# 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 | Inland Power & Light |
| Report Date | 12/18/2025 |
| Contact Name | Patrick Egan |
| Phone Number | (509) 507-2814 |
| Email | patricke@inlandpower.com |
| Web address of published CEIP | |
| Are you a "qualifying utility" under the EIA? | Yes |
| Are you a BPA "full requirements" customer? | Yes |

# 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 | % | 66% | 65% | 65% | 69% | 66% |
| Nonemitting | % | 10% | 10% | 10% | 10% | 10% |
| Total | | 76% | 74% | 75% | 79% | 76% |

| | |
|---|---|
| Describe how the target demonstrates progress toward meeting the 2030 and 2045 CETA standards (WAC 194-40-200(2)). | IP&L currently supplies 24% of our retail electric load from unspecified market purchases. We retire Renewable Energy Credits (RECs) against these purchases to maintain carbon neutrality. Depending on water year conditions and the availability of hydro resources, IP&L has been operating and is projected to continue operating between 99% and over 100% carbon neutral through 2029.<br><br>Our need to meet short-term load growth with a greater portion of unspecified market purchases creates slight decreases in reportable renewable percentages over the next two years until we can rely on a greater portion of renewables in 2029. It is important to note that some of these market purchases do in fact come from renewable generation but are not able to be reported as such.<br><br>Furthermore, Inland Power & Light is currently pursuing power purchase agreement(s) for the 2030+ period that are expected to fully cover our total retail load to help us achieve 100% carbon-free power in line with CETA requirements. |

## 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 | 186,131 | 189,574 | 193,571 | 196,836 | 766,112 |
| Energy Efficiency | MWh to be acquired over the interim performance period | 1,371 | 1,371 | 3,029 | 3,029 | 8,799 |
| Demand Response | MW to be acquired over the interim performance period | - | 0.40 | 0.40 | 0.40 | 1 |

## Energy efficiency assessment methodology details

| | |
|---|---|
| Conservation Assessment Method | Conservation Potential Assessment |
| Hyperlink to Relevant Assessment | https://www.inlandpower.com/cpa |
| Notes | * This report was based on the Northwest Power and Conservation Council's 2021 Power Plan using the Total Resource Cost (TRC) test to identify conservation actions.<br>* The process includes the costs such as the avoided cost of energy and the social cost of carbon.<br>* The report concludes that over half of conservation is coming from the residential sector and can be attributed to improvements in HVAC, weatherization, and water heating. |

## 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. | * DR findings are most significant for the residential customer class because of the high customer count and strong correlation between this rate class and the winter peaking demand. This can be achieved via thermostat programs that can help smooth out peaks from space heating, which IP&L is looking into.<br>* Residential behind-the-meter battery storage also has high DR potential, with IP&L rolling out a pilot program for this type of demand response.<br>* The agricultural sector also has DR potential from irrigation load control during the summer.<br>* Direct Voltage Regulation (DVR) can also lead to significant demand response savings, however barriers to utilizing this service exist in IP&L's service territory because of dispersed population and as-of-yet low adoption of in-home technologies (EV's, grid-enabled water heaters, controllable thermostats) that enable DVR. |
| Hyperlink to Relevant Assessment | https://www.inlandpower.com/cpa |
| Notes | |

