

Clean Energy Implementation Plan Reporting Template

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Deadline: January 1, 2026

Submission: Submit this workbook and all supporting documentation via SmartSheet.

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Enter information in yellow fields

Select drop-down option from list in orange fields

Do not modify grey-shaded fields.

Note: this Excel workbook is macro-enabled to allow for the selection of multiple CETA categories on the Indicators & Forecast tab. If you have security restrictions or have no use for this feature, you do not have to enable macros.

Relevant Clean Energy Transformation Act Statutes and Rules

RCW 19.405.060

Clean energy implementation plan—Compliance criteria—Incremental cost of compliance.

(2)(a) By January 1, 2022, and every four years thereafter, each consumer-owned utility must develop and submit to the department a four-year clean energy implementation plan for the standards established under RCW 19.405.040(1) and 19.405.050(1) that: (i) Proposes interim targets for meeting the standard under RCW 19.405.040(1) during the years prior to 2030 and between 2030 and 2045, as well as specific targets for energy efficiency, demand response, and renewable energy; (ii) Is informed by the consumer-owned utility's clean energy action plan developed under RCW 19.280.030(1) or other ten-year plan developed under RCW 19.280.030(5); (iii) Is consistent with subsection (4) of this section; and (iv) Identifies specific actions to be taken by the consumer-owned utility over the next four years, consistent with the utility's long-range resource plan and resource adequacy requirements, that demonstrate progress towards meeting the standards under RCW 19.405.040(1) and 19.405.050(1) and the interim targets proposed under (a)(i) of this subsection. The specific actions identified must be informed by the consumer-owned utility's historic performance under median water conditions and resource capability and by the consumer-owned utility's participation in centralized markets. In identifying specific actions in its clean energy implementation plan, the consumer-owned utility may also take into consideration any significant and unplanned loss or addition of load it experiences.

(b) The governing body of the consumer-owned utility must, after a public meeting, adopt the consumer-owned utility's clean energy implementation plan. The clean energy implementation plan must be submitted to the department and made available to the public. The governing body may adopt more stringent targets than those proposed by the consumer-owned utility and periodically adjust or expedite timelines if it can be demonstrated that such targets or timelines can be achieved in a manner consistent with the following: (i) Maintaining and protecting the safety, reliable operation, and balancing of the electric system; (ii) Planning to meet the standards at the lowest reasonable cost, considering risk; (iii) Ensuring that all customers are benefiting from the transition to clean energy: Through the equitable distribution of energy and nonenergy benefits and reduction of burdens to vulnerable populations and highly impacted communities; long-term and short-term public health and environmental benefits and reduction of costs and risks; and energy security and resiliency; and (iv) Ensuring that no customer or class of customers is unreasonably harmed by any resulting increases in the cost of utility-supplied electricity as may be necessary to comply with the standards.

(4)(a) A consumer-owned utility must be considered to be in compliance with the standards under RCW 19.405.040(1) and 19.405.050(1) if, over the four-year compliance period, the average annual incremental cost of meeting the standards or the interim targets established under subsection (2) of this section meets or exceeds a two percent increase of the consumer-owned utility's retail revenue requirement above the previous year. All costs included in the determination of cost impact must be directly attributable to actions necessary to comply with the requirements of RCW 19.405.040 and 19.405.050.

(b) If a consumer-owned utility relies on (a) of this subsection as a basis for compliance with the standard under RCW 19.405.040(1), and it has not met eighty percent of its annual retail electric load using electricity from renewable resources and nonemitting electric generation, then it must demonstrate that it has maximized investments in renewable resources and nonemitting electric generation prior to using alternative compliance options allowed under RCW 19.405.040(1)(b).

WAC 194-40-200

Clean energy implementation plan.

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

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

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

(a) **Energy efficiency.** (i) The CEIP must establish a target for the amount, expressed in megawatt-hours of first-year savings, of energy efficiency resources expected to be acquired during the period. The energy efficiency target must comply with WAC 194-40-330(1). (ii) A utility may update its CEIP to incorporate a revised energy efficiency target to match a biennial conservation target established by the utility under RCW 19.285.040 (1)(b) and WAC 194-37-070.

