



Clean Energy Implementation Plan **Public Participation Plan**



Contents

Introduction.....	1
Background	1
2025 Public Participation Partnerships	3
Partnering with Advisory Groups	3
Partnering with the Equity Advisory Group	4
Proposed EAG Meetings & Topics.....	5
Partnering with Public Engagement Consultants.....	6
Named Community Identification.....	8
Customer Benefit Indicators	12
Public Participation Strategies	15
Maximize the Impact of Existing Strategies	15
Multi-Language Strategy	16
Future Multi-Language Strategy Activities	17
Quarterly Public Participation Meetings.....	18
Quarterly CEIP Newsletter	19
CEIP Public Comment Form	19
Frequently Asked Questions	20
CEIP Customer Survey	20
CETA Webpage	21
Enhance Technological Accessibility	22
Educational Videos	22
Social Media and Strategic Communications	23
Community Events.....	23
Community Partnerships Program	25
Strategies Under Consideration	25
Pre-Recorded Public Presentations	25
Telephone Town Halls	26
CEIP Hotline	26
Public Engagement Milestones	26
Public Comments	27
Closing.....	29
Appendix A - Washington Regulatory Requirements	30
Appendix B – CEIP Public Participation Plan Comments	36

Introduction

Enacted into law in May 2019, the Clean Energy Transformation Act (CETA) requires electric utilities to eliminate coal-fired electricity from serving Washington retail electric customers by the end of 2025, use a carbon-neutral supply of electricity by 2030, and source 100 percent of their electricity from renewable or non-carbon-emitting sources by 2045. Each electric investor-owned utility is required to file a Clean Energy Implementation Plan (CEIP) every four years describing the specific and interim targets to reach these goals, as well as specific actions which will be taken over for the four-year implementation period toward reaching these clean energy goals, while reducing energy and non-energy burdens for customers in Highly Impacted Communities and Vulnerable Populations, collectively referred to as Named Communities. Specifically, CETA requires all customers to equitably benefit from the transition to clean energy.¹

A Public Participation Plan outlines the Company's schedule, methods, and goals for public participation and education, both during the development of the CEIP and throughout its implementation.²

To ensure equitable outcomes, the Public Participation Plan is framed in the concepts of recognition justice and procedural justice. The insights from public participation strategies and partnering with the Equity Advisory Group (EAG), helped create Customer Benefit Indicator (CBI) metrics, which are intended to measure the equitable distribution of clean energy benefits and burdens to all customers.

Background

In compliance with WAC 480-100-655(2), Avista filed its first Public Participation Plan (2021 Plan) on April 30, 2021,³ and its 2023 Public Participation Plan (2023 Plan) on May 1, 2023.⁴ The 2021 Plan primarily focused on establishing the EAG, identifying customer inequities and Named Community populations, and establishing CBIs and calculating baseline metrics. The

¹ RCW 19.405.060(1)(c)(iii).

² WAC 480-100-655(2).

³ Docket UE-210295.

⁴ Docket UE-210628.

Avista's 2025 Public Participation Plan

2023 Plan outlined strategies to mitigate public participation barriers and implement meaningful engagement with all customers, especially those located in Named Communities. Since filing its previous plans, the Company has made strides in both maturing existing strategies and implementing new engagement strategies. Avista continues to seek input from its EAG, its other advisory groups, and third-party expertise by engaging Desautel Hege (DH),⁵ a local social impact agency, to support the implementation of its 2025 Plan and provide future strategy insights. DH prioritizes equity by focusing on fairness, justice, and access to opportunity for all. Their research and experience in leading social change initiatives have informed the 2025 Plan.

The primary function of the EAG is to review, consult, and advise Avista to ensure all customers are benefiting from the transition to clean energy. This includes the equitable distribution of energy and non-energy benefits, as well as the reduction of burdens and barriers in Named Communities. Additionally, the EAG provides guidance for the Company's public outreach strategies to ensure Avista customers have access to clean energy educational materials, public meetings, and information regarding participation in various Company programs. CBIs and corresponding metrics have been identified in collaboration with the EAG and several of Avista's advisory groups, including the Energy Assistance Advisory Group (EAAG) and Energy Efficiency Advisory Group (EEAG). These metrics ensure programs, policies, and resources utilized throughout the CEIP implementation period result in the equitable distribution of benefits and reduction of burdens across all customer segments.

The objective of the 2025 Plan is to ensure specific public engagement strategies are adopted and implemented for all customers, with specific emphasis for those in Named Communities, and those efforts result in increased awareness and participation in the Company's transition to cleaner energy. By engaging with the community through various methods, Avista aims to address participation barriers and make sure the benefits and burdens of clean energy are shared fairly among all customers.

⁵ <https://wearedh.com/equity/>

2025 Public Participation Partnerships

Partnering with Advisory Groups

In accordance with WAC 480-100-655(1), several advisory groups were consulted throughout the implementation of the 2021 CEIP, the 2023 Biennial CEIP Update, and are being consulted in the development of the 2025 CEIP. The advisory groups consulted include the Integrated Resource Plan's (IRP) Technical Advisory Group (TAC), EEAG, EAAG, and EAG. Advisory groups were consulted in the development of the 2025 Clean Energy Action Plan's interim and specific actions, identification of CBIs, public participation perspectives and recommendations, and consulted on the identification of Vulnerable Populations. Special emphasis was given to input by the external-facing EAG formed in accordance with WAC 480-100-655(1)(b).

Additionally, to promote transparency and engagement on topics related to the 2025 CEIP, Avista established a CEIP Advisory Group to gather input on specific components of the 2025 CEIP. In November 2024, an email invitation was extended to all Avista's existing advisory groups regarding the 2025 CEIP advisory Group. Monthly meetings with this group have and will occur from January through June 2025. Responses were received from a variety of existing advisory group members, creating an extensive and diverse knowledge base amongst participants in these CEIP conversations.

As shown in Table 1 below, Avista convenes regularly with its advisory groups, providing reasonable advance meeting notice and presentation materials in advance of each meeting.

Table No. 1: Avista's Advisory Groups

Advisory Group	Frequency
Energy Efficiency Advisory Group	Quarterly
Energy Assistance Advisory Group	Bi-Monthly
Equity Advisory Group	Monthly
IRP Technical Advisory Committee – Pre-IRP Development	As needed
IRP Technical Advisory Committee – IRP Development	Bi-Weekly, as needed
Distribution Planning Advisory Group	Quarterly
CEIP Public Participation Meetings	Quarterly, as needed
2025 CEIP Advisory Group (temporary)	Monthly (Jan-June 2025)

Avista's 2025 Public Participation Plan

Avista recognizes the valuable insights provided by these groups and actively seeks feedback on key aspects in the development of its CEIPs. In addition to general members of the public who may participate, the advisory groups also have representatives from the Washington Utilities and Transportation Commission (Commission), the Attorney General's Public Counsel Unit (Public Counsel), and other advocates who represent various customer groups and populations within the communities Avista serves. Recognizing individuals may serve on multiple advisory groups or have other external commitments, Avista intentionally combines meetings where possible.⁶ Avista also notifies advisory group members of Company and Commission public meetings related to the CEIP, allowing for broader public awareness and potential input. A full list of Avista's advisory groups and organizations represented among each is available on the Company's CETA webpage.⁷

Partnering with the Equity Advisory Group

In accordance with WAC 480-100-655(1)(b), the EAG reviews, consults, and advises Avista on equity issues including, but not limited to Vulnerable Population designation, CBI metric development, and recommendations for the equitable distribution of energy and non-energy benefits and reduction of burdens to Named Communities. This group is comprised of diverse individuals, including social and environmental justice advocates, public health advocates, members of local tribes, and customers who live in a Named Community or work for an agency supporting Named Communities. A full list of members and the organization or customer group they represent is provided in Attachment A.

The Company utilizes the International Association for Public Participation's (IAP2) Public Participation Spectrum⁸ in its EAG meetings to provide transparency and manage expectations related to meeting content and desired outcomes. Through this process, the Company is fostering an environment built on trust and credibility.

⁶ WAC 480-100-655(1)(d) - Engaging with advisory groups for the purposes of developing the CEIP does not relieve the utility of the obligation to continue to convene and engage these groups for their individual topical duties. This section does not supersede existing rules related to those groups.

⁷ www.myavista.com/ceta

⁸ <https://iap2.org.au/resources/spectrum/>

Avista's 2025 Public Participation Plan

The EAG also provides guidance for the Company's public outreach strategy to ensure Avista customers have access to CEIP-related educational materials, public meetings, and information on how to participate in Company programs. The EAG has also been instrumental in ensuring consistency in the application and integration of Named Communities and CBI metrics in the Company's Equitable Business Planning Framework.⁹ Additionally, the EAG has assisted the Company in developing a prioritization methodology for the Named Community Investment Fund grant awards and has provided valuable input pertaining to the Company's Multi-Language Strategy (MLS).

