

CITY OF SEATTLE

RESOLUTION 32181

A RESOLUTION relating to the City Light Department; approving the City Light Department's 2026-2029 Clean Energy Implementation Plan as required by Washington State's Clean Energy Transformation Act (CETA), chapter 19.405 RCW.

WHEREAS, in 2019 the Washington State Legislature passed the Clean Energy Transformation Act (CETA) requiring Washington State utilities to be carbon neutral by 2030 and use 100 percent non-emitting resources by 2045; and

WHEREAS, CETA further requires utilities to compile and submit a Clean Energy Implementation Plan (CEIP) every four years to show progress in meeting the underlying requirements of CETA; and

WHEREAS, the City Light Department's CEIP reflects the statutory requirement to advance energy equity and ensure the equitable distribution of energy and non-energy benefits, particularly for vulnerable populations and highly impacted communities; and

WHEREAS, the City Light Department's CEIP is consistent with the City Light Department's most recently adopted Integrated Resource Plan (IRP) as required under WAC 194-40-200(3), and reflects long-term planning for energy needs, resource adequacy, and reliability; and

WHEREAS, the Seattle City Council approved the City Light Department's 2022–2025 CEIP via Resolution 32040 in 2022, as required under CETA (RCW 19.405.060); and

WHEREAS, the Seattle City Council adopted Resolution 32059 in 2022, directing that the One Seattle update to the Comprehensive Plan update address climate change, climate resiliency and adaptation, and environmental justices; and

1 WHEREAS, in 2025, Mayor Bruce Harrell issued Executive Order 2025-04 directing a
2 comprehensive update to The City of Seattle’s 2013 Climate Action Plan, including an
3 integration of climate resilience, climate adaptation, and transportation emissions
4 reduction strategies—objectives that are consistent with and supported by City Light’s
5 2026–2029 CEIP; and

6 WHEREAS, climate change threatens Seattle residents’ health, well-being, and economic
7 vitality, with disproportionate impacts on vulnerable communities; and

8 WHEREAS, the deadline for the City Light Department to submit the 2026-2029 CEIP is
9 January 1, 2026 and, once approved by the Seattle City Council, City Light’s 2026–2029
10 CEIP will be submitted to the Washington State Department of Commerce by the January
11 1, 2026 due date; NOW, THEREFORE,

12 **BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SEATTLE, THE**
13 **MAYOR CONCURRING, THAT:**

14 Section 1. The City Light Department’s Clean Energy Implementation Plan, attached to
15 this resolution as Attachment 1, Exhibit A, is adopted as the City’s plan for compliance with
16 Washington State’s Clean Energy Transformation Act.

Adopted by the City Council the 16th day of September, 2025,
and signed by me in open session in authentication of its adoption this 16th day of
September, 2025.



President _____ of the City Council

The Mayor concurred the 18th day of September, 2025.



Bruce A. Harrell, Mayor

Filed by me this 18th day of September, 2025.



Scheereen Dedman, City Clerk

(Seal)

Attachments:
Attachment 1 – SCL 2026-2029 Clean Energy Implementation Plan Report
Exhibit A – SCL 2026-2029 Clean Energy Implementation Plan



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

Clean Energy Implementation Plan Reporting Template

Published: March 10, 2026

Deadline: January 1, 2026

Submission: [Submit this workbook and all supporting documentation via Smartsheet.](#)

Questions: [Aaron Tam, Austin Scharff, Glenn Blackmon, Energy Office, CETA@commerce.wa.gov.](#)



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	Seattle City Light
Report Date	6/10/2025
Contact Name	Cierra Holland
Phone Number	206-386-4588
Email	cierra.holland@seattle.gov
Web address of published CEIP	https://www.seattle.gov/city-light/energy/power-supply-and-delivery/clean-energy-implementation-plan
Are you a "qualifying utility" under the EIA?	Yes
Are you a BPA "full requirements" customer?	No

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	%	88%	87%	85%	83%	86%
Nonemitting	%	5%	5%	5%	5%	5%
Total		92%	91%	90%	88%	90%

Describe how the target demonstrates progress toward meeting the 2030 and 2045 CETA standards (WAC 194-40-200(2)).

Per Commerce this cell is N/A; already meeting 80% over the 4-year period.

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	9,464,348	9,398,829	9,011,731	8,979,352	36,854,260
Energy Efficiency	MWh to be acquired over the interim performance period	70,080	70,080	100,740	100,740	341,640
Demand Response	MW to be acquired over the interim performance period	3	3	3	3	12

Energy efficiency assessment methodology details

Conservation Assessment Method	Conservation Potential Assessment
Hyperlink to Relevant Assessment	N/A at this time; we may post here once approved by Seattle City Council: https://www.seattle.gov/city-light/energy/power-supply-and-delivery/energy-conservation
Notes	Planning to be heard at Seattle City Council in 2025.