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

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

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

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

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

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

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

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

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

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

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

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

Utility Name & Contact Information

Note: if you list multiple contacts, please separate their information by a comma and a space.

Report Year	2026
Compliance Period	2026-2029
Utility Name	Franklin County PUD #1
Report Date	11/12/2025
Contact Name	Katrina Fulton
Phone Number	509-412-2267
Email	kfulton@franklinpud.com
Web address of published CEIP	https://www.franklinpud.com/rates-power-resources/resource-planning/
Are you a "qualifying utility" under the EIA?	Yes
Are you a BPA "full requirements" customer?	No

Targets

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

Utilities with less than 25,000 customers only need to complete cells H8 and H9 in the interim targets table below.

Clean Energy Type	Units	2026	2027	2028	2029	4-year Period
Renewable	%	82%	86%	85%	76%	82%
Nonemitting	%	9%	9%	9%	9%	9%
Total		91%	95%	94%	85%	91%

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

n/a

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

Utilities with less than 25,000 customers only need to complete cells H17-19 in the specific targets table below.

Resource Category	Units	2026	2027	2028	2029	4-year Period
Renewable Energy	MWh to be used over the interim performance period	1,035,927	1,098,346	1,098,061	988,709	4,221,043
Energy Efficiency	MWh to be acquired over the interim performance period	4,098	4,983	6,133	7,288	22,501
Demand Response	MW to be acquired over the interim performance period	-	-	-	-	-

Energy efficiency assessment methodology details

Conservation Assessment Method	Conservation Potential Assessment
Hyperlink to Relevant Assessment	https://www.franklinpud.com/rates-power-resources/resource-planning/
Notes	Conservation Potential Assessment completed by Lighthouse Energy Consulting and Nauvoo Solutions

Demand response assessment methodology details

Did your utility conduct a demand response assessment?	Yes
Please briefly describe your demand response assessment findings. Please describe if there are DR opportunities for particular customer classes or barriers to utilizing DR in your service territory. Please describe which DR technologies were found to be cost-effective, reliable, and feasible.	The demand response assessment identified several products as potentially cost effective in the summer months. This includes irrigation demand response as well as other products targeting summer demand reductions. Some products have costs split across seasons and therefore may warrant further investigation before developing a target.
Hyperlink to Relevant Assessment	https://www.franklinpud.com/rates-power-resources/resource-planning/
Notes	Demand Response Potential Assessment completed by Lighthouse Energy Consulting and Nauvoo Solutions

Indicators & Forecast

Specific actions to ensure equitable transition (WAC 194-40-200(1)(4))

Enter information in the yellow fields below. Each indicator should correspond with the information entered in the same row. See the Menu of Ideas for examples. You can leave any unused fields blank or delete any unused rows. If you need to expand the table, you can drag the boundary of the data table by

Index	Ind_ID	Indicator	CETA Category	Specific Action 1	Specific Action 2	Outcome Metric 1	Outcome Metric 2	How will the indicator and its associated metrics look different across the service territory in four years after taking the specific actions?
1	2026_46_1	Increased energy efficiency	Energy Security and Resiliency	Continue energy efficiency programs to meet identified target		MWh Savings Achieved		Homes and businesses will use energy more efficiently through participation in expanded program offerings.
2	2026_46_2	Increased grid resilience	Energy Security and Resiliency	Further evaluate demand response programs		If cost effective, MW of flexible load		If cost effective, the District can keep rates low through peak demand reductions through demand response and reduced exposure to high market prices
3	2026_46_3	Clean energy acquisitions	Environmental Benefits	The District will acquire additional clean energy through new agreements and extensions of existing agreements.	The District will sell portions of those resources that are not needed to minimize cost risk.	Measure MWh of clean energy acquired via resource additions or extension of current resource contracts	Measure MWh sold and approximate fiscal impact.	The District will acquire additional clean energy resources, increasing the share of clean energy used to serve load while minimizing impacts on utility costs.
4	2026_46_4	Supporting highly impacted communities and vulnerable populations	Reduction of Costs and Risks	The District will continue its existing work to support its highly impacted communities and vulnerable populations.		Customer energy burden		Energy burden of the District's most vulnerable customers will decrease with support from the District.
5	2026_46_5							
6	2026_46_6							
7	2026_46_7							
8	2026_46_8							
9	2026_46_9							
10	2026_46_10							

Specific Actions & Equity

Specific actions to ensure equitable transition (WAC 194-40-200(1)(4))

Click "Data">"Refresh All" to auto-populate the specific actions list below with the specific actions from the previous spreadsheet tab.

