Clean Energy Implementation Plan Reporting Template

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Deadline: January 1, 2026
Submission: Submit this workbook and all supporting documentation via Smartsheet.
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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	
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. This 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/getattachment/5b21cab4-119b-4d3a-855c-3292fe4cc5d8/Resolution-No-2700-2025-Conservation-Potential-Assessment-for-2026-2045.PDF
Notes	n/a

Demand response assessment methodology details

Did your utility conduct a demand response assessment?	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.	
Hyperlink to Relevant Assessment	https://www.bentonpud.org/getattachment/2e98eb40-f7fd-4434-80a4-dc151bf5d649/Demand-Response-Potential-Assessment-(DRPA)-Report-FINAL-2025-06-20.PDF
Notes	

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	$3.1M total budget forecast for 2026-2029	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?	
How do your planned specific actions address the EHD factors for HICs (if applicable)?	

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 isolation; and
(b) Sensitivity factors, such as low birth weight and higher rates of hospitalization.

Please describe how your utility identified vulnerable populations through a public process (e.g., surveys, focus groups, public forums, etc.)	Reference Benton PUD's 8/29/2025 "CEIP Introduction Presentation" (Slides 17-25).
How does your utility's planned specific actions address the vulnerable population factors (if applicable)?	

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:

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.	*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 …*
What barriers to public participation does your utility's community face due to language, cultural, economic, technology, or other factors?	*WAC 194-40-220(2) - In assessing whether a public input opportunity is reasonable, the utility must consider barriers to public participation due to language, cultural, economic, technological, or other factors consistent with community needs.*
What reasonable accommodations has your utility provided to reduce barriers to public participation?	*WAC 194-40-220(1) - Each utility must provide reasonable opportunities for its customers and interested stakeholders to provide input to the utility during the development of, and prior to the adoption of, plans identifying actions to comply with RCW 19.405.040(8) and other requirements of RCW 19.405.040 and 19.405.050. A utility may use a single coordinated public input process in the development of its clean energy implementation plan, its integrated resource plan or resource plan, as applicable, and its clean energy action plan or 10-year action plan, as applicable.*
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.	*WAC 194-40-050(2) - (continued) ... 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.*

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?	
Hyperlink to Relevant Assessment/Resource Plan	https://www.bentonpud.org/getattachment/3923c71b-efec-4a38-98be-cc52f10b4fd4/2024-Resource-Plan-for-2025-2034-Resolution-No-2681-2024-08-27.PDF

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 yellow

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.

	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	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**	**$ -**	**$ -**	**$ -**	**$ -**

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