# 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 clicking and dragging the bottom right corner downward.*

| Indicator | CETA Category | Specific Action 1 | Specific Action 2 | Specific Action 3 | Specific Action 4 | Outcome Metric 1 | Outcome Metric 2 | Outcome Metric 3 | Outcome Metric 4 | Outcome Metric 5 | How will the indicator and its associated metrics look different across the service territory in four years after taking the specific actions? |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Increased energy affordability for households | Reduction of Burdens to Vulnerable Populations and Highly Impacted Communities | Implement low-interest credit program Building Energy Savings Today (BEST) for qualified members to finance energy-conservation improvements with low interest rates. | Participate and offer monetary bill assistance for certain income-qualified member populations. | Implement the Community Assistance for Residential Energy (CARE) program which helps cover the implementation of residential conservation measures for eligible income-qualified members. | | Improve home energy usage and home improvement impacts for projects that would otherwise not be undertaken as well as reinvest interest earned from the program into offering other services free of charge. | Avoid service shutoffs for utility members. | Improve home energy usage and home improvement impacts for projects that would otherwise not be undertaken. | | | * These specific actions will help to reduce the energy burden on our members who experience the most difficulty balancing home comfort and energy uses with other critical budgeting needs. In four years, we anticipate these actions will target homes in the most dire need of repair, facilitate a high level of trust with members, and foster more input from members on which services are most important to them. |
| Increased grid resilience | Energy Security and Resiliency | Develop pilot program implementing behind-the-meter residential storage with focus on communities highly impacted by wildfire mitigation, with goal of expanding to greater service territory. | | | | Number of households able to maintain power during Public Safety Power Shutoffs. | | | | | * This pilot program is designed to educate utility members and staff on the potential use case for behind-the-meter storage to offer resiliency during outage events. In four years, we anticipate having enough experience and a proven use case to begin rolling out project to wider service territory. |
| Improved home comfort and community health | Environmental Benefits | Develop and offer free home energy audits for all members to help identify highest-impact improvements and provide cost-effective strategies to reduce energy usage. | | | | Rebates and energy savings that result from assessment recommendations. | | | | | *Members who are more knowledgeable about home energy usage and have an established relationship of trust with the utility means we will have the groundwork to roll out programs requiring more active participation. |
| Increased access to quality jobs | Economic Development | Develop and implement comprehensive STEM education initiative providing students with hands-on opportunities and scholarship funding. | | | | Develop local expertise in utility operations and support career opportunities for community members. | | | | | *Increased participation in specialized workforce roles among member families. |
| Reduced greenhouse gas emissions | Environmental Benefits | Secure federal funding for contracting with wind and solar facilities. | 20-year PPA for renewable resource in addition to applicable attributes of the supply. | Firming and shaping of renewable resource. | Address current transmission constraints while preserving our carbon neutrality goals. | Sign NewERA contract with USDA. | Sign long-term PPA with renewable generation. | Annual PPA or tolling arrangement with generator offering fast response ramping to shape around renewables. | Transmission build as response to IPL's facilitation of new renewable generation resources. | | *Increased access to renewable energy generation for all members throughout service territory. |
| Increased public participation in utility programs from highly impacted communities and vulnerable populations | Reduction of Burdens to Vulnerable Populations and Highly Impacted Communities | Collaborate with the Spokane Tribe of Indians to create an agricultural education grant program. | Create 4-H/FFA scholarship program. | | | Increase crop and livestock productivity and specialization for tribal members. | Increase participation of recipients for program activities. | | | | * Greater localized food production capability reduces dependence on outside food sources. Can also lead to increased collaboration on distributed generation opportunities.<br>* Participants in scholarship program gain exposure to advanced technology opportunities and also sets the stage for other utility partnerships. |

# 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.*

*Enter information in the yellow fields. Each specific action should correspond with information entered in the same row. Please delete any unused rows once you finalize your report.*

