

Appendix F:

Draft Clean Energy Implementation Plan Comments – Stakeholder

CLIMATE SOLUTIONS COMMENTS

SECTION	COMMENT	AVISTA RESPONSE
INTERIM AND SPECIFIC TARGETS	While we appreciate Avista’s commitment to procuring clean energy resources over the next decade, we were disappointed to see the Company’s plan is primarily based on clean energy procurement rather than supplying their customers with clean energy. Customers all across Washington have demonstrated a desire to be served with clean energy, and selling the clean energy attributes associated with those clean energy resources runs counter to CETA’s intent to serve customers with clean energy	Avista has revised its interim targets to show increasing renewable targets from 2022 to 2030.
	The plan outlined in the CEIP assumes an interpretation of “use” that is based on clean energy procurement, rather than delivering clean energy to customers. Again, we believe this runs counter to the intent of the law, and would like to see the Company undergo additional analysis assuming an interpretation of “use” that aligns with actually serving customers with 100% clean energy.	The final determination on the “use” issue will be reflected in the Company’s IRP update, CEIP update, and future planning efforts. The determination on “use” would not have materially impacted this first CEIP, but Avista will revise its CEIP if directed to by the WUTC if they find this issue to be a material difference to this plan
	In order to plan for meeting the 2030 and 2045 standards, it is also important that the IRP and CEIP analysis include more detailed assumptions on the cost and availability of renewable natural gas, hydrogen, and technology needed to run various fuels through existing and/or new gas turbines. If this information is not included as part of the analysis, then Avista should be assuming a shorter lifespan of gas plants in the IRP in order to comply with the 2045 standard. Failing to include non-fossil natural gas assumptions ignores the true cost of investing in those resources as utilities plan for a 100% clean energy future, and could greatly impact on the Company’s long-term plans for meeting the CETA standards	Avista considered these cost and technologies in its 2021 IRP and will continue to in future IRPs. Avista will consider feedback on shorter natural gas plant lives in its next IRP.
CUSTOMER BENEFIT INDICATORS	CBIs lack clarity on how the CBIs influence specific actions and interim targets in the CEIP. We encourage Avista to more clearly show how the CBIs were used in the CEIP and how they inform the specific actions and interim targets in order to meet the customer benefit and equity requirements of CETA.	The interim targets and specific actions were informed primarily by the CEAP, with specific actions further described in the Biennial Conservation Plan. CBIs will be utilized in program evaluation and RFP analysis as a component of overall resource evaluation. In future CEIPs, CBIs will be incorporated into resource selection for the CEAP.

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NWEC COMMENTS

SECTION	COMMENT	AVISTA RESPONSE
RECOMMENDATION #1	Revise the proposed targets and actions to clearly convey how Avista intends to comply with RCW 19.405.040(1)(a), including supplying its Washington customers with electricity from renewable and non-emitting generation: Avista’s compliance strategy is based on a misinterpretation of the “use” requirement in the statute.	Avista disagrees. Avista clearly states how it intends to comply with RCW 19.405.0401(1)(a). Unfortunately, NWEC is casting judgement on how the WUTC may require compliance of this standard prior the WUTC determining how to comply with this statute. This is clearing a difference of opinion of how the Company and NWEC interpret the law without guidance from the WUTC. Avista has stated it may need to revise it plan depending on the WUTC decision on “use”.
RECOMMENDATION #2	Adopt an aggressive target for demand response, and a specific action to deploy grid-enabled hot water heaters: Launching a set of coordinated pilots in the next few years would allow these resources to be fully available when their capacity is most needed	Avista now includes 30 MW Demand Response goal. Avista appreciates NWEC’s enthusiasm for grid-enabled hot water heaters and will include this program when and if it is cost effective for Avista’s customers.
RECOMMENDATION #3	Remove the Post Falls upgrade from the CEIP, and consider lower cost clean energy alternatives.	Avista disagrees with NWEC’s conclusion, but does agree it needs to provide more detail regarding the company’s decision and has added this context to the final draft.
RECOMMENDATION #4	Consider alternative capacity options to the Kettle Falls upgrade	Kettle Falls upgrade is proposal found to be cost effective in an IRP and clearly indicates it is not committed to this project without conducting and RFP to clearly illustrate this project is in the best interest of customers. Avista is concerned why NWEC is against low cost renewable power with capacity attributes.
RECOMMENDATION #5	Update the load forecast and associated proposed targets and actions to account for the impacts of climate change	It is not a requirement to update the load forecast for the CEIP
RECOMMENDATION #6	Include approved transportation electrification investments in the CEIP as planned energy transformation projects	Rules relating to ETPs are not yet finalized thus we do not know if our TE programs would qualify for as an ETP. Currently, we do not intend to pursue our TE programs for ETPs under the alternative compliance option.
RECOMMENDATION #7	Adopt an additional specific target for reducing fossil fuel generation used to serve Avista’s retail load, supported by a CBI for greenhouse gas emissions, and specific action to investigate the availability of clean firm capacity or other resources to meet infrequent long-duration events.	An additional metric is included to account for Avista’s greenhouse gas emissions. No CBI is needed to investigate the availability of clean firm capacity to meet long term durations- NWEC is offering a solution to Avista CBI for avoiding customer outages. Avista will analyze resource

		options that meet reliability requirements and the requirements of clean energy.
RECOMMENDATION #8	Add a specific action to conduct distribution system planning, supported by CBIs for energy resiliency, security, and community development	Avista's CBI for outage duration meets this recommendation. At this point Avista is open to expanding this CBI to a broader geographic basis to show deficiencies in portions of Avista system that may benefit from upgrades- Avista plans to work with stakeholders on this metric prior to the two-year update.
CEIP REQUIREMENTS	Avista's Draft CEIP does not establish interim targets showing how Avista will make reasonable progress toward meeting the 2030 and 2045 standards, as required in WAC 480-100-640(2) and (3).	Avista has revised its interim targets to show increasing renewable targets from 2022 to 2030.
	Avista should, at a minimum, incorporate an alternative approach that supports an interpretation of RCW 19.405.040(a) which accounts for renewable and non-emitting electricity used to serve Avista's Washington load.	Avista shared alternative options with stakeholders at the first CEIP public participation meetings, at this time it does not impact this initial 4-year CEIP period. Avista does not see the need to add additional studies when the methodology is uncertain and an update to the CEIP will be made in two years.
REC SALES	Avista's proposed compliance strategy between 2022 and 2030 is to retain 40% of its available RECs from procured renewable resources for eight years before leaping to 100% REC retention in 2030. This proposed REC sales and retirement schedule does not show how Avista will make reasonable progress toward meeting the 2030 standard, nor is it appropriate to include this proposed business strategy in the CEIP. Before 2030, Avista may decide, for business purposes, that it wants to manage its REC retirements and sales in a specific way. We believe this decision is entirely unrelated to its CEIP	Avista's strategy is to acquire renewable and non-emitting resources to serve 100% of its retail load by 2030 as directed by the law. Avista's compliance strategy is to acquire resources to meet this objective. To clearly describe its intentions, Avista has revised its interim targets chapter to be clearer.
	Avista has selected a strategy based solely on the separate acquisition and retirement of renewable energy credits (RECs), which is not consistent with the requirement to use electricity from renewable resources and nonemitting generation to serve its customers. Since Avista's Draft CEIP relies on a single interpretation, it is inherently incorrect and incomplete.	Avista disagrees. Avista has provided a clear interim target to retire RECs as required by rule and acquire resources to prepare for the 2030 goal. Whether or not Avista chooses to exceed this proposal and sell the associated RECs with this energy indicates Avista exceeds CETA requirements, subject to a commission order authorizing our target.
ENERGY EFFICIENCY	Avista's Draft CEIP does not include specific targets for energy efficiency, demand response and renewable energy that are consistent with WAC 480-100-640(3)(a).	Avista disagrees, Targets for energy efficiency, demand response and renewable energy is clearly outlined in Chapter 2.
DEMAND RESPONSE	The lack of a specific target for Demand Response (DR) in Avista's Draft CEIP is a glaring omission, and inconsistent with the statute and CETA rules. Under WAC 480-100-640(3)(a)(ii), the DR target is not optional. While Avista states that its DR target is "0", the Draft CEIP also goes on to describe three pilot DR programs that it suggests may be	Avista has revised its demand response target to 30 MW. In addition, several specific actions in terms of program development have been further explained in final CEIP.

	implemented during the implementation of the first CEIP. The Draft CEIP does not explain whether other pilot programs were considered, nor does it provide any view of whether DR is cost-effective during the first CEIP period	
	Adopt an aggressive target for demand response, and a specific action to deploy grid-enabled hot water heaters.	Avista appreciates NWECC's enthusiasm for grid-enabled hot water heaters and will include this program when and if it is cost effective for Avista's customers.
RENEWABLE ENERGY TARGET	we do not think that Avista's strategy to propose two interim targets – one based on renewable acquisitions and one based on REC retirement – is consistent with the statute or rule. We recommend that Avista develop a renewable energy target that is based on the amount of electricity from renewable energy resources supplied to retail customers.	Avista provided additional clarification in the final CEIP. Avista now proposes one specific target of Renewable Energy Credit sales. Avista proposes to acquire or evaluate additional clean energy sources during 2022-2025 to meet the 2030 target.
	Recommend that Avista remove the 84 MW natural gas peaker from the CEIP, since it is not a renewable resource or nonemitting generation	Avista has stepped back its discussion of the need for natural gas generation in the final draft but does include a short disruption of the need for additional capacity to reliability serve its customers.
GENERAL COMMENT	Avista's Draft CEIP fails to explain how customer benefit indicators are used to ensure that all customers are benefiting from the transition to clean energy, as required by WAC 480-100-610(1)(c) and WAC 480-100-640(4)	Chapter 3 Customer Benefit Indicators provides discussion on how each CBI will be measured and the benefits of each in ensuring customers benefit from the transition to clean energy. Chapter 4 Specific Actions provides a list of benefits and explanation for each WAC identified benefit area (energy, non-energy, reduction of burden, etc.) under the Specific Action Categories of Renewable Energy, Energy Efficiency, Demand Response and Other Company Initiatives.
BASELINE METRICS	The final choice of CBIs seems to be primarily influenced by the availability of baseline metrics,	NWEC assumptions are false. Final CBIs were based on the results of the voting metrics. Within the voting metrics "data power" (which represents information which can most readily be tracked, measured or counted) was only one component within total voting matrix. See additional information in Chapter 3.
GENERAL COMMENT	Avista's Draft CEIP does not adequately describe the specific actions it will take to fulfill its specific targets over the four years, with data required by WAC 480-100-640(5) and narratives, required by WAC 480-100-640(6).	Avista disagrees. Chapter 4 specifically describes how Avista will meet interim targets from Chapter 2.
	Avista's Draft CEIP does not accurately reflect the projected incremental cost, as described in WAC 480-100-660(4) which incorporates the specific methodology described in WAC 480-100-660(1).	Avista disagrees. Avista describes the incremental cost in chapter 5 and provides all workpapers to substantiate its estimates based on the rules provided by the WUTC, NWECC should provide more detail how Avista does not accurately reflect its incremental cost.
	For the public to understand if the projected costs are accurate, the rules require the utility to identify in the calculation all investments and expenses that will be made to meet or make progress towards the 2030 and 2045 standards, and how those costs are directly attributable to those standards. The data that could support this	Avista disagrees, NWECC is expected the CEIP covering 2022 to 2025 should project costs for the next 20 years. This is the place of the IRP, which Avista clearly demonstrates these costs.

	<p>understanding was submitted in a redacted Appendix, when it should be clearly stated in the CEIP. While there are snippets of information included in the CEIP, much more explanation of the projected incremental cost of Avista's propose compliance strategy is needed, such as:</p> <ul style="list-style-type: none"> • The output in MWh and the cost that Avista projects for obtaining the Chelan hydropower PPA; • A comparison of the cost of upgrading Post Falls, which results in an incremental increase of 3.8 MW for more than \$80 million, compared to alternatives; and • Information about the costs or power increases provided for upgrading the wood biomass facility Kettle Falls, and how those costs are proposed to be allocated. 	
	<p>Public Participation must be detailed in the CEIP, with a summary of advisory group member comments with the utility's responses, including which issues were addressed and incorporated into the CEIP, along with reasons for rejecting public input. While this summary is required for the Final CEIP and not the Draft, it seems that at least the input received so far from all the advisory bodies - not just some of the feedback from the Equity Advisory Group - should be included in the Draft, so that the public and UTC staff can consider that input in their review and comments.</p>	<p>Per Commission requirements in UE-191023 and UE-190698 paragraph 25, footnote 4 the "At a minimum, draft CEIP must contain the utilities final proposed specific actions, specific targets and interim targets." The Company met this requirement under a very tight timeframe.</p> <p>Further, each individual public participation meeting introduction contained brief discussions of comments received through surveys or comments from previous meetings.</p>
	<p>Avista's compliance strategy is flawed and does not represent a lowest reasonable cost approach to complying with CETA. Avista should develop an alternative compliance strategy, including specific targets and actions that meet the requirements of the law.</p>	<p>Avista disagrees. NWECC does not provide any examples of why this is not the lowest reasonable cost, rather it is stating an opinion about the conclusions of the plan likely do not meet their desires.</p>
	<p>The CEIP should be a short, concise, standalone document that clearly delineates the exact actions the utility will take over the four-year implementation period. The reader should not have to jump between the CEIP, the Biennial Conservation Plan (BCP) and the Integrated Resource Plan (IRP) to get a full picture of Avista's CETA compliance plan. All relevant information should be distilled and contained in the CEIP, with the other plans serving as supporting documentation in appendices</p>	<p>Avista is balancing the need to provide detail for the next four years and the related documents. Unfortunately, this is a complex and technical issue and Avista's final draft should assist in bridging gaps between documents.</p>
	<p>While it is informed by the information in the Clean Energy Action Plan (CEAP), it is not limited to the information in the CEAP. In this case, the CEAP was prepared long enough in advance of the CEIP that more up-to-date information and data should be incorporated and reflected in the CEIP. In the</p>	<p>The IRP is the foundation in which the CEAP and CEIP are built off of, you have to have the CEAP completed as quickly as possible in order to inform the CEIP, the law and rules were not intended to have these all done at one time</p>

	future, it would be appropriate for Avista to conduct its CEIP planning concurrently with its Integrated Resource Plan (IRP) and CEAP, so that the two processes can inform each other	
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PUBLIC COUNSEL COMMENTS

