Clean Energy Transformation Act, **Clean Energy Implementation Plan**
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Deadline: January 1, 2022
Submission: Email this workbook and all supporting documentation to **CETA@commerce.wa.gov**
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Washington State Department of Commerce

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Do not modify blue-shaded fields.

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.

(3)(a) An investor-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 (1) of this section equals a two percent increase of the investor-owned utility's weather-adjusted sales revenue to customers for electric operations above the previous year, as reported by the investor-owned utility in its most recent commission basis report. 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 an investor-owned utility relies on (a) of this subsection as a basis for compliance with the standard under RCW 19.405.040(1), 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).

(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).

(5) The commission, for investor-owned utilities, and the department, for consumer-owned utilities, must adopt rules establishing the methodology for calculating the incremental cost of compliance under this section, as compared to the cost of an alternative lowest reasonable cost portfolio of investments that are reasonably available.

WAC 194-40-200
Clean energy implementation plan.

(1) **Specific actions.** Each utility must identify in each CEIP the specific actions the utility will take during the next interim performance period or GHG neutral compliance period to demonstrate progress toward meeting the standards under RCW 19.405.040(1) and 19.405.050(1) and the interim targets under subsection (2) of this section and the specific tar gets under subsection (3) of this section. Specific actions must be consistent with the requirements of RCW 19.405.060 (2)(a)(iv).

(2) **Interim target.** The CEIP must establish an interim target for the percentage of retail load to be served using renewable and nonemitting resources during the period covered by the CEIP. The interim target must demonstrate progress toward meeting the standards under RCW 19.405.040(1) and 19.405.050(1), if the utility is not already meeting the relevant standard.

(3) **Specific targets.** The CEIP must establish specific targets, for the interim performance period or GHG neutral compliance period covered by the CEIP, for each of the following categories of resources:

(a) **Energy efficiency.** (i) The CEIP must establish a target for the amount, expressed in megawatt-hours of first-year savings, of energy efficiency resources expected to be acquired during the period. The energy efficiency target must comply with WAC 194-40-330(1). (ii) A

utility may update its CEIP to incorporate a revised energy efficiency target to match a biennial conservation target established by the utility under RCW 19.285.040 (1)(b) and WAC 194-37-070.

(b) **Demand response resources.** The CEIP must specify a target for the amount, expressed in megawatts, of demand response resources to be acquired during the period. The demand response target must comply with WAC 194-40-330(2).

(c) **Renewable energy.** The utility's target for renewable energy must identify the quantity in megawatt-hours of renewable electricity to be used in the period.

(4) **Specific actions to ensure equitable transition.** To meet the requirements of RCW 19.405.040(8), the CEIP must, at a minimum:

(a) Identify each highly impacted community, as defined in RCW 19.405.020(23), and its designation as either: (i) A community designated by the department of health based on cumulative impact analyses; or (ii) A community located in census tracts that are at least partially on Indian country.

(b) Identify vulnerable populations based on the adverse socioeconomic factors and sensitivity factors developed through a public process established by the utility and describe and explain any changes from the utility's previous CEIP, if any;

(c) Report the forecasted distribution of energy and nonenergy costs and benefits for the utility's portfolio of specific actions, including impacts resulting from achievement of the specific targets established under subsection (3) of this section. The report must: (i) Include one or more indicators applicable to the utility's service area and associated with energy benefits, nonenergy benefits, reduction of burdens, public health, environment, reduction in cost, energy security, or resiliency developed through a public process as part of the utility's long-term planning, for the provisions in RCW 19.405.040(8); (ii) Identify the expected effect of specific actions on highly impacted communities and vulnerable populations and the general location, if applicable, timing, and estimated cost of each specific action. If applicable, identify whether any resource will be located in highly impacted communities or will be governed by, serve, or otherwise benefit highly impacted communities or vulnerable populations in part or in whole; and (iii) Describe how the specific actions in the CEIP are consistent with, and informed by, the utility's longer-term strategies based on the analysis in RCW 19.280.030 (1)(k) and clean energy action plan in RCW 19.280.030(1)(l) from its most recent integrated resource plan, if applicable.