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.	City Light completed a Demand Response Potential Assessment (DRPA) as a part of the 2026 Demand Side Management Potential Assessment. The assessment identified 12 MW of cost effective demand response in the 2026-29 period. Based on model inputs, the DRPA found Critical Peak Pricing to be cost-effective. In the 2026-29 period we plan to explore this product and evaluate its feasibility and reliability. City Light currently has a Bring Your Own Thermostat pilot, and we are developing an Industrial Curtailment program and Time of Use rates; we will continue to test and evaluate these offerings.
Hyperlink to Relevant Assessment	N/A at this time; we may post here once the report is final: https://www.seattle.gov/city-light/energy/power-supply-and-delivery/energy-conservation
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.

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_95_1	Reduce household electric energy burden	Reduction of Costs and Risks	Design and deliver an accessible Community Solar Program	Increase the number of customers enrolled in the Utility Discount Program	Evaluate best case practices for fair rate development and/or cost attribution		Decrease average household energy burden among income-eligible participants as a result of an accessible community solar program	Decrease average household energy burden among Utility Discount Program participants	Provide actionable strategies to apply fair rate development in future rate-setting processes			We anticipate increasing energy affordability and relevant metrics to improve low-income households' ability to comfortably afford their energy bills. Since the southern part of our service area is where a disproportionate number of lower-income households reside, this area may benefit more. However, our service area has many mixed-income communities and expect there to be benefits across many neighborhoods. Especially among populations who may be unaware they qualify, like seniors on fixed incomes or college students.
2	2026_95_2	Improve community health outcomes	Public Health	Deliver transportation electrification investments that target overburdened communities and vulnerable populations.				Reduce metric tons of carbon dioxide equivalent (MTCO2e) in our service area					As we target transportation electrification investments in overburdened communities and vulnerable populations, we plan to directly invest in EV infrastructure, electric fleets and vehicles, and other similar projects. Some of these improvements will occur directly in the named communities. We hope to see these investments translate into air quality improvements in these neighborhoods. However, we recognize there are many other factors contributing to air quality, including other emissions not within our control or jurisdiction.
3	2026_95_3	Increase public participation in utility programs from highly impacted communities and vulnerable populations	Reduction of Burdens to Vulnerable Populations and Highly Impacted Communities	Increase the number of utility assistance community partnerships	Develop and implement a bi-annual Language Access Plan	Actively recruit multi-family buildings, businesses, and organizations to participate in our programs	Create a Whole Home Energy program to increase access to our energy efficiency and weatherization programs	Partner with five new community-serving organizations to increase awareness and enrollment in our utility assistance offerings	Provide meaningful access to utility services and programs for individuals with limited English proficiency	At least 200 buildings participate in energy management, energy efficiency, electrification, and/or other relevant programs	Increase customer touchpoints with energy efficiency and weatherization programs in HICs and VPs		As the southern part of our service area has a disproportionate number of HICs and VPs, this area may benefit more from the actions listed. That's not to take away from other neighborhoods though, as our service area has many mixed communities with residents of various incomes and demographics. And so, we expect there to be benefits across many neighborhoods.
4	2026_95_4	Improve access to economic opportunities in the green energy sector	Economic Development	Establish foundations of a green job pathway through a high school awareness campaign	Design and implement a High School Internship Program Targeting youth in households with income at or below 80% AMI	Target WMBE contractors for our EV Charger Installation Program Certification		Complete at least 3 High School Energy/Green job career fairs or presentations annually	Each year, at least 5 high school students from low-income households participate the internship program, gaining hands-on experience and increased clarity about career pathways in the green energy sector.	Certify 20 WMBE contractors supporting equitable access to clean energy infrastructure opportunities			This indicator and associated metrics may not look significantly different across the service area since it aims to target high school youth and WMBE contractors who may or may not reside in our service area. One of the primary focuses is to create awareness and foster more representation into the green energy industry.

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.

