

Clean Energy Implementation Plan Reporting Template

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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 targets 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	Cowlitz County PUD #1
Report Date	12/31/2025
Contact Name	Jennifer Langdon
Phone Number	360-501-9392
Email	jangdon@cowlitzpud.org
Web address of published CEIP	https://www.cowlitzpud.org/ceip
Are you a "qualifying utility" under the EIA?	Yes
Are you a BPA "full requirements" customer?	No

Tam, Aaron (COM):

Full requirements customer is defined under RCW 19.280.020 as "an electric utility that relies on the Bonneville power administration for all power needed to supply its total load requirement other than that served by nondispatchable generating resources totaling no more than six megawatts or renewable resources."

Tam, Aaron (COM):

"Qualifying utility" is defined as a utility that serves more than 25,000 customers in Washington. These utilities are required to meet the requirements of the EIA (Chapter 19.285 RCW) and prepare an integrated resource plan (Chapter 19.280 RCW).

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	%	76%	79%	76%	75%	76%
Nonemitting	%	9%	7%	9%	9%	8%
Total		85%	86%	85%	84%	84%

Describe how the target demonstrates progress toward meeting the 2030 and 2045 CETA standards (WAC 194-40-200(2)).	not applicable	Tam, Aaron (COM): This section is not required if the cell in H10 is 80% or greater.
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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	3,477,152	3,731,506	3,648,076	3,587,590	14,444,324
Energy Efficiency	MWh to be acquired over the interim performance period	13,578	13,578	24,966	24,966	77,088
Demand Response	MW to be acquired over the interim performance period	60	60	60	60	240

Tam, Aaron (COM):
Measured in first-year savings. First year savings are the savings that EE equipment accrues in the first year after installation.

Energy efficiency assessment methodology details

Conservation Assessment Method	Conservation Potential Assessment
Hyperlink to Relevant Assessment	https://www.cowlitzpud.org/efficiency/conservation-potential-assessment/
Notes	Tam, Aaron (COM): If you selected "Regional Assessment," please describe the regional assessment methodology. If you selected "Other," please elaborate.

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.	<p>Cowlitz PUD contracted with Lighthouse Energy Consulting and Nauvo Solutions to prepare a 2025 Demand Response Potential Assessment (DRPA). The DRPA generally followed the methodology used by the Northwest Power and Conservation Council in the 2021 Power Plan and included many of the same demand response (DR) products. This DRPA includes products in the residential, commercial, and industrial sectors. The DR products impact both the summer and winter seasons and utilize a range of strategies, including direct load control, customer-initiated demand curtailment, and time-varying prices to effect reductions in peak demand.</p> <p>Industrial real time pricing, residential smart thermostat DR, and industrial demand curtailment were the only products with a cost-effectiveness ratio greater than 1.0. The remaining products fell below the cost-effectiveness threshold. In the summer season, industrial real time pricing was the only cost-effective product. Overall, the assessment quantified 106 MW of achievable winter DR capacity and 113 MW of achievable summer DR capacity. Most of the achievable DR potential identified is in the industrial sector, which is consistent with the makeup of Cowlitz PUD's loads. Industrial real time pricing, which was modeled from some of Cowlitz PUD's existing contractual arrangements, is cost-effective across both seasons and has already been implemented by Cowlitz PUD.</p> <p>The DRPA further explains that residential smart thermostats were identified as cost-effective in the winter. However, Cowlitz PUD conducted a study on cost effectiveness of a residential smart thermostat demand response program April 2023. The negligible decrease in energy due to monthly demand response events in addition to configuration fees, monthly recurring fees, annual recurring fees, and yearly customer incentives, did not result in a cost-effective demand response program. As a result, Cowlitz PUD did not move forward with implementation of a residential smart thermostat demand response program.</p>
Hyperlink to Relevant Assessment	https://www.cowlitzpud.org/about/transparency/ceip/
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 information entered in the same row. See the Menu of Ideas for examples. You can leave any unused fields blank or delete any unused rows. If you need to expand the table, you can drag the boundary of the data table by clicking and dragging the bottom right corner downward.

Tam, Aaron (COM):

For this column, you can select multiple CETA categories (add one at a time). If you have security restrictions, you must check unblock in the general properties of the file, "Enable Content" at the top, and restart workbook in order for this macro feature to work. If this macro feature still does not work, you can add a comment to list multiple CETA categories for an indicator.