Please enter "N/A" where the question is not applicable to the specific action.

SA_ID	Specific Action	Long Description	Resource Category	Program Type	Input Metric 1	Input Metric 2	Output Metric 1	Output Metric 2	What is the expected effect of this specific action on highly impacted communities and vulnerable populations?	How will the specific action and its resources be governed by (if applicable), serve, or benefit highly impacted communities or vulnerable populations, if at all?	What are the risks to highly impacted communities and vulnerable population associated with the clean energy transition? How does the utility intend to reduce these risks through this specific action (if applicable)?	Will resources be located in highly impacted communities or vulnerable populations? (Y/N/Not Applicable)	What is the general location of this specific action and its resources (if applicable)?	What is the timing of this specific action?	What is the estimated cost of this specific action?	What other benefits does the specific action bring that isn't covered by the listed metrics? (optional)
2026_46_1_1	Continue energy efficiency programs to meet identified target	The District will continue its existing energy efficiency programs and consider additional program offerings to meet the identified target.	Energy Efficiency	Energy Efficiency and Weatherization	Number of programs offered	Program budget	Participation rates across energy efficiency programs	Distribution of incentive dollars by energy efficiency program	Keeps utility rates lower over time. Lowers energy burdens, reduces monthly utility bills, and improves comfort and health outcomes for households in highly impacted communities and vulnerable populations.	The District's energy efficiency programs will serve HIC/VP customers through low income program offerings as well as Senior/Disability discounts. All program offerings are made available in both English and Spanish to help reach HIC/VP. Additionally, the District's website is offered in both English and Spanish.	HICs and VPs face risks associated with energy burdens and other financial hardships. The District will mitigate these risks this by continuing to offer multiple discount programs to assist in lowering energy burden , with at least one of the programs being offered to low income as defined by WAC.	Yes	Throughout the District's service territory	2026-2029	This action is supported by the District's existing program funding.	Improves indoor air quality, reduces arrears and shutoff risk, and creates local job opportunities in weatherization and construction trades.
2026_46_2_1	Further evaluate demand response programs	The District will further evaluate the cost effectiveness of the most promising demand response programs, including irrigation demand response and smart thermostats.	Demand Response	Demand Response	If cost effective, number of programs offered	If cost-effective, program budget	If implemented, monitor participation rates across energy efficiency programs	If implemented, distribution of incentive dollars by energy efficiency program	Provides opportunities for incentives and empowers customers to participate in grid reliability without large upfront costs, creating new ways for vulnerable households to benefit.	The District will explore demand response programs that can benefit HICs and VPs by providing opportunities for bill savings without capital investments.	HICs and VPs are at risk of not being able to fully participate in the clean energy transition due to the large expenditures often required for energy efficiency and renewable energy. Demand response programs provide an option that often requires little to no capital expense.	Yes	Throughout the District's service territory	If implemented, 2026-2029	Cost will be determined based on whether program is implemented and its overall scope.	Enhances customer engagement, builds awareness of energy use, and improves overall grid reliability during peak demand events.
2026_46_3_1	The District will acquire additional clean energy through new agreements and extensions of existing agreements.	Over the next two years, the District will work towards completing agreements on multiple CETA-compliant resources, through a combination of new agreements and extensions of existing agreements.	Renewable Energy	Utility-scale Resources	Number of contracts implemented for additional clean energy resources		MWh of renewable energy added to portfolio		This action will ensure compliance with CETA requirements for clean energy while minimizing costs and rate impacts.	n/a	The District's HICs and VPs face risks associated with high energy burdens. This action is intended to support the District's compliance with CETA requirements while minimizing costs.	N/A		2026-2029	To be determined	n/a
2026_46_3_2	The District will sell portions of those resources that are not needed to minimize cost risk.	To minimize costs and price risks, the District will sell portions of resources that are not needed while maintaining CETA compliance.	Renewable Energy	Utility-scale Resources			Amount of excess renewable energy sold to third parties		This action will ensure compliance with CETA requirements for clean energy while minimizing costs and rate impacts.	n/a	The District's HICs and VPs face risks associated with high energy burdens. This action is intended to support the District's compliance with CETA requirements while minimizing costs.	N/A		2026-2029	This action will reduce costs to the District and its customers.	n/a
2026_46_4_1	The District will continue its existing work to support its highly impacted communities and vulnerable populations.	The District currently takes a variety of actions to support its highly impacted communities and vulnerable populations. These actions will be continued through the timeframe of this CEIP as well as Creating a Local Customer Services Expo to assist HIC/VP with available resources	Other	Public Outreach and Engagement	Host a Customer Service Expo to offer programs available and a forum to encourage customer connections in hopes to reach HIC/VP		Measure attendance of the Customer Service Expo and capture the number of customers who were able to utilize a program offering from a HIC/VP that attended the event.		Increase awareness of available programs to HIC/VP to ensure programs offered are being utilized by the HIC/VP	The District's increased community outreach will ensure HIC/VP are aware of programs that could help lower their energy burden.	HICs and VPs face risks associated with energy burden and other financial hardships. The District will mitigate these risks this by continuing to offer multiple discount programs to allow for lowering energy burden , with at least one of the programs being offered to low income as defined by WAC	Yes	Throughout the District's service territory	2026-2029	This action is supported by the District's existing program funding and staff.	Increases customer engagement, building awareness of energy use, and programs available to lower that energy use.