											Please enter "N/A" where the question is not applicable to the 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 populations 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_95_1_1	Design and deliver an accessible Community Solar Program	Implement a program and identify MMW of feasible new community solar generation projects in Seattle and Franchise Cities (sites will vary including: rooftop, ground mounted, parking canopies, and floating will be investigated) identified through technical modeling and community input. Leverage external funding to reduce the portfolio project costs to ensure no-cost participation and a guaranteed bill credit for income-eligible customers and a competitive payback for market-rate customers. Center disadvantaged and minority-owned business entities by preparing them to bid on projects and encourage contractors to provide training opportunities, leveraging existing workforce development programs.	Renewable Energy	Community Solar	Community Solar Program	Financial investment in development of community solar projects.	Number of outreach events in HICs or events serving VPs.	Apply for Washington State University (WSU) Community Solar Expansion Program funding to reduce the projects costs associated with projects serving income-eligible customers.	Number of MMW's of community solar built in HIC and/or areas serving VP	Number of income-eligible customers informed of the Community Solar Program measured by event attendance.	Percent bill discount offered to income-eligible Community Solar Program participants.	Increased access to local solar generation and/or increased resilience due to solar paired with storage at existing community facilities serving HICs/VPs. Reduced energy burden for income-eligible customers. Locating projects at community spaces honors communities, may increase resilience to power outages if solar projects are paired with storage, may increase property values, and will generate an additional revenue stream (utility payment for use of space for life of solar project).	HICs/VPs have been engaged in program design and will continue to be engaged until program launch and during program implementation. See R7 for description of benefits. Also, projects may be in HICs at facilities serving VPs.	HICs/VPs have historically been left out of the clean energy transition. They may not be able to install solar because of cost, building age, and/or because they live in multi-family housing. A community solar program will overcome those barriers by offering 50% of our program subscription (~2MMW) for income-eligible customers and offering those customers no-cost participation and a guaranteed bill discount.	Yes	Our service area. Solar projects will be interconnected on the distribution grid.	We are designing this program. Construction on project(s) is expected ~2026-2028; customer enrollment begins ~2028, as projects are completed.	We are developing/refining cost estimates. Rough order of magnitude estimate is \$14.8M to build ~4MMW. This does not reflect external funding sources the utility plans to leverage to reduce that cost.	We are investigating opportunities to integrate workforce development and public art.
2026_95_1_2	Increase the number of customers enrolled in the Utility Discount Program	Promote enrollment in the Utility Discount Program by removing barriers to access and expanding engagement with HICs/VPs.	Other	Resilience	Utility Discount Program	Number of outreach events in HICs	Number of languages application is translated into	Number of community sign up events	At least 35% of eligible customers are enrolled in Utility Discount Program	Average annual customer bill savings from Utility Discount Program		By reducing the energy burden of customers from HICs/VPs, we are alleviating some financial strain. With the discount, customers have less pressure from high energy costs so they can focus on other essentials.	We are working with Community Partners and community liaisons who work with HICs/VPs to co-design culturally relevant messaging, process improvements, and enrollment support, which includes meeting their well-being and causing economic hardship. High energy burdens can prevent people from accessing other essential needs and increases their risk of displacement.	Energy burden can disproportionately affect HICs/VPs impacting their well-being and causing economic hardship. High energy burdens can prevent people from accessing other essential needs and increases their risk of displacement.	N/A	The utility's service territory.	This work is ongoing.	The estimated cost for communications, language access, and engagement is \$150,000.	Increase awareness of and participation in other utility assistance and energy efficiency programs to help reduce customer energy burdens.
2026_95_1_3	Evaluate best case practices for fair rate development and/or cost attribution	This action is in direct response to priorities stated during our public process and our commitment to an equitable transition. This study will evaluate best case practices to develop fair rates or cost attributions. Currently, this action will be managed by our finance team.	Other	Resilience	Finance	Funds spent on contracting services to do the study	Number of interviews with other utilities or relevant institutions			Final report showing best practice cost attribution methodology		Completing this study will provide best practice review to ensure our cost attribution practices fairly assign costs to each of our customer classes.	This action could provide more fair processes and practices when developing rates or cost attributions.	HICs and VPs risk potentially taking on a disproportionate share of the cost as we transition entirely to clean energy. This study will share methods to mitigate this impact.	N/A	N/A	2026-2030	Approximately \$250,000.	N/A
2026_95_2_1	Deliver transportation electrification investments that target overburdened communities and vulnerable populations.	Implement transportation electrification initiatives that prioritize overburdened communities and vulnerable populations by expanding access to electric vehicles, charging infrastructure, and clean transit options. These investments aim to reduce air pollution, improve public health, lower transportation costs, and promote environmental equity in historically underserved areas.	Other	Transportation Decarbonization	Transportation Electrification	Number of community partners	Number of outreach events in HICs or VPs		Transportation electrification funding spent in HICs and VPs	Number of chargers in HICs		Delivering targeted transportation electrification investments in HICs and VPs will ideally improve the overall air quality and lower our climate impact. It will also bring public investments and improvements to the community that will foster EV adoption.	Many of our transportation electrification programs are committed to partnering with community leaders and organizations. Some of these will be formal contracts to facilitate their involvement as these contracts would extend people's time and expertise. These partnerships will help identify priority locations and the type of transportation investments they'd like to see.	Specifically with transportation electrification, we risk excluding HICs/VPs from participating because of high EV costs and limited access to EV charging stations. We intend to reduce these risks by partnering and delivering on community-identified priorities.	Yes	The utility's service territory.	Ongoing	Approximately \$3.7 million.	N/A
2026_95_3_1	Increase the number of utility assistance community partnerships	Work with trusted community organizations and income-qualified housing providers to promote enrollment in the Utility Discount Program.	Other	Public Outreach and Engagement	Utility Discount Program	Number of community organizations we reach out to about Utility Assistance programs	Funds allocated to contractually partner with community organizations		Number of organizations we contract with	Number of customers enrolled via streamlined applications (e.g. auto-enrollment and express rate applications)	Update to Community Based Organization Utility Assistance Enrollment Toolkit	This will help increase awareness of and participation in our Utility Assistance Programs within HICs/VPs. It also reduces harm by streamlining the enrollment process.	HICs/VPs were engaged through a program evaluation and customer research to inform our partnering strategies. We are also working with community orgs to co-design contracting processes to reduce the burden on our partners and designing partnerships that help us better meet the needs of HICs/VPs.	Energy burden can disproportionately affect HICs/VPs impacting their well-being and causing economic hardship. High energy burdens can prevent people from accessing other essential needs and increases their risk of displacement.	N/A	Our service area.	Partnership identification and development will be ongoing throughout implementation of the CEP.	The estimated cost is \$100,000, which includes contracting with City of Seattle Department of Neighborhoods and funding for mutually-beneficial partnering.	Through these partnerships, we are reducing participation barriers for people who are linguistically and/or digitally isolated. In addition, we are investing in organizations that serve HICs/VPs.
2026_95_3_2	Develop and implement a bi-annual Language Access Plan	In accordance with Executive Order 2025-03, City Light will develop and implement a Language Access Plan.	Other	Public Outreach and Engagement	City of Seattle Language Access Program	Number or proportion of persons with limited English proficiency	Funds allocated for translation, interpretation, transcription	Develop and socialize Language Access toolkit for employees and consultants	Volume of communications materials translated	Number of in-language customer interactions via LanguageLine Interpretation services	Number of community events hosted with interpreters (e.g. Dept of Neighborhoods Community Liaisons)	Ensure equitable access to our services, resources and benefits regardless of English language proficiency.	As a municipal utility, we are responsive to our customers and elected representatives. The City's Language Access Program, which is led by the Office of Immigrant and Refugee Affairs and the corresponding Executive Order governs City Light's Language Access Plan.	With one in five Seattle residents speaking a language other than English at home, the risk is that customers with limited English proficiency miss out on the benefits of our region's clean energy transition. Through implementation of City Light's Language Access Plan, we are reducing barriers to awareness and expanding equitable access.	N/A	N/A	We are currently implementing the 2025-2026 Language Access Plan and will submit the 2027-2028 Language Access Plan by October 1, 2025.	We estimate spending \$750,000 through implementation of the 2025-2026 plan, and is currently estimating cost estimates for the 2027-2028 plan.	Fosters trust and supports relationship building with immigrant and refugee communities we serve.
2026_95_3_3	Actively recruit multi-family buildings, businesses, and organizations to participate in our programs	This action is meant to capture our programs that offer partnership opportunities, resources, or services with multifamily buildings, organizations and institutions, and businesses intentionally targeting those that serve HICs and VPs. Examples include the Strategic Energy Management Program, WholeHome Energy, and the Transportation Electrification portfolio.	Energy Efficiency	Community and Economic Development	Strategic Energy Management, Transportation Electrification, etc.	Number of community partners	Number of outreach events in HICs or VPs		Outreach materials developed	Number of languages materials translated into	Number of enrolled buildings, businesses, or organizations	We hope to sign on more buildings, businesses, and organizations that are in and/or serving HICs and VPs into the suite of programs we have available. This could materialize into various resources invested in these communities.	Depending on the program, HICs and VPs may have a direct say into what or where resources could be prioritized. At minimum, this action is meant to intentionally build and maintain partnerships with organizations and businesses that serve these communities and people of color.	One of the risks is that households without the means, such as financial, English proficiency, or time, may have a harder time accessing the benefits of a clean energy transition. The intention with this action is to lessen these barriers and at minimum provide education, staff expertise, and partnerships with institutions we don't regularly partner with.	Yes	Our service area.	Ongoing	Approximately \$300,000 per year.	We will also work with multi-family building owners to cross-promote enrollment in the Utility Discount Program and other services that benefit HICs/VPs.
2026_95_3_4	Create a Whole Home Energy program to increase access to our energy efficiency and weatherization programs	Empower residential customers to make the best home energy decisions for themselves and their community so that they can achieve affordable energy savings and emissions reductions. Offer targeted support to HICs and VPs, facilitate access to RA, state, and utility offerings, and emphasize holistic and personalized home energy planning.	Energy Efficiency	Energy Efficiency and Weatherization	Whole Home Energy Program	Number of outreach events in HICs and VPs	Number community partners engaged	Number of ads, recruitment tools developed	Number of efficiency and weatherization adopters in HICs and VPs	Reach of ads, recruitment tools		By increasing awareness of and access to energy efficiency and weatherization opportunities in HICs and VPs, we will enable more households to participate in programs that deliver energy and cost savings as well as improved in-home comfort, health, and safety.	HICs/VPs have been engaged in program design and will continue to be engaged through program launch and implementation. We are working with community partners to ensure HICs and VPs can benefit from program offerings by developing a culturally relevant communications strategy and identifying and removing barriers to participation.	HICs and VPs have historically been left out of the clean energy transition. They often have less control over their home energy infrastructure, like in the case of renters, and are less able to participate in incentive programs due to the upfront costs and often onerous applications and processes. We will overcome those barriers through targeted assistance, including to building owners and renters, stacked incentives, especially for income-qualified customers, and more comprehensive customer support.	Yes	Our service area.	Ongoing	We estimate spending \$100,000-150,000 per year on communications, marketing, and outreach. Total annual program costs closer to \$250,000-300,000.	Potential bill savings as energy efficiency and weatherization measures tend to improve a home's ability to retain a comfortable temperature and thus, use less energy. Overall, these types of improvements and potential savings could improve someone's quality of life.
2026_95_4_1	Establish foundations of a green job pathway through a high school awareness campaign	The utility's talent acquisition and workforce development teams will work to create opportunities, events, and partnerships with organizations and institutions that target and/or serve high school aged youth. The intention is to create awareness of the diverse job opportunities of working at a utility, like Seattle City Light, or the green energy sector as a whole.	Other	Community and Economic Development	Workforce Development	Number of high school contacts	Volume of outreach materials created		Number of high school events attended/hosted	Number of high school partnerships		Increased awareness of career opportunities in energy sector.	Students will be better prepared to apply and interview for jobs and gain pathways to high-earning careers.	We risk that early career talent in these communities are overlooked for the future energy sector jobs.	N/A	Our service area (Seattle and surrounding neighborhoods) and our remote communities that are under-resourced and served.	Annually, with peak seasons of spring and fall.	Approximately \$30,000 for outreach materials and swag. Note: this amount also captures outreach events beyond this high school campaign.	Increased community partnerships with schools, associations and rate payers.
2026_95_4_2	Design and implement a High School Internship Program targeting youth in households with income at or below 80% AMI	This action along with action 4.1 that establishes green job pathways for high school aged youth will work together to provide paid work experience for youth interested in learning more.	Other	Community and Economic Development	Workforce Development	Number of outreach efforts at high schools in HICs	Number of applications received		Number of internship placements	Percent of applicants who identify as a person of color		By providing opportunities for high school age individuals to intern at City Light, we will hopefully expose potential future employees to the diverse set of jobs this industry has to offer. Whether they plan to attend a traditional college, vocational program, or something else, they should know there are well-paying opportunities for everyone in the green energy industry.	This will benefit HICs and VPs as it aims to target high school youth living in a household making 80% area median income or below.	We risk excluding marginalized groups from benefiting from the economic opportunities in this clean energy transition. This action will aim at mitigating this risk by targeting WMBE contractors for the EVCP certification we will offer.	N/A	Our service area (Seattle and surrounding neighborhoods) and our remote communities that are under-resourced and served.	Summer internships	This program will be funded by the City of Seattle Human Services Department.	Increased community partnerships with schools, associations and rate payers.
2026_95_4_3	Target WMBE contractors for our EV Charger installation Program Certification	City Light's transportation electrification program portfolio provides EV infrastructure training and business development assistance to cohorts of women and minority-owned businesses to promote their participation in the clean transportation transition	Other	Community and Economic Development	Transportation Electrification	Number of outreach events	Number of WMBE applicants		Number of WMBE contractors enrolled			With increased qualified contractors, there's more opportunity to see these investments occur in these communities. This certification opportunity may also increase the likelihood of WMBE-owned businesses coming from these communities.	This program targets WMBE contractors. HICs and VPs are disproportionately made up of people of color.	Part of the risk with a clean energy transition is that it will exclude marginalized groups from benefiting from the economic opportunities. This action will aim at mitigating this risk by targeting WMBE contractors for the EVCP certification we will offer.	N/A	N/A	Ongoing	Approximately \$200,000.	N/A