(d) Describe how the utility intends to reduce risks to highly impacted communities and vulnerable populations associated with the transition to clean energy.

(5) **Use of alternative compliance options.** The CEIP must identify any planned use during the period of alternative compliance options, as provided for in RCW 19.405.040 (1)(b).

(6) The CEIP must be consistent with the most recent integrated resource plan or resource plan, as applicable, prepared by the utility under RCW 19.280.030.

(7) The CEIP must be consistent with the utility's clean energy action plan developed under RCW 19.280.030(1) or other ten-year plan developed under RCW 19.280.030(5).

(8) The CEIP must identify the resource adequacy standard and measurement metrics adopted by the utility under WAC 194-40-210 and used in establishing the targets in its CEIP. (9) If the utility intends to comply using the two percent incremental cost approach specified in WAC 194-40-230, the CEIP must include the information required in WAC 194-40-230(3) and, if applicable, the demonstration required in WAC 194-40-350(2).

(10) Any utility that is not subject to RCW 19.280.030(1) may meet the requirements of this section through a simplified reporting form provided by commerce.

Utility name:	Seattle City Light
Report date:	2021
Contact name/Dept:	Robert Cromwell/Customer Energy Solutions
Phone:	206-684-3856
Email:	robert.cromwell@seattle.gov
Web address of published CEIP:	https://powerlines.seattle.gov/2021/08/05/clean-energy-future-survey/
Small utility:	No

A small utility is a utility that is not required by RCW 19.280.030(1) to prepare an integrated resource plan.

Seattle City Light

Interim target: Percentage of retail load to be served using renewable and nonemitting resources (WAC 194-40-200(2))

Resource	2022	2023	2024	2025	4-year Period
Renewable	92%	92%	93%	93%	92%
Nonemitting	5%	5%	5%	5%	5%
Total	97%	97%	97%	97%	97%

[Small utilities may enter a single value in cell G6 and leave the remaining cells blank.]

Describe how the target demonstrates progress toward meeting the 2030 and 2045 CETA standards (WAC 194-40-200(2)). ***This section is not required if the value in cell G6 is 80% or greater*** **:**

Specific targets (WAC 194-40-200(3)):

Resource	Amount	
Energy Efficiency	310,603 (cum. savings thru 2025)	MWh to be acquired over the interim performance period (measured in first-year savings)

Renewable energy	31,821,434	MWh to be used during the interim performance period
Demand response	0	MW to be acquired over the interim performance period

Identify and describe the specific actions the utility will take over the next interim performance period to demonstrate progress toward meeting the utility's interim targets and the 2030 GHG neutral and 2045 clean electricity standard (WAC 194-40-200(1)):	
Specific action proposed	**Description of how the action demonstrates progress toward meeting interim targets and the standards**
Proactively seek customer and community voice	Design and refine demand-side programs and clean energy strategies to ensure alignment with equitable outcomes and customer choices.
Conservation program equitable program design	Create new opportunities for conservation (target highly impacted communities and vulnerable populations, geography, and season; pivot away from lighting; look towards efficient electrification)
Demand Response	City Light's IRP did not select demand response products. That said, City Light plans to launch time of day rates by 2023, residential/small business demand response pilots by 2022, and managed electric vehicle charging pilots by 2025.
RFP for CETA and I-937 eligible resources	The selection of resources will use City Light's IRP framework which includes goalposts for meeting the 2030 and 2045 standards, resource adequacy, I-937 and Seattle's existing carbon neutral policy. Seattle City Light plans to pursue demand side and supply side resource thru customer programs and RFP processes to meet future needs identified and updated through its IRP framework. All plans are centered around conservation, demand response and renewable energy. Guidance for resource decision come from SCL's Strategic Plan, Clean Energy Equity Plan and are consistent with the Clean Energy Implementation Plan and the IRP framework.
2022 & 2024 IRP updates and 2024 CPA updates	Continue to refine inputs including new load forecasts and generation forecasts reflecting new regulations, codes and UW Climate Impacts workgroup climate change data for SCL with input from technical advisors in the 2022 IRP process and inclusive of customer input into future plans.
2020 IRP Progress Report	Follow through on actions identified in the 2020 IRP Progress Report pg. 22 http://www.seattle.gov/Documents/Departments/CityLight/2020IRPProgessReport.pdf