SECTION	COMMENT	AVISTA RESPONSE
CBI PRIORITIZATION	<p>Avista should explain, in detail, the prioritization process of customer benefit indicators.</p> <ul style="list-style-type: none"> Avista weighed the answers 65 percent for the EAG and 35 percent for the other stakeholders. Avista does not recount in the draft CEIP how this prioritization was presented to stakeholders. For instance, if the stakeholders were asked to select the top one indicator in each area, if there was a ranked choice, or any other method. They also do not explain how they then took the votes and used the weighting process to come to the total numbers provided in the table. Further, Avista does not outline which stakeholders comprised the “other” category 	Additional clarification was added to Chapter 6 – Public Participation
CBI SELECTION	<p>Avista should either explain, in detail, how they plan to approach the prioritized benefit indicator of customer access to broadband, or allow stakeholders to select another metric.</p> <ul style="list-style-type: none"> It is not fair to the stakeholders who worked to have this metric and then determine it cannot be included without a clear explanation as to why it would not be an appropriate metric to measure customer access to clean energy. At the very least, if Avista does not include this metric, the advisory groups should be allowed to readdress the equity category and choose a second metric that Avista will consider 	Additional clarification was added to Chapter 3 to address this concern
	<p>Avista should explain, in detail, why they only selected one customer benefit indicator in the environmental category, but selected the top two in all other categories.</p> <ul style="list-style-type: none"> In the “environmental” category, Avista only chose one indicator, “reducing polluting emissions” and provided no explanation for why they did not include the second highest, “locational environmental impacts equitably sited.” Based on conversations with Company representatives, it is Public Counsel’s understanding that 	Additional clarification was added to Chapter 3 to address this concern

	<p>this was done because the prioritized two metrics were correlated. As outlined in the “metrics chosen” section below, however, the metric chosen to represent pollution reduction essentially eliminates localized pollution impacts. This disregards the earnest, well-supported concerns of the EAG and other stakeholders</p>	
CBI METRICS	<p>Avista should revise its metrics to track customer benefit indicators so that they more accurately reflect the intent of the EAG and other stakeholders, and so that Avista Utilities is held accountable to each in the transition to clean energy</p>	<p>Avista’s metrics are directly aligned with customer, EAG and advisory group input as described in Chapter 3 and Chapter 6. The Company is very committed to an open, transparent, all-inclusive process. As such, all suggested CBIs should be reviewed with the all participants. The Company reviewed Stakeholder proposed CBIs and noted in several areas there was alignment with the final CBIs proposed in the CEIP. The Company will consider other CBIs in the next CEIP and encourages Stakeholders to participate in these meetings in order to provide time for full review.</p>
	<p>The EAG expressed concern about increasing access to clean energy and reaching customers who previously have not participated in programs to language barriers or lack of understanding of the application process. Avista’s draft CEIP outlines that they will track the number of workshops, mobile, outreach, and energy fair events they facilitate annually. This does not address the EAG’s concern about language barriers or understanding. In fact, Avista has already tracked this data at least since 2016, and does not specifically discuss any new initiatives. The Company fails to address the continued problem of customers that are unable to be reached due to these barriers, despite Avista’s existing events</p>	<p>Additional clarification was added to Chapter 6 to address this concern. In addition, embedded within the CBI Availability of Modes/Methods of Communication is the intent to address language barriers. The Company will work with the EAG to help identify more specific barriers and develop methods to address.</p> <p>The Company believes this is a bigger issue than the CEIP and will work to address barriers in additional areas based on information received from EAG.</p>
	<p>This indicator was selected to target investments in named communities to positively impact local community and economic development or reduce non-energy financial burdens. Avista states that they will accomplish this using the Avista Foundation. The Avista Foundation is separate from Avista’s utility operations, and is the primary community investment source from Avista Corporation. When outlining the requirements, WAC 480-100-610(4) states: “In making progress toward and meeting subsections (2) and (3) of this section, each utility must...” Avista’s proposal is not allowed according to the WAC, as it is not a utility action. Avista Foundation is separate from Avista Utilities. The investment must come from Avista Utilities in order to be compliant. Avista mentions later in the document the potential for a “Named Community Investment Fund,” which has not yet been set up. If developed, it would be utilized for direct investment in projects to improve the equitable distribution of</p>	<p>The Avista foundation was utilized as a preliminary metric to illustrate commitment through all sections of Avista Corporation. Due to feedback from stakeholders and because the Named Community Investment Fund has been proposed, the metric related to the Avista Foundation has been removed.</p>

	clean energy by targeting named communities. This fund would comply with the WAC, and should be the focus of Avista in this CBI.	
	Outdoor air quality was frequently brought up and discussed among Avista’s EAG and other stakeholders, with an emphasis on localized impacts of pollutants. Avista has chosen to track the annual number of days where the Air Quality Index (AQI) reaches at least unhealthy air for sensitive groups (101+), and weighs it according to proximity to Avista’s customer base. This essentially reduces this metric to extreme events, such as wildfires, and ignores steps the utility may have more control over, such as electrification and cleaner fuel usage. Data provided by Avista in the draft CEIP attributes much of the historical AQI problems to regional wildfires. This is not what the EAG requested. In fact, outdoor air quality and reduced risk of wildfires were considered separately when prioritizing CBIs. Outdoor air quality was given a total score of 18 in the environmental category and wildfire received a score of only seven	<p>The Outdoor Air Quality metric based on number of unhealthy days for certain individuals normalizes the impacts from wildfires. There appears to be confusion as to what the metric indicates.</p> <p>Avista has provided additional information on this metric as described in Chapter 3 – Customer Benefits</p>
	Like outdoor air quality, stakeholders expressed concerns about Avista’s GHG emissions. Avista chose to use a regional emissions metric. This, again, removes accountability from Avista. Public Counsel’s understanding is that with this metric, Avista could do absolutely nothing to reduce their GHG emissions, but because of advancing technology in other sectors, such as transportation and general electrification, the regional GHG emissions could still go down. The final CEIP should propose ways Avista will be held accountable for their own GHG emissions, across all generating resources serving Washington retail load.	Avista has provided additional information on this metric in Chapter 3 – Customer Benefits
RENEWABLE AND NONEMITTING RESOURCES	Avista should consider lower-cost, higher-benefit alternatives to investments at Post Falls and Kettle Falls generating stations	More description on Post Falls and Kettle Falls is included in Chapter 4 – Specific Actions.
DEMAND RESPONSE	<p>Avista should propose demand response targets related to each of their programs, commit to formally reporting demand response results, and discuss, in detail, their plans to use demand response to meet future targets.</p> <ul style="list-style-type: none"> • Avista’s draft CEIP does not propose any demand response program targets or actions for the 2022–2025 CEIP period, yet they have many demand response programs in development and operation during this period. This includes, but is not limited to, Time of Use and Peak Time Rebate pilots for electric residential and generation service customers, a connected communities 	Demand response has been expanded on in Chapter 4 – Specific Actions

	<p>project, an active energy management pilot program, and a micro-grid design project for Spokane Tribe of Indians. Public Counsel would like to see targets from each of these programs. At the very least, Avista should commit in the final CEIP draft to formally reporting the results of each of these programs during the 2022–2025 period</p>	
<p>BARRIERS TO PARTICIPATION</p>	<p>Avista should discuss, in detail, how they plan to address barriers to participation.</p> <ul style="list-style-type: none"> • Avista outlined in the draft that they do not “have an established overarching Company-wide plan or process to identify and remove public participation barriers such as language, cultural, or economic barriers.”⁶ The Company states that this is because it will be a lengthy process, and they will work with the EAG to develop a plan to address these barriers within 12 months of filing its initial CEIP. Avista should include in the final CEIP further discussion on this process, such as how often meetings will be held, and how they plan to keep stakeholders informed. Public Counsel recommends Avista should be required to report to its other advisory groups the progress on creating this plan, as well as the plan itself, once it is completed, to increase accountability and transparency to the public participation process 	<p>Avista will involve all advisory groups of progress of addressing barriers to participation.</p> <p>In addition, EAG will be instrumental in the development of such a plan.</p> <p>Finally, the CEIP Public Participation Process will meet, at minimum, quarterly and all participants will be informed in this plan.</p>

Appendix F:

Public Participation Comments

CEIP Comments Provided by CEIP Public Participation Meeting Participants

CEIP Public Participation Meeting #1 Comments – May 20, 2021, 1:00-3:30 pm PST

Commenter	Comment	Avista Response
Toby Hearsey	Can you expand on renewable natural gas?	Renewable natural gas can come from landfills that can be capped, or other opportunities with farms and cattle that are close to our service territory that may have economic opportunities for us. Any natural methane-emitting source and there are different sources. It could be injected in the existing natural gas system or synthetic gas, blends, etc. We are looking at various ways to decarbonize for the environment.
Mike Kelley	Please explain “carbon neutral gas”.	An example is dairy and if they don’t have a carbon capture. The waste expands as it’s being digested. If we can capture it and use it, it won’t go into the atmosphere. It has been shown to increase the heat in the atmosphere. That’s one example. Green hydrogen made from splitting water molecules by using a clean electricity source to split and combine with a carbon source or not. That is what carbon-neutral natural gas would be.
Logan Callen	About how much natural gas is used for generation vs. what is delivered to customers?	We’d be guessing. Maybe we can get back to you. 31% of generation on the electric side would be natural gas generated, but best if we can get back to you. In 2020, Avista’s system LDC, or local distribution company, used 37,223,382 Dth of natural gas and Avista’s thermal plants used 26,785,934 Dth of natural gas to serve both its system loads for Washington and Idaho. Historic values follow a similar pattern.]
Maggie Gates	Is there a plan to move away from natural gas entirely?	No, not at this time.
Corey Dahl (Public Counsel)	1. All utilities are approaching the advisory groups differently and we don’t need to prescribe a one-size fits all approach. How is the utility ensuring that it is providing transparency if there isn’t a way to provide for other individuals or regulators to participate?	<ol style="list-style-type: none"> 1. It was important to create a safe space for the participants. We talked with the members of the Equity Advisory Group about should we allow observers and videotaping; we were told it would stifle input and participation. We’re asking folks to be active participants and won’t be recording. Anyone is welcome to actively participate. 2. We submitted a public participation plan, charter, information on the group and topics to the Commission. A report will go

	<ol style="list-style-type: none"> How can we guarantee broader assurance if there isn't a way to look under the hood? Don't want to needle on this too much but marginalized and highly impacted communities haven't had the best relationship with government so with us being involved, we may not be helping that relationship. But we're having trouble ensuring this is taking place without just taking Avista's word for it. We don't like to take the approach of just taking the utility's word for it. 	<p>out from the group to provide information to the other advisory groups. There are plenty of opportunities for review, questions, and the ability to provide input. The goal is to provide transparency without stifling collaboration</p> <ol style="list-style-type: none"> We are considering taking steps to think through this further.
Molly Brewer (UTC Staff)	<ol style="list-style-type: none"> Corey touched on some things I was going to follow up with. When I spoke with Annette, I understood there'd be opportunities for breakouts with these stakeholders. But not someone like me from PC or Staff. 	<ol style="list-style-type: none"> That is still the plan. Any member can attend as an active participant. I think we're saying the same thing – you can participate as an active participant. I think we need to table this issue until Annette is back and we can further discuss this issue.
Carol Weltz (SNAP)	Does Avista keep track of who they reached out to for this opportunity? This could provide this transparency	Yes
Amy Wheelless	Will there be notes from the EAG?	Yes, It may be helpful to clarify the EAG will convene at the same meetings as this public meeting with any interested community members or observers, and then the EAG will be able to separate into a small breakout group to discuss
Margee	I think you can resolve this by providing the URL for the Equity Advisory Group to this afternoon's attendees. All are invited to join, please submit a completed application. Washington's Clean Energy Future (myavista.com)	No response needed
Corey Dahl	We don't want to take up space and we're not customers but want to be included.	We appreciate your input and that it's a little different for each of the utilities and will take it under advisement as we move forward.
Kelly Hall (Climate Solutions)	<ol style="list-style-type: none"> First, we really appreciate your intentionality in maintaining the spirit of the law. On the second slide, when you say Idaho customers may 	<ol style="list-style-type: none"> Excellent question. It's still unknown, we'd have to look at opportunities on a case-by-case basis. It is an opportunity for Idaho customers to take advantage of if we allow this.

	<p>still sell their RECs to other Washington customers, is this referring to a sale of the RECs for use as an alternative compliance mechanism as an unbundled REC, or would you be "selling" the RECs bundled with the power to be used for the 80% clean energy requirement?</p> <p>2. Apologies for having you repeat, but how are you accounting for voluntary renewable energy programs? In other words, are you distinguishing between REC based programs and other programs that actually deliver clean energy to Avista's load?</p>	<p>2. Correct, we are differentiating. The third line – included in that PURPA/Customer Programs. I think there is debate about this. I'd like feedback from Commissions on that.</p>
Jean & Mike Walters	<p>What is the life expedience of Solar and Wind generating equipment?</p>	<p>From life expectancy, traditionally what happens is will buy through a PPA of 15 years for solar and 20 years for wind. Although the facilities are designed to last longer for example up to 30 years. The generation output will degrade over time, but maintenance mitigates some of this. Both facility types can be repowered and since it's a brownfield site the cost to repower should be less than a new facility</p>
Ricky Davis	<p>Is Avista considering repowering Palouse Wind?</p>	<p>Palouse Wind is owned by another party; we have a 30-year contract. We're in year 9. Under that agreement it is unlikely to be repowered. Avista has rights to purchase at a point in the future. At this time, there are no plans for repowering.</p>
Jennifer Snyder (UTC)	<p>Will the EAG be looking at potential other factors that define vulnerable populations in Avista's service territory?</p>	<p>Yes, I believe that is the plan. One of the issues is what happens when you have a population that isn't in one of these named communities but is still vulnerable.</p>
Maggie Gates	<p>Will Avista consider communities outside its service area? For instance, populations who are impacted by pollution from energy production sites like Colstrip.</p>	<p>Another good question. When we look at retiring resources not in Avista's service territory, I think the intent is to look at these areas as well. Colstrip is unique because this is already included in law.</p>
Molly Brewer	<p>1. Given that a main way for customers to provide input is through the CEIP meetings, what efforts are being made to reach the hard-to-reach customers/</p>	<p>1. Quick answer is that we haven't done much in that regard. We know for our service territory it is Spanish and it is a very small percentage. We have translators available but haven't reached out to these individuals for them to participate.</p> <p>2. We'll make sure that things will be available in both languages where appropriate.</p>