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")	65
# of census tracts that are at least partially on "Indian Country"	-
Average EHD v2.0 rank for service territory	6.7
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?	The top EHD factors are Environmental Exposures and Environmental Effects. Specifically, under Environmental Exposures a significant percentage of census tracts rank 10 for "Diesel Exhaust PM2.5 Emissions," "Proximity to heavy Traffic Roadways," and "Toxic Releases from Facilities." Environmental Effects is another factor with a large number of metrics that rank at 9 or 10 for "Proximity to Hazardous Waste Facilities" and "Lead Risk From Housing." The central and southern parts of our service area also rank high (9 or 10) on the EHD on many other factors, such as "Proximity to Risk Management Plan (RMP) Facilities" and "Proximity to Superfund Sites." This is unsurprising as these areas are historically redlined communities where Black, Indigenous, and people of color were only allowed to live. Decades old policies are still seen as these communities have higher concentrations of BIPOC residents, as demonstrated by EHD's "People of Color" factor.
How do your planned specific actions address the EHD factors for HICs (if applicable)?	The top EHD factors were Environmental Exposures generally attributed to transportation pollution and Environmental Effects since our service area has a large superfund site and older homes with higher lead concentrations. Our specific actions attempt to address these significant exposures by focusing on our transportation electrification work that targets investments in HICs and VPs. That portfolio also helps WMBE contractors obtain certification in EV charging installation. We also have our comprehensive home energy efficiency and weatherization programs that make improvements in people's homes to maintain a comfortable home temperature, potentially reducing situations where people their windows for extended periods of time and lessening environmental exposures and effects. Similarly, we have other programs targeting industrial, commercial, and multi-family buildings to develop energy management plans that would lessen fossil fuel use and potentially limit exposure of other pollutants as they electrify.