Seattle City Light

Highly impacted communities (WAC 194-40-200(4))

Report each Highly Impacted Community in the table below.

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 map. Visit the Department of Health website for instructions on how to identify Highly Impacted Communities:
https://www.doh.wa.gov/DataandStatisticalReports/WashingtonTrackingNetworkWTN/ClimateProjections/CleanEnergyTransformationAct/CETAUtilityInstructions

Census Tract (enter 11 digit FIPS code)	County Name	Tribal Lands (Yes/No)	Environmental Health Disparities Topic Rank
53033000100	King	No	9
53033001200	King	No	9
53033007300	King	No	9
53033007402	King	No	10
53033008002	King	No	10
53033008100	King	No	10
53033008200	King	No	9
53033008500	King	No	10
53033008600	King	No	10
53033008700	King	No	10
53033009000	King	No	10
53033009200	King	No	10
53033009300	King	No	10
53033009400	King	No	9
53033010001	King	No	9
53033010002	King	No	9
53033010100	King	No	9
53033010300	King	No	9
53033010401	King	No	9
53033010702	King	No	9
53033010800	King	No	9
53033010900	King	No	10
53033011001	King	No	9
53033011002	King	No	10

53033011101	King	No	9
53033011102	King	No	9
53033011200	King	No	10
53033011300	King	No	10
53033011401	King	No	9
53033011700	King	No	10
53033011800	King	No	10
53033011900	King	No	10
53033026001	King	No	9
53033026500	King	No	10

Seattle City Light

Vulnerable populations (WAC 194-40-200(4))

Please list all indicators 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

Factor	Details	Source	Date Last Updated	Approximate number of households in service territory (if applicable)
Ex. COVID cases	*Cases by race and ethnicity*	*Department of Health COVID-19 data dashboard*	*2021*	*1,000*
Racial & Social Equity Composite Index	Identified index scores by census tract	City of Seattle's Office of Planning & Community Development	2011-2015 for the Racial and Social Equity Index. The household count by census tract is based on data from 2013-2017.	59643 listed as "highest disadvantage"
Displacement Index	Identified moderate and high index scores by census tract	Puget Sound Regional Council	Index created in 2019 with data ranging from 2011-2016	252,662 at high and moderate
Duwamish Valley	The Duwamish Valley is an identified environmental justice ne	Duwamish Valley Action Plan / American Community Survey 5-Year Estimates	2016	5600
Vulnerable groups	(1) black, indigenous, and people of color (BIPOC), (2) low income, (3) limited English proficiency, and (4) immigrants and refugees	City of Seattle's Equity & Environment Agenda	TBD	TBD

Describe and explain any changes to the indicator from the utility's previous CEIP, if any:

This is the first CEIP so no changes in indicators have occured relative to a previous version.

Indicators are provided on the 'Forecast of Impacts' tab.