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

| Specific Action | Long Description | Resource Category | Program Type | Program Name | Input Metric 1 | Output Metric 1 | 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) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Implemented low-interest credit program Building Energy Savings Today (BEST) for qualified members to finance energy-conservation improvements with low interest rates. | The BEST low interest financing program (5%) is a great opportunity to get energy saving projects completed in your home! This tariff program is offered to members for specific energy savings projects that are allowed under the Rural Energy Savings Program (RESP). The RESP is overseen by the United States Government acting through the Rural Utilities Service (RUS) office. | Energy Efficiency | Energy Efficiency and Weatherization | Building Energy Savings Today (BEST) | # of member households that qualify | # of member households that partake in program | To improve standards of living for utility members in highly impacted communities. | This program is only available to vulnerable populations. | The clean energy transition has potential to increase energy rates and raise the cost of replacing appliances or other weatherization measures. This action specifically addresses these burdens for vulnerable populations. | Yes | All eligible member households within our service territory. | Ongoing | $ 214,666 | *Increased attendance at school leading to higher grades as customers have a more comfortable home and get sick less often.<br>*Reduced time off work or medical bills.<br>*Improved indoor air quality. |
| Participate and offer monetary bill assistance for certain income-qualified member populations. | Members who qualify for assistance with paying bills can work with Inland Power & Light to get support and help avoid power shutoffs. | Other | Community and Economic Development | Internal Assistance | # of member households that qualify | # of member households that partake in program | To avoid power shutoffs or arrearages. | This program is only available to vulnerable populations. | The clean energy transition has potential to increase energy rates and the cost of service. This action specifically addresses these burdens for vulnerable populations. | Yes | All eligible member households within our service territory. | Ongoing | 2026 - $400,000<br>2027 - $471,000<br>2028 - $550,000<br>2029 - $628,000 | NA |
| Implement the Community Assistance for Residential Energy (CARE) program which helps cover the implementation of residential conservation measures for eligible income-qualified members. | The Community Assistance for Residential Energy (CARE) Program assists members with making weatherization upgrades and repair options including HVAC, windows, and insulation. Eligibility is based on income. | Energy Efficiency | Energy Efficiency and Weatherization | Community Assistance for Residential Energy (CARE) | # of member households that qualify | # of member households that partake in program | To improve standards of living for utility members in highly impacted communities. | This program is only available to vulnerable populations. | The clean energy transition has potential to increase energy rates and raise the cost of replacing appliances or other weatherization measures. This action specifically addresses these burdens for vulnerable populations. | Yes | All eligible member households within our service territory. | Ongoing | $ 214,666 | *Increased attendance at school leading to higher grades as customers have a more comfortable home and get sick less often.<br>*Reduced time off work or medical bills.<br>*Improved indoor air quality. |
| Develop pilot program implementing behind-the-meter residential storage with focus on communities highly impacted by wildfire mitigation, with goal of expanding to greater service territory. | Inland Power and Light is in collaboration with regional and industry partners to launch a three-phase pilot program to deploy residential battery storage systems in homes in our service territory. This initiative aims to:<br>*Reduce wildfire risk<br>*Gauge customer appetite for demand response<br>*Support clean energy goals<br>*Deliver community benefits<br>*Send price signals for demand response | Demand Response | Demand Response | Residential Resilient Energy Storage Initiative (RRESI) | # of member households that partake in pilot | # of member households that partake in full program | This specific action is intended to target vulnerable populations impacted by high rates of wildfire and storm outages. This will help improve reliability for these populations, especially those with a medical need. | The highly impacted communities are taking part in the design of this pilot so that Inland Power and Light offerings are tailored to the needs of the end user. | Electrification and the clean energy transformation are increasing dependence on electricity and the potential for wildfire risks to more drastically disrupt residential needs. This action will help keep critical energy appliances online during outage events. | Yes | Specific rural distribution grids with high outage frequency or likelihood. | *Phase 1 - Jan 2025 to Jan 2026<br>*Phase 2 - Jan 2026 to Mid 2027<br>*Phase 3 - Mid 2027 onward | $ 2,640,000 | *Increased education<br>*Increased technology adoption |
| Develop and offer free home energy audits for all members to help identify highest-impact improvements and provide cost-effective strategies to reduce energy usage. | Inland Power is pleased to offer a no charge energy audit service to Inland Power members. Our energy audit is a comprehensive assessment that can help you understand the whole picture of your home's energy use. An audit can help you determine how much your home uses, where your home is losing energy, and which problem areas and fixes you should prioritize to make your home more efficient and comfortable. | Energy Efficiency | Energy Efficiency and Weatherization | Home Energy Audit | # of households that sign up for this service | # of households that take action on conservation measures identified during the audit | This specific action helps highly impacted communities and vulnerable populations identify the most cost effective ways to lower their bills and improve home comfort. | For highly impacted communities and vulnerable populations, this action directly feeds into specific actions that help assist such populations with achieving conservation and weatherization measures. | As a free audit, this action can directly educate populations with high energy burden and is designed to help identify assistance opportunities for impacted communities. | Yes | Entire service territory | Ongoing | $ 214,666 | *More comfortable home<br>*Better relationship with utility<br>*Empowering members with free education opportunity |