Proposed EAG Meetings & Topics

Avista hosts Equity Lens Sessions with its EAG on the third week of each month. The Company actively identifies meeting topics by seeking input from EAG members and discussing topics pertaining to equity in its CEIP activities and beyond. To achieve consistent and relevant input during EAG sessions, Avista's third-party EAG facilitator developed a standard set of questions, listed below, for EAG members to consider and reflect upon, no matter the topic at hand. This collaborative approach started in February 2025 and ensures that the discussions remain relevant and address the most pressing issues faced by the community.

- What clarifying questions or curiosities do you have about the presentation?
- What disparities, root factors, or inequities (historic and current) are related to this topic?
- How could Avista improve engagement strategies related to this topic, if at all?
- What new ways could help measure and track benefits and reduced burdens related to this topic?
- What steps, practices, or policies could help reduce future inequities related to this topic?

Table 2 below lists the proposed EAG Equity Lens Session topics throughout 2025.

Table No. 2: 2025 Proposed EAG Meeting Schedule¹⁰ & Topics

Meeting Dates	Proposed Agenda Topics
January 22 & 24, 2025	<ul style="list-style-type: none">▪ 2021 Clean Energy Implementation Plan Overview▪ 2025 EAG Schedule
February 26 & 28, 2025	<ul style="list-style-type: none">▪ Customer Payment Tools & Processes

⁹ Docket No. UE-220053 et. al. which can be found at <https://www.utc.wa.gov/casedocket/2022/220053/docsets>

¹⁰ EAG meetings are held the third week of each month on Wednesdays at noon and Fridays at 7:30 am.

Avista's 2025 Public Participation Plan

Meeting Dates	Proposed Agenda Topics
	▪ 2025 EAG Schedule Feedback
March 19 & 21, 2025	▪ 2025 Public Participation Plan Preview
April 23 & 25, 2025	▪ 2025 Clean Energy Implementation Plan Customer Benefit Indicators
May 21 & 23, 2025	▪ 2025 Clean Energy Implementation Plan Preview
June 18 & 20, 2025	▪ TBD
July 23 & 25, 2025	▪ TBD
August 20 & 22, 2025	▪ Multi-Language Access Update
September 17 & 19, 2025	▪ TBD
October 23 & 25, 2025	▪ 2025 Clean Energy Implementation Plan filing
November 19 & 21, 2025	▪ Named Communities Investment Fund (NCIF)
December 17 & 19, 2025	▪ TBD

Partnering with Public Engagement Consultants

While Avista makes concerted efforts to generate public interest and increase participation in various programs and public meetings, the Company also relies on third-party subject matter experts to assist and develop strategies for increased meaningful engagement. These engagement experts provide additional insight and recommendations for reaching members of the community and overcoming obstacles to participation. These recommendations, combined with knowledge gathered from the EAG, put Avista on a path for a mature public participation process, which helps to alleviate or overcome identified barriers or obstacles.

Public Participation Partners (P3):¹¹ In the 2023 Plan, Avista contracted with Public Participation Partners (P3), a woman-and-minority-owned company based in Georgia, to establish best practices for community engagement, with a focus on reaching customers in Avista's Named Communities. After surveying the Company's existing public engagement efforts, seeking input from the EAG, Named Community members, advocacy groups, and offering their own expertise, P3 provided strategies for Avista's 2023 Plan. P3 provided recommendations on outreach timing, methods, and language considerations to supplement Avista's existing customer outreach. Listed in Table 3 below, these best practice engagement strategies included actions to reduce language barriers, produce educational videos, and collect customer comments, among others.

¹¹<https://publicparticipationpartners.com/>

Table No. 3: The 2023 Plan's Public Engagement Strategies

▪ Quarterly Public Participation Meetings	▪ Quarterly CEIP Newsletter
▪ Enhance Technological Accessibility	▪ Educational Videos
▪ Multi-Language Strategy	▪ Frequently Asked Questions
▪ CEIP Public Comment Form	▪ Pre-Recorded Public Meetings
▪ Community Events	▪ Telephone Town Halls
▪ CETA Webpage	▪ CEIP Hotline

Since the inception of the 2023 Plan, Avista has matured in delivering several of the strategies above. For example, promoting the public participation meetings through social media has increased meeting attendance, establishing a formalized multi-language access strategy has addressed language barriers, and improvements to the Company's CEIP webpages were deployed in February 2025 to make it easier to find information about Avista's CETA efforts. An update on each strategy in Table 3 is provided in the *Public Participation Strategy* section below.

Desautel Hege (DH):¹² Building upon Avista's culture of continuous improvement, Avista sought out additional guidance to further enhance its public engagement and outreach strategies. In March 2024, the Company contracted with its long-term professional social impact agency partner Desautel Hege (DH) to support the creation and execution of Avista's 2025 Plan and mature existing engagement efforts. DH is a Spokane-based communications and creative strategy agency with an equity-centered approach that specializes in social change. The Company has partnered with DH for more than 25 years on projects related to messaging, branding, and the development of crisis communication plans in the event of natural disasters or prolonged outages. DH is viewed as a trusted community partner in Eastern Washington and across the state, with a focus on maintaining relationships with more than 230 regional community organizations and media outlets.

Through partnering with DH, the Company intends to mature and enhance previous recommendations to reach additional customers and/or communities through a united community engagement strategy. As described in Attachment B, DH conducted extensive research to develop a comprehensive list of recommendations, including strategy sessions with

¹² <https://wearedh.com/equity/>

Avista's 2025 Public Participation Plan

Avista, insight interviews with community leaders, an EAG member survey, landscape research amongst equity-centered community-based organizations and regional peer utilities, and a review of existing Avista outreach and communication materials. As illustrated in Table 4 below, DH's research and experience in leading social change initiatives have informed the 2025 Plan in the areas of community engagement and awareness, increasing participation in events, and improving the accessibility of information. They have also been instrumental in delivering on components of the 2023 Plan, including developing communication materials in multiple languages, creating short educational videos, and enhancing Avista's CETA webpage.

Table No. 4: The 2025 Plan's Public Engagement Strategies

▪ Maximize Impact of Existing Strategies	▪ Enhance Community Partnerships
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Named Community Identification

In preparation for Avista's 2021 CEIP, and in support of required Public Participation Plans, the Company, along with its various advisory groups (EAG, EEAG, EAAG), identified communities in its Washington electric service territory who may be disproportionately impacted by the transition to cleaner energy. This includes communities with adverse socioeconomic conditions, and those experiencing increased pollution and climate change impacts, among others. Through identifying and pursuing these populations, the Company aims to broaden accessibility and focus on the equitable distribution of clean energy benefits and burdens. Avista adopted two types of community groups, including Highly Impacted Communities as defined in WAC 480-100-605,¹³ and the Vulnerable Population designation was determined in partnership with the Company's advisory groups. Collectively, these groups are classified as Named Communities and defined as follows:

- A Highly Impacted Community, as defined by law, is designated by the Washington Department of Health (DOH). Their DOH Environmental Health Disparities Map (DOH Map) identifies five health disparity themes in terms of environmental exposures, environmental effects, socioeconomic factors, sensitive populations, and tribal areas, and ranks these themes on a score between 1 through 10 by census tract. The DOH also includes any areas fully or partially within "Indian country."

¹³ WAC 480-100-605 defines a Highly Impacted Community as "a community designated by the department of health based on the cumulative impact analysis required by 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."

- A Vulnerable Population, as defined by Avista in collaboration with its advisory groups, is a community experiencing disproportional environmental burdens or risk due to:
 - Adverse socioeconomic factors, including unemployment, high housing, and transportation costs relative to income, access to food and health care, and linguistic isolation; and/or
 - Health sensitivity factors, such as low birth weight and higher rates of hospitalization.
 - Avista and its advisory group identified Vulnerable Populations characteristics are provided in Attachment C.

Under the 2021 CEIP, the Company's EAG and other advisory groups helped Avista determine the Vulnerable Population designation using DOH's Socioeconomic Factors and Sensitive Population themes with a score of 9 or 10. Beyond inclusion of those indicators, additional collaboration with its EAG members resulted in the identification of incremental traits that could be considered in Avista's Vulnerable Population definition. These characteristics, which may or may not have been physically mapped, aided the development of the Company's 2021 CBIs, and were established in recognition of procedural equity. This Vulnerable Population methodology was conditionally approved,¹⁴ contingent upon the incorporation of additional conversations, to identify additional Vulnerable Population characteristics by Avista, its EAG, and EAAG.¹⁵

After that conditional approval, the Company continued Vulnerable Population discussions internally and with its advisory groups. In Avista's 2023 Biennial CEIP Update, the Company proposed to increase the Vulnerable Population designation by integrating data from the federal government's Justice40 Initiative's Climate and Economic Justice Screening Tool¹⁶ (CEJST) to highlight additional energy-related disparities within its service territory. Table 5 below provides a summary of discussions pertaining to Named Communities and Vulnerable Populations with advisory groups and members of the public:

¹⁴ Docket No. UE-210628.