Vulnerable populations were identified based on City of Seattle's Office of Planning & Community Development Racial and Social Equity Composite Index that combines information by census tract on race, ethnicity, and related demographics with data on socioeconomic and health disadvantages to identify where priority populations make up relatively large proportions of neighborhood residents. Additional information used to identify vulnerable populations is a displacement index created by Puget Sound Regional Council (PSRC), referenced in the Seattle 2035 Equity Analysis. Displacement risk is a composite of indicators representing five elements of neighborhood displacement risks: socio-demographics, transportation qualities, neighborhood characteristics, housing, and civic engagement. These vulnerable populations are shown within the table on the Indentify HIC tab. Another resource used to identify vulnerable poplulations is City Light's Transportation Electrification Strategic Implementation Plan (TESIP), which identifies environmental justice neighborhoods and recognizes the Duwamish Valley as containing some of Seattle's most underserved populations. Finally, City of Seattle identified four groups through its Equity & Environment Agenda that could be considered vulnerable: (1) black, indigenous, and people of color (BIPOC), (2) low income, (3) limited English proficiency, and (4) immigrants and refugees.

Seattle City Light

Distribution of energy and non-energy costs and benefits (WAC 194-40-200(4))

Please report one or more indicators, developed through a public process, and used to identify the forecasted distribution of energy and non-energy costs and benefits for the utility's portfolio of specific actions, including impacts resulting from achievement of the specific targets established under WAC 194-40-200(3).

Indicators must be associated with one of the following categories: energy benefits, non-energy benefits, reduction of burdens, public health, environment, reduction in cost, energy security, or resiliency.

Category	Indicator	Details	Source	Date Last Updated
Ex. Resiliency	*Number of outages in utility census tracts*	*Use SAIDI, CAIDI and SAIFI data geolocated across service territory*	*Utility data*	*2021*
Energy benefits, Energy security, and Resiliency	1. Expenditures of existing and planned community energy projects	Total dollars expended on existing and planned community energy projects	Utility data	Source Date TBD
Energy benefits, Energy security, and Resiliency	2. Locations of existing and planned community energy projects	Geographic extent of projects in targeted Highly-Impacted Communities	Utility data	Source Date TBD

Non-energy benefits, Reduction of cost, and Resiliency	3. Career Development	Includes percentage change in VP participation in City of Seattle apprenticeships and jobs. Advances local, good paying jobs that have high development potential and provide career pathways for youth.	TBD	Source Date TBD
Reduction of energy burdens and Reduction of cost	4. Public Outreach	Percent of change in education programming targeted to HICs and VPs on energy planning, projects, personal choices, and safety.	Utility data	Source Date TBD
Public health, Energy security, and Resiliency	5. Public energy education	Percent of change in education programming targeted to HICs and VPs on energy planning, projects, personal choices, and safety.	Utility data	Source Date TBD

Energy benefits, Reduction of energy burdens and Reduction of cost	6. Burden (cost) to program participation	Percent change in program participant costs and rates of participation from HICs and VPs. Address challenges to participating in programs due to cost of entry.	Utility data and JD Power indicators	Source Date TBD and JD Power Annually
Energy benefits, Reduction of cost, Energy security, and Resiliency	7. Accessibility to non-single-family homeowners	Percent change of utility program dollars allocated to non-single-family homeowners for pilot projects, grants, rebates, or other incentives to provide alternative energy sources. Provides access to alternative energy sources such as solar or net metering programs that are difficult for multifamily residents and renters to implement.	Utility data	Source Date TBD

Public health and Environment	8. Outdoor air quality (Concentration of diesel particulate matter in air and reduction of greenhouse gas emissions)	Percent change of air quality indices such as particulate matter or emissions. Track long-term air quality and emission volume, especially along heavily trafficked corridors that impact communities; however, cannot be tracked as individual City Light impacts due to multiple contributions acting as a whole and would be measured and tracked by others.	Washington Tracking Network, https://www.epa.gov/outdoor-air-quality-data/air-data-daily-air-quality-tracker, https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=5f239fd3e72f424f98ef3d5def547eb5&extent=-146.2334,13.1913,-46.3896,56.5319	Source Date Varies; Multiple Sources
Energy benefits, Energy security, and Resiliency	9. Feeder outages	Percent change in SAIDI and SAIFI values in HICs and VPs.	Utility data	Source Date TBD

Energy benefits, Energy security, and Resiliency	10. Response time to outages	Percent change of average response and restoration times in HICs and VPs. Identifies how long it takes for an outage to be resolved in communities..	Utility data	Source Date TBD

Please report the forecasted distribution of energy and non-energy costs and benefits on identified highly impacted communities and vulnerable populations for the utility's portfolio of specific actions, including impacts resulting from achievement of the specific targets established under WAC 194-40-200(3). You must do a separate row for each action and for each population affected.