| Develop and implement comprehensive STEM education initiative providing students with hands-on opportunities and scholarship funding. | Inland Power will launch a STEM Academy to spark student interest in STEM careers through hands-on experiences, industry partnerships, and facility tours. The program will highlight hydroelectric power's role in the region and offer opportunities for college credit, internships, and apprenticeships with local businesses. | Other | Apprenticeship Program | STEM Academy | # of participants identified for initiative | # of participants who use this opportunity to advance personal learning and growth. | Provide support for educational opportunities of young adults, including those identified in highly impacted communities and vulnerable populations. | By focusing on a range of STEM initiatives that appeal to the variety of career opportunities and economic drivers of IP&L's diverse service territory. | Risks to agricultural production necessitate shifting specialization and education to help maintain livelihood while acting as stewards of the environment. This program will help provide educational opportunities for future generations of our local economy. | Yes | Entire service territory | 2027+ | $17,000 | *Community engagement<br>* Collaboration with utility |
| Have secured federal funding for contracting with wind and solar facilities. | Pursued and was rewarded funding from federal New ERA grant process specifically to help shield members from monetary impacts of the clean energy transition. | Other | Community and Economic Development | NewERA Grant | Money received from federal government | All actions enabled by IP&L receiving this funding. | Reduce energy burden of clean energy transition and provide education and development opportunities. | By allowing IP&L to dedicate more time and resources into specific actions benefiting these communities. | Using federal assistance allows IP&L to offer greater services and more access to renewable energy while reducing the costs of doing so. | Yes | Entire service territory | Ongoing | $ 700,121 | *Federal funding reduces the economic burden of meeting CETA and CCA requirements |
| 20-year PPA for renewable resource in addition to applicable attributes of the supply. | IP&L is engaging with renewable developers in the region to secure a Power Purchase Agreement (PPA) that enable IP&L to meet state renewable mandates and benefit members who might not otherwise have the option to pursue renewable energy options on their own. | Energy Efficiency | Utility-scale Resources | Renewable PPA | Cost of PPA | Development of renewable resource and energy generation from this resource to serve IP&L members. | Allow participation in clean energy transition without needing to have private distributed renewable generation. | This will benefit the whole service territory by creating a more diverse fuel mix. | For members of highly impacted communities and vulnerable populations who may want to participate in the clean energy transition but do not have the means to do so privately, this allows them to be served by a diverse mix of generation including solar/wind. | No | Generation built outside of service territory, but will serve all members of service territory. | 2029-2049 | $ 52,200,000 | *long term price stability for our members |
| Firming and shaping of renewable resource. | Firming and shaping of renewable resource from a carbon-emitting resource on a short-term basis while seeking non-emitting technology solution to provide firming and shaping products. | Renewable Energy | Utility-scale Resources | Renewable resource firming & shaping | Cost of contract | Reliability of power supply | Increase renewable generation of fuel mix while maintaining reliability. | By keeping power reliable | NA | No | Service territory | 2029-2049 | $ 12,600,000 | *Ensures reliable and sustainable energy supply<br>* Avoids penalties in our power supply contracts |
| Address current transmission constraints while preserving our carbon neutrality goals. | Grid constraints hinder the efficient integration of new resources and the ability for these new resources to meet demand. | Renewable Energy | Utility-scale Resources | Transmission constraint resolution | | MWhs able to meet utility load. | NA | NA | NA | No | Entire grid | 2029-2049 | $ 1,576,000 | *Ensures reliable and sustainable energy supply<br>* Avoids penalties in our power supply contracts |
| Collaborate with the Spokane Tribe of Indians to create an agricultural education grant program. | Collaborating with the Spokane Tribe to establish a self-sustaining food production program (crops and livestock) while employing tribal members now for future generations. | Other | Community and Economic Development | Tribal agricultural grant program | Money acquired through grant | Local food production and employment | Enabling more localized control of food production and establishment of specialized knowledge. | This will be developed in collaboration with the Spokane Tribe of Indians and create local benefits. | Risks to agricultural production necessitate shifting specialization and education to help maintain livelihood while acting as stewards of the environment. This program will help provide educational opportunities for future generations of our local economy. | Yes | Spokane Tribe of Indians land and communities. | 2027+ | $25,000 | *Reduced dependence on transportation and industrial food processing |
| Create 4-H/FFA scholarship program. | Engage with multiple communities in our service territory to offer scholarship programs to 4-H & FFA groups and enable educational programs and hands-on opportunities. | Other | Community and Economic Development | 4-H/FFA Scholarship Program | Money dedicated for program development | Number of participants in program | Enable educational opportunity for younger generations of highly impacted communities and vulnerable populations. | Will directly enable participation of younger generations in specific communities. | More intricate agricultural systems require further education for continued, sustainable use. This will help engage members of the agricultural community and offer these learning opportunities. | Yes | Multiple communities both highly impacted and not throughout service territory. | 2027+ | $25,000 | NA |