¹⁵ In compliance with Order 02 in Docket-210628, Condition 39, Avista will provide an extensive narrative pertaining to the full process it undertook to determine Vulnerable Populations in its 2025 CEIP.

¹⁶ Avista recognizes the CEJST map is no longer operational yet also provides value in identifying additional populations to recognize under the CEIP and in the Company's equitable business planning requirements.

Table No. 5: Named Communities & Vulnerable Populations Discussions

Date	Topic	Audience	Outcome
January 2022	Named Communities	EAG, EAAG, EEAG	Identified greater Spokane, WA mappable locations of Peaceful Valley and the Northeast Spokane neighborhood
April 2023	Biennial CEIP Update	Public	
July 2023	Vulnerable Populations	EAAG	
April 2024	Vulnerable Populations	EAG (in person)	
October 2024	Vulnerable Populations	EAG, EEAG	Identified elderly populations, Takesa Village in Mead, WA, populations with high energy burden, populations with disabilities, citizenship status
November 2024	Vulnerable Populations	EAAG	Agreement with EAG members about the October 2024 Vulnerable Populations updates
March 2025	Named Communities	EAG, CEIP Advisory Group	

Avista held discussions with its EAG and the 2025 CEIP Advisory Group in March of 2025 regarding updating the DOH map version and incorporating the CEJST data for the 2025 CEIP. Avista is scheduled to discuss Vulnerable Population designation during its second quarter 2025 public participation meeting.

In its 2021 CEIP, the Company incorporated data from the Washington DOH map (version 1.0 released January 2019), resulting in approximately 105,867 customers or 44% of its Washington electric service territory designated as a Named Community.¹⁷ Based on 2024 metric calculations conducted in the first quarter of 2025, the Company has 245,564 Washington's residential electric customers. In its 2025 CEIP, the Company plans to incorporate Washington's updated DOH map (version 2.0 released January 2022) and the CEJST data (version 2.0 released December 2024). With those combined and updated data sets, it is estimated Avista's 2025 CEIP Named Community designation, which includes both

¹⁷ Based on metrics calculated in first quarter 2021 with a Washington electric residential customer count of 238,026.

Avista's 2025 Public Participation Plan

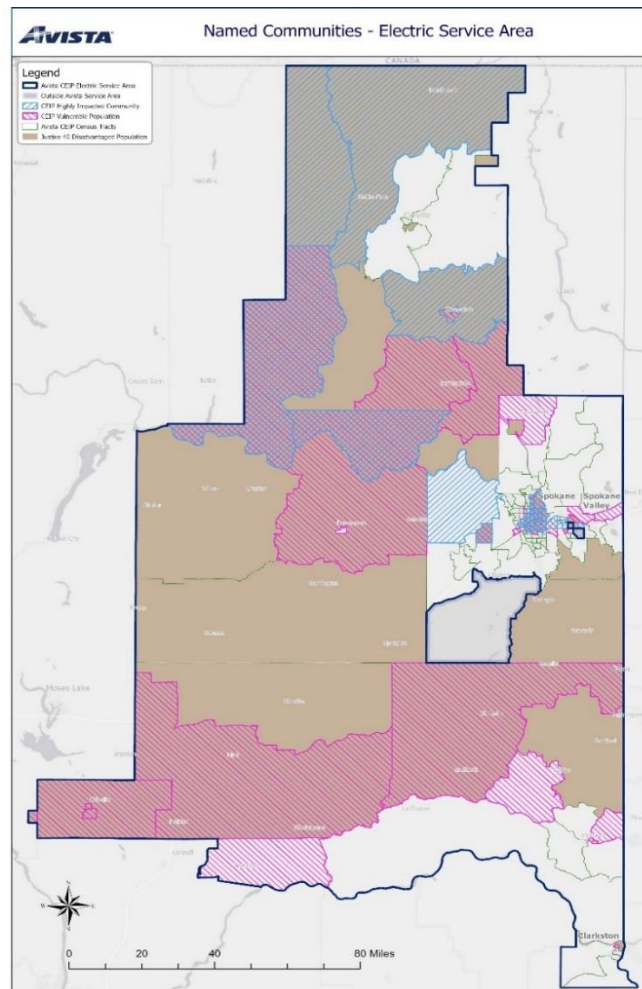
Highly Impacted Communities and Vulnerable Populations, will increase to 143,013 or 58% of its Washington residential service territory (see Table 6 below). Through a recognition justice lens, these maps provide insight into factors which may lead to disproportional outcomes and ensure CBI metrics are built upon an understanding of what is most important to Avista and its customers.

Table No. 6: Named Community Household Comparison

Source	Version	Community	2021 CEIP	2025 CEIP
WA DOH	2019	Highly Impacted	15,157	
	2019	Vulnerable	43,010	
	2019	Both Highly Impacted & Vulnerable	47,700	
WA DOH	2022	Highly Impacted		34,767
	2022	Vulnerable		49,977
	2022	Both Highly Impacted & Vulnerable		49,632
CEJST	2024	Vulnerable		8,637
Total Households			105,867	143,013

Figure 1 below represents Avista's Washington electric service area under the updated 2025 Named Community designations with DOH's Highly Impacted shaded in pink, Vulnerable Populations shaded in blue and CEJST populations shaded in brown, with some areas of the service territory overlapping in all three categories. See Attachment D for additional Named Community map information.

Figure No. 1: 2025 CEIP Named Community Designation



Customer Benefit Indicators

Avista's approach to energy equity and distributive justice is multifaceted. By including transparent and consistent CBIs, the Company provides a framework to measure progress and ensure accountability in areas such as affordability, accessibility, reliability, and environmental impacts. In accordance with WAC 480-100-610(4), the Company's CBIs encompass categories such as energy and non-energy benefits and burdens to Vulnerable Populations, public health, environment, energy security, and resiliency. Further, CBIs reflect characteristics identified by the EAG that represent Vulnerable Populations, as well as Highly Impacted Communities provided by the DOH. As the Company increases delivery of energy from clean resources, increases participation in energy efficiency programs, and implements demand response

Avista's 2025 Public Participation Plan

programs, these metrics help identify disparities among customer groups and evaluate progress towards equitable outcomes.

It's important to recognize transitioning to an equitable and clean energy future cannot be achieved through a single resource or program, nor can it be accomplished solely through CEIP targets and specific actions. Rather, planning for the desired equitable outcomes requires comprehensive, Company-wide commitment. Throughout 2023 and 2024, the Company held discussions regarding indicators and metrics in relation to 2025 IRP, 2025 CEIP planning, equitable business planning and the incorporation of Performance Based Regulatory (PBR) metrics. These meetings, as outlined in Table 7 below, were crucial for incorporating diverse perspectives in the development and application of equity metrics across diverse use cases.

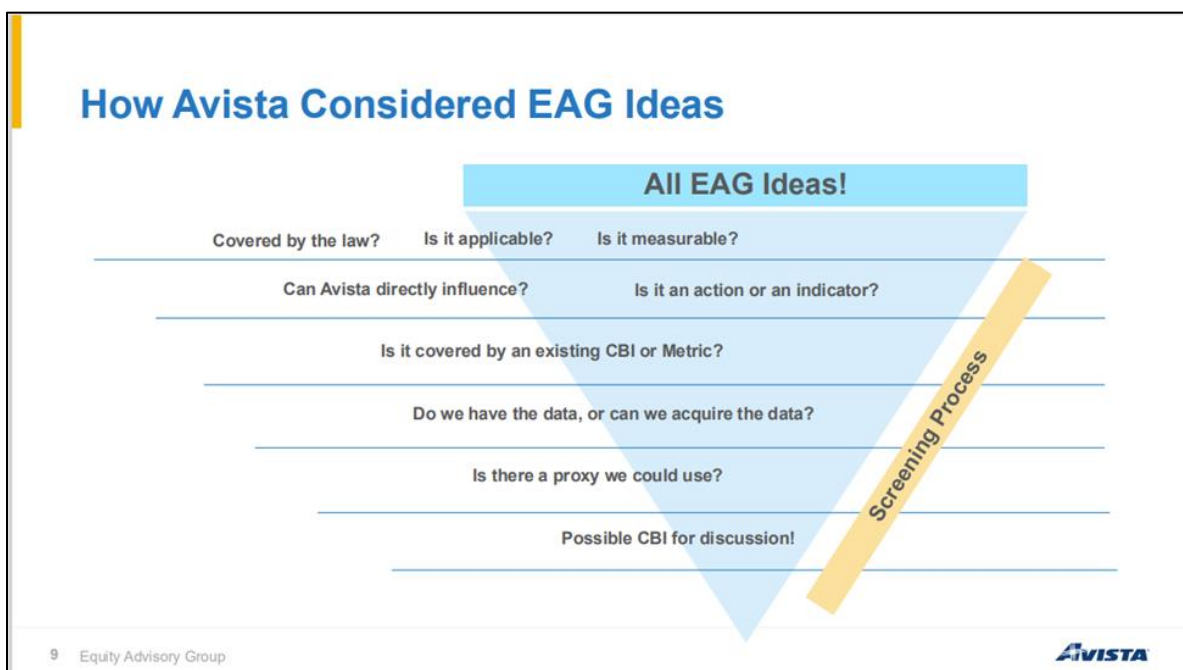
Table No. 7: Customer Benefit Indicator Discussions