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.

Utility Specific Action (e.g. name of resource)	**Population affected? (select one per row)**	**Indicator**	**Detail (describe distribution of energy and non-energy benefits on named population)**	**Location of Resource (if applicable)**
Ex. Replace substation	*Tribe*	*resiliency*		*substation address*
Utility Discount Program	Low income	4. Public outreach 6. Burden (cost) to program participation	Rate assistance program, applied to a customer's bills going forward (60% reduction in City Light bill).	Throughout service territory
Emergency Low Income Assistance	Low income	4. Public outreach 6. Burden (cost) to program participation	For 2021, assistance is available twice in a 12-month period and the program is not conditional on shutoff notices, it applies to customers with balances of $250 or more	Throughout service territory

Project Share	Low income	4. Public outreach 6. Burden (cost) to program participation	Project Share funds are used for customers currently enrolled in the UDP and have also received the ELIA benefit to help them achieve a zero balance on their active electric account. The program provides one-time per year assistance up to $500 towards a customer's City Light bill.	Throughout service territory
Budget Billing Program	Low income	4. Public outreach 6. Burden (cost) to program participation	A monthly billing plan option that enables customers to spread energy costs evenly throughout the year, providing certainty to each bill and assists customers in avoiding high bills during peak demand.	Throughout service territory
Energy Equity Rate Pilot	Low income	6. Burden (cost) to program participation	Offers a suite of wrap-around benefits for income-qualified customers with high energy burdens: a reduced rate for electrical consumption; energy efficiency upgrades and weatherization projects; and a balance forgiveness program upon successful completion of agreed upon payments that fit household budgets.	Throughout service territory
HomeWise	Low income	5. Public energy education 6. Burden (cost) to program participation	Offers weatherization services to income eligible households, with the aim of decreasing each participating household's energy bills while also increasing comfort, health, and safety.	Throughout service territory
Direct Install Services Program (Powerful Neighborhoods)	Low income	4. Public outreach 5. Public energy education 6. Burden (cost) to program participation	Provides free energy efficiency improvements for individual units and multifamily building common areas.	Throughout service territory
Small Business Program	Small business	4. Public outreach 6. Burden (cost) to program participation	Installs energy efficient lighting and equipment at no- and low-cost to the participating businesses to assist in lessening the affordability pressures in this high cost region.	Throughout service territory

Multifamily Retrofit Programs	Multifamily residents	4. Public outreach 5. Public energy education 6. Burden (cost) to program participation	Provides a wide range of retrofit energy efficiency solutions for capital improvement, operations & maintenance, and behavioral improvements, across existing multifamily buildings.	Throughout service territory
Built Smart	Multifamily residents and developers	4. Public outreach 5. Public energy education 7. Accessibility to non-single-family homeowners	Encourages developers of new multifamily buildings to reach beyond standard energy code and develop additional electricity savings through financial incentives.	Throughout service territory
Multifamily Weatherization	Multifamily residents and owners	4. Public outreach 5. Public energy education 6. Burden (cost) to program participation 7. Accessibility to non-single-family homeowners	Incentivizes owners of existing multifamily properties to invest in insulation, window, and exterior door upgrades.	Throughout service territory
Green Up Community	NA	6. Burden (cost) to program participation 7. Accessibility to non-single-family homeowners	Incentivizes new solar arrays hosted by affordable housing and other low-income service providers through the purchase of renewable energy credits (RECs) acquired by Green Up participants.	Throughout service territory

