

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

Resource	2022	2023	2024	2025	4-year Period
Renewable	0%	0%	0%	0%	0%
Nonemitting	0%	0%	0%	0%	0%
Total	0%	0%	0%	0%	92%

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

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

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

Resource	Amount	
Energy Efficiency	6,242.980	MWh to be acquired over the interim performance period (measured in first-year savings)
Renewable energy	1,311,021.995	MWh to be used during the interim performance period
Demand response		MW to be acquired over the interim performance period

Identify and describe the specific actions the utility will take over the next interim performance period to demonstrate progress toward meeting the utility's interim targets and the 2030 GHG neutral and 2045 clean electricity standard (WAC 194-40-200(1)):

Specific action proposed	Description of how the action demonstrates progress toward meeting interim targets and the standards
Continue purchasing tier one energy from BPA	BPA's fuel mix has been over 95% carbon-free for the last four years and is projected to be at least 92% renewable and non-emitting for the next four, meeting the statutory clean energy standard established by CETA for the 2022-2025 reporting period.
Increase energy efficiency	Implementing energy efficiency programs will allow Jefferson County PUD to meet the targets identified above and help to minimize future load growth, reducing the need for clean energy resources to comply with CETA's future clean energy standards.

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

Report each Highly Impacted Community in the table below.

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

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

Department of Health has designated Highly Impacted Communities as those ranking 9 or 10 on the Environmental Health Disparities map. Visit the Department of Health website for instructions on how to identify Highly Impacted Communities:

<https://www.doh.wa.gov/DataandStatisticalReports/WashingtonTrackingNetworkWTN/ClimateProjections/CleanEnergyTransformationAct/CETAUtilityInstructions>

Census Tract (enter 11 digit FIPS code)	County Name	Tribal Lands (Yes/No)	Environmental Health Disparities Topic Rank
53031950500	Jefferson	No	1
53031950300	Jefferson	No	1
53031950400	Jefferson	No	4
53031950202	Jefferson	No	3
53031950601	Jefferson	No	3
53031950602	Jefferson	No	3
53009990100	Clallam	Yes	1
53009002300	Clallam	Yes	2
53031950702	Jefferson	Yes	1

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

Factors	Details	Source	Date Last Updated	Approximate number of households in service territory (if applicable)
<i>Ex. COVID cases</i>	<i>Cases by race and ethnicity</i>	<i>Department of Health COVID-19 data dashboard</i>	<i>2021</i>	<i>1,000</i>
Low-income seniors	Customers receiving the low-income senior discount	Jefferson County PUD customer data	EOY 2020	310
Low income customers	Customers receiving the low-income discount	Jefferson County PUD customer data	EOY 2020	409
Customers with unstable housing	Customers with a history of shutoffs	Jefferson County PUD customer data	3-Yr Avg 2017-2019	1,310

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

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

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

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

Category	Indicator	Details	Source	Date Last Updated
Ex. Resiliency	Number of outages in utility census tracts	Use SAIDI, CAIDI and SAIFI data geolocated across service territory	Utility data	2021
Energy and non-energy benefits	Distribution of program participation and incentive dollars	Track the distribution of program participation across customer types	Utility program data	2021
Resiliency	Outages	Utility data on outages	Utility data	2021

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

Identify the expected effect of specific actions on highly impacted communities and vulnerable populations and the general location, if applicable, timing, and estimated cost of each specific action. If applicable, identify whether any resource will be located in highly impacted communities or will be governed by, serve, or otherwise benefit highly impacted communities or vulnerable populations in part or in whole.