Ind_ID	Indicator	CETA Category	Specific Action 1	Specific Action 2	Outcome Metric 1	Outcome Metric 2	How will the indicator and its associated metrics look different across the service territory in four years after taking the specific actions?
2026_4442_1	Increased affordability of household energy	Reduction of Burdens to Vulnerable Populations and Highly Impacted Communities	Develop a residential energy efficiency program to install insulation in income qualified housing.	Convert 50% of the Districts remaining high pressure sodium area lights to LED lights.	Reduced electric bill costs for households with upgraded weatherization.	Reduced electric bill costs for households with upgraded LED lights.	Lower energy burden as a result of weatherization and LED upgrades.
2026_4442_2	Improved access to clean energy	Environmental Benefits	Create policies and a process for community solar development.		Increased access to renewable energy for customers.		More households will have ownership or access to clean energy bill credits.
2026_4442_3	Improved grid resilience	Energy Security and Resiliency	Convert two miles of overhead power lines to underground.	Deploy an early fault detection program on the electric distribution system.	Reduced the number of electric outages.	Reduced outage frequency (# of events) and outage duration (# of minutes).	There will be fewer unplanned outages and duration of outages should decrease.
2026_4442_4	Reduced greenhouse gas emissions	Environmental Benefits	Develop a spending plan for revenues generated from the clean fuels program.		Increased Zero Emission Vehicle adoption.		There will be a decrease in greenhouse gas emissions.

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 from the previous spreadsheet tab. Enter information in the yellow fields. Each specific action should correspond with information entered in the same row. Please delete any unused rows once you finalize your report.

Tam, Aaron (COM):
Resource Category refers to the three main resource categories under Specific Targets.

SA_ID	Specific Action	Long Description	Resource Categ	Program Type	Program Name	Input Metric 1	Input Metric 2	Output Metric 1	Output Metric 2	Output Metric 3
2026_4442_1_1	Develop a residential energy efficiency program to install insulation in income eligible housing.	Provide attic, floor, and wall insulation upgrades to income qualified households that are deficient (this includes owner occupied and tenant occupied homes). The PUD would have an executed contract with an insulation contractor (via Request for Proposal process) to assess and install required insulation in homes the PUD identified through home energy audits. By having an insulation contractor on hand and working with PUD customers in-house, insulation can be upgraded at a quicker pace than through other entities.	Energy Efficiency	Energy Efficiency and Weatherization	Income Eligible Residential Weatherization Program.	Budgeted resources for the installation of attic, floor, and wall insulation.		Number of income qualified households who's insulation was upgraded to code.		
2026_4442_1_2	Convert 50% of the Districts remaining high pressure sodium area lights to LED lights.	The District has approximately 2,100 high pressure sodium area lights distributed throughout Cowlitz County that customers pay for monthly. Converting these lights to LED will help the District meet energy efficiency requirements, reduce system loading, and lower monthly bills for customers paying for these lights. The plan is to replace approximately 300-500 lights per year until complete.	Energy Efficiency	Energy Efficiency and Weatherization	LED Area Light Conversion Project	Budgeted resources for capital work to replace lights.		Number of lights converted from high pressure sodium to LED.		
2026_4442_2_1	Create policies and a process for community solar development	Develop policies to allow community solar projects on the Cowlitz PUD system, such as income-eligible multi-family housing or where customers can acquire shares to receive benefits. Staff would develop standard program policies and processes, which could then be implemented if there is sufficient customer interest in such projects. This would help increase access to renewable energy for our customers, especially those who rent or have poor sites for solar. The District can measure interest (such as webpage visits), applications received, and energy savings on implemented projects.	Renewable Energy	Community Solar	Community Solar	Staff Time - hours expended.		Number of qualifying projects completed.		
2026_4442_3_1	Convert two miles of overhead power lines to underground	Overhead power lines have higher outage statistics than underground lines due to vegetation and weather. Converting overhead lines to underground lines increases reliability, reduces wildfire risk, and increases public safety due to reduced down wire exposure. The District has two jobs to convert overhead lines to underground: 1.1 miles at the end of Mt. Pleasant road in Kelso (affecting 56 customers) and 0.94 miles at Frasier road in Amboy (affecting 45 customers). Both are high risk fire areas. These are in design with an estimated release date of 2026.	Other	Resilience	Overhead to Underground Conversion Projects	Budgeted resources for capital work to convert lines.		Miles of line converted from overhead to underground.		
2026_4442_3_2	Deploy early fault detection program on electric distribution system	The District performed a pilot project in 2025, installing 50 early fault detection (EFD) sensors on power poles below conductors on selected rural distribution feeders. The sensors will provide advanced notice of electrical faults on high voltage assets, preventing equipment failures and unplanned service outages. District Operations will have enhanced insight of system vulnerabilities and failing equipment to address maintenance priorities in advance of service disruptions. A successful EFD system boosts reliability, minimizes downtime, and enhances operational efficiency. EFD sensors also detect vegetation encroachment on power lines, further preventing electrical faults or potential fire hazards.	Other	Resilience	Early Fault Detection Program	Budgeted resources for equipment, labor, and monitoring software.		Budgeted resources spent.	Percent of distribution feeders covered.	Number of devices installed.
2026_4442_4_1	Develop a spending plan for revenues generated from the clean fuels program	Under the Clean Fuels Standards program, the District can monetize credits to generate revenue. However, the revenues must be spent within parameters established by the state, and on costs related to electric vehicles. The District will consider how best to spend these revenues to help our customers reduce greenhouse gas emissions from transportation. Examples of projects could include offsetting costs for infrastructure upgrades, rebate programs, or grants. The District can track funding spend, avoided cost of fossil fuels, and potential fossil fuel/GHG avoided.	Other	Transportation Decarbonization	Clean Fuels Credit Monetization	Staff Time - hours expended.	Clean Fuels Standard Credit Revenue.	Budgeted resources spent.		

