



Seattle City Light

JUNE 2025

2026-2029 Clean Energy Implementation Plan Report

INTRODUCTION

The Clean Energy Transformation Act (CETA), signed by Governor Jay Inslee in 2019 (SB 5116), commits Washington state to an electricity supply free of greenhouse gas emissions by 2045. CETA establishes a phased transition, requiring utilities to supply greenhouse gas-neutral electricity by 2030 and 100% of electricity from renewable or non-emitting resources by 2045. As part of this law, utilities must submit a governing board-approved, Clean Energy Implementation Plan (CEIP) every four years, outlining the specific actions they will take during the upcoming compliance period.

PURPOSE OF REPORT

Seattle City Light created this report to familiarize the City of Seattle's elected officials with the 2026-2029 CEIP. We provide a full summary of targets, indicators, and specific actions in the state-required CEIP Excel workbook template (Exhibit A to this attachment). This narrative provides an accessible overview of the CEIP's key components, including compliance targets, equity considerations, and public engagement efforts. The approved CEIP must be formally submitted to the Washington State Department of Commerce by January 1, 2026.

The CEIP reflects Seattle's continued commitment to environmental stewardship, equity, and transparency. It focuses on near-term, measurable steps toward clean energy while ensuring that Highly Impacted Communities and Vulnerable Populations¹ benefit from the transition.

INTERIM AND SPECIFIC TARGETS (2026-2029)

There are two sets of targets City Light is required to establish for the CEIP:

¹ Highly Impacted Communities and Vulnerable Populations are terms used within CETA and are defined in RCW 19.405.020.

1. Interim targets for serving retail electric load with renewable and non-emitting resources.

- a. "Renewable" includes water, wind, solar energy, geothermal, renewable natural gas, renewable hydrogen, wave, ocean or tidal power, biodiesel fuel that is not derived from crops raised on land cleared from old growth or first growth forests, and biomass energy.
- b. "Non-emitting" includes electricity from a generating facility or a resource that provides electrical energy, capacity, or ancillary services to an electric utility and that does not emit greenhouse gases as a by-product of energy generation. It excludes renewable resources.

2. Specific targets for renewable energy, energy efficiency, and demand response.

- a. The renewable energy target is the quantity in megawatt hours of renewable electricity expected to be used in the period.
- b. The energy-efficiency target is the amount, expressed in megawatt-hours of first-year savings, of energy efficiency resources expected to be acquired during the period. For the purposes of this report, we use the term conservation interchangeably with energy efficiency.
- c. Demand response² target includes an amount, expressed in megawatts, of demand response resources acquired during the period.

These targets align with the utility's most recent Integrated Resource Plan (IRP) and Demand Side Management Potential Assessment (DSMPA), which includes conservation potential and demand response potential, and adheres to a methodology set by RCW 19.285.040. The 2024 IRP Progress Report identified the most cost-effective mix of supply side resources that meet all policy constraints and results in a "resource adequate" portfolio, which means we have adequate generating capacity to meet customer demand for electricity. The 2024 IRP Progress Report has a resource adequacy standard of not exceeding two loss-of-load events every 10 years. This is a standard industry metric for measuring the likelihood of service interruption due to inadequate generation supply. The 2026 DSMPA identified the most cost-effective mix of demand and supply side resources, with a focus on the economic potential of demand side resources.

The interim targets reflect the percentage of load that we expect to support with clean energy during the 2026-2029 period and are consistent with resource planning assumptions. These targets are based on output from the 2024 IRP Progress Report. We forecasted specific generation used to meet load, including both existing and new resource acquisitions specified by the IRP, and calculated the part that is renewable or non-emitting for the interim years 2026-2029. Most of the renewable generation

² "Demand Response" is defined in RCW 19.405.202(11) and, more specifically, refers to changes in electric usage by demand-side resources from their normal consumption patterns and may include energy storage and measures to increase or decrease electricity production on the customer's side of the meter. The utility identifies the need for demand response and how it can be met at the lowest reasonable cost, then puts out a signal and incentive for customers to respond to.

targeted below consists of hydropower from our owned dams and contract with the Bonneville Power Administration (BPA). The non-emitting generation included below is the nuclear part of BPA's fuel mix.

The table below summarizes the projected percentages of renewable and non-emitting energy used to serve load.

Clean Energy Type	INTERIM TARGETS PRIOR TO 2030					
	Units	2026	2027	2028	2029	4-year period
Renewable Targets	%	88%	87%	85%	83%	86%
Non-emitting Targets	%	5%	5%	5%	5%	5%
Total		92%	91%	90%	88%	90%

We based the specific targets below for renewable energy on the 2024 IRP Progress Report. They consist of the *total* amount of forecasted renewable energy generation in contrast to the interim targets above, which only reflect energy to serve load in City Light's portfolio over the next four years, including planned resource additions.

We based the specific targets for energy efficiency and demand response on our most recent 2026 DSMPA, which calculated conservation economic potential and demand response economic potential. In the report, we identified the most cost-effective amount of energy efficiency and demand response to pursue to meet load and policy requirements.