# 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. | - Inland Power & Light (IPL) engaged in public input processes both for the development of this CEIP as well as for specific programs contained within the CEIP.<br>- IPL conducted a public input process to help determine the structure of a pilot program for a battery energy storage backup initiative. This pilot program is being designed to target highly impacted communities (HIC) and vulnerable populations (VP) at risk of the outsized impacts of public safety power shutoffs.<br>- To initiate public input and work to overcome technological barriers, IPL sent out both physical postcards and an email notification inviting target members to take part in one of two public input sessions regarding the program.<br>- At these sessions, IPL introduced members to the motivation and goals of the program, the technology solution identified for the program and outlined process milestones for initiating this pilot. Following the overview but during the meeting itself, IPL conducted a survey to gather member preferences and provide an opportunity for members to signal their continued interest.<br>- IPL further engaged in public input gathering for the development of the CEIP. IPL published a draft of the CEIP on the utility's website October 2025. IPL highlighted the CEIP in the October newsletter and in subsequent bills and newsletters, thus directing members to review the plan and provide feedback via by mail, email, over the phone, or in person at public listening sessions planned throughout the service territory. IPL scheduled 4 listening sessions at public libraries located in each of the four main geographies that we serve and held these meetings early November 2025, one month after publishing the draft CEIP. Two of these libraries also reposted notices of the meetings on their own media channels.<br>- At these public meetings, IPL provided a PowerPoint overview of components of the CEIP and held time for any member questions or comments, including the option for written commentary. |
| What barriers to public participation does your utility's community face due to language, cultural, economic, technology, or other factors? | - IPL has a diverse member demographic requiring the utility to be thoughtful in fostering effective communication and participation.<br>- Most significantly is the span between our more urban and rural members, the latter of which often live in areas with lower rates of technological adoption. This is why we prioritize multiple methods of communication (digital/physical/face-to-face).<br>- Our service territory also experiences economic dispersion that is reflected in the flexibility and availability of member schedules and employment, with a good mix of 9-5 work schedules as well as shift schedules or agricultural schedules. To help mitigate this, we offer meetings at different times of the day or early evening.<br>- Furthermore, IPL solicited public feedback during the development of this Clean Energy Implementation Plan through multiple channels and with 6 weeks of open comment period. |
| What reasonable accommodations has your utility provided to reduce barriers to public participation? | - Our utility works to reach members with a multitude of channels including print, digital, word-of-mouth, and physical interactions.<br>- In seeking input for our battery pilot program, we held two meetings one week apart with different times to accommodate the variety of work schedules of our target population. One meeting was in the morning during the week, while another was during the evening.<br>- We also allowed members who were unable to make these meetings a chance to voice their opinions with email and phone conversations detailing the program and soliciting the same questionnaire as was given during the meetings themselves. These responses were taken into account all the same and those who signaled interest via phone or email were added to the participation list.<br>- For our solicitation of input in developing the CEIP, we drove to central hubs within each of our four distinct geographies and held open meetings at public libraries. In addition to this we solicited feedback via multiple channels including print, digital, and physical notifications. |
| 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. | - IPL relied heavily on public feedback for developing specifics of the residential battery storage pilot with the motivation of creating an offering that meets the critical needs of end users. IPL also plans to get back in touch with members who have signaled interest in participating and provide a final review of program offerings before committing to signing up to participate.<br>- For development of the finalized CEIP program IPL did not receive any feedback on the draft plan published early October 2025, with the window for providing feedback open for 6 weeks and implementation of multiple communications to members regarding the opportunity to do so. |