SA_ID	Specific Action	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_4442_1_1	Develop a residential energy efficiency program to install insulation in income eligible housing.	Reduction in monthly household electric consumption.	Households with adequate insulation experience lower electric bill costs.	Loss of airflow in and out of the home resulting in increased monthly electric bills.	Yes	Cowlitz County	2026-2029	\$ 800,000.00	Increased customer engagement and education of energy efficient households.
2026_4442_1_2	Convert 50% of the Districts remaining high pressure sodium area lights to LED lights.	Reduction in monthly electric consumption.	LED lights use less energy and cost less to operate.	Less affordable lights and electricity.	Yes	Cowlitz County	2026-2029	\$ 264,000.00	
2026_4442_2_1	Create policies and a process for community solar development	Increased access to solar benefits for renters.	Renters will qualify to access solar.	Investment in renewable energy is cost prohibitive or not possible under current policies for many. This program would allow vulnerable populations the ability to directly benefit from solar energy.	Yes	Cowlitz County	2026-2028	\$ 30,000.00	Increased renewable energy in Cowlitz county. Reduced energy costs due to bill credits.
2026_4442_3_1	Convert two miles of overhead power lines to underground	Reduction in annual outages for customers affected by overhead lines.	Reducing risk associated with outages from down wire, reduces wildfire potential and the associated air pollution from associated smoke.	Higher risk of outages and associated wildfire/air pollution.	Yes	Cowlitz County	2026-2028	\$ 1,200,000.00	Increased public safety from down power lines.
2026_4442_3_2	Deploy early fault detection program on electric distribution system	Reduction in number and duration of customer unplanned electric service outages.	Program deployment will result in increased monitoring for system deficiencies and investment in grid component replacement/upgrades, thus reducing unplanned outage frequency and duration.	Fewer outages experienced due to program deployment will result in fewer household disruptions during times of severe and extreme weather, including impacts to medical devices and food storage. Highly impacted communities and vulnerable populations may have limited options to secure alternative shelter during times of extreme ambient temperatures.	Yes	Cowlitz County	2026-2028	\$ 2,400,000.00	Reduction in wildfire risk caused by utility equipment.
2026_4442_4_1	Develop a spending plan for revenues generated from the clean fuels program	Avoided GHG emissions.	A portion of spending will be designated for highly impacted communities.	As the cost of fossil fuels rise, increasing electric vehicle adoption will help save money on transportation.	Yes	Cowlitz County	2026 forward	\$ 300,000.00	Reduced traffic noise, reduced vehicle maintenance costs, reduced GHG emissions, increased air quality.