Date	Topic	Audience
November 2023	Clean Energy Benefits/CBIs	EAG
June 2023	CBI and CEIP Condition Discussions	EAG, EAAG, EEAG, Public
January 2024	Energy Equity in Utility Operations (Equitable Business Planning)	EAG
February 2024	Determinants of Equity	EAAG
April 2024	CETA/CEIP Overview & 2025 CBI Discussion	EAG
May 2024	Continue 2025 CBIs & Resource Selection Metrics	EAG
June 2024	Continue 2025 CBIs & Resource Selection Metrics in Preparation for 205 IRP	EAG
July 2024	2025 CBI Summary	EAG
August 2024	Equitable Business Planning (Capital Planning)	EAG
October 2024	2025 CBI Summary	EEAG (in person)
November 2024	2025 CBI Summary	EAAG
April 2025	CBI & PBR Alignment	EAG, CEIP Advisory Group
May 2025	2025 CBIs & TBD	Public

The process began with the EAG in November 2023 with a refresher session on the principles of equity and a full-day, in-person EAG meeting in April 2024 where members identified inequalities and possible root causes. Throughout the second and third quarter of 2024, existing CBIs were evaluated, and potential new CBIs were discussed to address current needs and challenges. This exercise was instrumental in refining CBIs and integrating them into Avista's

planning and decision-making processes. In July 2024, a summary framework was shared with the EAG (see Figure 2 below), and subsequent advisory groups, regarding how identified inequities were considered and what questions the Company discussed in retaining an existing CBI metric or establishing a new CBI metric.

Figure No. 2: Inequity Identification to Possible CBI Metric Considerations



Although many discussions have occurred, additional discussions are planned with advisory groups and members of the public in preparation for the proposed 2025 CBIs under the 2025 CEIP. The existing 2021 CBIs under the 2021 CEIP are provided in Table 8 below.

Table No. 8: Avista's 2021 CEIP Customer Benefit Indicators¹⁸

Equity Area	Customer Benefit Indicator
Affordability	<ul style="list-style-type: none"> Participation in Company Programs Number of Households with a High Energy Burden
Accessibility	<ul style="list-style-type: none"> Availability of Methods/Modes of Outreach and Communication Transportation Electrification Named Community Clean Energy Investments in Named Communities

¹⁸ Proposed 2025 CBIs will be detailed in the Company's 2025 CEIP that will be filed with the Commission no later than October 1, 2025.

Avista's 2025 Public Participation Plan

Equity Area	Customer Benefit Indicator
Energy Resiliency	▪ Energy Availability
Energy Security	▪ Energy Generational Location ▪ Residential Arrearages and Disconnections for Nonpayment
Environmental	▪ Outdoor Air Quality ▪ Greenhouse Gas Emissions
Public Health	▪ Employee Diversity ▪ Supplier Diversity ▪ Indoor Air Quality

Public Participation Strategies

As previously discussed, the Company has sought to mature and expand its existing public participation strategies. Several of the strategies discussed in this section build upon the elements of the 2021 and 2023 Plans, are informed by the Company's partnerships with P3 and DH, and incorporate recommendations from the EAG, EEAG, EAAG, and CEIP advisory group members. These strategies were also informed by internal Company experts, including the Energy Efficiency team's experience with increasing public awareness and participation in energy efficiency programs, the Social Impact team's efforts with creating Community Benefit Plans (for federal grant applications), Energy Assistance efforts, and Avista's Corporate Communication team's expertise, amongst other Avista contributors. For the 2025 Plan, Avista will focus on the public participation strategies as outlined below.

Maximize the Impact of Existing Strategies

Several of the planned 2025-2027 engagement efforts build upon the success of the 2023 Plan. Avista will leverage and mature those current engagement approaches that have proven effective to maximize the impact of existing efforts. This approach not only builds on established successes but also ensures efficient use of resources, driving a greater overall impact. Additionally, DH provided a comprehensive review process of Avista's existing engagement strategies. Insights from their discovery phase determined Avista's 2023 Plan,

“Continuing the efforts underway creates a consistent experience for the communities Avista has already connected with and allows for further refinement of tactics to increase reach and efficacy. Continuing to focus on increasing language access and improving the CETA webpage, along with

Avista's 2025 Public Participation Plan

developing educational videos, will enhance connection and information sharing with Named Communities in meaningful and sustainable ways.”¹⁹

Table 9 reflects barriers and 2023 strategies that Avista will mature as discussed in more detail below. Barriers identified in the 2023 Plan as provided by P3 and Avista's EAG include language, economic, cultural, and other factors. These strategies aim to improve the effectiveness and availability of outreach methods

Table No. 9: Maturing 2023 Plan's Strategies

Strategy	Barrier to Overcome	2021 CBI
Multi-Language Strategy	Language	Methods/ Modes of Outreach
Monthly EAG Meetings	Economic	Methods/ Modes of Outreach
CEIP Customer Survey	Other factors	Methods/ Modes of Outreach
Educational Videos	Economic and other factors	Methods/ Modes of Outreach
Quarterly Meetings & Newsletter	Other factors	Methods/ Modes of Outreach
Community Events	Cultural and other factors	Investments in Named Communities Methods/ Modes of Outreach
CEIP Webpage	Other factors	Methods/ Modes of Outreach

Multi-Language Strategy

As reported in the Company's 2023 Plan, approximately 2.1% of Avista's Washington customers prefer a language other than English as their primary language (i.e., 97.9% prefer English). The second most preferred language aside from English is Spanish, with one percent of Washington customers preferring Spanish as their primary language. Additional preferred languages include Russian, Ukrainian, Arabic, Mandarin Chinese, and Marshallese.

To address this, the Company established an internal MLS team in August 2023 to examine the multi-language needs of its customers with the goal of providing actionable recommendations for implementation, as well as improving various communication channels to enhance customer experience. In October 2024, Avista presented and sought feedback from its EAG regarding the MLS strategy, including research, Washington service territory language

¹⁹ See Attachment B, DH's Community engagement plan for CETA and beyond.

demographics, completed projects, and a framework for prioritizing future language-access projects.

Avista's first project included providing Spanish translation on its website in April 2024 and was followed by Spanish translation of the Company's Public Safety Power Shutoff (PSPS) outage map in June 2024. Avista's payment kiosk, located in Avista's Spokane campus lobby, received an iPad with the Spanish translation feature. Additionally, Avista has improved its consistency in providing certain communications in Spanish, including energy assistance, energy efficiency, clean energy, electric and natural gas safety, and wildfire resiliency. Finally, the Company presently employs four Customer Service Representatives (CRS) to support Spanish-speaking customers through Avista's Customer Contact Center. The Company also utilizes a third-party translation vendor, Language Line Solutions, to provide translation services for more than 200 language options to support additional language needs for its customers.

EAG members were supportive of Avista's MLS approach to reducing language access barriers. The Company is committed to engaging with its EAG on MLS updates and working collaboratively to prioritize future projects.

Future Multi-Language Strategy Activities

The Company is committed to reaching customers using their preferred language and enhancing support for multilingual customers throughout all its customer-facing channels. Avista will continue to review and prioritize adding additional language translation on the Company's website, in printed collateral, on the mobile app, and with the Interactive Voice Response (IVR) system available through Avista's Contact Center.

The Company is also exploring options to obtain a customer's preferred language choice (beyond collection through a CSR) as several potential language access projects are dependent on the availability of a customer's preferred language, including but not limited to, letters, notices, text, and chat communication.

Avista is committed to collaborating with its advisory groups in relation to ongoing and current MLS projects, identifying needs for future projects and developing a prioritization

methodology for project implementation. This process helps inform Avista's MLS strategy, which ultimately enables multilingual customers access to essential energy information and Company programs.

Quarterly Public Participation Meetings

Avista's Quarterly Public Participation Meetings are a cornerstone of Avista's CEIP public engagement strategy. These meetings provide a platform for community members, including representatives and customers from Named Communities, to voice their concerns and offer feedback on Avista's clean energy initiatives. Topics including interim and specific targets, updates on clean energy projects, CBIs, and equity considerations are discussed. Table 10 below provides the meeting dates and agenda topics for each of Avista's public meetings throughout 2023 and 2024.