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.)	We conducted an extensive public input process to engage with overburdened communities and better understand their priorities, barriers to access, and which populations should we make sure to focus on — Identifying Vulnerable Populations. We used various methods to ensure meaningful community participation. These methods included analyzing recent engagement reports from the past couple of years; learning sessions with advisory councils, disability advocates, neighborhood associations; focus groups with community leaders and youth interns; and a P-Patch event in a South Seattle neighborhood. During our conversations, we began by asking, "Who is most impacted or burdened when we have unexpected outages?" and "Which populations or groups of people would be most harmed if our lights went out for a few hours, or days?" As we began hearing similar populations, we asked participants to assess if the groups previously mentioned were accurate and if anyone was missing. The populations that participants listed were consistent. Then it was our job to ensure there was a data source for us to capture these groups.
How does your utility's planned specific actions address the vulnerable population factors (if applicable)?	Overall, we plan to be more intentional in ensuring we create more access and inclusion within our program offerings. During our public process, the community identified "Increased public participation from HICs and VPs" as an indicator and as such developed four specific actions to address VP factors. One of these actions is to develop and implement bi-annual Language Access Plans that would serve the utility has best recommendations to meaningfully communicate with limited English proficiency populations and in plain language to all our customers. Two others revolve around contracting with trusted community partners to support customer enrollment in our programs, like our financial assistance programs.