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)?	Environmental Health Disparities Map
# of census tracts that are HIC (Rank 9 or 10 under EHD v2.0 or at least partially on "Indian Country")	three
# of census tracts that are at least partially on "Indian Country"	zero
Average EHD v2.0 rank for service territory	five
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?	Two EHD factors are present in our highly impacted communities: environmental and socioeconomic. Both are ranked a nine in the health disparities map. The environmental factor includes lead risk from housing. The socioeconomic factor includes no high school diploma, poverty, and unaffordable housing.
How do your planned specific actions address the EHD factors for HICs (if applicable)?	The planned specific actions target energy burden reduction, increased electric grid resiliency, and reduced GHGs.

Tam, Aaron (COM):
Write down general observations about the EHD factors (environmental exposures, environmental effects, socioeconomic factors, and sensitive populations) and associated EHD metrics for your highly impacted communities.

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

Please describe how your utility identified vulnerable populations through a public process (e.g., surveys, focus groups, public forums, etc.)	Vulnerable populations were directly discussed during our July 2025 public focus group. After presenting definitions and discussing vulnerable populations identified in our 2022 CEIP, Cowlitz PUD presented the following vulnerable populations to the group: seniors, people with disabilities, renters, residents of manufactured homes, immigrants and people of color, housing efficiency (energy burden), and employment status (income). Participants in the Focus Group stated that the vulnerable populations presented to them are the right ones. Specifically, the feedback was that this is the clientele they serve. They further noted that seniors and people with disabilities are populations they find themselves serving more.
How does your utility's planned specific actions address the vulnerable population factors (if applicable)?	The planned specific actions target energy burden reduction, increased electric grid resiliency, and reduced GHGs.

Factor Category	Factor	Details	Source	Date Last Updated
E.g., Employment	Unemployment	% unemployed over 16 years old	American Community Survey	12/15/2019
Age	Seniors	20% of population above 65 years old	data.census.gov	7/1/2025
Disability	Disabled under age 65	15% of population less than 65 years old	data.census.gov	7/1/2025
Housing	Rental of Housing	34% of homes are not owner occupied	data.census.gov	7/1/2025
Race	Language other than English	English	data.census.gov	7/1/2025
Employment	Unemployment	5.3% of the population is unemployed	ESD.gov	8/1/2025

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

The "Factor Category" above differs slightly from the "Factors" listed in the 2022 CEIP reporting template. For instance, age above, maps to seniors, age 65+. In 2026, Cowlitz PUD is acknowledging all seniors, not just those living alone (as was identified in the 2022 CEIP). "Housing" above, captures renters and residents residing in manufactured homes. In the 2022 CEIP, renters and residents in manufactured homes were individual "Factors". Lastly, employment was added as a "Factor" for the 2026 CEIP. This captures employment status including level of income and energy burden.

Public Participation

Provide a summary of the public input process conducted in compliance with WAC 194-40-220.

Cowlitz PUD's public process officially commenced following an introductory presentation to Cowlitz PUD's Board of Commissioners May 13, 2025, at a public board meeting. The CEIP webpage (<https://www.cowlitzpud.org/ceip/>) was published on cowlitzpud.org May 14, 2025. This page described what the CEIP is, elements of the public process including specific planned in-person events and timeline, a link to the clean energy community survey, and RSVP email for the public to participate in three in-person discussions (Workshop June 16, 2025; Focus Group I July 16, 2025; Focus Group II, July 23, 2025).

The community survey was available to all Cowlitz PUD customers from May 14, 2025, through August 31, 2025. The survey was designed to collect feedback from our customers regarding a variety of topics including the most important values when planning for clean energy in our community, the importance and concern for clean energy, challenges our community faces today, how Cowlitz PUD can help customers participate in clean energy programs, and customer willingness to pay for clean energy.

The survey was made available through a variety of formats: online, QR code, June and July Connected Newsletter, kiosk in the lobby of the main PUD building, paper during the CEIP workshop, CEIP focus group, Cowlitz PUD table at "Concerts at the Lake", customer appreciation day BBQ, a public meeting in Ryderwood, WA 8/12/2025, and through a QR code on social media. The final participation rate of the community survey was 0.6%.