Table No. 10: Avista's 2023 & 2024 Public Participation Meetings

Date	Topic
April 11, 2023	2021 Clean Energy Implementation Plan Overview
June 27, 2023	Electric supply and CBI Update
September 14, 2023	CEIP Biennial Update
December 12, 2023	Investing in Our Communities
March 26, 2024	Energy Resiliency
May 14, 2024	Integrated Resource Planning
August 14, 2024	Participate in Washington's Clean Energy Future
November 13, 2024	2025 Electric Integrated Resource Plan

Avista promotes these meetings through various channels, including the quarterly email newsletter, email notification (English and Spanish), its website (English and Spanish), social media, and community outreach materials with quick response (QR) codes (English and Spanish), to promote awareness and encourage participation. To enhance accessibility during these virtual meetings, Avista leverages the auto-captioning feature in Zoom, providing real-time caption translation in multiple languages. This ensures that all community members, especially those whose primary language is not English, can participate. In addition, the Company has utilized the Zoom polling feature during the meetings to increase real-time feedback from customers and will continue to gauge awareness and interest in meeting content.

Avista's 2025 Public Participation Plan

Building upon the success of these meetings in the previous Public Participation Plans, Avista will strive to maintain a consistent schedule and increase promotion. Participants are encouraged to ask questions and provide input, ensuring the Company's plans remain transparent, inclusive, and responsive to community needs. Presentation materials and meeting recordings are available on Avista's CETA webpage, under the Public Participation Meetings subpage.²⁰ Dates for Avista's 2025 public participation meetings are outlined in Table 11 below, 2026 meetings and topics are yet to be developed. However, once identified, they will be posted to Avista's CETA webpage on the Public Participation Meeting subpage.

Table No. 11: Avista's 2025 Proposed Public Participation Meetings²¹

Dates	Agenda
March 26, 2025	Energy Efficiency
May 28, 2025	Customer Benefit Indicators & Public Participation
August 13, 2025	TBD
November 13, 2025	TBD

Quarterly CEIP Newsletter

To keep the community informed and engaged in its CEIP, Avista introduced a quarterly CEIP email newsletter in June 2024. This newsletter provides updates on public participation meetings, EAG meetings, and the community impacts made through Avista's NCIF. This initiative helps customers stay informed about key developments and encourages active participation in the transition to a cleaner energy future. Customers can sign up for the newsletter through Avista's CEIP webpage,²² and enrollment is shared and encouraged during quarterly public participation meeting and monthly EAG Equity Lens Sessions. Additionally, the Company is exploring options for providing the CEIP newsletter in Spanish.

CEIP Public Comment Form

Avista developed its CEIP Public Comment Form to provide a channel for collecting comments and feedback to ensure all customers and interested parties have an opportunity to participate in the decision-making process. The form is located on the Company's CETA webpage, allowing community members to voice their thoughts, ask questions, and provide

²⁰ <https://www.myavista.com/about-us/washingtons-clean-energy-future/public-participation-meetings>

²¹ Quarterly public participation meetings are planned for 7:30 am and noon

²² <https://www.myavista.com/about-us/washingtons-clean-energy-future/clean-energy-implementation-plan>

feedback on Avista's clean energy activities. By collecting diverse perspectives, Avista aims to refine its strategies and better address the needs and concerns of its customers. The Company's CEIP Public Comment Form is promoted during EAG Equity Lens sessions and public participation meetings.

Frequently Asked Questions

In support of providing educational materials pertaining to clean energy, Avista developed a Frequently Asked Questions (FAQ) document for its CETA webpage. The FAQ addresses common questions and concerns related to the CEIP, including the goals of CETA, types of clean energy resources, reliability and what provisions exist to ensure equitable access to clean energy. This resource also helps to streamline communication, allowing community members to find answers quickly and easily. The document was posted in March 2025 in conjunction with the redesigned CETA webpages and is available in English and Spanish. In addition to the traditional FAQ, Avista developed a one-page fact sheet that covers important information related to CETA, Avista's CEIP, the NCIF, and other opportunities for engagement. This document is available in English and Spanish on Avista's CETA website and has been distributed at community events. It is available in Attachment E.

CEIP Customer Survey

In the summer of 2022, Avista launched its first CEIP customer survey. In April of 2024, the Company launched its second survey with the intent of gauging customer awareness and sentiment regarding clean energy. The survey will be offered biennially in alignment with the Public Participation Plan and the Biennial CEIP Update, with the next survey planned for 2026. In general, both surveys included questions regarding affordability, reliability, environmental impacts, potential burdens, and potential benefits of clean energy.

In the first survey, the Company asked 23 energy-related questions and 11 optional demographic questions in an English-only online format, resulting in a 1.7% response rate. To center the survey's focus and make it easier to complete, Avista reduced the questions from its original survey to 7 meaningful energy-related questions and 13 optional demographic questions. The Company offered the survey online (English & Spanish) and in paper format (Spanish, Russian, Ukrainian, Arabic and Marshallese), resulting in a 1.2% response rate. The

survey was promoted through emails to Avista's Washington electric customers, at community events, through printed materials shared with CBOs and at the customer service desk in Avista's lobby. Under both surveys, the voluntary demographic information shared by customers reflected that the primary responder population represented an English-speaking heterosexual white male homeowner, age 66 or older, with a college degree.

In terms of customer sentiment, comparing results between the two surveys is difficult as the question quantity and content is quite diverse. However, under the second survey, the majority of responders state affordability to be the most important consideration for clean energy, while reducing climate impacts and enabling new technologies are the two primary benefits, and increased costs represent the greatest burden to clean energy efforts. A detailed summary of Avista's 2024 CEIP survey results are provided in Attachment F.

In future surveys, the Company intends to keep the question content and quantity consistent to measure changes and/or trends in response rate, customer sentiment, and customer demographics. In addition, the Company will continue the use of QR codes on printed material for ease of mobile access to the online survey. The Company will continue to offer a paper and online version of the survey in multiple languages and take steps to increase awareness, availability, and accessibility through community partnerships to increase response rates and diversify customer demographics. In addition to gaining customer insight, these survey results may help Avista prioritize actions to address areas of concern or support continuing with existing Company actions.

CETA Webpage

Avista made significant efforts to enhance its CEIP webpage to better serve its customers and interested parties. After collaborative planning with DH, the Company launched the re-designed CETA webpages in February 2025, with a user-friendly interface, updated content, and streamlined navigation. The new design features a central landing page that connects to four new pages related to CETA, including public meetings, the EAG, the NCIF, and the CEIP. Under the Learn More section on the central landing page, Avista centralized the content for the quarterly newsletter, the public comment form, the CETA FAQ, and links to upcoming public participation and EAG meetings. These enhancements are designed to provide

transparent, accessible, and comprehensive information about Avista's clean energy activities, ensuring that all community members can stay informed and involved. Additionally, Avista's CETA webpage provides essential information about the Company's progress towards clean energy goals, CEIP and Biennial CEIP Update documents, as well as public and EAG meeting links and materials. Avista will continue to update the CETA webpages to provide current documents and meeting materials in an accessible and intuitive format.

Enhance Technological Accessibility

As described in Avista's 2023 Plan, a lack of internet availability and access to technology are identified as potential barriers to customer participation. Avista hosts its virtual public meetings on the Zoom platform, providing online meeting links and a dial-in phone option. For customers who are hearing impaired or need translation services, an auto-captioning feature enables real-time captioning translation. Virtual public meeting details are available on the CEIP webpage at least three business days prior to any public meetings.

Additionally, the Company provides iPads in its lobby to support customer access to their online Avista accounts, pay their bill, or complete additional Avista transactions. Moreover, the iPad technology has the capability of Spanish translations.

For those who may lack access to technology, and to reach customers where they are, the Company attends public events throughout its Washington service territory to promote clean energy efforts and, where possible, provide educational materials in English and Spanish regarding energy efficiency programs and energy assistance options. Additional information is provided in the *Community Events* section below.

Educational Videos

Avista is committed to educating the public about Washington's clean energy future through a series of educational videos. As the Company continues to strive towards fostering trust and collaboration with customers, these videos will aid awareness and support that effort. Avista is working with DH to produce a video series designed to educate and engage the public about CETA, clean energy goals and its benefits, and how to participate in Company programs. Although these videos will be recorded in English, caption translation will be available in Spanish, Russian, Ukrainian, Arabic and Marshallese. These videos are designed to

accommodate a variety of promotional and educational needs, and will be available on the Company's webpage, social media platforms, and other channels. The Company's first video highlights the benefits of the My Energy Discount program and is anticipated to be released in the second quarter of 2025. Avista is committed to producing its second educational video within the 2025-2027 public participation period.

Social Media and Strategic Communications

Beginning in the spring of 2024, Avista published 12 social media stories related to CETA that garnered approximately 200,000 impressions. This success was bolstered by Avista's implementation of a paid social media strategy for story promotion, resulting in CETA-related paid posts achieving an average of 42.82% more impressions compared to non-paid posts. Additionally, Avista featured six stories in local news outlets, including multiple rural papers, posted 14 articles on its website, and included three features in direct customer emails. Stories were also shared in newsletters published by local nonprofits that partner with Avista.

Avista intends to continue using social media and other communication channels to promote public meeting awareness, NCIF stories, and educational content. All NCIF participant stories, which include customer sentiment, can be found at <https://www.myavista.com/ncif> and on Avista's blog at [myavista.com/connect](https://www.myavista.com/connect).