Factor Category	Factor	Details	Source	Date Last Updated
E.g., Employment	Unemployment	% unemployed over 16 years old	American Community Survey	12/15/2019
Health	Sensitive Populations	Customers who depend on electricity because of a disability (ex. uses an electric wheelchair), illness (ex. diabetes), or are immuno-compromised (ex. seniors, children under five).	American Community Survey	2023
Language	Limited English Proficiency	Customers who speak English as an additional language and have limited proficiency, making it difficult to engage in English.	American Community Survey	2023
Race	Franchise Communities	Lower-income residents and/or Black, Indigenous, or People of Color (BIPOC) residing in franchise cities and unincorporated communities.	American Community Survey	2023

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

In this CEIP, we changed our factors to three new groups: Sensitive Populations, Limited English Proficiency, and Franchise Communities. Previously, they were Racial & Social Equity Composite Index, Displacement Index, Duwamish Valley, and Vulnerable Groups. These changes came about because of our outreach and engagement plan. Based on what we read from outreach and engagement notes from the past two years and our own engagement with community, participants elevated these populations as those who would be most impacted.

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.

Seattle City Light delivers essential services to a diverse, multicultural community. Our work affects the daily lives of our customers. As we plan for a clean energy future, our planning must reflect the needs, priorities, and lived experiences of those we serve.

Integrated Approach to Strategic Planning Engagement

We listened to feedback from our community partners and made changes to improve how we work with them. We coordinated public input for the Clean Energy Implementation Plan (CEIP) with other long-term, strategic planning (e.g. City Light's Strategic Plan and Integrated Resource Plan). This more integrated approach helps us better understand the lived experiences of our customers. It also supports a more coordinated approach to reducing barriers and improving service equity in all our work.