	<p>populations with limited English-proficiency to solicit their feedback?</p> <ol style="list-style-type: none"> 2. I would welcome further discussion on this. 3. Will customers and EAG members have opportunities to create their own customer benefit indicators besides the ones that Avista creates? 4. Will there only be review of what the company developed or will they develop their own. 	<ol style="list-style-type: none"> 3. Not sure I understand your question. Our intention is to develop these indicators in collaboration rather than have Avista create our own. Our indicators are only a starting point to get the ball rolling. Even though we presented some indicators we're still planning to get input. 4. It's either yes, no or how about this as informed by the group.
<p>Michele Bennington</p>	<ol style="list-style-type: none"> 1. I live in West Central [Spokane] and volunteer at Our Center Community Outreach. Our Governor [Inslee] signed bill 1026 to reduce environmental disparities in our state. If we cut back in named communities, how will that impact this bill that just got signed into law? If you have native people who live on a reservation that is partially in the "zone" how will it impact them when being a highly impacted group. 2. I'm very concerned about cutting off people that need help. In West Central we have Kendall Yards then you cross the street to extreme poverty stricken and homeless. Where will we place the importance to address these highly impacted areas. 3. I was thinking about environmental racism. I'm not clear about what the health department is talking about in their mapping. We have a high rate of asthma and such that contribute to a lower quality of life. I need to better understand this. Pollution 	<ol style="list-style-type: none"> 1. I haven't reviewed that bill in its entirety. There may be communities that may not fit the definition, but we've identified it as vulnerable. As we work with the Equity Advisory Group, we'll identify how to help with these areas. 2. That will be a challenge as they don't fit nicely into a census track. Also, this won't replace our other programs but rather augment them to get an increased and broader impact. And I think this might be the intent of that law that was signed. 3. More focus on clean energy and reduce impacts from thermal plants. Could this help with a community of high asthma rates from transportation – can we electrify cars to help with this? We'll have to work with the Advisory Group to determine how best to do this in our area. We identify the areas that need the help and put in place efforts to help them. How much can we influence? Avista is clean – may have limited ability to correct this. What can we do collectively to find solutions if they're available?

	doesn't stay in geographic boundaries.	
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CEIP Public Participation Meeting #2 Comments – June 17, 2021, 9:00-11:30 am PST

Commenter	Comment	Avista Response
Lauren (Northwest Energy Coalition)	80% requirement under CETA is about delivering Clean Energy to customers in WA state, NVEC believes these resources need to be serving WA customers.	All resources serve all our load, it's how you allocate them. If rules say ID resource don't count but an unbundled REC does, then we'd do that. Still some rulemaking to go to figure that all out.
Jennifer Synder (WUTC)	Any thoughts on how the fee will be calculated?	2 methods, market-based – see how similar RECs are being sold, cost-based, we're leaning toward the market-based methodology
Claire Richards	What is ventilation and how is that different from cooling or heating?	Ventilation includes ECMs, strategic energy management, ducting insulation, fan motors, advanced construction design. Cooling includes insulation measures, water cooling, HVAC equipment, chillers for restaurants and grocery
Lauren McCloy	What was the impact on the EE targets from using the social cost of carbon, as required in CETA? Also, what are the demand response and storage targets?	When we evaluate resources, in the past we look at what we're avoiding. With CETA, it requires us to include the social cost of carbon. Get back on a specific answer as this was studied. 5-10% more EE; second question is addressed in the next couple of slides.
Jennifer Snyder	will you be engaging this (or other) advisory groups to discuss Data Response pilots?	Yes. After we get more info on the concept. We don't want to pick programs/solutions prior to CBI being defined as they'll determine what we'll pursue.
Clyde Abe	Will Avista be looking into Bi-directional EV Charging?	It is not cost effective to be looking at this alternative right now. Avista will continue to evaluate.
Claire Richards	Can you explain a bit more how energy efficiency savings are calculated? How does it relate to conservation? So, I'm guessing if you did new programs, you would have more savings.	We do an EE Potential Assessment done by a consultant, look at our customers and estimate our uptake of EE programs, also estimate cost and savings. Each measure has a savings value and there's regional lobby like RTF that calculate prescriptive savings and EM&V (both internal and external to calculate savings. Conservation and EE and even DR interchangeably. They are somewhat different, but we often use them interchangeably. John – Yes, more programs more savings and there's an average measure life of 18 years so older measure implemented, drop off but more are added every year.
Gavin's iPhone	Why is Avista asking us what data it has access to?	It's not necessarily what data we have but also data from other sources that you might be aware of.

Gavin Tehold	<ol style="list-style-type: none"> 1. is broadband actually addressed in CETA? 2. Are Avista employees voting in these polls? 	<ol style="list-style-type: none"> 1. Not addressed by CETA but as some of Avista's infrastructure is updated, it may have the ability to create the opportunity to add broadband using Avista's infrastructure to some folks in focused communities. Energy savings could require broadband internet 2. Yes, but we can track and segregate; stakeholders outside our service territory are voting as well. We are able to tell which votes were cast by the EAG and will consider those votes separately from those of the full group.
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CEIP Public Participation Meeting #3 Comments – July 15, 2021, 9:00-11:30 am PST

Commenter	Comment	Avista Response
Joni-NWEC	<ol style="list-style-type: none"> 1. The Specified Sales are strictly for California and not for WA 2. How Do you handle RECs with California sales? 	<ol style="list-style-type: none"> 1. Clarified that we sell to California and we wanted to share the information with customers for transparency. 2. We do not retire the RECs we just retain them in REGIS.
Michelle Bennington	Does the drought situation impact hydro power?	We are at 90% of the average production right now, we are creating less, but this is not the worst production we have seen but this could continue to decline based on weather.
Joni-NWEC	Interim targets ask for you to show how you are reaching goals but specific targets ask for how you are complying?	Our proposal shows a separation between how much we plan to add to our system and how much we plan to retire which will be discussed in further detail in a few slides.
Claire Richards	Does selling RECs mean there's less renewable energy vs. oil/gas overall? So, other companies are offsetting their oil/gas by buying your renewable energy? Is that how that works?	Oil is not a main source of generation for power, natural gas, does not change anything, if we sell RECs to California that is one less megawatt hour that will not be listed in that area, but oil does not have a major impact. The natural gas side has the ability to sell into the market.
Joni-NWEC	This chart seems to indicate that Avista sells almost half of the hydro it generates with the related REC, is that correct?	The difference between the left bar and the right bars is the specified power we sold in 2020
Claire Richards	It would imply that we have more clean energy than we need?	That is correct for most years

Joni-NWEC	<ol style="list-style-type: none"> 1. This is admirable, but why did Avista Choose 100% by 2030, instead of the benchmark of 80% renewables/ non- emitting served to retail load? 2. This is to have utilities bring in new electricity that 80% would be renewable and non-emitting which is renewables with its RECs, not just simply RECs. 3. So, you will be serving all retail load with 100% renewable power and RECs? 	<ol style="list-style-type: none"> 1. 80% is how much energy is really connected and this is a good question. We did not want to just acquire RECs, we do have our Idaho portion of power that we are planning on limiting to 20%, this may be a lower cost and it may not, we feel the intent of the law is to bring new renewable power to the state. 2. We may be using the term “RECs” and “energy” interchangeably, we are doing this without the RECs being connected to any power to meet our goals, 3. Yes, that is what we are planning for.
Art Swannack	Wouldn't your Idaho section need to retain these credits for possible future use should the Federal Govt continue down the renewable power policy road?	They are always going to be paying for the renewable resource which will be another discussion during another time, Idaho is allocated 1/3 of our renewable resources. If there is a federal requirement they will have those resources and it would make sense for Idaho customers to sell those RECs to lower Idaho customer rates. Idaho could say that they are no longer selling RECs to WA for clean energy? That is a risk down the road that we have with our proposal in the event that happens.
Claire Richards	It seems like since CETA is percentage of electricity but there's more and more gas lines being installed in new construction, that the overall amount of renewable energy vs fossil fuels would be lower than it would be otherwise.	CETA is based on retail electric sales, so there should be less and less natural gas, there has been a cap and trade law in WA that will be discussed as needed.
Debra Reynolds	The Securities and Exchange Commission held a workshop a few year ago on whether or not you can say that you are producing clean energy if you do not retire the REC, as you put this out there and claim that this is your ramp rate to get to your clean energy goal, I understand the desire to save money and not retire RECs before you need them but if you want to report in the fuel mix and other places that this is what you are doing, I feel you might need to retire the REC, I am not sure where that will go, but wanted to flag that for you.	We do show this in the fuel mix and our proposal will show in our fuel mix disclosure. Will we report less clean energy than we are producing, yes.

Joni-NWEC	If you are producing and retaining 40% of the renewable power then aren't you only at 40% of your deliverable load?	Yes, that is correct
Jessie Twigg-Harris	What kind of measurable rate impact are we talking about for 2030?	We will get to that in the next slide
Kevin Holland	Asked to go back to the previous slide, in 2029 that means 40% of our load obligation is served by green load and another 35% is served by null power as we are choosing to monetize the value?	That is correct
Joni-NWEC	In the draft slides sent prior to this meeting, this chart is slightly different, and shows a decrease for electric customers, so are you using electric sales for your gas customers too.	No, the previously drafted slide was a monthly estimate and this was changed because we wanted to show the annual impacts not monthly and we do not really have an average customers so wanted to show what a customer that is not a dual fuel customer and only uses KWH without the gas offset within the home. At the end of the day is about 1 percent rate impact.
Claire Richards	What legislation do we have or can have in the future to reduce the impact on low income customers?	In 2021 SB 5295 was passed that requires all IOU to pass low income relief to its low income customers, Ana Matthews is leading the effort to look at our low income rate assistance program and we will have some new or modified programs as it pertains to our low income customers.
Art Swannack	It seems like, using a bit of interpolation, that customers in 2030 are going to be impacted by around \$100/yr if using electric heat.	The values are on the bottom left of the slide on slide 15 that we use today. These are for unbundled RECs. The amounts listed are unbundled. 8.50 is a price that we agree to for a bundled hydro electricity and delivered to CA on active transmission that we have, RECS can have a different value depending on where you are selling it to. Wind and solar require more transmission power so there is a lot of adjustment in the amount where a hydro facility is more flat. Comment to clarify the graph on page 15. The Green is what retail load will be served by renewable energy and the RECs are retired. The dark blue line is from the 40% to the 95% is what part of retail load would be served by "null" energy (via state of Washington) that is energy generated by a renewable resource, but where the REC has been separated from the energy and monetized to reduce the overall rate impact to customers of CETA directed clean energy resource acquisitions. The last 5% would be served by non-renewable energy sources.
Andres Alvarez	How were the REC values of wind/solar calculated? What is driving the difference	

	between solar/wind and other hydro electric projects?	
Shawn Collins	CETA also requires services to low-income customers.	Yes, it does, we have a number of energy assistance offerings today and CETA has certain requirements. We will be increasing our current low-income offerings from a dollar amount and product offering perspective
Joni-NWEC	The graph on slide 14 is confusing and looks like you are on a path to only retiring 40%, then you are only reaching 40% of the goal, why not increase the amount gradually each year?	We did discuss and we re trying to maximize the benefit for customers. We looked at what is the max value for customers. Why 40%? We looked at 15% that needs to be kept for I-937 and we looks at our historical RECs sold and tried to come up with a reasonable amount that has been historically able to be sold, we came up with 40%.
Art Swannack	I prefer that you help customers as much as you can so I like what you are doing with the REC, I am wondering if this target meets the targets for EV etc., or does this mean we will need more?	As a percentage we will need more and also included in our projections is an EV scenario. This CEIP is for the first 4 years and my understanding is that we can change the interim targets for the next interim period, if we see we cannot meet the target then we will change them moving forward.
Jessie Twigg-Harris	It seems that the rate impact is reasonable, but for highly vulnerable customers, it is significant. So, it seems a big part of this larger conversation then becomes the ways Avista can increase program opportunities that might balance out that impact. Yes?	As a company affordability is a key pillar we are trying to reach for all of our customers, it is very important to us. There are cost implications of CETA and this is strictly on the power supply side, there are also costs on the transmission and distribution system so we are looking to increase the number of customers who are eligible and the amount customers are eligible for.
Claire Richards	Can you please put that link in the chat?	https://www.myavista.com/ceta or https://www.myavista.com/about-us/washingtons-clean-energy-future
Jessie Twigg-Harris	You referred to access to the programs through SNAP and other community orgs. Is there a master list of access points to these programs? My concern is about accessibility for especially rural customers. And how a person can identify their local access points to these programs.	There are a variety of ways folks can learn about/access our programs starting with our website, calling our call center, through our outreach programs, and our and partner marketing campaigns.
Claire Richards	When I called Avista they said the energy audits were funded by a grant and the money ran out.	
Clyde Abe	Does the small Home WX include mobile homes?	Yes, they are included in our residential rebate options

Deaneal Mcknight	Does weatherization help apartment recipients?	Yes
Shawn Collins	Will the targeted Wx pilots for named communities be discussed/reviewed in the EE Advisory Group?	Yes, we did discuss this about 4 months back and we are excited to share advancements as they take place
Claire Richards	When will the energy audits restart?	Once we hear from CDC that it is safe to resume
DeAnna Knope	Mobile homes are not very energy efficient at all just saying	Yes, they can lose heat quite quickly and we want to continue to have EE for these customers
Claire Richards	People living in mobile homes are at the highest risk of extreme heat, wildfire smoke etc. So to whatever extent those can be weatherized.	Yes, thank you for the comment
Jessie Twigg-Harris	Will the EAG spend more time discussing access and increased outreach? It seems the access points depend significantly on internet/phone access, etc.	Yes, the EAG will discuss access and outreach. You can also call our contact center and visit our website. We also have our energy van where we travel through different communities within our service territory.
Claire Richards	I hope we can come back to grid modernization later. I would like to know more about that one, please!	We have submitted an application for a grant with the state department of commerce to partner with the Spokane Tribe, Microgrids are connections of multiple buildings situated close together and is connected to backup battery or solar power in the event of an outage. This will help with grid resiliency
Michelle Bennington	Stated that she does not do anything with Avista except to pay her bill, and she says when we talk about community, the first thing we need to do is talk about the term vulnerable and put it in the terms of "marginalized". If we are talking about going to communities, we need to break down the technical info and needs a more basic understanding of what RECs are.	Agrees with terminology and would encourage that kind of language as well, but the law is written with the language written such as "vulnerable populations" and we will try to get to a place where we state preferred terms.
Clyde Abe	I would like more explanation on CETA and the regulatory requirements and I know it has been defined previously but it would be helpful to hear that a little more along with more information about RECs. A definition matrix on CETA alone would be helpful.	CETA=Clean Energy Transformation Act and a terminology and definitions sheet has been posted to the CETA webpage

Claire Richards	I think one of the things I would like to know more about is energy resiliency. Since we know that it is necessary to ultimately electrify everything with clean energy, if power outages are used as a reason not to electrify, then I would really like to know what Avista is doing to modernize the grid and prevent those impacts once we do electrify everything.	Energy Resiliency; if there is an outage, energy resiliency is how quickly does the grid normalize and come back on? Another form of energy resiliency is the ability for the customer to overcome an issue, when power is out and a customer needs to stay warm, how easily can a customer overcome the power grid issue and find heat etc.,
Art Swannack	I think vulnerable and marginalized are not necessarily the same thing when planning for electric needs. Vulnerable means to me they may not have access to power when needed. Marginalized means they aren't included in the decision processes.	No reply needed
Julie Henry	Now that we know how wrong things, we never imagined can go really bad, security is a huge concern. Do we have plans for extreme heat, cold, fires, drought, major snow fall, mudslides, avalanche?	We are working on this especially after the severe heat we had, we will investigate this further and get back to you.
Art Swannack	Following up on Julie's question, are we evaluating renewables as to their strength and weaknesses during different types of weather extremes and then creating a weighting for the time of year they are used vs likelihood of limited generation capacity? Probably a long-term issue to examine in Integrated resource plan but will affect what is being talked about here.	Yes, this is part of the IRP where we look at the reliability option and what it will take to make them reliable. There is a separation between generation and the distribution/transmission component. Although we have the generation, the transmission/Distribution side is where the issue fell during the hot weather experienced by Avista customers. We are currently working internally to address those exact issues. As you might imagine this is top of mind and we are evaluating.
Julie henry	Language might prove very important to connect with populations. They are used to not being approached or empowered. For me, when you reached out to me via email and wrote how important my participation would be that was all I needed to respond. Are we including this information on Avista Bills?	Our CETA Website has now been translated into Spanish and proofs were received yesterday on translated bill inserts and newsletters.