To make our community aware of the four-month long CEIP public process, multiple communication methods were employed. These methods included:

- Mailed postcards to all customers who receive monthly discounted rates on their electric bills, customers who received LIHEAP funding in 2025, and customers who received the Washington State Department of Commerce one-time bill assistance fund of \$200 in 2025 through CCA funding.
- Radio public service announcements and a bi-weekly radio program called "PUD Live" with Bicoastal Media on KEDO 1270 am and 99.9 fm
- The Connected Newsletter mailed to all customers receiving an electric bill
- A June 15, 2025, article titled "Cowlitz PUD seeks public input for CETA Mandates" in the Columbia River Reader
- Social media posts
- Cowlitzpud.org
- Public facing in-person workshop June 16, 2025, held at Lower Columbia CAP
- Public facing in-person Focus Group, July 16, 2025, held at Lower Columbia CAP
- Public facing in-person presentation, August 12, 2025, held in Ryderwood, WA

The workshop held in June was aimed at all Cowlitz PUD customers interested in providing input into our CEIP. This in-person event was designed to provide participants with an overview of clean energy, what it is, current status, how to participate in further in-person events and the community survey, and discuss any additional topics the participants wanted to engage in. A total of eight PUD customers were in attendance. These eight represented landlords, consumers, and local organizations. The topics covered included: introductions, clean energy requirements overview, CETA, CEIP, definitions of vulnerable populations and highly impacted communities, initial community survey results, examples of CEIP elements, engagement opportunities, and open discussion and questions. All participants were engaged, asked questions, and contributed to the conversation. Five of the participants completed the clean energy community survey in paper format and submitted them to PUD staff. Six workshop participants signed up for Focus Group I. Focus Group I occurred July 16, 2025, in person at Lower Columbia CAP. While ten participants RSVP'ed for the event, two personnel from Lower Columbia CAP and one landlord took part in the discussion. This focus group was aimed at discussing two major topics, vulnerable populations and indicators unique to Cowlitz County. After a brief introduction, PUD staff presented the identified vulnerable populations. Participant feedback confirmed the vulnerable populations presented were the right ones. Additionally, PUD staff presented a list of indicators. Focus Group participants didn't provide specific feedback about the presented indicators.

Focus Group II was canceled due to a lack of participation.

Cowlitz PUD staff participated in a public meeting with the Ryderwood community on August 12, 2025. A similar presentation to that presented at Focus Group I was presented. Attendees at the meeting asked questions about a variety of topics outside of the CEIP. A total of 19 participants completed the community survey.

The draft CEIP was presented to the Board of Commissioners at the November 12, 2025 Regular Meeting with opportunity for public comment provided. The final CEIP was adopted by the Board of Commissioners at the December 9, 2025 Regular Meeting.

<p>What barriers to public participation does your utility's community face due to language, cultural, economic, technology, or other factors?</p>	<p>The barriers to public participation Cowlitz PUD faces include low-income households, seniors, individuals with disabilities, non-English-speaking communities, and limitations to Internet access.</p>
<p>What reasonable accommodations has your utility provided to reduce barriers to public participation?</p>	<p>To reduce barriers to public participation, we took a proactive, community centered approach. This involved using the following outreach methods: social media, website, newsletter, print media, radio, in-person events, and kiosk. These outreach methods were crucial in seeking public participation in the clean energy community survey, June workshop, and July focus group. A total of 9,122 postcards were direct mailed to low-income households requesting participation in the clean energy community survey. The postcard was published in English and Spanish. Paper versions of the clean energy community survey were made available at multiple in-person events: June Workshop, July Focus Group, Concerts at the Lake (7/31/2025), Customer Appreciation Day (8/3/2025), Ryderwood Improvement & Service Association (RISA) presentation. Located in the main office of the PUD lobby, a Kiosk was available for customers to participate in the clean energy community survey from May 14th through August 31st, 2025. PUD staff provided an in-person presentation to the community of Ryderwood, which is a senior community with limited internet access.</p>
<p>Describe how public comments were reflected in the specific actions under WAC 194-40-200(4), including the development of the CEIP and your utility's supporting integrated resource plan or resource plans, as applicable.</p>	<p>The District used the Department of Health impact analysis to identify areas in our service territory that are highly impacted. The District reviewed census data to evaluate if any changes were needed to the vulnerable populations in the 2022 CEIP. Staff presented the identified populations at a focus group, where other service providers agreed that the list was an accurate representation of those who need assistance in our community. In the community survey, responses overwhelmingly indicated that affordability and reliability are our customers' priorities for their electricity service. As such, we looked at all indicators for potential rate increase impacts to ensure they were financially prudent. Additionally, two indicators directly relate to these priorities: Increased affordability of household energy and Improved grid resilience. The actions considered were evaluated for potential rate impacts. Specifically, developing a policy that allows solar credits to go to low-income tenants at multi-family housing is simply a policy change, and the customers wanting clean energy will still be responsible for procuring the resource, which doesn't create any shifting costs to the other customers for the project. Lastly, we have an action item to increase program participation in low-income insulation, which would reduce household energy burden.</p>