Green Up	NA	4. Public outreach 7. Accessibility to non-single-family homeowners	A voluntary green power program that allows any utility customer to purchase renewable energy through a self-selected additional charge on their utility bill.	Throughout service territory
Renewable Power Purchase Agreements	NA	1. Expenditures of existing and planned community energy projects 2. Locations of existing and planned community energy projects	City Light has three main renewable energy purchased power agreements: Columbia Ridge Landfill Gas, Stateline Wind, and King County Wastewater Treatment Plant; and various smaller contracts for renewable energy credits.	Arlington, OR; Walla Walla, WA; King County, WA
Virtual Net Metering	Solar customers	1. Expenditures of existing and planned community energy projects 2. Locations of existing and planned community energy projects 6. Burden (cost) to program participation	City Light is developing virtual net metering functionality, which will enable eligible customers with solar installations to virtually distribute excess solar generation to multiple customer meters.	Throughout service territory

Public Transit Projects	NA	1. Expenditures of existing and planned community energy projects 2. Locations of existing and planned community energy projects 8. Outdoor air quality	Collaborating on electrifying public transportation with King County Metro, Washington State Ferries, and Port of Seattle.	Throughout service territory and nearby communities
Public Charging Station Pilot	EV users	1. Expenditures of existing and planned community energy projects 2. Locations of existing and planned community energy projects 8. Outdoor air quality	Public charging stations serve populations that need public charging options; City Light is installing 26 DC fast chargers across the service territory.	Throughout service territory

Personal Mobility Program	Under development	1. Expenditures of existing and planned community energy projects 2. Locations of existing and planned community energy projects 8. Outdoor air quality	City Light is developing new program opportunities for personal mobility. Program(s) are expected to launch in 2022.	Throughout service territory
Fleets Programs	Under development	1. Expenditures of existing and planned community energy projects 2. Locations of existing and planned community energy projects 8. Outdoor air quality	City Light is identifying new program opportunities for commercial, government, and non-profit fleets. Program(s) are expected to launch in 2022.	Throughout service territory and nearby communities

Seattle City Light

Integrated resource plan compliance (WAC 194-40-200(6))

This CEIP is consistent with the most recent integrated resource plan or resource plan, as applicable, prepared by the utility under RCW 19.280.030. **Select yes or no.**

Yes

Clean energy action plan compliance (WAC 194-40-200(7))

The CEIP is 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). **Select yes or no.**

Yes

Long-term plans (WAC 194-40-200(4)(c)(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:

The specific actions were developed as part of the 2020 IRP progress report and have been updated with information from the 2022 Conservation potential assessment. The 2022 Conservation Potential Assessment included an assessment of demand response and considered how renewable energy would be part of City Light's actions using the new developed IRP Framework presented in the 2020 IRP Progress report.

Seattle City Light

Risk (WAC 194-40-200(4)(d))

Describe how the utility intends to reduce risks to highly impacted communities and vulnerable populations associated with the transition to clean energy.

In order to meet the intent of CETA, for customer programs with a strong equity link, City Light program managers will complete a racial equity analysis and set annual equity targets that will aim to reduce risk and increase benefits to highly-impacted communities and vulnerable populations. Additionally, program managers, assisted by Communications staff, will engage with highly impacted communities and vulnerable populations to define equity indicators and enhance City Light's likelihood of achieving equity outcomes. Staff will endeavor to remove barriers to engagement to minimize burdens for public participation. Finally, program managers will develop and implement strategies to address equity targets and achieve equity outcomes.

As programs are carried out, program managers will gather data to track performance against the established equity targets. These data should be mapped or connected to the affected highly-impacted communities and vulnerable populations. At regular intervals, data will be reviewed to see if progress is being made toward the targets and that the implemented strategies are supporting the intended equity outcomes. If progress is off target, adjustments will be made to program design and execution to elevate equity.