CEIP Public Participation Meeting #4 Comments – August 17, 2021, 9:00-11:30 am PST

Commenter	Comment	Avista Response
Julie Henry	Do you need us (EAG) at the Sep 9th meeting?	This is a voluntary meeting, but we would love to have all participation. We are also hoping to engage a broader audience who haven't been involved in all these participation meetings to date.
Michelle	<ol style="list-style-type: none"> 1. Is gas being categorized as clean energy? 2. I was thinking the food banks in Spokane, especially West Central, we have high utility bills. I'm thinking that a good point of reference for us is maybe we can help with solar panels for the food banks and clothing banks. 	<ol style="list-style-type: none"> 1. Natural gas is not included in the CEIP. This plan is very specific to electric. We are not ignoring gas, which will go down another path to clean energy, but this is very specific to electric. 2. We are looking at investments in these communities, we will write this down to be considered.
Joni (NWECC)	<ol style="list-style-type: none"> 1. Could you explain "proximity of Energy generation "in more detail? Is the point to locate generation in WA or is the point to ensure polluting generation is NOT placed in or removed from named communities? 2. other utilities are looking at the polluting generation in these communities. 	<ol style="list-style-type: none"> 1. the point is not to ensure that generation is not placed in named communities – we've heard it's both a plus/minus. We're not saying we're not locating there. 2. we're trying to measure the generation of any source either connected or located in our state. This is broader than named communities but looking at security for Washington. We also have a named community tracking of this. The EAG and public participants who helped prioritize the CBIs did consider the equitable siting of locational environmental impacts (i.e. not putting polluting facilities in environmental justice/historically excluded communities). It ultimately came in second place to Reducing Polluting Emissions overall.
Michelle	Is there a plan to develop programs to educate people of color and women as part of this clean energy?	that is going to be tracked to make sure we're representing women and people of color as we develop program, we'll focus on those hard to reach areas
Joni (NWECC)	Would you explain again what the ID Clean Purchase represents	There are two options to meet goals. In order to meet the goal, we'd have to acquire that energy from ID customers. That's the Idaho share of Palouse/Rattlesnake wind and KF. If we can retire RECS, we'd forgo those purchases. We'll cover the impacts of this in the cost cap section.

Julie Henry	What are RECs in the chart?	We are asking to retire 40% of our clean energy and the blue bars represent how much we would procure.
Fred Huett	I realize you don't have a capacity need until 2025, with strong support of DR. What is your thinking on getting ready?	Great thoughts. We are trying to instill trust and keep customers informed. Connected water heaters – we are seeing some and it's transitioning. There are certain steps in the CEIP that we will be taking as we evaluate and move forward on DR. And we just signed with a large customer. When we do our evaluation every 2 years, we take that ramp up period into consideration. We're very aware of it.
Joni (NWECC)	<ol style="list-style-type: none"> 1. The next meeting scheduled for Sep 9th Is that just for CBIs? 2. Is there another meeting for those involved to discuss the draft CEIP? 3. I'd encourage you to schedule a meeting for those folks to look at the detail. 	<ol style="list-style-type: none"> 1. The purpose is really for the customers we haven't reached or weren't able to listen into these meetings. We've received feedback that some customers don't want to be involved at this level but they'd still like to be aware and informed of the progress of this. This will be an overview but then we'll have break out where we'll dive deeper into certain areas such as EE. 2. nothing schedule yet and folks can make comments. 3. I'll need to think about that because the timing is so crunched. Want to make sure we can do something with the feedback in the short timeframe.
Joni (NWECC)	<ol style="list-style-type: none"> 1. Pertaining to incremental cost of compliance, that's what you'll do to comply with CETA? 2. You're saying you'd have no acquisition without CETA? 3. You're anticipating you're selling what you're acquiring. James 	<ol style="list-style-type: none"> 1. ALC – absent CETA 2. Correct. This isn't necessarily to replace anything other than market transactions. No resource retired in this period. Avista is long on energy – likely selling more energy than we would today. Could be thermal, hydro, anything. In this first 4-year period since Avista is fairly clean, there's not a lot of acquisition required. 3. Looking at it from a system basis, there's more energy than we need so we'll be selling. We'll continue to sell RECs and specified power.
Michelle	Did I understand that we are not measuring jobs and economic development.	we're not specifically measuring jobs, however, we are measuring investments in these communities (jobs results from that) and clean generation in named communities.

CEIP Public Participation Survey(s)

Topics	Key Topics	Avista Response
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June 2021

Survey was a follow up to the meeting on June 15 where customer benefit indicators were voted on. The purpose of this survey was to solicit additional feedback to ensure CBIs were accurately reflected

06/2021	CBIs should be measurable.	Additional information in this area was included in the July meeting. This feedback was a little bit premature – although relevant and addressed in the following meeting
	Not all CBIs were included	Additional information was provided in the July meeting. Not all CBIs were included but rather the final two voted on in the June meeting.
	Language	Language was a bit too technical in the June meeting. Avista worked towards simplifying presentations / discussions where applicable and continues to aim at a level of discussion for customers to understand. In addition, sent to all Participants a Glossary of Terms in the July meeting, as well as REC video to aid in understanding.

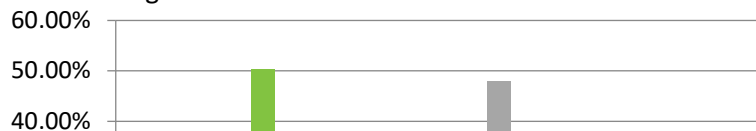
CEIP Public Participation July Survey Results

A survey was sent to all Avista Washington Electric customers asking for additional input into the potential benefits and burdens of clean energy. The intent was to ensure that the final CBIs appropriately captured the priorities of customers/stakeholders. Avista reviewed the results from survey questions, as well as all comments and summarize them at a high level in the graphs below.

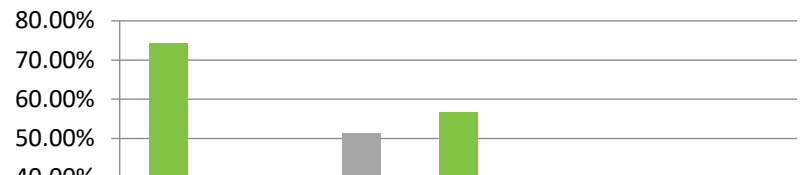
The primary areas of comments are reflected in bullet points under each graph. In addition, there were several comments regarding the speed of the transition (both “too slow” and “too fast”), as well as several political posts (climate change is a joke). Overall, comments were primarily in the areas of affordability, climate and environment.

Thinking about our transition to clean energy, what potential benefits do you think are most important? Please choose up to four.

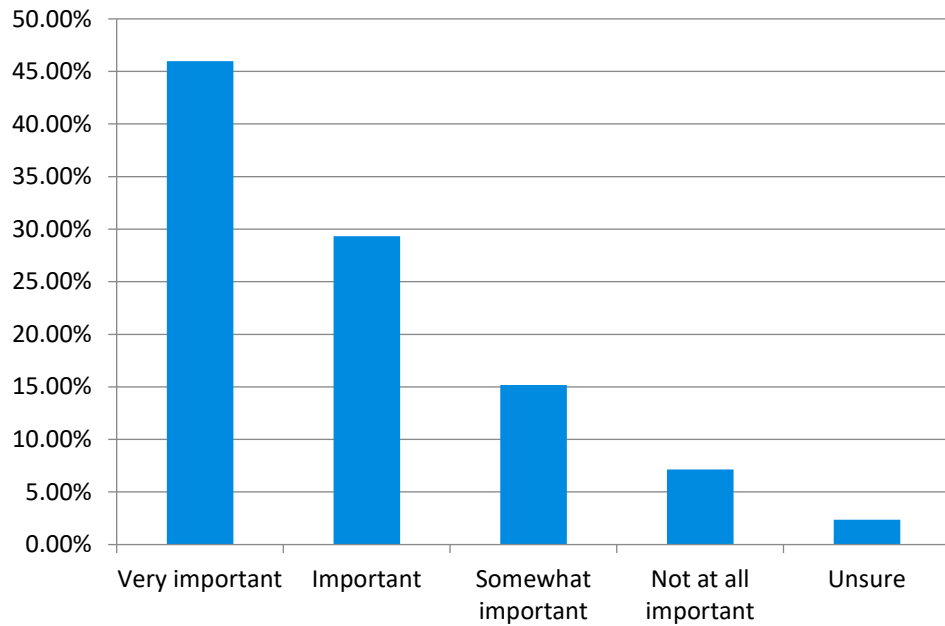
Public Participation Meeting Comments



Thinking about our transition to clean energy, what potential challenges concern you most? Please choose up to four.



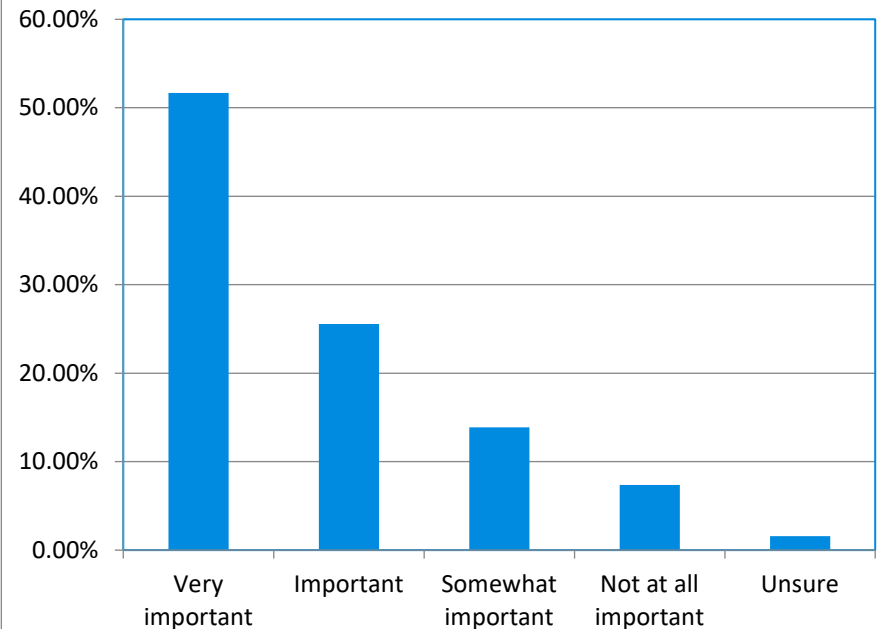
How important are public health benefits to you?



What Public Health benefits would you like to see from clean energy?

- Improved air quality
- Reduced Pollution
- Slowed Climate Change

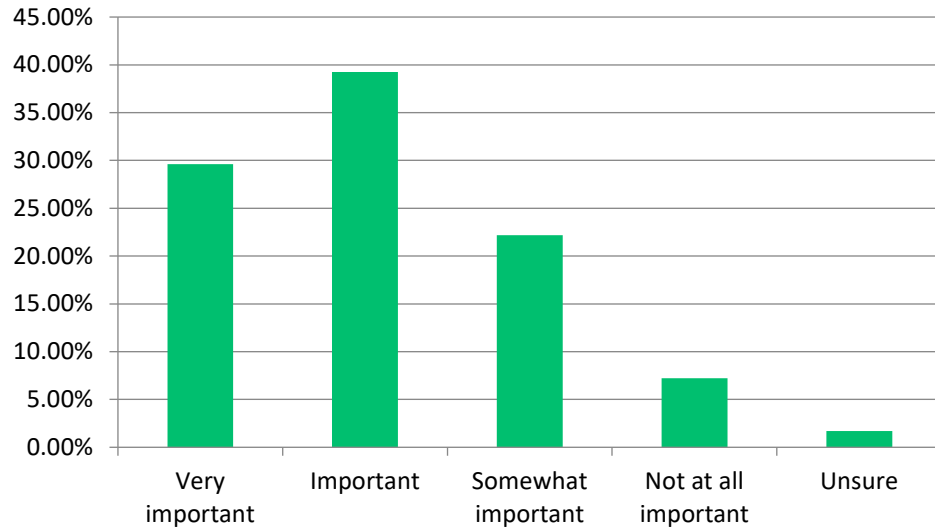
How important are environmental benefits to you?



What Environmental benefits would you like to see from clean energy?

- Improved water and air quality
- Reduced GHG emissions
- Slowed Climate Change

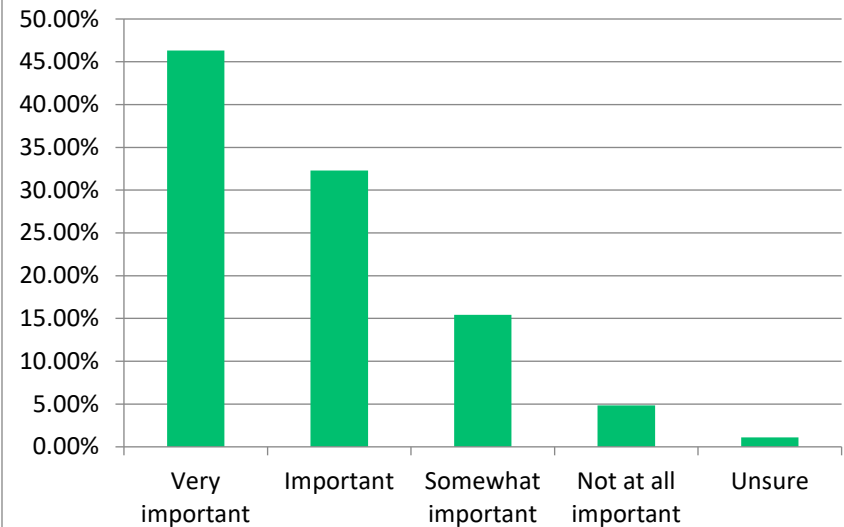
How important are economic benefits to you?



What Economic would you like to see from clean energy?