Community Events

Avista leverages community partnerships through attending community events to support the goals of its CEIP by engaging with local organizations and meeting customers where they engage in the community. These partnerships help Avista understand community needs and priorities, ensuring that clean energy initiatives are inclusive and beneficial to all. Additionally, attending community events allows Avista to educate the public about clean energy programs, foster trust, and build stronger relationships.

Members of Avista's Social Impact and Energy Efficiency departments partnered to leverage outreach opportunities in Washington State. Throughout 2024, the team engaged in approximately 113 events, with the opportunity to reach more than 13,500 community members, including low-income and senior populations. These engagement events included:

- Educational booths at resource fairs and community events.
- Engagement with CBOs and community partners.
- Energy efficiency presentations to increase program awareness.
- Promotional giveaways and printed materials at various CBOs.

Avista strives to attend community events in each of the Washington counties it serves, including urban and rural locations in Spokane, Grant, Franklin, Whitman, Adams, Ferry, Lincoln, Pend Oreille, and Stevens counties. By participating in local events, Avista intends to engage directly with community members, gather valuable feedback, provide information about its clean energy initiatives, and help build strong relationships to ensure community needs are addressed.

It also demonstrates how Avista's existing actions complement those recommendations provided by both P3 and DH. Avista will continue participating in local events, engaging directly with community members, gathering valuable feedback, and providing information about its clean energy activities. Findings from these events will be documented and shared in order to foster cross-departmental understanding, and further Avista's recognition and procedural justice efforts – building additional awareness of circumstances and characteristics within and across Named Communities.

Future engagement activities under consideration include providing materials and attendance at community fairs, food bank donation drives, local markets, and career fairs, amongst others. Avista will use its Named Community map and EAG identified Vulnerable Population characteristics to identify additional public events the Company may attend in an effort to reach Named Communities.

Implementing New Strategies

In addition to maturing the 2023 Plan's engagement strategies, Avista is dedicated to expanding its reach through new community partnerships and outreach techniques. In collaboration with DH and the EAG, the strategy outlined aims to build trust, centralize community expertise and wisdom, and encourage communities to engage with Avista. The Company recognizes that additional customers could benefit from the clean energy transition and targeted support from community experts may help to bridge that gap. Often these community experts are the first point of contact with Avista's customers and may serve as a

liaison between the Company and the community. To reach more customers, developing and enhancing relationships with CBOs is crucial for identifying needs and inviting diverse perspectives into the decision-making process.

Community Partnerships Program

To build authentic community partnerships, Avista in collaboration with DH, will research and develop a comprehensive community partnership program with the intent to engage trusted message carriers within Named Communities. It's anticipated these community partners will serve as trusted message carriers, as they possess a deep knowledge of the community through established relationships. Their partnership with Avista will lead customers, specifically in Named Communities, to further engage with Avista. The more communities consistently view Avista as an authentic and equal partner committed to their well-being, the higher the levels of customer engagement, participation, and satisfaction with Avista's energy offerings and programs. During this partnership exploration phase, DH will conduct a landscape review which may include, but is not limited to:

- Identify peer utility offerings with similar partnerships or programs.
- Assess community partners, including their level of readiness and capacity to engage.
- Determine the community organizations' existing perception of Avista.
- Identify intersections, priorities, barriers, and opportunities within Named Communities.

DH will engage with the EAG in the development of this potential program and seek input on strategies and priorities during their regularly scheduled equity lens sessions, with thoughtful intent for a community-informed plan and equitable outcomes. Avista will work with DH to refine details of the Community Partnership Program and develop an implementation plan. Avista also assesses whether internal resources can be leveraged, or if additional resources are needed, to execute the plan.

Strategies Under Consideration

While the Company made significant strides toward implementing a majority of strategies under the 2023 Plan, not all were implemented. This section outlines three strategies included in the 2023 Plan that have yet to be implemented.

Pre-Recorded Public Presentations

Avista is considering using pre-recorded public presentations as part of its CEIP to enhance public education and participation in virtual public education. The Company anticipates these pre-recorded messages would provide additional context as well as offer an accessible way for community members to stay informed at their convenience. These presentations would be accessible through Avista's CETA webpage, if available.

Telephone Town Halls

While the concept of a telephone town hall meeting was discussed as part of the 2023 Plan, Avista decided not to execute this engagement strategy. Telephone town halls are virtual meetings over the phone that can engage thousands of people simultaneously and simulate an in-person town hall. Although Avista has experienced some success with this strategy in regard to wildfire resiliency efforts, this format lacks visual media, has limited engagement capabilities due to loss of as non-verbal cues, and are typically suited for addressing a single topic. Based on the complexity of the CEIP, virtual meetings and/or in-person meetings are preferred when addressing multiple topics.

CEIP Hotline

The logistical challenges and costs associated with establishing and maintaining a specialized hotline resulted in the decision to remove this as a CEIP engagement strategy. Avista found that leveraging existing digital platforms, such as its website, social media, email newsletters, and virtual public meetings, along with in-person community events, is an efficient way to reach a broad audience. These channels provide timely updates, detailed information, and opportunities for community engagement without the need for a dedicated hotline.

Public Engagement Milestones

The following timeline reflects the key components for public engagement efforts throughout 2025 and 2026 and allows time to review and incorporate feedback from public engagement efforts into the Company's 2025 CEIP and 2027 Biennial CEIP Update. It will also be necessary to conduct additional outreach throughout 2025 and 2026, including advisory group meetings, distribution of communication materials, and additional community outreach in order to engage with the diverse populations served by the Company. The engagement efforts represented in Figures 3 and 4 are not intended to provide an exhaustive list, but rather an

Avista's 2025 Public Participation Plan

overview of the Company's proposed engagement activities quarterly during the 2025 Plan's implementation period.

Figure No. 3: Avista's Proposed 2025 Engagement Timeline



Figure No. 4: Avista's Proposed 2026 Engagement Timeline



Public Comments

Comments and feedback from advisory group members and the public about the 2025 Plan and the development of the 2025 CEIP are welcome at any time during the implementation period. Comments can be provided electronically by utilizing the CEIP comment form at www.myavista.com/ceta, by sending an email to ceta@avistacorp.com, or by contacting the

Avista's 2025 Public Participation Plan

Company at 1-800-227-9187 and asking to speak to someone about the CEIP. Key dates for CEIP public participation meetings and customer comment review dates are outlined in Table 12 below. Throughout 2025 and 2026, Avista anticipates additional CEIP-related community engagement efforts and communications that are not listed in Table 12 or in this 2025 Plan.

Table No. 12: 2025 Tentative Public Participation Opportunities

Date	Topic
March 26, 2025	Quarterly Public Participation Meeting: Residential & Commercial Energy Efficiency Programs
April 1, 2025	Draft 2025 Public Participation Plan available for advisory group review
May 1, 2025	File 2025 Public Participation Plan
May 28, 2025	Quarterly Public Participation Meeting: 2025 CEIP Customer Benefit Indicators & Public Participation Plan
August 13, 2025	Quarterly Public Participation Meeting: Preview Avista's 2025 Clean Energy Implementation Plan
September 1, 2025	Draft 2025 Clean Energy Implementation Plan available for public comment
October 1, 2025	File 2025 Clean Energy Implementation Plan
November 13, 2025	Quarterly Public Participation Meeting: Topic TBD

A list of previously held meetings and future scheduled meetings, including meeting summaries, materials, and comments received along with the Company's responses, can be found on the Company's CETA webpage. Per WAC 480-100-655(2)(g)(iv) final drafts of the 2025 CEIP and 2027 CEIP Biennial Updates will be posted to Avista's CETA webpage.

In compliance with WAC 480-100-655 (1)(c), Avista will continue to notify advisory group members of the upcoming Company and Commission public meetings scheduled to address its 2025 CEIP and 2027 CEIP Biennial Updates.

In accordance with WAC 480-100-655 (1)(f), advisory group members may comment on the Company's CEIP filings with the Commission.

Avista's 2025 Public Participation Plan

Pursuant to WAC 480-100-655(3), Avista will provide its Washington electric customers with a written notice within 30 days of filing its CEIP with the Commission.

The Company provided its draft 2025 Plan to its advisory groups April 1, 2025. The comments received along with Avista's responses are provided in Appendix B.

Closing

Avista remains committed to pursuing and maturing inclusive and equitable customer outreach strategies in the effort to increase awareness and participation. The company is eager to engage customers in innovative and effective ways, ensuring every customer's voice is heard throughout the transition to a cleaner future. Through collaborative efforts with Avista's EAG and other advisory groups, partnerships with DH, and ongoing customer outreach, the Company will continue to mature its engagement strategies. The development and implementation of Avista's 2025 Plan, along with the Company's 2025 CEIP, is an iterative process, with comments continuously utilized to improve these processes and outreach efforts.

Appendix A - Washington Regulatory Requirements

Appendix A details each Washington Administrative Code (WAC) regarding the Public Participation Plan as required by the Clean Energy Transformation Act (CETA). Additionally, Avista discusses where each requirement is covered in the Public Participation Plan document.