Building on Existing Feedback

To be responsive to community feedback and not overburden them, we connected with teams that had recently conducted relevant community engagement (e.g. TESIP 2.0, Comprehensive Plan, etc.). This collaboration helped develop awareness of feedback that community members have provided to date. This helped us include information that had already been shared to inform City Light's CEIP. It also enabled us to find gaps in community voices and where we needed more information. After reviewing this feedback, we were better positioned to create specific engagement strategies and have more meaningful conversations during the public input process.

CEIP Public Participation

We engaged with representatives from Highly Impacted Communities and Vulnerable Populations through a public input process. We wanted to better understand who may need extra support, learn about barriers they face, and decide what areas we should focus on improving. We used various methods to gather input and make sure everyone had a chance to participate:

- **Learning Sessions:** We joined standing meetings with community representatives including the City of Seattle Indian Advisory Council, City of Seattle Disability Commission, and the South Park Neighborhood Association. We also hosted a learning session with City Light interns, who are youth/young adults engaged in the energy sector.
- **Community Event:** We talked with over one hundred (100) community members at the City of Seattle Department of Neighborhood's P-Patch Resource Fair. We worked with interpreters to engage community members in more than 5 different languages.
- **QualBoards:** We conducted a three-day online focus group with a diverse group of 35 customers, which included broad representation across Seattle and our Franchise Cities (Burien, SeaTac, Lake Forest Park, Shoreline, Skyway, Tukwila, and White Center).
- **Community Liaison Focus Groups:** We hosted focus groups with 22 community members contracted to do community engagement on behalf of the City through the City of Seattle Department of Neighborhoods Community Liaisons Program. The Community Liaisons, many of which have worked with communities on City Light projects, represented 21 different language communities as well as communities with disabilities.
- **Community-Based Organization Focus Groups:** We interviewed 28 community service providers about barriers to affordability programs and recommendations for helping community members reduce energy burdens.
- **External Advisory Panel:** We convened a group of representatives from local nonprofits, government partners, and energy providers to inform the development of City Light's Integrated Resource Plan (IRP) and Demand-Side Management Potential Assessment (DSMPA).

During engagement, community members and partners helped identify Vulnerable Population characteristics, barriers and opportunities for a just transition to a clean energy future, and indicators and potential actions to include in City Light's CEIP.

Continuing to Engage

We will continue to build on the relationships we developed throughout the CEIP public participation process and to expand partnerships to support the implementation of the CEIP.

What barriers to public participation does your utility's community face due to language, cultural, economic, technology, or other factors?

Through this community process we identified the following barriers:

- **Technical and Industry Jargon:** City Light's use of technical terms and industry jargon creates barriers and affects people's interest in engaging and their ability to provide meaningful feedback.
- **Language and Cultural Barriers:** Within City Light's service area, more than 20% of residents were born in another country and 24% of residents speak a language other than English at home. Therefore, language can be a potential barrier to participation. Lack of cultural relevance or trust in government due to historical injustices and disparities can result in some communities being less engaged.
- **Internet Access:** According to the City of Seattle's Technology Access and Adoption Study, an estimated 8% of Seattle households do not have internet access both at home and on-the-go (i.e. mobile). Vulnerable Populations and Highly Impacted Communities have less access to reliable, fast internet when compared to the general population.
- **Digital Literacy:** The City of Seattle's Technology Access and Adoption Study also reported that "Seattle's population is moderately skilled when it comes to technology, but more than two out of five need some assistance completing at least a few digital tasks." Community members experience barriers with effectively navigating technology.
- **Logistical Barriers:** Community members are busy and engaging on clean energy is not a top priority for many. A lack of time to participate and the level of difficulty to participate present logistical barriers to the public input process.

What reasonable accommodations has your utility provided to reduce barriers to public participation?

As a municipal utility, we need to remove barriers to public participation, so that our work reflects inputs from the communities we serve. City Light's Environmental Equity Advisor worked closely with City Light's Communications Division and the City of Seattle Department of Neighborhoods to plan and implement inclusive community engagement for the CEIP development.

- **Reviewing Existing Feedback:** We reviewed input from other long-term planning efforts to respect the time our customers spent providing feedback. In addition to reducing harm, we were also able to tailor our public participation process based on what we had already heard from the community.
- **Communications and Language Access:** To support access and inclusion, we developed communications materials using plain language standards to ensure they were clear, concise, and well organized. This also included being more approachable in how we engaged with communities. For the planning efforts included in the existing feedback we reviewed, we also worked with Office of Immigrant Affairs (OIRA) to develop in-language content and partnered with City of Seattle Department of Neighborhoods to engage communities in their preferred language.
- **Culturally Relevant Engagement:** We worked with the City of Seattle Department of Neighborhoods to develop culturally appropriate engagement strategies and partnered with meeting organizers to tailor our engagement to be relevant and relatable to the communities we were engaging with.
- **Community Conversations:** We took several approaches to improving access to participation. This included participating in existing meetings where community members were already gathering, conducting outreach in multiple formats (in-person, online, and hybrid), and hosting activities on evenings and weekends.
- **Trusted Community Partners:** We engaged with community leaders, community-based organizations, and City of Seattle Department of Neighborhoods Community Liaisons to engage with communities on issues such as affordability, energy, public health, environment, etc. By engaging with trusted community partners, we were able to learn about priorities, challenges, and needs without overburdening community members.