- Jobs
- Training
- Affordability

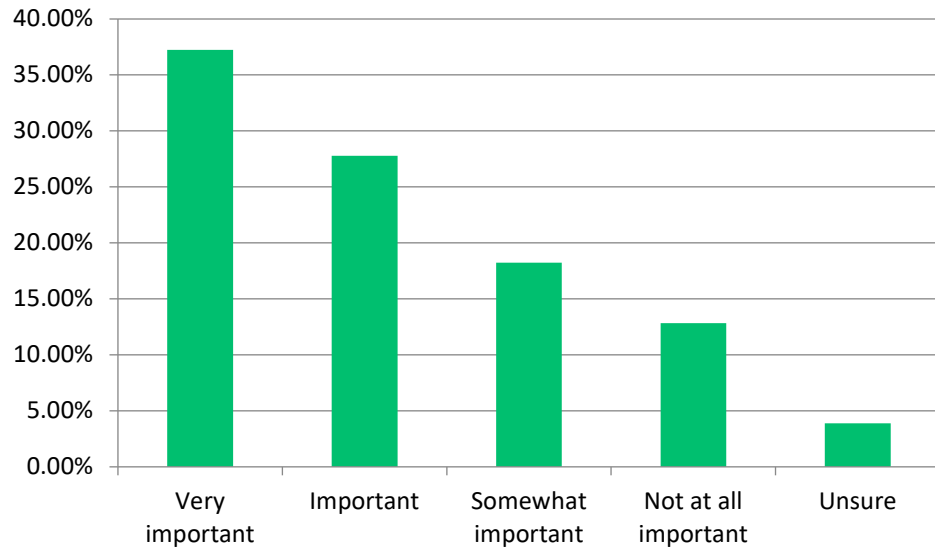
How important are affordability benefits to you?



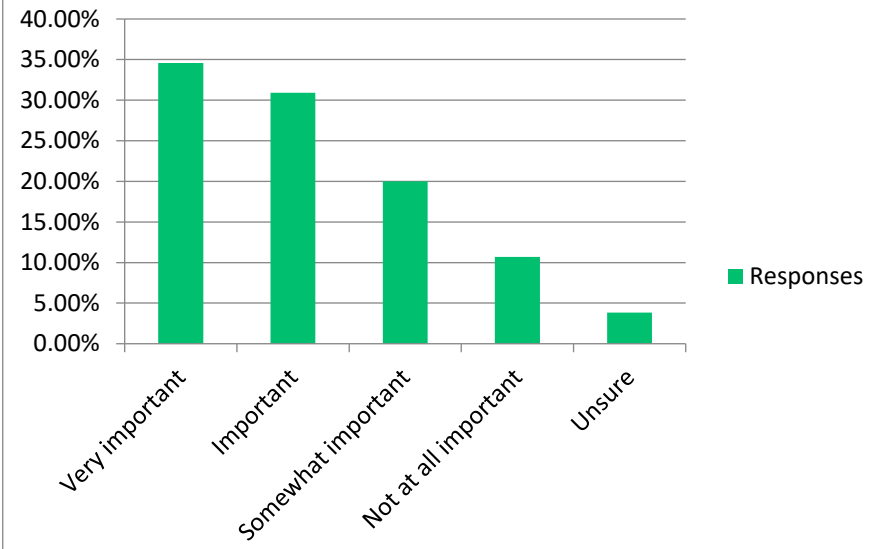
What affordability benefits would you like to see from clean energy?

- Reduced Cost
- Cheaper electricity by solar and wind
- Incentives/Rebates/Awareness

How important are clean electricity participation benefits to you?



How important are accessibility benefits to you?



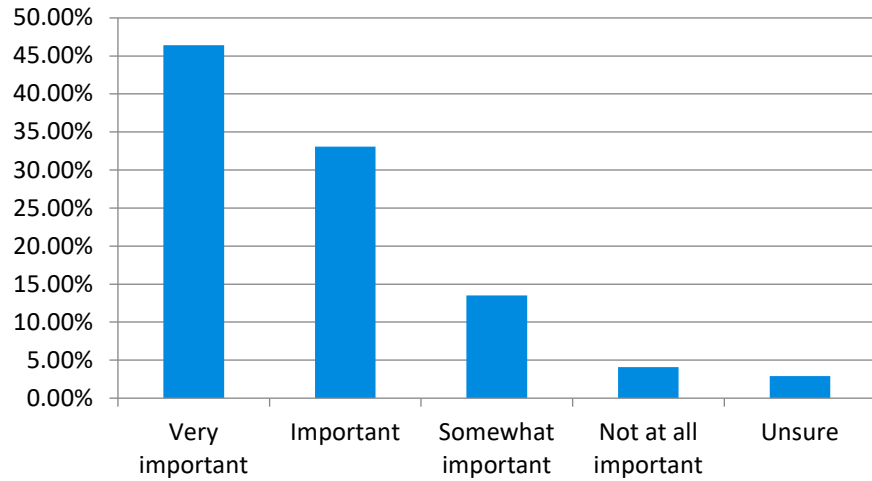
How important are clean energy participation benefits to you?

- Solar
- Wind
- Lower Cost

What Accessibility benefits would you like to see from clean energy?

- Solar
- Wind
- Affordability and Subsidies

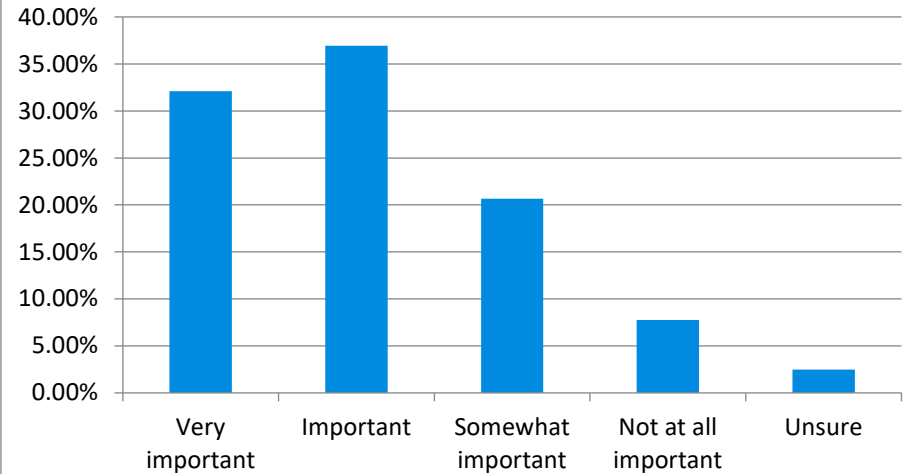
How important are energy resiliency benefits to you?



How important are resiliency benefits to you?

- Infrastructure
- Battery Backup
- Customer owned backup systems

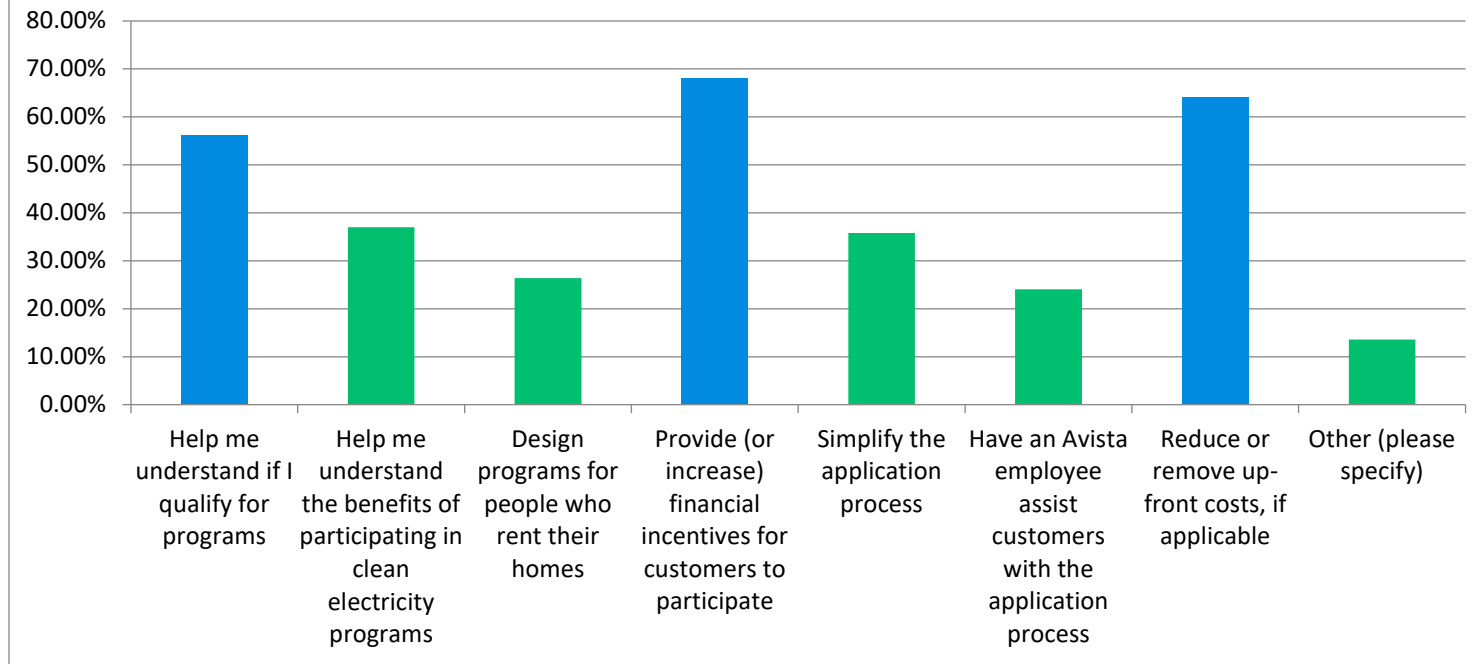
How important are comfort and satisfaction benefits to you?



What comfort benefits would you like to see from clean energy?

- Affordability
- Accessibility
- Backup sources

How can we help you (and others) participate in clean energy programs? Select all that apply.



Appendix F

Draft Clean Energy Implementation Plan Comments – Stakeholder

STAFF COMMENTS

SECTION	COMMENT	AVISTA RESPONSE
2020 ANALYSIS	There is a difference between renewable energy generation and actual energy supplied to meet retail sales. The rulemaking under docket UE-210183 will provide additional clarity on what the Commission Expects. In the meantime, Staff expects Avista to provide more detailed discussion in the final CEIP about how the current state should inform the Analysis	Avista will modify, as needed, based on final determination in rulemaking under Docket UE-210183
	Please add a footnote or reference to Table 2.1 referring the reader to Appendix E and explain in the text the REC and Specified Sales adjustments included in the “Renewable Energy After REC/Specified Sales” column in Table 2.1.	Avista reconsidered its interim targets and now includes increasing targets for renewable energy and non-emitting power. Further, Table 2.1 was updated for clarification. Additional clarification in this area should help address Staff concerns.
MEDIAN WATER	Impact of median water year – Please add a sheet to Appendix E showing how the 2020 actual data would change if it were adjusted for a median water year. Please include a discussion about how this might or might not change the assumptions within the development of Table 2.2.	Avista modified Renewable Energy targets to include the impact of Median Water as a separate column “Renewable Energy Under Utility Control with Median Hydro Conditions in Table 2.1
REC SALES	<p>Please provide any available legal analysis on this issue. Please clarify in the text whether the definition of clean energy is limited to renewable energy, or if it also includes non-emitting energy.</p> <p>Please explain why 40 percent is the right REC retirement goal, and discuss its relationship to the 41.5 clean percentage prior to transfers shown in Scenario 3 on the Summary Table in Appendix E.</p> <p>Avista proposes to generate CETA-compliant energy equivalent to 100% of retail load by 2030 rather than 2045. Potential approval of this plan would allow for potential early acquisition. Avista must fully discuss the benefits and costs for acquisition before statutory deadlines in the final CEIP. The Company should use the policy statement on early acquisition in docket UE-100849 to guide its discussion.</p>	Avista reconsidered its interim targets and now includes increasing targets for renewable energy and non-emitting power. Due to upcoming rules for compliance regarding the “use” of energy; Avista may need to alter its interim targets in future plans.
ENERGY EFFICIENCY	EE targets under CETA must include all energy efficiency without adjustments removing NEEA	Modified in Final filing to include NEEA.

	Staff recommends addressing why there is no measurable increase in the EE target from additional equity value	Avista expanded on the energy efficiency section of Chapter 4 to include additional discussion of “measurement” of energy efficiency programs and targets.
DEMAND RESPONSE	Staff requests that Avista create a demand response target that includes, at minimum, currently planned acquisition of DR. A cumulative accounting of DR capability that includes the ramp-up period required for new programs with larger future goals is necessary.	Avista modified final CEIP to include a demand response target in MW as well as additional specific actions related to demand response development. Programs which are intended to utilize AMI data were further expanded.
RENEWABLE ENERGY TARGET	Staff request Avista clearly quantify and describe a renewable energy target in the final draft. The renewable energy target should include subsets showing the EIA-eligible renewable energy, CETA-eligible renewable energy, and distributed renewable energy. The clean energy interim procurement target Avista included is not a substitute for a specific renewable energy target. In Chapter 4, the Company describes three specific renewable resource investments, but do not relate any of them to a renewable energy target.	Additional information is provided in the report and supporting workpapers to meet this request.
FORECASTED DISTRIBUTION OF NONENERGY COSTS AND BENEFITS	<p>Each specific target area above should be accompanied by a forecasted distribution of nonenergy costs and benefits. Staff understands that additional work is underway to make a robust forecasted distribution possible. This analysis must be completed for each target to the degree information is currently available.</p> <p>If a full analysis is unavailable, a full narrative should be provided in the final CEIP explaining what information is still needed, how the information could modify the Company’s plans, what next steps to obtain this data will be taken, and when the Company will update its CEIP with the new information.</p>	<p>Non-energy costs and benefits for renewable energy targets and demand response will be evaluated for the next IRP process through a third-party consultant. This information will be reviewed with the IRP TAC and discussed with EAG as needed.</p> <p>Energy Efficiency contains additional clarification of non-energy benefits</p>
DATA ORGANIZATION	<p>In order to improve navigation and usability of the information and data conveyed throughout the plan, as intended by CETA and the Commission’s electronic file format requirements, Staff has several recommendations.</p> <ul style="list-style-type: none"> • Use active links to supporting data throughout the plan, when available. • Replace the pasted values in both the WASR workbooks with specific formulas and cell references. • Provide more granular descriptions explaining, step-by-step, how Avista’s underlying modeling and studies (e.g., 2021 IRP, 2022-23 BCP) inform the Company’s lowest reasonable cost analysis and compliance with the clean energy transformation standards. This description should reference individual supporting workpapers and including specific components of workpapers (e.g., workbook cells, tabs). <p>Avista should develop a master file index that lists each filename, a summary of each file’s contents, what files or models the given file</p>	Avista has taken additional steps to provide clarity on supporting workpapers, including document links and descriptions.