Public Participation Plan Filing Requirements

WAC Rule	Requirement	PPP Discussion
WAC 480-100-655 (1)	Advisory groups. The utility must demonstrate and document how it considered input from advisory group members in the development of its CEIP and biennial CEIP update. Examples of how the utility may incorporate advisory group input include: Using modeling scenarios, sensitivities, and assumptions advisory group members proposed and using data and information supplied by advisory group members as inputs to plan development. As part of this process and consistent with (i) of this subsection, the utility must communicate to advisory group members about whether and how the utility used their input in its analysis and decision-making, including explanations for why the utility did not use an advisory group member's input.	Not applicable to the Public Participation Plan, this will be included in Avista's 2025 CEIP, due October 1, 2025.
WAC 480-100-655 (1)(a)	The utility must involve all advisory groups in the development of its CEIP and its biennial CEIP update, including the equity advisory group identified in (b) of this subsection.	See the Partnering with Advisory Groups section.

Avista's 2025 Public Participation Plan

WAC Rule	Requirement	PPP Discussion
WAC 480-100-655 (1)(b)	The utility must maintain and regularly engage an external equity advisory group to advise the utility on equity issues including, but not limited to, vulnerable population designation, equity customer benefit indicator development, data support and development, and recommended approaches for the utility's compliance with WAC 480-100-610 (4)(c)(i). The utility must encourage and include the participation of environmental justice and public health advocates, tribes, and representatives from highly impacted communities and vulnerable populations in addition to other relevant groups.	See the Partnering with the Equity Advisory Group section, the Customer Benefit Indicators section, and the Named Community Identification section.
WAC 480-100-655 (1)(c)	The utility must convene advisory groups, with reasonable advance notice, at regular meetings open to the public during the planning process. A utility must notify advisory groups of company and commission public meetings scheduled to address its CEIP and biennial CEIP update.	See the Partnering with Advisory Groups and Public Comments sections.
WAC 480-100-655 (1)(d)	Engaging with advisory groups for the purposes of developing the CEIP does not relieve the utility of the obligation to continue to convene and engage these groups for their individual topical duties. This section does not supersede existing rules related to those groups.	See the Partnering with the Equity Advisory Group section.
WAC 480-100-655 (1)(e)	Nothing in this section limits the utility from convening and engaging public advisory groups on other topics.	The Company does not limit itself from convening and engaging public advisory groups on other topics.
WAC 480-100-655 (1)(f)	Participation in an advisory group does not restrict groups and individuals from commenting on CEIP filings before the commission.	See the Public Comments section.

Avista's 2025 Public Participation Plan

WAC Rule	Requirement	PPP Discussion
WAC 480-100-655 (1)(g)	The utility must make available completed presentation materials for each advisory group meeting at least three business days prior to the meeting. The utility may update materials as needed.	See the Public Participation Strategies section, Enhance Technological Accessibility subsection.
WAC 480-100-655 (1)(h)	The utility must make all its data inputs and files used to develop its CEIP available to the commission in native file format and in an easily accessible format. The utility may make confidential information available by providing it to the commission pursuant to WAC 480-07-160 . The utility should minimize its designation of information in the CEIP as confidential. Nonconfidential contents of the CEIP, biennial update, and supporting documentation as well as nonconfidential data inputs and files must be available for advisory group review in an easily accessible format upon request. Nothing in this subsection limits the protection of records containing commercial information under RCW 80.04.095 .	Not applicable to the Public Participation Plan, this will be included in Avista's 2025 CEIP due October 1, 2025.

Avista's 2025 Public Participation Plan

WAC Rule	Requirement	PPP Discussion
WAC 480-100-655 (1)(i)	As part of the filing of its CEIP and biennial update with the commission, the utility must provide a summary of advisory group comments received during the development of its CEIP and biennial update and the utility's responses, including whether issues raised in the comments were addressed and incorporated into the final CEIP as well as documentation of the reasons for rejecting public input. The utility must include the summary as an appendix to the final CEIP. Comments with similar content or input may be consolidated with a single utility response.	Not applicable to the Public Participation Plan, this will be included in Avista's 2025 CEIP due October 1, 2025.
WAC 480-100-655 (2)	Participation plan and education. The utility must involve advisory groups in developing the timing and extent of meaningful and inclusive public participation throughout the development and duration of the CEIP, including outreach and education serving vulnerable populations and highly impacted communities. On or before May 1st of each odd-numbered year, the utility must file with the commission a plan that outlines its schedule, methods, and goals for public participation and education both during the development of its CEIP and throughout the implementation of the plan. The utility must include the following in its participation plan:	The Public Participation Plan in its entirety provides content around how Avista will be effectively engaging its customers throughout the CEIP implementation period.

Avista's 2025 Public Participation Plan

WAC Rule	Requirement	PPP Discussion
WAC 480-100-655 (2)(a)	<p>Timing, methods, and language considerations for seeking and considering input from:</p> <p>(i) Vulnerable populations and highly impacted communities for the creation of or updates to customer benefit indicators and weighting factors for the utility's compliance with WAC 480-100-610 (4)(c)(i); and</p> <p>(ii) All customers, including vulnerable populations and highly impacted communities, for the creation of, or updates to, customer benefit indicators and weighting factors for the utility's compliance with WAC 480-100-610 (4)(c)(ii) and (iii).</p>	<p>See the Public Participation Strategies, Public Engagement Milestones, and Public Comments sections.</p> <p>(i) See the Named Community Identification section.</p> <p>(ii) See the Customer Benefit Indicators section.</p>
WAC 480-100-655 (2)(b)	Identification of barriers to public participation including, but not limited to, language, cultural, economic, or other factors, and strategies for reducing barriers to public participation.	See the Public Participation Strategies section.
WAC 480-100-655 (2)(c)	Plans to provide information and data in broadly understood terms through meaningful participant education.	See the Public Participation Strategies section, the Quarterly Public Participation Meetings section, the CETA Webpage section, and the Partnering with the Equity Advisory Group section
WAC 480-100-655 (2)(d)	A proposed schedule of public meetings or engagement, including advisory group meetings.	See Quarterly Public Participation Meetings , Partnering with the Equity Advisory Group , Public Comments sections, and Table No. 11: Avista's 2025 Proposed Public Participation Meetings in the Quarterly Public Participation Meetings section.
WAC 480-100-655 (2)(e)	A proposed list of significant topics that will be discussed.	See Table No. 11: Avista's 2025 Proposed Public Participation Meetings in the Quarterly Public Participation Meetings section.

Avista's 2025 Public Participation Plan

WAC Rule	Requirement	PPP Discussion
WAC 480-100-655 (2)(f)	The date the utility will file the final CEIP with the commission	Not applicable to the Public Participation Plan, this will be included in Avista's 2025 CEIP, to be filed and due no later than October 1, 2025.
WAC 480-100-655 (2)(g)	<p>A link to a website accessible to the public and managed by the utility, to which the utility posts and makes publicly available the following information:</p> <ul style="list-style-type: none">(i) Meeting summaries and materials for all relevant meetings, including materials for future meetings;(ii) A current schedule of advisory group meetings and significant topics to be covered;(iii) Information on how the public may participate in CEIP development; and(iv) Final plans and biennial CEIP updates posted within 30 days of final commission action.	See the CETA Webpage section

Avista's 2025 Public Participation Plan

Appendix B – CEIP Public Participation Plan Comments

The Avista Clean Energy Implementation Plan (CEIP) Public Participation Plan (PPP) aims to ensure that community members have a voice in shaping Avista's clean energy future. The plan includes various strategies to engage the public, gather feedback, and incorporate community input into decision-making processes. These comments are crucial for Avista to refine its plans and ensure they align with community needs and expectations.

Organization	Comment	Avista Response
Overall		
Washington Commission Staff	Establish a formal feedback log that clearly connects advisory group input with subsequent modifications in the CEIP. This process should ensure that feedback is systematically captured, evaluated, and incorporated to reinforce transparency.	Through the CEIP Advisory Group meeting process, Avista has been documenting comments received and are addressed in the subsequent meetings. A comment matrix will be included in the 2025 CEIP outlining the comments received and how the Company addressed each.
Vulnerable Populations		
Washington Commission Staff	Expand on the methodology used to identify Vulnerable Populations. Specifically, clarify how recognition and procedural equity were applied and how these principles will be maintained moving forward.	As approved and provided in Appendix A of Order 02 in Docket UE-210628 Condition 39, ²³ Avista will provide a robust narrative in its 2025 CEIP outlining the methodology used to identify Vulnerable Populations, how equity principles are considered in this identification, and how the Company will maintain this process moving forward.

²³ Condition 39: In its 2025 CEIP, Avista will include a description of the work it completed between its 2021 CEIP and 2025 CEIP to expand its Vulnerable Populations, including an overview of all actions and evaluations completed, as well as summaries of discussion and input from its advisory groups. Further, it will specify the methodology used to identify Vulnerable Populations in its 2025 CEIP and a comparison of Vulnerable Populations between the 2021 and 2025 CEIP.