Utility Specific Action or (e.g. name of resource or program)	Population(s) Affected	Indicator	Detail (describe distribution of energy and non-energy benefits on named population)	Location of Resource (if applicable)
<i>Ex. Replace substation</i>	<i>Tribe</i>	<i>resiliency</i>		<i>substation address</i>
Implement energy efficiency programs to meet identified target	All identified vulnerable populations and highly impacted communities	Distribution of program participation and incentive dollars	While all Jefferson County PUD customers benefit from the acquisition of energy efficiency as a low-cost resource, benefits such as bill savings, incentives, and home improvements often go only to those who can afford the cost of purchasing energy efficient equipment. Jefferson County PUD's planned actions to reduce risks to these populations will help the highly impacted community members and vulnerable populations receive more of these benefits.	n/a
Implement energy efficiency programs to meet identified target	All identified vulnerable populations and highly impacted communities	Outages	Implementing energy efficiency may help reduce the number of outages among the highly impacted communities and vulnerable populations by reducing system peak demands.	n/a

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

Describe how the specific actions in the CEIP are consistent with, and informed by, the utility's longer-term strategies based on the analysis in RCW 19.280.030 (1)(k) and clean energy action plan in RCW 19.280.030 (1)(l) from its most recent integrated resource plan, if applicable:

BPA assures its power supply is available to meet its firm power supply obligation on a long term planning, forecast, basis. As directed by the Pacific Northwest Electric power planning and Conservation Act, a fundamental statutory purpose for BPA is to assure it has an adequate supply of power, which BPA meets through its power planning function As guided by the Northwest power and Conservation Council power Plan.

BPA's firm power supply obligation under the Northwest power Act means BPA supplies all the power a customer needs to serve their retail consumer demands on a continuous basis except for reasons of force majeure. This obligation takes into account and is adjusted by the amount of non-federal power/resources Jefferson County PUD #1 uses to serve their load and by the type of product the Jefferson County PUD #1 elects to purchase from BPA. BPA's currently effective Regional Dialogue load Following Contracts obligates BPA to supply all the electricity required to meet the second to second variation in the Jefferson County PUD #1's load net of the Jefferson County PUD #1's non-federal resources.

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

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

Jefferson County PUD identified several potential risks to vulnerable populations during its engagement with community organizations. These included risks associated with the clean energy transition and those that are tangential to it:

- **Housing Scarcity/Unaffordability:** Jefferson County is experiencing both a housing shortage and a significant increase in home prices and rental costs, resulting in risks of growing numbers of individuals and households moving into marginal housing (trailers, campers, unheated utility structures); living out of their cars; or living in shelters, group encampments, or solo on public or private property.
- **Unhealthy homes:** This includes renters who are living in unsafe conditions but cannot move because of the high costs of moving and lack of other affordable options. It may also include landlords that cannot afford to or choose not to improve their properties. These homes often pose a health risk due to the presence of mold, and/or poor ventilation. They also risk high energy burdens due to efficiency losses from lack of insulation or poor weatherization, or in some cases, the increased use of energy resources to control or contain mold growth.
- **Marginal Structures:** In some cases, unhealthy homes reach an advanced state of disrepair resulting in either tenants or owners moving into temporary housing adjacent to the degraded structure. Not only do individuals or households in these scenarios face increased health risks or energy burdens, but they also risk losing eligibility for participation in energy efficiency programs that could help improve their health and reduce their energy burden.

Two strategies identified to address the identified risks are energy efficiency measures and bill payment options. Efficiency measures can improve a home’s health and comfort while reducing utility costs. Bill payment options—including levelized monthly billing, autopay, and pre-payment—may help households control utility expenses by providing more information about energy use and cost, preventing unexpectedly large bills, and preventing customers from incurring fees associated with unpaid bills.

Jefferson County PUD already offers levelized billing and autopay and is in process of developing a pre-payment option. In order to expand participation in these billing options to populations who could benefit from them, Jefferson County PUD will continue to:

- Conduct targeted outreach to vulnerable populations based on their bill payment history (i.e., customers with late payments) to offer alternative bill payment options.
- Default customers with late payments/in arrears/with disconnect notices to levelized billing.
- Offer incentives to customers to adopt alternative bill payment options.
- Partner with community organizations to offer financial and/or efficiency education.