Highly Impacted Communities & Vulnerable Populations

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

Highly Impacted Community is defined in RCW 19.405.020(23) as:

(23) "Highly impacted community" means a community designated by the department of health based on cumulative impact analyses in RCW 19.405.140 or a community located in census tracts that are fully or partially on "Indian country" as defined in 18 U.S.C. Sec. 1151.

Department of Health has designated Highly Impacted Communities as those ranking 9 or 10 on the Environmental Health Disparities (EHD) map.

[Link to Instructions to Identify Highly Impacted Communities \(HIC\)](#)

[Link to the Environmental Health Disparities](#)

[\(EHD\) Map](#)

Which methodology did you use to identify highly impacted communities (HIC)?	Environmental Health Disparities Map
# of census tracts that are HIC (Rank 9 or 10 under EHD v2.0 or at least partially on "Indian Country")	5
# of census tracts that are at least partially on "Indian Country"	0
Average EHD v2.0 rank for service territory	6.5
What are the top 1-3 EHD factors in your highly impacted communities? What are the rankings for these EHD factors and the associated metrics?	The highly impacted communities in Franklin PUD's service area score highly in each of the EHD factors (environmental exposures, environmental effects, socioeconomic factors, and sensitive populations). Numerous metrics within these categories receive high scores, including ozone concentrations, PM2.5 concentration, proximity to Risk Management Plan facilities, no high school diploma, people of color, population living in poverty, primary language other than English, and unemployment.
How do your planned specific actions address the EHD factors for HICs (if applicable)?	The District's planned actions address risks related to affordability by pursuing energy efficiency to reduce energy burdens and identifying low-cost resources for compliance with CETA's clean energy requirements.

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

Please list all socioeconomic factors and sensitivity factors developed through a public process and used to identify Vulnerable Populations based on the definition in RCW 19.405.020(40):

(40) "Vulnerable populations" means communities that experience a disproportionate cumulative risk from environmental burdens due to:

- (a) Adverse socioeconomic factors, including unemployment, high housing and transportation costs relative to income, access to food and health care, and linguistic isolation; and
(b) Sensitivity factors, such as low birth weight and higher rates of hospitalization.

Please describe how your utility identified vulnerable populations through a public process (e.g., surveys, focus groups, public forums, etc.)	The District's survey collected demographic information and identified energy-related concerns and priorities. Energy costs were a widespread concern and the Spanish language surveys received by the District noted lower income than the English language responses.
How does your utility's planned specific actions address the vulnerable population factors (if applicable)?	Planned actions address the concerns around affordability and reliability. Ongoing actions by the District, such as providing the website in Spanish, address risks from language barriers.