	<p>informs, and a clear illustration of any required folder structure for operation of a given model.</p> <p>Staff requests that Avista make the following workpapers more user-friendly ahead of the final CEIP filing:</p> <ul style="list-style-type: none"> • Two (2) PriSM 7.0 workbooks, both Baseline and with the Chelan PUD contract, • WASR reasonably available portfolio • WASR alternative lowest reasonable cost portfolio <p>To accomplish this, Staff suggests the following specific modifications to Avista PRiSM workpaper that would be helpful ahead of the final CEIP filing:</p> <ul style="list-style-type: none"> • Significantly expand the “README” tab within both workbooks to include listed explanations of what each workbook tab provides in plain language understandable to a technical generalist. Ideally, such explanations would include how the various tabs relate to one another. For example, Staff assume the “Clean goals” tab encompasses the findings generated from the “Resource Data” and “EE_Selection” tabs but have been unable to trace data flow amongst these workbook sheets. • Specifically reference how the data tabs within these technical workpapers inform key figures and tables found within the plan. For example, Staff would like to see how Avista derived its energy efficiency 10-year IRP forecast illustrated in Figure 2.3 from the underlying IRP data workbooks. <p>Staff believe the Company could take similar actions (e.g., more tightly linking the underlying Excel workbooks with the report) with the WASR files.</p>	
PARTICIPATION IN COMPANY PROGRAMS	Staff recommends the Company separately track and report the participation in EE programs from participation in Bill Assistance programs	Avista accepted Staff’s suggestion and modified CBI.
	Figure 3.5 Staff recommends tracking the <u>percentage</u> of customers who participate in bill assistance compared to all customers <i>who are qualified</i> to participate in bill assistance	Avista accepted Staff’s suggestions and modified CBI
NUMBER OF ENERGY BURDENED HOUSEHOLDS	Table 3.4 Staff recommends the Company add percent of total households in these two categories so we can see relatively how many household’s energy are burdened	CBI updated to include new information from Empower Dataworks for energy burden. Per Staff’s suggestion, an additional measurement will be tracked for percent of total households in each category.

AVAILABILITY OF METHODS/MODES OF OUTREACH AND COMMUNICATION	Staff recommends tracking the number of customers reached by outreach methods rather than counting number of events.	Avista accepted Staff's suggestion and modified CBI.
NAMED COMMUNITY CLEAN ENERGY	<p>Staff recommends tracking and reporting EE and clean energy participation separately as shown in Appendix E.</p> <p>The Company should also track both categories for all customers and Named Communities</p>	<p>Avista accepted Staff's suggestion and modified CBI to include tracking of clean generation and EE separately for Named Community Generation</p> <p>Avista disagrees with staff regarding tracking distributed generation due. The amount of distributed energy is not an indicator of customer benefit, but rather an action the utility could undertake to solve a customer issue or other indicator.</p>
NAMED COMMUNITY INVESTMENT	<p>Provide examples of investments that may be made and how they would benefit named community</p> <p>Provide information on what the basis is for 60% target</p> <p>What is measurement of success?</p>	<p>Avista modified CBI to represent a Named Community Investment Fund rather than using the Avista Foundation.</p> <p>Additional clarification for this metric is contained in document.</p>
OUTAGE DURATION	<p>Value of lost load – measured difference between a hospital losing power and one residential household. Staff recommends using this metric or not tracking outage duration at all.</p> <p>If outage duration must be used, provide explanation as for why there may be shorter average duration in Named Communities compared to all</p>	<p>Avista disagrees with staff to value lost load based on economic value; this type of preferences will create additional biases toward inequities as it would favor reducing outages in high value areas.</p> <p>Avista will keep reliability as a CBI due to customers requested its inclusion and is an important measure to ensure the transition to clean energy does not reduce reliability. Avista provides additional context for the results of the baseline data and is willing to discuss alternative ways to present this data in a meaningful way to its customers.</p>
PROXIMITY OF ENERGY GENERATION	<p>Proximity of energy generation should be focused on distribution level. Please explain and develop a plan to track and report of distributed generation. Please include a plan for development of named community governance of generating resources.</p> <p>What are specific benefits to Named Communities and are there any unintended consequences?</p>	<p>Avista disagrees with staff regarding tracking distributed generation due. The amount of distributed energy is not an indicator of customer benefit, but rather an action the utility could undertake to solve a customer issue or other indicator.</p> <p>Avista includes a generation metric for named communities to respond to customer choice to measure its economic benefits to these communities, it is possible distributed generation may not be the best solution for these communities.</p>
OUTDOOR AIR QUALITY	<p>Are there differences in air quality in Named Communities vs. all customers. If so present and demonstrate how Named Communities benefit specifically.</p> <p>This CBI appears to track unhealthy air due to general causes, which may not always be linked to Avista actions.</p>	<p>Additional information is provided in the chapter of why Avista chose to monitor emission from a regional level. Further, Avista added additional data tracking of Avista's WA source emissions. Due to the complexity of plant air emissions and their perceived impact on the region Avista plans to work with stakeholders to refine this metric in a future CEIP.</p>

	<p>Staff views this metric is deficient as it now stands.</p> <ul style="list-style-type: none"> • Staff recommends tracking air quality around generation sources and other large facilities • Track avoided particulate emissions – the more Avista invests in the more Avista invests in electrification and insulation in wood burning homes, the more avoided particulate emissions from decreased in fires for heating. (or any type of alternative heating). If Avista could track the cost of these alternatives, it could make the decision to either electrify or allow the alternatives and invest in carbon sinks. 	
<p>GREENHOUSE GAS EMISSION</p>	<p>Staff does not agree that a regional perspective fully captures the GHG impacts of Avista’s activities. If Avista wants to measure GHG benefits to all customers/Named Communities, it should identify and track a direct causation between Avista resource decisions and GHG reductions that benefit customers/Named Communities, for example, the GHG emissions reductions resulting from its transportation electrification plans.</p> <p>Avista should also include the GHG emissions from Avista generation facilities as a sub-metric, since it will be reporting that information in its annual reports.</p>	<p>Avista disagrees with staff regarding using regional emissions as a metric and has provided additional detail within the chapter. Although Avista does agree to track Avista’s emissions in addition to regional emissions.</p>
<p>AVISTA EMPLOYEE DIVERSITY</p>	<ol style="list-style-type: none"> 1. Show the causal relationship between how increased diversity at Avista leads to addressing systemic racism, which then leads to specific benefits to customers/Named Communities, especially as it relates to public health. 2. Explain in the text why this is listed under public health. The text notes that this indicator is an attempt to address systemic racism (Staff notes that the CDC has declared systemic racism a serious public health threat). 3. Table 3.5 - Clarify in the text - What does “diversity” mean here vs. racially diverse? In general, a definition of diversity is needed other than saying it refers to gender and race. When the table reads Avista has 5% Craft diversity and 2% Gender diversity, what does this mean? Does it mean 5% BIPOC people and 2% women? Ensure this definition and “unit of diversity” is well defined. 4. Workforce availability – please provide the data supporting the workforce availability numbers. Further, if data is available, this should reflect each individual community, not just greater Spokane area. 	<p>Avista modified language in Chapter 4 – specific Actions and in the Chapter 3 – Customer Benefit Indicators to provide additional detail requested by Staff.</p>

	<p>5. Please provide additional discussion and plans focused on the diversity of managers/ directors and executives and how management structure and initiatives focus on a culture of equity in a tangible and measurable way.</p> <p>Please explain why Avista is willing to wait until 2035 to meet its goal of reflecting community diversity. How will Avista change its recruitment practices to increase the speed of this transition?</p>	
AVISTA SUPPLIER DIVERSITY	<ol style="list-style-type: none"> 1. Explain in the text why this is listed under public health. The text notes that this indicator is an attempt to address systemic racism (Staff notes that the CDC has declared systemic racism a serious public health threat). 2. Demonstrate how does this (and employee diversity above) specifically benefit Named Communities. 3. Please provide an explanation of the 11 percent diverse supplier use goal. If available, please provide a discussion of the current level of available diverse suppliers in the greater Spokane area. 6. o Please provide some examples of initiatives Avista supports that encourage the development of diverse supply chains. 	Avista modified language in Chapter 4 – specific Actions and in the Chapter 3 – Customer Benefit Indicators to provide additional detail requested by Staff.
INDOOR AIR QUALITY	<p>Please include an explanation of the causal relationship between Avista actions and IAQ and benefits to all customers/ Named Communities in the development of this indicator.</p> <ol style="list-style-type: none"> 4. Please provide a timeline for the development of this indicator. 	Avista has met with several experts including WSU and the Spokane Air Authority regarding IAQ. Avista and customer’s agree this should be a CBI; due to the difficulty to obtain data for baseline analysis and Avista effect on outcomes of IAQ, this CBI should be discussed further with stakeholders and health experts prior to making a decision on how to monitor this metric
GENERAL COMMENT	<p>Staff notes that a picture (logic model) of how inputs or resources flow through the specific actions and the results of those specific actions provides strong support for the approval of those specific actions. These logic models will provide both a visual and clear demonstration of correlation between the benefits and burdens of specific actions and the outcomes for Named Communities, directly linked to the customer benefit indicators.</p>	<p>Chapter 4 – Resource Selection includes a graphic for portfolio selection to help address this comment.</p> <p>Chapter 3 contains a table of which CBI impacts what energy benefit area.</p>
RENEWABLE ENERGY	<p>The specific renewable energy actions in the plan beginning on page 4-3 are refitting Post Falls Hydroelectric and Kettle Falls Biomass, and an RFP for Montana wind. The document needs to be clear as to why these resources are the lowest reasonable cost alternatives to meet the Company’s need. Avista will need to provide detail on how much clean energy can be expected to be available from the portion of clean energy paid for by Idaho customers, and whether they expect that availability to change.</p>	Additional language is included in the final draft to provide more information of why and how Avista has chosen its resources.

	Table 4.11 does not mention the clean energy purchase from Idaho. It also does not seem to be consistent with the targets in chapter 2. Please explain the differences.	
ENERGY EFFICIENCY	Regarding the EE specific actions beginning on page 4-7, Avista explained during a listening session that it considers EE to be the action, while the programs underneath it is the methods of acquisition. Staff believes the programs are the specific actions that will be used to meet the EE target. Please consider revising for the final. Please provide the table supporting Figure 4.2 with energy efficiency and contingency separate from each other.	Avista accepted Staff's suggestions and modified specific actions to tie to each individual program. Brief descriptions of each action (program) is provided in Chapter 4, a full description is included in Appendix C. In addition, Appendix I provides more detail than previously provided.
SPECIFIC ACTIONS TABLE (EXHIBIT I)	Please provide the timing and location for the specific actions referenced on p. 4-7 and in Appendix I. Another suggested area of improvement is the capacity contribution, energy contribution, and cost columns found in Appendix I – Avista's Specific Actions Matrix. Staff observes these values are pasted with no underlying source files or formulas. Avista needs to be able to show how these values were derived	Avista developed a new Appendix I, with a column referencing where information may be found for each specific actions.
DEMAND RESPONSE	Program details, program budgets, measurement and verification protocols should be added for demand response programs, particularly the third-party contract that will make up the bulk of Avista's planned DR acquisition over the four-year period. The demand response discussion beginning on page 4-14 not only needs to include additional detail on costs and timing for each of the programs listed but should include specific actions that Avista will undertake to address gaps in knowledge of DR.	Avista accepted Staff's proposal and modified document.
RESOURCE ADEQUACY	The resource adequacy discussion beginning on page 4-22 does not describe the specific resource adequacy metrics the Company will use to decide whether the IRP has selected "enough" resources to meet its resource need. Please fully describe Avista's resource adequacy requirement and measurement metrics consistent with RCW 19.405.030 through 19.405.050 and explain how the specific actions in this plan will allow the Company to meet this standard. We appreciate the Company's attention to the development of regional resource adequacy assessments.	Additional language is included in the final draft to provide more information regarding the information already provided regarding resource adequacy.
	Please provide a clear explanation of the projected differences in market sales in modeled results. Describe the reason for relying on Revenue Requirement as a proxy for "Weather Adjusted Sales Revenue" and any alternatives considered.	Staff's comment regarding market sales is not clear as the document does not get into specific detail on power transactions. Avista does provide additional information to how power costs are calculated, and this information may clarify this issue.

		Additional language is added to the document regarding WASR.
	Expand on page 6-7 paragraph 2, to clarify how the utility will use targeted outreach to engage with the Named Communities during the upcoming 4-year implementation period. Staff emphasizes the need to engage them during the implementation period, not only during the planning period. Include as many specific and concrete plans and examples as possible of how the Company will seek input from/partner with the public and Named Communities in the implementation period. Staff is likely to provide additional comments on the public participation plan filed in Docket UE-210295 as it completes its review of the CEIP.	Chapter 6 modified to include additional language on targeted outreach.
	<p>Staff recommends the Company review comments made on the IRP to identify additional issues that should be addressed as company commitments in the CEIP.</p> <p>Specific items that Staff expects to be included in the company commitments are:</p> <ul style="list-style-type: none"> • DER assessments beyond EE and DR- these are required in the next IRP but should also be considered in distribution planning. • A list of any items, besides those explicit in WAC 480-100-625(4), that the Company has identified to be updated in the 2023 IRP progress report. • The date that an updated workplan covering the development of the 2023 IRP progress report will be provided. • Distribution planning – at minimum the date at which a workplan will be available. • A modeling workplan for the proposed approach to include named community impacts in its next IRP. • Implement RCW 19.280.030(1). • Develop a study of regulatory barriers, and potential solutions, to clean energy program implementation. 	Please see CEIP Chapter 7 next steps for specific items listed.