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.

Public input played a critical role in our work to develop a CEIP that reflects the interests and needs of the communities we serve. We co-developed indicators for the CEIP and co-defined Vulnerable Populations with community members through an iterative process:

1. **Draft:** We developed a draft list of indicators and a working definition of Vulnerable Populations based on existing feedback.
2. **Engage:** We gathered community feedback on the draft list of indicators and Vulnerable Populations definition.
3. **Refine:** We updated the list of indicators and Vulnerable Populations definition based on community feedback.
4. **Validate:** We received confirmation on the list of indicators and Vulnerable Populations definition from the Community Liaison Focus Groups.

The CEIP, including the indicators and actions, reflects community priorities and key themes that surfaced throughout our public participation process, which focused on ways we could reduce energy burden and expand equitable access to benefits. The plan incorporates the communities' request that we plan and design this work to center Vulnerable Populations and Highly Impacted Communities and to continue engaging people throughout the clean energy transition. Finally, the CEIP incorporates feedback from the External Advisory Panel, which advised on the development of City Light's Integrated Resource Plan (IRP) and Demand-Side Management Potential Assessment (DSMPA).

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?	We intentionally coordinated the public input process for the CEIP with other long-term, strategic planning, including our 10-year Strategic Plan and Integrated Resource Plan. The public process directly informed and helped identify the CEIP indicators and specific actions. As a result of this coordination, our specific actions are consistent with the our IRP and strategic plan. The specific actions were developed as part of the 2024 IRP Progress Report and have been updated with information from the 2026 Demand Side Management Potential Assessment (DSMPA). The 2026 DSMPA included an assessment of demand response and considered how renewable energy would be part of City Light's actions.
Hyperlink to Relevant Assessment/Resource Plan	https://www.seattle.gov/documents/Departments/CityLight/IRP/2024IRPProgressReport.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)	The resource adequacy standard used by Seattle City Light in the 2024 IRP Progress Report is the Loss of Load Events (LOLEV). Based on the costs and benefits of market reliance, and given our resources and hydro flexibility, City Light has established the resource adequacy standard of LOLEV=0.2, or shortfalls not exceeding two events every ten years. This standard is used in establishing the resource adequacy needs for City Light's critical months for the next 20 years. These critical months are July and August in the summer, and December and January in the winter. For more detail about the resource adequacy standard see page 17 of the 2024 IRP Progress Report: https://www.seattle.gov/documents/Departments/CityLight/IRP/2024IRPProgressReport.pdf The resource adequacy standard used by Seattle City Light in the 2026 DSMPA is to allow no unserved energy over the 32 representative days per year modeled. This standard was used since the limited number of representative days modeled did not allow for a full probabilistic assessment.
Methods of measurement (e.g., probabilistic assessments of resource adequacy)	The resource adequacy standard used by Seattle City Light in the 2024 IRP Progress Report is based on a probabilistic assessment of resource adequacy using hourly simulations of temperature and hydro conditions (30 temperature years, 30 hydro years). For Seattle City Light, LOLEV is the expected number of deficit events over the total number of simulations after accounting for hydro flexibility and market reliance. The resource adequacy standard used by Seattle City Light in the 2026 DSMPA allows for no unserved energy in all hours of the 32 representative days per model year of the study period (2026-2045). Twenty-four of those days are "typical" days, using the median hydro and weather scenarios, out of 29 hydro scenarios and 30 weather scenarios per modeled year. The set of typical days consists of two days per month: one weekday and one Sunday or holiday. The remaining eight days represent "RA constrained" days, which are the single day in each month out of all hydro and weather scenarios that have the greatest resource need. April, May, September, and October did not have any days with resource needs, so were not included in the set of RA-constrained days.

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 fields below. Enter information in the yellow fields only. The grey cells will populate themselves.

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

		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
Year	Retail revenue requirement					
0						
1	(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)	\$ -	4	\$ -		
2	(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)	\$ -	3	\$ -		
3	(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)	\$ -	2	\$ -	\$ -	\$ -
4	(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)	\$ -	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.

[illegible][illegible][illegible]