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?	<p>The District's current and projected resource portfolio consists of clean and non-emitting resources that exceed the 2030 GHG Neutral Standard. The 2024 IRP evaluates the District's long-term needs and identifies enhancements to its preferred portfolio to address potential capacity deficits. The IRP's Clean Energy Action Plan outlines actions to: maintain the existing resource portfolio and explore opportunities to enhance the District's REC position to ensure the availability of sufficient alternative compliance instruments in advance of the 2030 Standard implementation, implement all cost-effective conservation, monitor load growth and make energy and capacity adjustments to its resource portfolio as required, and comply with the requirements of the Western Resource Adequacy Program (WRAP). Given that the District's clean energy position exceeds the 2030 GHG Neutral Standard, the specific actions in this CEIP have been tailored toward enhancing grid resilience, increasing customer access to distributed generation resources, and bolstering energy efficiency investments. The specific actions will benefit vulnerable populations and highly impacted communities across the District's service area. Independent of the CEIP's list of specific actions, the District will be exploring future demand response program potential with its large industrial customers and seeking opportunities to acquire additional energy, capacity, and transmission resources to support any new load growth opportunities and ensuring it is able to maintain WRAP reliability standards and meet its CETA compliance requirements for the foreseeable future.</p> <p>Hyperlink to Relevant Assessment/Resource Plan https://www.cowlitzpud.org/about/transparency/integrated-resource-plan/</p>

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)	<p>Cowlitz PUD currently plans to a Resource Adequacy (RA) standard intended to achieve a Loss of Load Expectation (LOLE) of 1-in-10 or less. Cowlitz PUD currently achieves this standard using a three-year average winter peak load metric plus a planning reserve margin varying from 15-20% depending on the calendar month of the winter season. This standard is generally consistent with prudent utility practices and relevant regulatory requirements and will continue to be employed throughout calendar year 2026 of the CEIP compliance period. Beginning in 2027, Cowlitz PUD is anticipated to begin participating in the Western Resource Adequacy Program (WRAP). As a participant in this program, Cowlitz will adopt the WRAP programs RA standards starting in calendar year 2027. The WRAP RA standards are similarly intended to achieve a LOLE of 1-in-10 or less and are determined based on an average (P50) peak load forecast plus a seasonal monthly planning reserve margin that is informed through a probabilistic analysis of the WRAP region and subregions. The WRAP P50 load forecast for each of the two (winter and summer) seasons is determined by taking the median of the individual maximum peak load observed during each of the past five seasons. Planning reserve margins in the WRAP program vary by month, ranging from 10%-29%. The WRAP RA standards are similarly consistent with prudent utility practices and relevant regulatory requirements and are expected to be adopted by all participants in the forthcoming SSP Markets Plus day-ahead and real-time energy market for the Western United States.</p>
Methods of measurement (e.g., probabilistic assessments of resource adequacy)	<p>The methods of measurement used to inform the WRAP program standards consist of probabilistic analysis of regional and subregional loads and resources, which inform the planning reserve requirements needed to ensure the targeted 1-in-10 LOLE is achieved. Additionally, statistical analysis is also implemented to determine capacity critical hours, which are used to help determine the capability of certain types of resources during the highest system capacity needs.</p>