In order to increase the distribution of efficiency benefits to identified vulnerable populations, Jefferson County PUD will both expand on current energy efficiency improvement efforts and develop new programs. During the 2022-2026 timeframe, Jefferson County PUD will:

- Increase collaboration efforts with Community Action Program and local charitable organizations to identify at-risk populations in need of energy efficiency upgrades.
- Review options for pooling resources to provide efficiency upgrades and repairs to applicable unhealthy and marginal structures.
- Continue and increase efforts to educate contractors on available efficiency incentives for low-income residents needing efficiency upgrades

through direct outreach and digital and print communications.

- Continue and increase outreach to utility customers regarding energy efficiency incentive availability for low-income households. This includes direct communication, billing messages, earned media, and digital and print communications.

The PUD is also in the planning stages for on-bill financing of energy efficiency programs. Such financing, when implemented, would greatly reduce the up-front cash requirements for vulnerable populations to take part in energy efficiency improvements in the home. The PUD has applied for revolving funding from the USDA's RUS RESP Loan program. If approved, the program would begin in 2022 and continue through 2026.

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

Provide a summary of the public input process conducted in compliance with WAC 194-40-220. Describe how public comments were reflected in the specific actions under WAC 194-40-200(4), including the development of one or more indicators and other elements of the CEIP and the utility's supporting integrated resource plan or resource plans, as applicable.

Jefferson County PUD took a multipart approach to engaging the public in the creation of its Clean Energy Implementation Plan.

Jefferson County PUD is one of the only public utilities in Washington State with a Citizen Advisory Board (CAB). The nine-member CAB is comprised of three citizens appointed by the commissioners from each of the county's three electoral districts. Pre-pandemic, the CAB met on the second Monday of each month. Since COVID-19 has met remotely as needed. Meetings are always open to the public.

The CAB consulted on the creation of the PUD's low-income support programs and has provided input and guidance on various changes since. To engage the CAB on the equity issues involved in the CEIP, a survey and CETA overview document were provided prior to the CAB's early December meeting. During the meeting, PUD staff walked CAB members through the process of identifying vulnerable populations in Jefferson County and risks to those populations. Staff explained the actions the PUD intended to take to meet and exceed CETA goals before engaging the CAB in listing various indicators for each category type.

This same process was repeated at the subsequent regular public meeting of the PUD's Board of Commissioners. The 3 member publicly elected board reviewed the CAB's responses and added some of their own to the survey sheet recorded by staff.

PUD staff also reached out to local public health and social service workers. The same survey that was distributed to the CAB and Commission was provided prior to remote meeting consultations. PUD staff engaged in a lengthy remote meeting with the Population Health team from Jefferson Healthcare. The Population Health team informed staff about "dual-eligible" populations, or individuals who qualify for both Medicare and Medicaid, and are therefore often most vulnerable to risk factors identified. They also expressed the need for increased "energy literacy" efforts to help mitigate risks, and to cited increased literacy as a possible indicator.

The Energy Assistance Director of Jefferson County's local Community Action Agency likewise identified populations in unhealthy or marginal housing as being especially vulnerable. The risks of poor indoor air quality due to poor ventilation, excess moisture and resulting mold was discussed in great detail. Targeting weatherization improvements to marginal households was discussed as an indicator that fell under many of the pre-identified categories.

PUD staff also posted the CEIP survey on the PUD's website and included an article about CETA and a link to the PUD's CEIP survey in PUD's weekly e-newsletter. No response from the general public was received.

The BOC provided further comment on the finalized prior to adoption at a second public meeting in December. The adopted plan was then posted on the PUD's website at jeffpud.org/ceta.

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

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

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

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

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

Resource adequacy standard	BPA's Regional Dialogue Load Following Product
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Methods of measurement	<p>BPA is responsible for assuring an adequate power supply to meet Jefferson County PUD's total retail load.</p> <p>BPA is working to provide further detail on this at a future date. Additional detail can be found in BPA's White Book at https://www.bpa.gov/p/Generation/White-Book/Pages/White-Book.aspx.</p>
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