Factor Category	Factor	Details	Source	Date Last Updated
E.g., Employment	Unemployment	% unemployed over 16 years old	American Community Survey	12/15/2019
Income	Low Income	<185% of Federal Poverty Level	American Community Survey	9/22/2025
Language	Primary language other than English	Share of population speaking English	American Community Survey	9/22/2025

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

This CEIP is generally consistent with the prior CEIP while consolidating several factors into high-level categories related to the factors of income and language.

Public Participation

Public participation (WAC 194-40-200(4), -220(1))

Provide a summary of the public input process conducted in compliance with WAC 194-40-220.	The District conducted a survey that collected demographic information and asked participants their energy-related concerns and priorities in the clean energy transition.
What barriers to public participation does your utility's community face due to language, cultural, economic, technology, or other factors?	Barriers include language, awareness, and technology barriers.
What reasonable accommodations has your utility provided to reduce barriers to public participation?	The District advertised the survey through multiple channels, including its website, social media, flyers provided to the local Community Action Committee, bill inserts, an iPad setup in the District lobby, etc. The survey could be taken online or via paper forms. English and Spanish versions were also available. In total, 702 surveys were completed.
Describe how public comments were reflected in the specific actions under WAC 194-40-200(4), including the development of one or more indicators and other elements of the CEIP and your utility's supporting integrated resource plan or resource plans, as applicable.	The majority of survey responses reflect prioritizing energy costs and reliability. The District's planned actions for energy efficiency and clean energy support the priority of keeping costs low while further investigations into demand response can help identify options to support reliability.

Long-term Plans

Integrated resource plan & clean energy action plan compliance (WAC 194-40-200(6-7), WAC 194-40-200(4)(c)(iii))

Is your clean energy implementation plan (CEIP) consistent with the most recent integrated resource plan or resource plan, as applicable, prepared by your utility under RCW 19.280.030?	Yes
Is your CEIP consistent with your utility's clean energy action plan developed under RCW 19.280.030(1) or other 10-year plan developed under RCW 19.280.030(5)?	Yes
How are the specific actions consistent with your utility's resource plan and clean energy action plan?	Franklin PUD's 2024 IRP projects meeting customer needs and complying with CETA targets through energy efficiency, power provided by BPA, its own resources, additional renewable resources under consideration, and market purchases. The targets included in this CEIP and the actions identified to achieve them are based on the same strategy.
Hyperlink to Relevant Assessment/Resource Plan	https://www.franklinpud.com/rates-power-resources/resource-planning/

Resource Adequacy Standard

Resource adequacy standard (WAC 194-40-200(8))

Identify the resource adequacy standard and measurement metrics adopted by the utility under WAC 194-40-210 and used in establishing the targets in the CEIP. Identify and explain any changes to your resource adequacy standard.

Resource adequacy standard (e.g., peak load standards, loss of load probability or loss of load expectation)	Peak Load is used for resource planning
Methods of measurement (e.g., probabilistic assessments of resource adequacy)	Approach used for peak load determination: 1. Examine the winter (December-February) and summer (June-August) actual single-hour daily peak load and daily HLH average load for December 2015 through Dec 2019 and determine the load associated with the given percentile. 2. Establish this value as expected winter and summer hourly and HLH peak load for the 1st year of the IRP (2021). 3. Use the annual growth in energy load as the annual growth rate for future years. 4. Using a P95 historical load results in higher peak planning loads. The RA metric usually contains rules for determining peak hourly load and resource outputs. A survey of markets found the following requirements for determining peak load: • Western Electric Coordinating Council (WECC): Forecast peak hour load increased by 18% to cover; contingency reserves 6%, regulation 5%, 4% for additional outages, and 3% for temperature variation. • Northwest Power Pool (NWPP): Forecast peak hour load increased by 7-8% for Contingency and Regulation, by 3-10% for additional or prolonged outages, and by 1-10% to cover temperature (assume about 5% for this portion), economics, and new plant delays; this results in an 11-28% requirement. • California Independent System Operator (CAISO): Forecasted hourly peak loads are increased by 15% to account for outages and contingencies . CAISO does not break out the load variation portion. • Midcontinent Independent System Operator (MISO): Forecasted coincidental hourly peak loads are increased by about 8% for load variation and 7% for outages (contingencies).