Avista's 2025 Public Participation Plan

Organization	Comment	Avista Response
Washington Commission Staff	Further detail how the plan will meet the Commission's direction from the CETA Rulemaking Order to "prioritize vulnerable populations and highly impacted communities that experience the greatest inequities and disproportionate impacts, and that have the greatest unmet needs."	As this requirement pertains to CEIPs, Avista will evaluate an unmet needs designation internally and if applicable, work with its advisory groups to determine characteristics to be proposed in its 2025 CEIP.
Customer Benefit Indicators (CBIs)		
Washington Commission Staff	<i>"In its 2025 CEIP, the Company plans to incorporate Washington's updated DOH map (version 2.0 released January 2022) and the CEJST data (version 2.0 released December 2024), thus increasing the Named Community populations by 134,720 and 8,637 customers, respectively."</i> It is unclear whether these figures correspond to Vulnerable Populations versus Highly Impacted Communities, or if there is an error in the text. Clarify the language.	Named Community Identification section updated, see Table No. 6: Named Community Household Comparison which outlines the specific number of Highly Impacted Communities and Vulnerable Populations.
Northwest Energy Coalition (NWECC)	What counts towards the Customer Benefit Indicators in the Equity Area of Accessibility: Named Community Clean Energy and Investments in Named Communities	Metrics that correspond with each of Avista's CBIs are included in the 2023 Biennial Update . ²⁴ The 2025 CEIP will include a list of proposed CBIs and corresponding metrics.
NWECC	What do the following Customer Benefit Indicators found in the Equity area of Public Health mean: Employee Diversity and Supplier Diversity.	Metrics that correspond with each of Avista's CBIs are included in the 2023 Biennial Update .
Washington Commission Staff	Provide a more detailed breakdown of the participation barriers and establish clear metrics to assess the effectiveness of mitigation strategies. For instance, on p. 18, consider including data on the usage frequency of the translation service provided by Language Line Solutions to better demonstrate its reach.	Please see updated Table No. 9: Maturing 2023 Plan's Strategies in the Maximize the Impact of Existing Strategies section which provides the engagement strategies.

²⁴ <https://www.myavista.com/about-us/washingtons-clean-energy-future/clean-energy-implementation-plan>

Avista's 2025 Public Participation Plan

Strategic Approaches		
NWEC	"If customers watch the pre-recorded meetings, Avista anticipates there will be broader understanding, and increased engagement during the live virtual meetings." - Would the information from the pre-record meeting be repeated in the live virtual meeting? We are concern that requiring folds [folks] to watch something before attending the live meeting would discourage attendance as it would be seen as time consuming and burdensome.	The pre-recorded meeting would serve as the presentation for the audience, providing customers with an option for reviewing educational materials at their convenience.
Washington Commission Staff	Include more comprehensive information regarding current achievements and future targets of the educational campaign, with specific engagement metrics segmented by customer groups.	For visibility, the Company will use its existing marketing impressions CBI metric to track the educational videos. Avista is unable to provide more granular reporting, such as audience segmentation, due to the limitations of its social media management software.
NWEC	Under Maximize the Impact of Existing Strategies": "Avista will leverage and mature those current engagement approaches that have proven effective to maximize the impact of existing efforts." Does Avista have specific approaches they are planning to leverage? It would be great to see those listed.	The Maximize the Impact of Existing Strategies section outlines how each existing effort will be matured. Additionally, Table No. 9: Maturing 2023 Plan's Strategies in the same section outlines each of these strategies.
NWEC	Avista is committed to producing its second educational video within the 2025-2027 public participation period. - This videos sound like great resources. We would like to see Avista commit to producing more that 1 additional video during the 2025-2027 period.	Avista will strive to create additional videos during the public participation period however, due to resource constraints, cannot commit to producing more than one video every two years.
NWEC	Videos and info sharing with Named Communities are mentioned above. Why are they not include in this table?" Table No. 8 (9)	Table 9 has been updated to include 'Educational Videos' in the Maximize the Impact of Existing Strategies section.

Avista's 2025 Public Participation Plan

EAG Member	"...public meetings on the Zoom platform." This obviously does not address lack of online access. Zoom requires a stable internet connection, often an issue in rural areas. Dial-in can feel awkward but better than nothing, requires strong facilitation skills to involve all participants.	To address technology barriers, Avista attends community events to meet customers where they are, providing educational and promotional materials. Please see the third paragraph of Enhance Technology Accessibility section and the Community Events sections.
EAG Member	"Virtual public meeting details are available on the CEIP webpage..." If you don't have internet access, how do you know about the meeting to dial in?	All public meetings include dial in information. Promotional materials for Public Participation meetings contain a QR code that can be accessed with a smartphone. Printed communication is distributed to partner organizations and their clients to inform them about upcoming meetings.
EAG Member	Is there a converted effort to be sure the end user receives these emails/information? e.g., tenants who do not pay Avista directly but rather through a landlord.	For electronic communications, Avista utilizes email addresses linked to customer accounts. Additionally, in an effort to reach all customers, Avista engages through community events, public meetings, distributing promotional and education materials, and more.
Language Access		
NWEC	"The Company is also exploring options to obtain a customer's preferred language choice (beyond collection through a CSR) as several potential language access projects are dependent on the availability of a customer's preferred language, including but not limited to, letters, notices, text, and chat communication." - This is very important work. Would be great to have more details on what these option are.	Currently, language preferences are only captured when speaking with a Customer Service Representative. The company is exploring additional methods to obtain a customer's preferred language which is required for account-specific communications such as letters, notices, texts, or chats.

Avista's 2025 Public Participation Plan

Community Outreach		
Washington Commission Staff	Consider detailing the types of questions or topics that you'll use to engage both advisory groups and the public in the CEIP process, aligned with the IAP2 Spectrum of Public Participation. Provide clear examples how participants' input will drive meaningful decisions.	Avista actively involves the public through quarterly public meetings and interested parties through monthly CEIP and EAG advisory group meetings. Avista in partnership with the facilitator determines the level of public participation according to the IAP2 standards, using either a slide and/or a question that aligns with the detail required by Avista during each meeting. Presentation examples can be found on the EAG webpage . Additionally, action items and comments received by Avista, are discussed at the beginning of each CEIP and EAG meetings.
NWEC	"Identify additional public events the Company may attend in an effort to reach Named Communities." - Reaching Named Communities is extremely important. Does Avista have a specific number of events they aim to attend? It would be great to see a specific goal here and how Avista will achieve it.	Avista does not set a specific number of events to attend each year but strives to engage with all nine counties it serves in Washington. Meaningful engagement is crucial, and recognizing quality interactions with customers is essential for building trust, rather than focusing solely on the quantity of events.

Avista's 2025 Public Participation Plan

EAG Member	<p>Lots of good outreach mentioned here (Community Event section), still thinking about the challenge of connecting the end users when they aren't the ones who see the bill or have a relationship with Avista. Curious if the materials handed out are different for the two groups, i.e., explaining to someone who never sees a bill how energy efficiency affects that hidden cost and their part in keeping it under control.</p>	<p>Most renters are billpayers with a direct relationship with Avista. Avista currently offers the Multifamily Energy Excellence Program (MEEP), which includes three program tracks for multifamily complexes: 1) in-unit lighting direct install; 2) deep retrofit (windows, insulation, and more); and 3) strategic energy management. Additionally, while not specifically targeted towards renters, Avista's residential rebates are available to both homeowners as well as renters. Avista also offers no-cost weatherization services for income qualified customers. These services are provided through partnerships with community action agencies.</p>
Community Partnerships		
NWEC	<p>"Virtual public meeting details are available on the CEIP webpage at least three business days prior to any public meetings." - We appreciate having this information posted head of the meeting. However three days is not a long time for folks to schedule around. It would be great to see this info posted at least a week in advance.</p>	<p>In accordance with WAC 480-100-655(1)(g), Avista ensures that presentations are available three business days in advance, at a minimum, with presentation materials provided earlier, if available.</p>
NWEC	<p>"take steps to increase awareness, availability, and accessibility through community partnerships to increase response rates and diversify customer demographics." - Does Avista have specific steps they plan to take to address these gaps?</p>	<p>Avista plans to collaborate with its EAG before the disbursement of the 2026 survey to develop actions aimed at boosting the response rate and demographics for the CEIP survey.</p>

Avista's 2025 Public Participation Plan

NWEC	"Avista will work with DH to refine details of the Community Partnership Program and develop an implementation plan. Avista also assesses whether internal resources can be leveraged, or if additional resources are needed, to execute the plan." - This sounds like a good idea! Will there be monetary compensation available for community partners who take on this role? Compensating community members for their work as messengers would be an important aspect of ensuring equity in the program.	Currently, Avista is uncertain about implementing compensation for community partners. However, this is a valuable suggestion, and the Company will further investigate the feasibility of monetary compensation.
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