A dedicated equity coordinator will guide completion of racial equity analyses, set annual program targets, identify data to be collected, report metrics to community members and the Department of Commerce, and provide feedback to program managers and City Light's Executive Team.

Implementing and evaluating actions to elevate equity and engaging with customers may incur additional programmatic costs.

Seattle City Light

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. 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 the utility's supporting integrated resource plan or resource plans, as applicable.

A small team at Seattle City Light from multiple divisions collaborated to draft an initial list of 33 equity indicators based on guidance from the Department of Commerce and other resources such as the City's Duwamish Valley Action Plan. They examined these against equity principles and if the indicators could be measured and track a desired outcome either by City Light or others. This group also scored the indicators on how they affected 8 Energy Equity Areas required by CETA and 5 racial equity opportunity areas adhering to the guiding principles of the City of Seattle's Race and Social Justice Initiative. This process narrowed the list of possible indicators to 10 for additional discussion with stakeholders and public.

On July 30, 2021 a presentation focused on the draft indicators was presented to the IRP Technical Advisory Group. This group is comprised of a diverse set of stakeholders including those from the environmental community, BPA, and local and regional organizations such as NWEC and Climate Solutions. Feedback from the group was used to revise the indicators.

Seattle City Light serves a population of approximately 900,000 residents. On August 6, 2021 City Light sent an email to approximately 180,000 City Light residential customers inviting them to learn more about Washington State's Clean Energy Transformation Act, City Light's progress to date, and a request to provide feedback and help shape our collective energy future by taking a brief survey. The questions in the survey were based on the equity indicators that City Light identified. We had 4,522 City Light customers complete the survey, including 641 Black, Indigenous, and People of Color (BIPOC), 1,328 renters, and 417 customers with an annual household income under $50,000.

Key learnings from the survey include: 1) the vast majority of respondents across all demographics are concerned about climate change, 2) the top three perceived benefits/concerns with transitioning to 100% clean energy by 2045 for each demographic, 3) majority of non-renters (regardless of other demographic) use a personal automobile as their primary method of transportation, 4) top three drivers for transportation decisions for each demographic, 5) EV adoption 50% less among renters/low-income customers, and 6) the majority of people across all demographics are very comfortable with going all electric in their daily lives.

We gathered thousands of responses from customers where they provided the names of trusted community-based organizations as well as new and different programs and services respondents would like to see City Light offer. We continue to evaluate the responses to ensure the voices of vulnerable populations and highly-impacted communities are well represented in our future planning. We will continue to use the survey results to help inform future utility outreach activities and program planning.

In addition to the learnings gathered from the survey, the Clean Energy Implementation Plan (CEIP) equity analysis was discussed with City Light's Environmental Advisory Committee on August 25, 2021. This Committee is comprised of local and national environmental organizations and is focused on the environmental mission of Seattle City Light.

City Light will be bringing the draft CEIP to a City Light Review Panel Meeting on November 23, 2021. The Seattle City Light Review Panel is made up of nine members including City Light's customers, tasked with reviewing and assessing City Light's strategic plan and providing an opinion on the merits of the plan and future revisions to it to the Mayor and City Council, and other roles as laid out by Seattle City Ordinance 123256. We look forward to hearing feedback from the Review Panel as we continue to build out our final CEIP.

Seattle City Light

Use of alternative compliance options (WAC 194-40-200(5))

Identify any planned use during the period of alternative compliance options, as provided for in RCW 19.405.040(1)(b):

Alternative compliance payments:	0	Dollars
Unbundled renewable energy credits:	0	Credits
Credits from energy transformation projects:	0	MWh
Electricity from the Spokane municipal solid waste to energy facility:	0	MWh

Seattle City Light

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.

