.
 - (b) **Energy assistance** may include direct customer ownership in distributed energy resources or other strategies if such strategies achieve a reduction in **energy burden** for the customer above other available conservation and demand-side measures.
- **"Energy assistance need"** means the amount of assistance necessary to achieve an **energy burden** equal to six percent for utility customers.
- **"Low-income"** means household incomes that do not exceed the higher of eighty percent of area median income or two hundred percent of federal poverty level, adjusted for household size.

The **proposed CEIP indicator** is associated with **low-income energy assistance** in the form of a residential low-income energy conservation program to ensure short and long-term energy and non-energy benefits.

Energy Assistance Reporting

RCW 19.405.120 Energy assistance for low-income households.

(4)(a) In addition to the requirements under subsection (3) of this section, each electric utility must submit **biennially** to the department an **assessment of**:

(i) The programs and mechanisms used by the utility to **reduce energy burden** and the effectiveness of those programs and mechanisms in both short-term and sustained **energy burden reductions**;

(ii) The outreach strategies used to encourage participation of eligible households, **including consultation with community-based organizations** and Indian tribes as appropriate, and comprehensive enrollment campaigns that are linguistically and culturally appropriate to the customers they serve in **vulnerable populations**; and

(iii) A cumulative assessment of previous funding levels for **energy assistance** compared to the funding levels needed to meet: (A) **Sixty percent** of the current energy assistance need, or increasing **energy assistance** by **fifteen percent** over the amount provided in 2018, whichever is greater, by 2030; and (B) **ninety percent** of the current energy assistance need by 2050.

(b) The assessment required in (a) of this subsection must include a plan to improve the effectiveness of the assessed mechanisms and strategies toward meeting the **energy assistance need**.

CETA “Section 120”
Low-income energy assistance reporting
is separate, but related, to **CEIP equity reporting**

CEIP Energy Assistance Reporting

CETA Categories: Reduction of costs and risks & Reduction of burdens to vulnerable populations and highly impacted communities

Indicator: Reduce household electricity energy burden

Equity Actions

- Provide a residential low-income energy conservation program to reduce energy assistance need

PROPOSED

Input Metrics

- Budget (\$) for internal program
- Budget (\$) for third-party program; *Benton Franklin Community Action Committee (CAC)*

PROPOSED

Output Metrics

- Count (#) & map of customers served
- Amount (\$) of energy assistance provided
- Percent (%) of program budget spent

PROPOSED

Outcome Metrics

- Energy assistance need (\$) by utility service area
- *From Commerce via Department of Energy's Low-Income Energy Affordability Data (LEAD)*

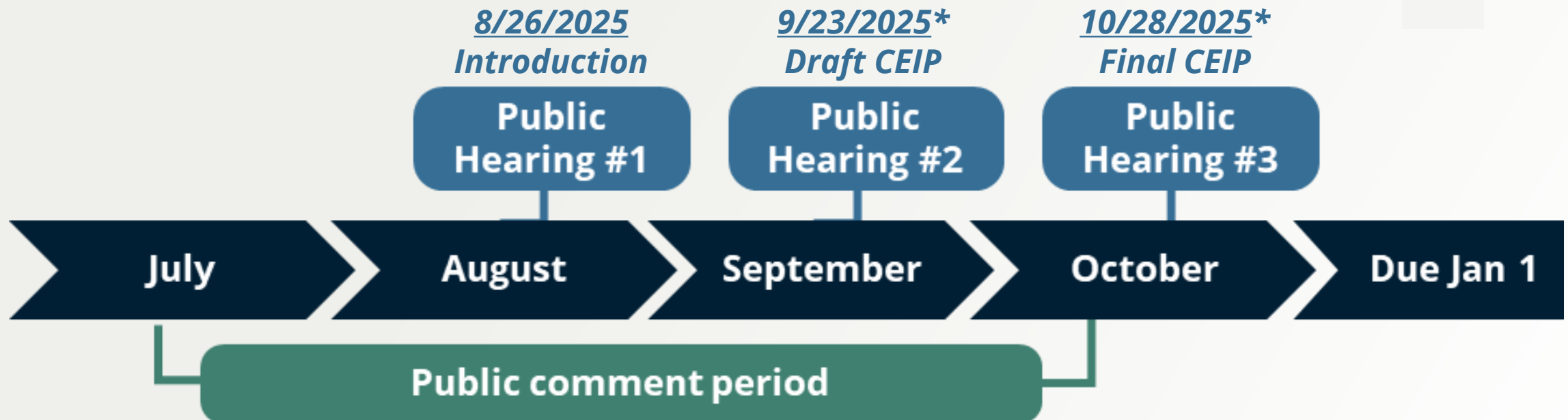
6. Public Input

How is Benton PUD including **public input**?

Public Input Process

WAC 194-40-050 (2)

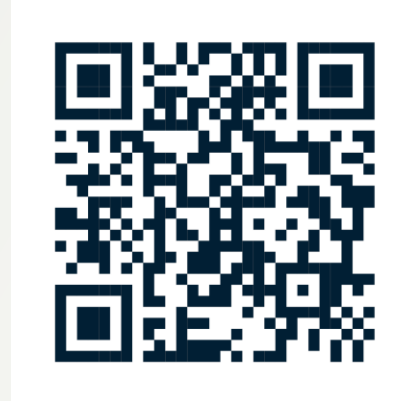
Each utility must submit with its **CEIP** a summary of the **public input process** conducted in compliance with **WAC 194-40-220** and a description of how **public comments** were reflected in the **specific actions** under **WAC 194-40-200(4)**, including the development of one or more **indicators** and other elements of the CEIP and the utility's supporting integrated resource plan or resource plans, as applicable.



* Proposed dates, subject to change

Public Comment

- **Public Comment Options:**
 - **CEIP website input form**
 - **In-person or virtual meetings**
 - **CEIP public hearings**
 - **Regular Commission meetings**
 - *Note: All public hearings will be held in-person at 9 AM during regularly scheduled Commission meetings at our Kennewick office. Meetings include a virtual and telephone option. See Commission meeting and attendance details on our [Commission page](#).*
- **For additional questions** about the CEIP or to request assistance with participating in the public process:
 - **Email power@bentonpud.org**
 - **or call Blake Scherer at (509) 585-5361**



<https://www.bentonpud.org/ceip>

Tell us what matters to you

As we develop our 2026-2029 CEIP, we want to make sure it reflects what matters most to our customers. To support this, we're offering multiple ways for customers and interested stakeholders to provide input:

- Attend public hearings with our Commission to hear updates and share your thoughts
- Use the online form below to leave feedback anytime that works for you

We appreciate your participation and look forward to hearing from you. For the District's 2022-2025 CEIP, visit our [Resource Planning page](#).

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Please share your input for us to consider as we develop the 2026-2029 CEIP: *

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