Appendix F:

Draft Clean Energy Implementation Plan Comments – Stakeholder

THE ENERGY PROJECT (TEP) COMMENTS

SECTION	COMMENT	AVISTA RESPONSE
GENERAL COMMENT		<p>Avista appreciates the time and attention of the Joint Advocates in developing proposed Customer Benefit Indicators.</p> <p>Avista reviewed the CBIs and noted several overlapped with Avista’s proposed CBIs. Due to when the comments from the Joint Advocates were received, Avista was not able to present their proposed CBIs to their EAG, advisory groups, or with the CEIP workgroup. Avista will continue to work collaboratively with the stakeholders on the development of additional CBIs for future CEIPs.</p>
GENERAL COMMENT	<p>Avista’s CBIs in a number of cases are quite general and high level, perhaps as a result of the filtering and simplification process employed.</p> <p>The Energy Project is not advocating removal of specific Avista CBIs but instead recommends additions or modifications in order to improve the effectiveness of the final product.</p>	<p>Avista added additional metrics to its proposed CBIs in the final CEIP, based on feedback received from TEP and other stakeholders. Importantly, the CBI’s proposed in this first CEIP are a starting point. The Company anticipates reevaluating its proposed CBIs with stakeholders in future CEIPs and modifying as needed.</p>
	<p>Avista’s CBIs are grouped within each Equity Area while also being linked to one or more of the statutory elements. As a result, it is not always clear which CBIs are intended to measure which statutory elements</p>	<p>Avista’s process began with equity areas of affordability, access to clean energy, etc. in order to help with understanding of the needed CBIs from all stakeholders. As such, it was not a straight-forward exercise to take this information and translate into statutory elements. In future CEIPs, the Company will ensure conversations and development of CBIs include additional steps to provide this clarity.</p>

		In Chapter 3, Avista has provided a table which shows which energy benefit area (statutory elements) tie to which CBIs.
ENERGY BENEFITS	TEP recommends adding more detail to the metrics to allow more effective tracking of progress. To track energy benefits from energy efficiency, CBIs should include specific tracking of (1) increased funding of energy efficiency, (2) increased program participation, (3) bill reductions, (4) conversion to energy efficient appliances, and (5) expanded energy efficiency in rental residential housing stock.	The Company has included an additional measurement for the CBI: Participation in Company Programs to include increased funding of energy efficiency. Please see Chapter 3 – Customer Benefit Indicators.
	Increased access to renewable or non-emitting generation resources should be tracked by: (1) the increase in number of distributed and community renewable projects; (2) an increase in the number of community groups and households that own renewable energy projects; and (3) an increase in the percentage of electricity generated by distributed renewable projects.	Avista has not adopted these metrics at this time but will evaluate and discuss them with stakeholders in its next CEIP.
NON-ENERGY BENEFITS	Recommend two CBIs to demonstrate non-energy benefits: (1) improved health and community well-being, and (2) increased community employment opportunities. To measure health and well-being TEP recommends measuring factors such as: (1) reduced number of school and work absences triggered by poor air quality in highly impacted communities; (2) improved housing conditions resulting from weatherization measure installation; (3) increased residential “comfort” factors due to more affordable bills, for example via installation of efficient heat pump technology; (4) increased access to electricity as a transportation fuel, and (5) incorporation of Non-Energy Benefits in utility cost-effectiveness analysis. For the second CBI, increased community employment opportunities, TEP recommends tracking: (1) increased representation of low-income and vulnerable populations in clean energy apprenticeships and/or training programs in the state; (2) an increase in living wage/union jobs; and (3) increased representation of low-income and vulnerable communities among contractors selected in program delivery. TEP recommends that more specificity be included, however, such as by tracking an increase in participation in apprenticeship and training programs, and contractor representation.	<p>Non-Energy Benefits and its impacts regarding Energy Efficiency contain several of TEPs suggestions.</p> <p>The analysis for Non-Energy Impacts was received from Empower Dataworks in the first part of September. As such, the Company has not had time to fully digest and consider if/how the results may be incorporated into the CBI.</p>
REDUCTION OF BURDENS	Avista’s draft appears to indicate that it may be planning to identify energy burden for “all Washington customers.” TEP recommends that this CBI be refined to measure a reduction in energy burden for these specific categories of customers: (1) highly impacted communities; (2) vulnerable populations; (3) participants in bill assistance programs; (4) known low-income customers; and other residential customers with high energy burdens. The focus should be on low-income, vulnerable populations, and highly impacted communities, rather an “all customers.”	Avista modified final CEIP to provide additional clarification on this CBI based on stakeholder feedback Please see Chapter 3 – Customer Benefits

	<p>Recommends a second CBI to measure reduction in burden -- reduced barriers for program participation. Specifically, this includes: (1) increased participation in bill assistance, weatherization, and energy efficiency programs and grant opportunities; (2) expanded translation services; (3) reduced cost disparities for charging EVs. Language barriers are referenced in the narrative but not specifically addressed in the Avista CBI. We recommend adding a metric to track availability of translation services.</p>	<p>While Avista does not propose a CBI specific to reduction in barriers, it is embedded within of Reduction of Barriers component described in Chapter 6.</p> <p>In addition, the CBI of Improved Methods/Modes of Outreach and Communication has TEPs suggestions embedded within in. We will work towards overcoming barriers in order to ensure customers are benefitting from the transition to clean energy.</p> <p>Avista is already taking steps to address language barriers.</p>
PUBLIC HEALTH	<p>Recommends to directly focus on improved public health outcomes by tracking: (1) hospital admissions for asthma; (2) decreased wood use for home heating; (3) improvements in indoor and outdoor air quality; and (4) reduction in health care cost burden.</p>	<p>Avista has been evaluating hospital admission for asthma and has not completed evaluation. It will consider this suggestion in its next CEIP</p> <p>Avista has included a metric regarding improvement in outdoor air quality in this CBI.</p>
ENVIRONMENTAL	<p>Recommendations include: (1) reduction of GHG emissions; and (2) reduced pollution burden and exposure (re outdoor air quality). For outdoor air quality, Avista proposes only to track the number of days the average customer experiences unhealthy air quality. This is only one measure of outdoor air quality and does not focus specifically on Named Communities. Recommendations would additionally track: (1) decrease in share of population and pollution burden by race/ethnicity, geography, and specific target customer groups; (2) decrease in air pollution exposure index by race/ethnicity, and other customer groups; (3) reduced particulates from fossil fuel burners in targeted neighborhoods; (4) reduced particulates next to coal rail lines; and (5) reduced diesel particulates.</p> <p>For greenhouse gas emissions propose the following metrics: (1) continuous reduction of GHG emissions in the utility service area; (2) increased electrification (gas to electric conversions); (3) increased electrification of medium and heavy duty utility maintenance fleets; (4) increased transit electrification.</p>	<p>Avista has current CBIs which tie to both of the Joint Advocates' recommendations for Environmental: (1) Outdoor Air Quality and (2) GHG Emissions. While Avista does not oppose a more granular evaluation of these metrics, at the present time, data is not readily available. Please see additional information in Chapter 3, page 3-25 and 3-26.</p> <p>Specific to GHG Emissions Avista has metrics similar to the Joint Advocates' recommendation: 1. Avista is monitoring the regional GHG metric through its CBI: Greenhouse Gas Emissions. Th CBI was modified from the Company's original proposal in response to Stakeholder feedback. In addition, based on stakeholder feedback, Avista included a metric for transportation electrification.</p> <p>For all other suggested CBIs/metrics, Avista is open to discussing their merit and incorporation into a future CEIP. Importantly, the CEIP is an iterative process and in the future these metrics may be modified as more information and data is available, and as agreed to in a public process.</p>
REDUCTION IN COST	<p>TEP recommends adoption of two CBIs: (1) expanding the bill assistance program; and (2) reduction in number and amount of arrearages. Neither</p>	<p>Avista modified final CEIP to provide additional clarification on this CBI based on stakeholder</p>

	of these CBIs appear to be fully included in the Avista draft. TEP proposes use of the following metrics for this CBI: (1) increased participation rates among all eligible customer, including Named Communities; (2) increased penetration rates (i.e., the portion of eligible customers participating); (3) increase both in annual program budgets and in utilization of the budgets; and (4) increase in customers avoiding disconnection due to receipt of assistance.	feedback. While not incorporating all of the suggested metrics, many of these elements will be tracked or already are through the Company's proposed CBI or other energy efficiency and energy assistance reporting requirements.
	TEP also supports an additional CBI to track cost reduction – tracking the number and amount of arrearages. Specifically, the CBI would measure the reduction in number and percentage of residential customers with arrearages over 90 days past due, with break-outs for customer by zip code/census tract, renter, highly impacted communities, vulnerable populations, known low-income and BIPOC communities.	Avista does not see this suggestion as applicable to the transition to clean energy. Affordability is a key equity area with proposed a CBI and associated metrics.
REDUCTION IN RISK	The Energy Project supports including two specific CBIs that reflect reduction of risk to customers. First, a reduction in numbers of customers with low credit scores, with fewer customers sent to collection. TEP recommends including the additional credit score CBI as a more specific measurement that is directly related to whether Avista utility customers are treated equitably with respect to credit and collection.	Avista does not see this suggestion as applicable to the transition to clean energy. Affordability is a key equity area with proposed a CBI and associated metrics.
	TEP supports metrics to increase neighborhood safety by: (1) reduced frequency and length of outages due to major disasters, wildfire, or extreme weather events, and (2) increased capacity of the local community to respond to such weather events.	Avista has included a CBI related to Outage Duration. Regarding the second metric, the Company is unsure of how tracking this would be possible. We appreciate the suggestion, and this would be a good topic to discuss with advisory groups and the EAG during the development of the next CEIP.
ENERGY SECURITY	The Energy Project supports adding two CBIs that relate to energy security. The first measure reductions in residential disconnections. Metrics should be adopted to track: (1) reduction in the number and percentage of residential disconnections; and (2) reduction in the number and percentage of residential disconnections by location and demographic information.	Avista does not see this suggestion as applicable to the transition to clean energy.
	A second important CBI to measure energy security is access to reliable clean energy. Metrics for this CBI would look at: (1) increased numbers of neighborhoods with storage/back up/ or locally powered centers for emergencies; (2) increased distributed generation in low-income neighborhoods; and (3) optimized grid investment in distribution.	Avista has not adopted these metrics at this time but will evaluate and discuss them with stakeholders in its next CEIP.
RESILIENCY	TEP supports CBIs to reduce the frequency and duration of blackouts and brownouts in Named Communities. This would be measured by improvements in SAIDI and SAIFI for Named Communities. The Energy Project also supports a CBI to track reduction in energy and capacity need by monitoring: (1) increased participation in targeted demand response (DR) programs, load management, and behavioral programs that result in a measurable reduction to peak demand; (2) increased	Avista has included a CBI related to Outage Duration and provided more clarification on the metric to track this CBI. Regarding the additional proposed CBI, the Company does not yet have DR programs, but will consider this suggestion in the future and effects of energy efficiency is measured and tracked closely already.

	energy efficiency savings; and (3) increased water savings due to energy efficiency measures.	
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Clean Energy Implementation Plan Survey Results

August 17, 2021

Annette Brandon

Survey Overview

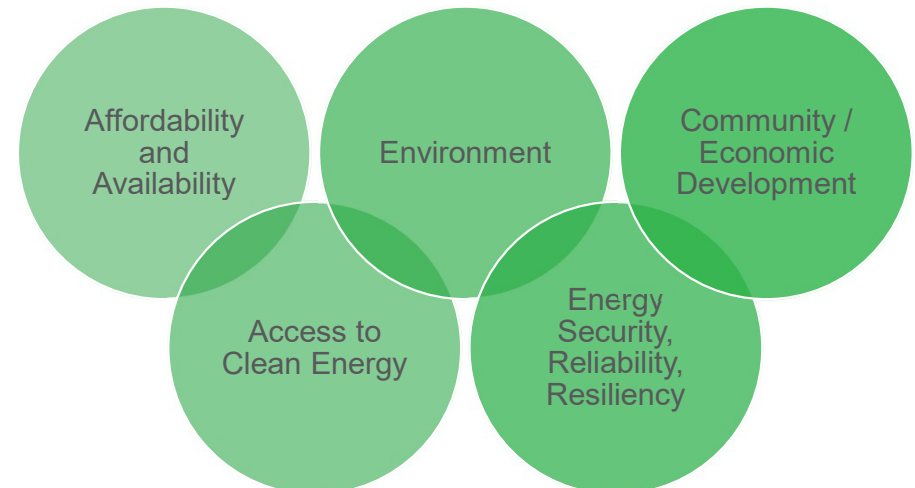
Intent of Survey was to gather additional input from customers who may not have been able to attend our CEIP Public Participation Meeting Series

2600 Customers Took Survey
36 Questions

Top Feedback (in order of importance)

1. Environmental Concerns
2. Public Health Concerns
3. Affordability

EQUITY AREAS



Customer Benefit Indicators

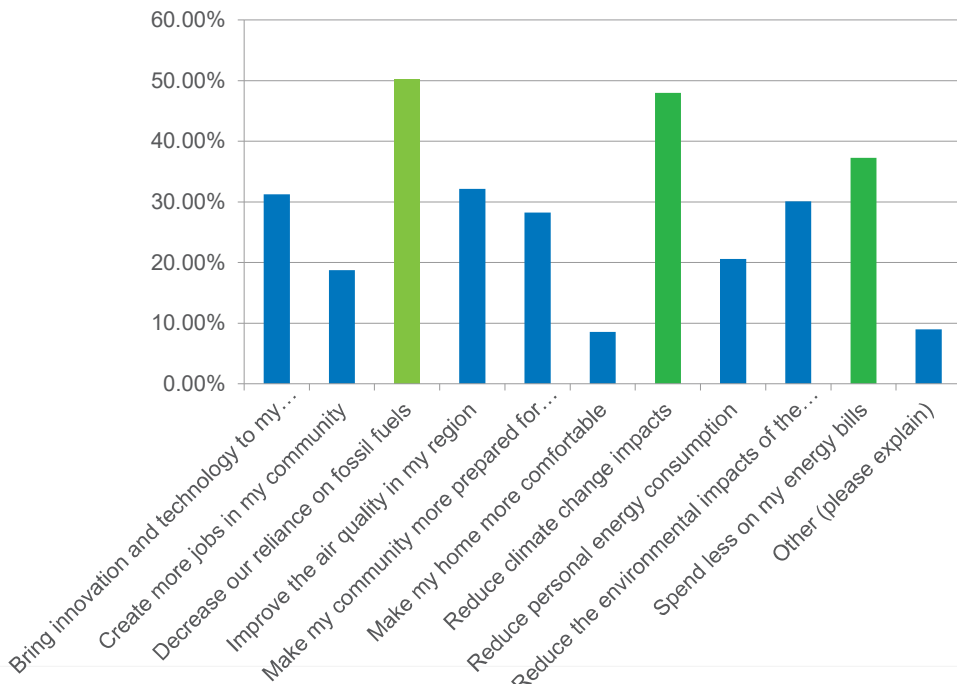
Equity Area	Customer Benefit Indicator
Affordability	<ul style="list-style-type: none"> • Participation in Company Programs • Number of Energy Burdened Households
Access to Clean Energy	<ul style="list-style-type: none"> • Availability of methods/modes of outreach and communication methods
Community Development	<ul style="list-style-type: none"> • Named Community Investments • Named Community Clean Energy
Energy Resiliency	<ul style="list-style-type: none"> • Outage Duration
Energy Security	<ul style="list-style-type: none"> • Proximity of Energy Generation
Environmental	<ul style="list-style-type: none"> • Outdoor Air Quality • Environmental
Public Health	<ul style="list-style-type: none"> • Employee Diversity • Supplier Diversity • Indoor air quality

Survey Results

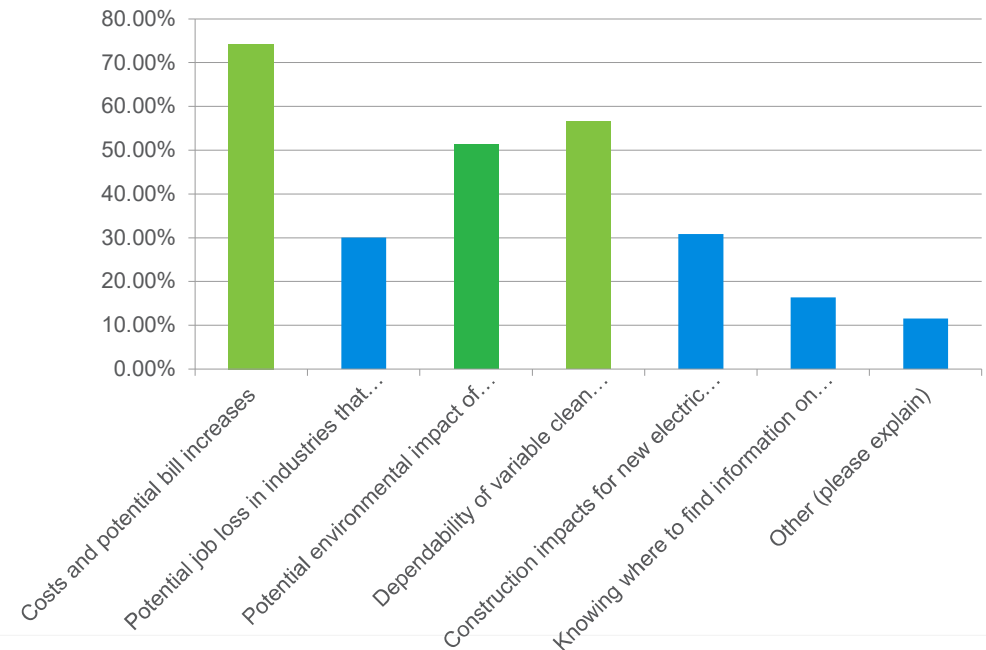
Benefits and Challenges

Common Themes:
 Climate Change/Environmental Impact
 Energy Cost (both benefit and challenge)
 Security/Dependability

Thinking about our transition to clean energy, what potential benefits do you think are most important? Please choose up to four.