Resource adequacy standard

The resource adequacy standard used by Seattle City Light is the Loss of Load Events (LOLEV), based on a probabilistic assessment of energy resource adequacy using hourly simulations of temperature and hydro conditions (30 temperature years, 39 hydro years). For SCL, LOLEV is the expected number of deficit events over the total number of simulations after accounting for hydro flexibility and market reliance. It is measured by month for the 20 year planning horizon. For more detail about the Resource Adequacy standard see pages 13-14 for Resource Adequacy Standard.
http://www.seattle.gov/Documents/Departments/CityLight/2020IRPProgessReport.pdf

Methods of measurement

Based on the costs and benefits of market reliance, and given our resources hydro flexibility, City Light has established the RA standard of LOLEV=0.2, or shortfall events not exceeding 2 every ten years. This standard is used in establishing the energy resource adequacy needs for City Light's critical months for the next 20 years. These critical months are July/August in the summer, and December/January in the winter. Based on City Light's portfolio and loads, the energy RA needs for July/August starts at about 145aMW in 2026 and rises gradually to about 270aMW by 2041. City Light has enough hydro in January to meet all of the RA needs in January, there is not RA need in January. However, the December need starts at about 35aMW in 2026 and rises to about 120aMW by 2041. Energy Resource Adequacy Contributions:

Energy Resource Adequacy Contributions

Resources	Summer - August				Winter - December			
	2026	2030	2035	2040	2026	2030	2035	2040
Conservation								
Commercial	0.35	0.46	0.65	0.95	-0.43	-0.50	0.37	0.95
Industrial	0.21	0.23	0.82	1.33	-0.55	-0.65	1.19	0.82
Residential	0.20	0.22	0.99	1.07	-0.20	-0.29	1.08	1.05
Demand Response								
Residential Water Heat DLC	0.02	0.02	0.04	0.08	0.09	0.14	0.11	0.09
Residential Space Heat DLC	0.02	0.02	0.03	0.06	0.08	0.11	0.09	0.08
Comml & Ind Curtailment	0.02	0.02	0.03	0.06	0.08	0.11	0.09	0.07
Renewables								
Gorge Wind	0.34	0.45	0.39	0.38	0.30	0.28	0.30	0.27
Central WA Solar	0.32	0.36	0.40	0.39	0.11	0.10	0.12	0.07
Southeast OR Solar	0.37	0.41	0.44	0.41	0.13	0.11	0.15	0.10

Seattle City Light

Annual cost threshold (WAC 194-40-200(9))

Enter information in the blue column only. The rest will pre-populate.

Do not complete this section unless the utility intends to comply using the 2% incremental cost approach specified in WAC 194-40-230.

Year	Retail revenue requirement	Annual amount from revenue increase equal to 2% of prior year revenue requirement	Number of years in effect	Threshold amount over four years	Sum of threshold amounts	Annual threshold amounts
2021						
2022		$	4	$.00	$.00	$.00
2023		$	3	$.00		
2024		$	2	$.00		
2025		$	1	$.00		
Annual threshold ammount as a percentage of average retail revenue requirement						#DIV/0!

Incremental cost

Itemize all costs the utility intends to incur during this interim period in order to comply with the requirements of RCW 19.405.040 and 19.405.050.	Expected cost	Alternative lowest reasonable cost	The cost is incurred during this interim reporting period. **Select yes or no.**	The cost is part of the lowest reasonable cost and reasonably available portfolio of resources that results in compliance with the GHG Neutral Standard and 100% Clean Standard. **Select yes or no.**	The cost is additional to the costs that would be incurred for the lowest reasonable cost and reasonably available resource portfolio that would have been selected in absence of the GHG Neutral Standard and 100% Clean Standard. **Select yes or no.**	The cost is not required to meet any statutory, regulatory, or contractual requirement or any provision of CETA other than the GHG Neutral Standard and 100% Clean Standard. **Select yes or no.**	Summarize and cite documentation of the expected cost of the utility's planned resource portfolio and the expected cost of the alternative lowest reasonable cost and reasonably available portfolio. Clearly label all documentation with the itemized name in the first column of this table. Attach documentation to the email submitted with the CEIP.