Resource Category	SPECIFIC TARGETS					
	Units	2026	2027	2028	2029	4-year period
Renewable Energy Targets	MWh to be used over the performance period	9,464,348 (1,080 aMW)	9,398,829 (1,073 aMW)	9,011,731 (1,029 aMW)	8,979,352 (1,025 aMW)	36,854,260 (4,207 aMW)
Energy Efficiency Targets	MWh to be acquired over the performance period	70,080 (8 aMW)	70,080 (8 aMW)	100,740 (11.5 aMW)	100,740 (11.5 aMW)	341,640 (39 aMW)
Demand Response Targets	MW to be acquired over the performance period	3	3	3	3	12

While City Light has offered energy efficiency programs for almost 50 years, demand response is a new undertaking for us. City Light currently has a “bring your own thermostat” pilot, we are developing an Industrial Curtailment Program, and will launch time of use rates later this year. In the 2026-2029 reporting period, we’ll continue to expand our portfolio of demand response offerings in support of customer and resource needs.. We will bring forward legislation in 2025 to City Council to amend the Seattle Municipal Code to authorize implementing future programs.

PUBLIC PARTICIPATION SUMMARY

To develop the CEIP, we partnered with the Seattle Department of Neighborhoods to engage with communities throughout our service area. The public participation process included:

1. **Reviewing existing feedback:** We reviewed relevant community feedback provided via other strategic planning efforts (e.g., City Light’s Transportation Electrification Strategic Investment Plan [TESIP 2.0] and the City’s Comprehensive Plan). This approach enabled us to respond to existing community feedback and identify gaps and opportunities in community engagement.
2. **Hosting community conversations:** We directly engaged with customers and community leaders through public meetings, focus groups, and community gatherings to inform the CEIP planning process.
3. **Engaging trusted community partners:** We met with community organizations and Seattle Department of Neighborhoods Community Liaisons, who work directly with Highly Impacted Communities and Vulnerable Populations on issues including affordability, public health, environment, etc.

Key themes from community feedback included an emphasis on centering vulnerable communities in the planning process, increasing awareness about how City Light is preparing for the clean energy transition, and ensuring customers have equitable access to programs and services.

EQUITY INDICATORS, SPECIFIC ACTIONS, AND EQUITY CONSIDERATIONS

The equity-related sections of the CEIP were directly informed by the public participation process that targeted priority populations identified by CETA as Highly Impacted Communities (HICs) and Vulnerable Populations (VPs). Though HICs are pre-determined by the state’s [Environmental Health Disparities \(EHD\) map](#) as census tracts ranking 9 or 10, the term “Vulnerable Population” must be defined through a public process.

Community outreach identified the following groups as most vulnerable or impacted by lack of access to power as those who:

- Rely on electricity for medical devices, medication, and/or personal mobility (e.g., electric wheelchairs, breathing machines, insulin).

- Disproportionately experience and are more sensitive to extreme weather events (e.g., community elders, children).
- Speak a language other than English or have limited English proficiency.
- Are lower-income and/or Black, Indigenous, or People of Color (BIPOC) living in franchise communities (e.g., White Center, Shoreline, Burien).

City Light is an industry leader in centering equity in customer programs and services. As such, many of our current offerings and services already align with the statutory requirement to ensure “equitable distribution of energy benefits and reduction of burdens to vulnerable populations and highly impacted communities.” To prioritize our submittal to the state, we focused on the priorities and concerns raised throughout our public engagement process. This approach ensured that the indicators we selected reflect our goals, and that the specific actions—the “how” behind achieving those goals—are rooted in community input, especially input from HICs and VPs.

We determined the **equity indicators**, or goals, as:

1. Reduce household electric energy burden³.
2. Improve community health outcomes (e.g., air quality).
3. Increase public participation in our programs from HICs and VPs.
4. Improve access to economic opportunities in the green energy sector (especially for young people).

Similarly, we identified the specific actions aligned with each indicator—and the corresponding outcomes used to measure community impact—through extensive public engagement. Community members expressed key concerns such as overall affordability and reliability, improved air quality, expanded opportunities for youth, and the removal of barriers to program participation. By grounding these elements in community-identified priorities, we can ensure that equity improvements are targeted toward the programs and services that matter most to the populations we serve.

GOVERNANCE AND APPROVAL

RCW 19.405.060 requires CEIPs to be approved by a utility’s governing body. Seattle City Council serves as the governing body for Seattle City Light. Approval of the CEIP, via City Council Resolution, is required prior to submission to the Washington State Department of Commerce by January 1, 2026. Upon approval, the final CEIP will be published on City Light’s website.

³ Household energy burden refers to the percent of a household’s income used to pay for energy bills (electricity and gas). Typically, households paying more than 6% of their income on energy bills are considered to have a high energy burden. As defined in WAC 480-100-605 “Energy assistance need” means the amount of assistance necessary to achieve an energy burden equal to six percent for utility customers.

CONCLUSION

We remain committed to an equitable transition to a clean energy future. The CEIP represents the legally required plan for delivering clean energy benefits to all customers during the 2026-2029 period. For complete details, please refer to the attached Excel workbook, which contains the full compliance filing.

EXHIBITS:

ATT 1 EX A – SEATTLE CITY LIGHT 2026-2029 CLEAN ENERGY IMPLEMENTATION PLAN