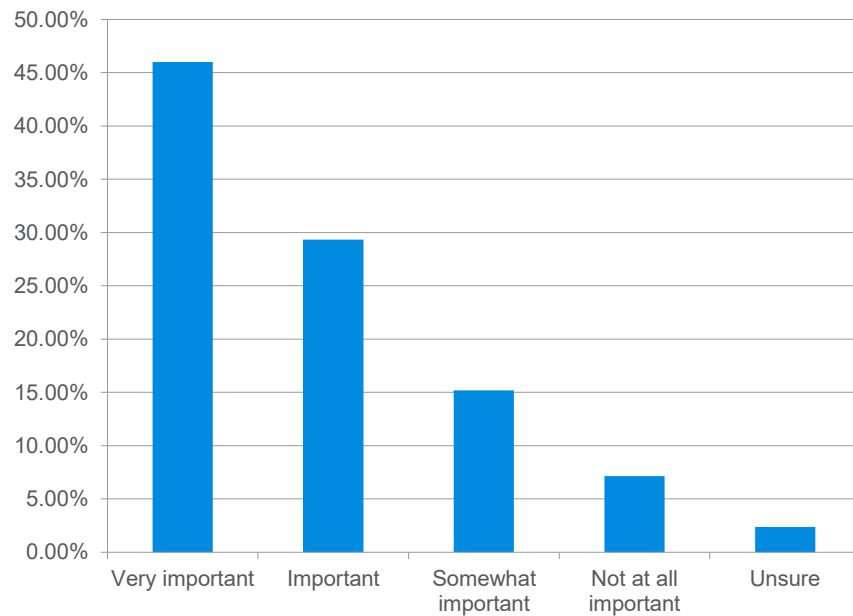


Thinking about our transition to clean energy, what potential challenges concern you most? Please choose up to four.



Survey Results - Public Health & Environment

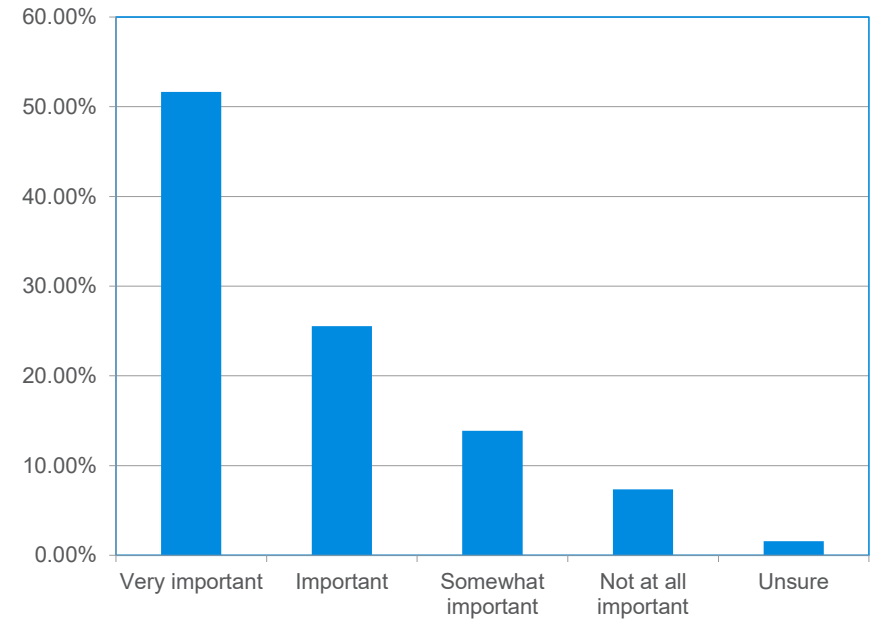
How important are public health benefits to you?



What Public Health benefits would you like to see from clean energy?

- Improved air quality
- Reduced Pollution
- Slowed Climate Change

How important are environmental benefits to you?

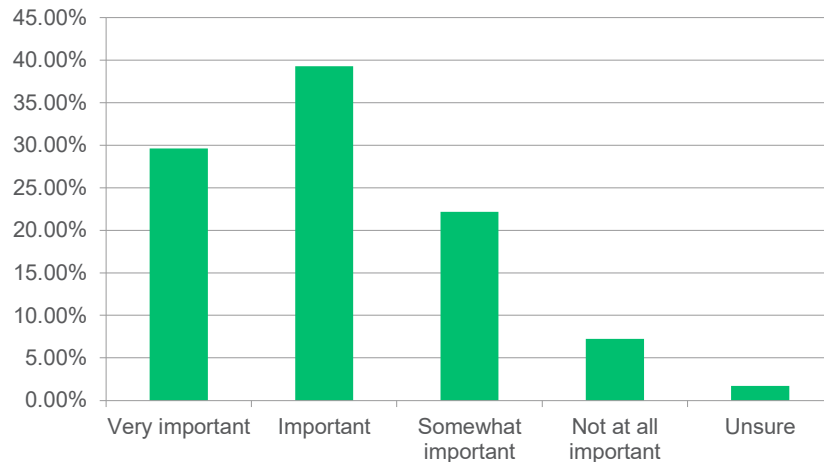


What Environmental benefits would you like to see from clean energy?

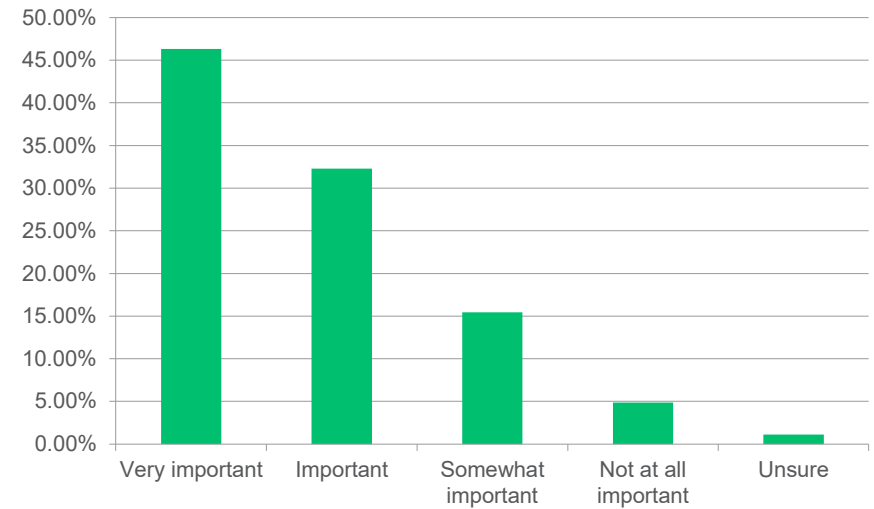
- Improved water and air quality
- Reduced GHG emissions
- Slowed Climate Change

Survey Results – Economic and Affordability

How important are economic benefits to you?



How important are affordability benefits to you?



What Economic would you like to see from clean energy?

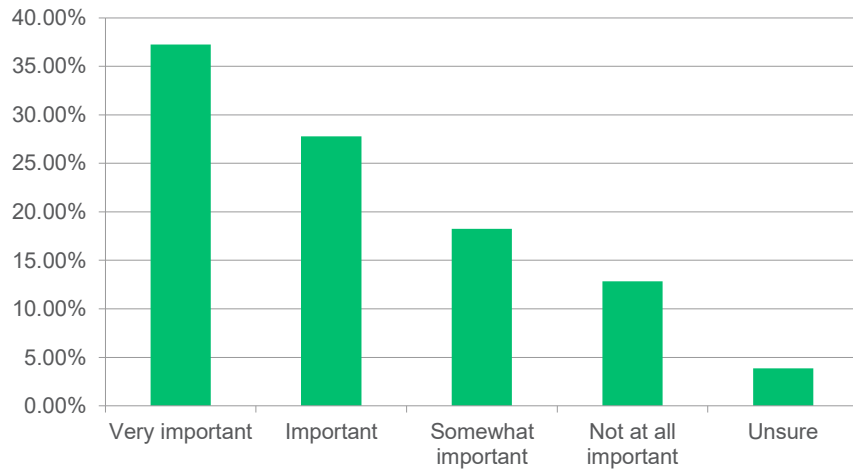
- Jobs
- Training
- Affordability

What affordability benefits would you like to see from clean energy?

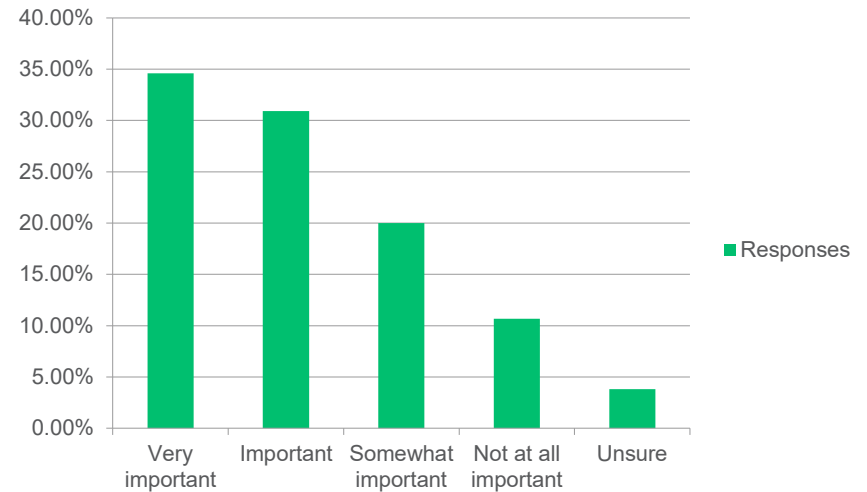
- Reduced Cost
- Cheaper electricity by solar and wind
- Incentives/Rebates/Awareness

Survey Results – Participation and Access

How important are clean electricity participation benefits to you?



How important are accessibility benefits to you?



How important are clean energy participation benefits to you?

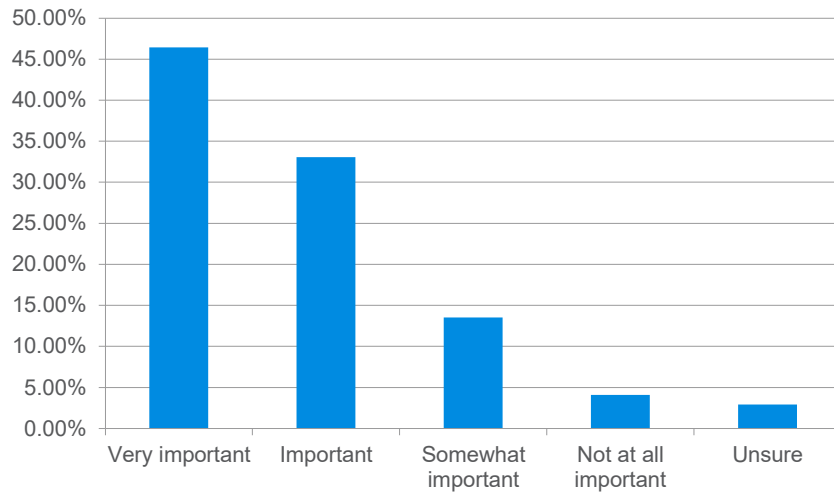
- Solar
- Wind
- Lower Cost

What Accessibility benefits would you like to see from clean energy?

- Solar
- Wind
- Affordability and Subsidies

Survey Results – Resiliency and Comfort

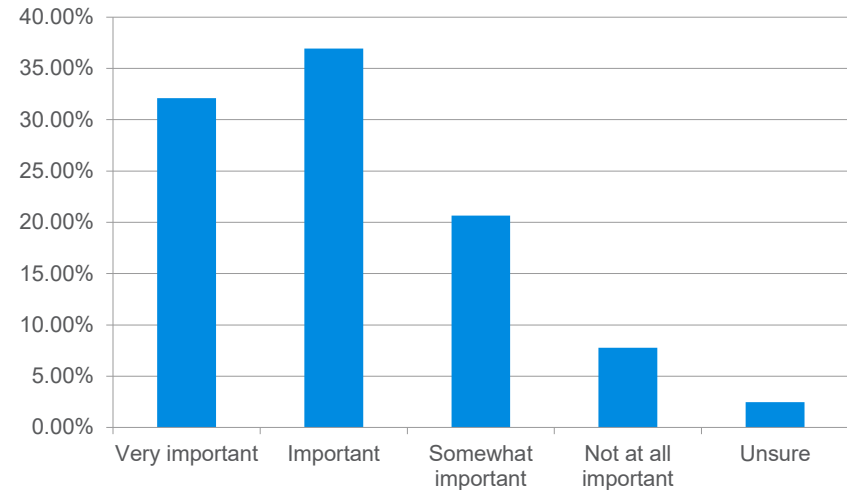
How important are energy resiliency benefits to you?



How important are resiliency benefits to you?

- Infrastructure
- Battery Backup
- Customer owned backup systems

How important are comfort and satisfaction benefits to you?



What comfort benefits would you like to see from clean energy?

- Affordability
- Accessibility
- Backup sources

Survey Results

How might we help you participation in clean energy

How can we help you (and others) participate in clean energy programs? Select all that apply.