# 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") | 15 Washington Census Tracts |
| # of census tracts that are at least partially on "Indian Country" | 7 Washington Census Tracts |
| Average EHD v2.0 rank for service territory | 4.80 |
| 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? | * Lead Exposure V2.0 - 6.4<br>* Health Disparities - 5.1<br>- Within this EHD, the Poor Health Outcomes has the highest ranking at 5.9 out of 10. |
| How do your planned specific actions address the EHD factors for HICs (if applicable)? | *Our focus on residential home improvement through education programs and assistance programs are helping improve things like indoor air quality and home comfort, which can help improve health.<br>*Our pursuit for greater resiliency with behind-the-meter storage help members dependent on medical accommodations during potential outage events. |

## 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.) | * IPL has been utilizing a number of surveys and publicly available information for our service territory to identify vulnerable populations.<br>* Rural Resources Community Action is an organization that focuses on economic improvement of Ferry, Lincoln, Pend Oreille, Whitman, and Stevens Counties, for which IP&L has members in all but Ferry County. Through the organization's 2021 Community Needs Assessment.<br>* The organization Inland Northwest Insights also conducts surveys for counties with active IPL membership that help identify and validate issues of highest concern for the communities we serve. |
| How does your utility's planned specific actions address the vulnerable population factors (if applicable)? | * Reducing the energy burden from impacts of the clean energy transition.<br>* Assisting with weatherization and updating appliances to help with indoor air quality.<br>* Generating educational and assistance programs for rural communities. |

| Factor Category | Factor | Details | Source | Date Last Updated |
|---|---|---|---|---|
| E.g., Employment | Unemployment | % unemployed over 16 years old | American Community Survey | 12/15/2019 |
| Transportation | Transportation Costs | Commute distances and public transp | American Community Survey | Sep-25 |
| Employment | Job Prospects | % of respondents reported needing in | Inland Northwest Insights Community s | Dec-19 |
| Energy burden | Highest concern of housing costs | Utility payments and weatherization | RRCA Community Needs Assessment | Nov-21 |
| Education | Cost of education for college, trade, or technical | % in need of financial assistance | RRCA Community Needs Assessment | Nov-21 |
| Rural customers | Needs of energy resiliency | Response of potential pilot participan | Inland Power & Light Public Session | Sep-25 |

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

* IP&L's 2022 CEIP identified Transportation Costs and Outages as key factors.
* These same factors were identified for the 2026 CEIP as well, but information sources are also keying in on the difficulties with education, energy burden, and employment.
* Both the newly identified factors and those consistent with the 2022 CEIP are main targets of IP&L's action items to benefit our member communities.

# 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? | IP&L is pursuing energy supply from a renewable resource to help cover Tier 2 energy needs (demand not served by BPA's Tier 1 resources) to ensure compliance with state goals. Term sheets for these renewable resources are not yet executed. |
| Hyperlink to Relevant Assessment/Resource Plan | https://www.inlandpower.com/_files/ugd/79b722_b3e19c36b58c4cfa8cb364904779418b.pdf |

# 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) | BPA assures its power supply is available to meet its firm power supply obligation on a long-term planning basis for full requirements customers like Inland P&L. 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 considers and is adjusted by the amount of non-federal power/resources Inland P&L uses to serve their load and by the type of product Inland P&L 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 Inland P&L's load net of Inland P&L's non-federal resources. |
| Methods of measurement (e.g., probabilistic assessments of resource adequacy) | BPA continues to assert they handle the obligation of resource adequacy for full requirements customers like Inland P&L and shares methods of measurements with the Washington State Department of Commerce. |

# Incremental Cost

Incremental cost calculation (WAC 194-40-230)

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

Please upload separately documentation and detailed reporting necessary to comply with the CEIP incremental cost reporting requirements in WAC 194-40-230.

You may use the calculator below to help estimate incremental costs; however, submission of detailed reporting is still required to comply with WAC 194-40-230. Delete the example numbers provided in the yellow fields below. Enter information in the yellow fields only. The grey cells will populate themselves.

| Summary of Results | |
|---|---|
| Total Incremental Cost | $ - |
| Average annual incremental cost | $ - |
| Annual threshold amount | $ - |
| Meets threshold? | Yes |

| Year | Retail revenue requirement | Annual amount from revenue increase equal to 2% of prior year revenue requirement | Number of years in effect | Threshold amount over four years | Sum of threshold amounts | Annual threshold amount |
|---|---|---|---|---|---|---|
| 0 | | | | | | |
| 1 | | $ - | 4 | $ - | | |
| 2 | | $ - | 3 | $ - | $ - | $ - |
| 3 | | $ - | 2 | $ - | | |
| 4 | | $ - | 1 | $ - | | |
| Annual threshold amount as a percentage of average retail revenue requirement | | | | | | #DIV/0! |

Itemize all lowest reasonable costs the utility intends to incur during this interim period in order to comply with the requirements of the Clean Energy Transformation Act (CETA), RCW 19.405.040 and 19.405.050. Also, provide the alternative lowest reasonable cost if the utility did not have to comply with CETA. If a resource included in an actual or alternative portfolio has a useful life or contract duration of greater than one year, the cost of that resource must be allocated over the expected useful life or contract duration using a levelized cost or fixed charge factor.

| With-CETA Resource Portfolio | | | | |
|---|---|---|---|---|
| Item Name | 2026 | 2027 | 2028 | 2029 |
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| Total | $ - | $ - | $ - | $ - |

| No-CETA Resource Portfolio | | | |
|---|---|---|---|
| 2026 | 2027 | 2028 | 2029 |
| $ - | $ - | $ - | $ - |
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| $ - | $ - | $ - | $ - |

| Incremental Cost | | | | |
|---|---|---|---|---|
| 2026 | 2027 | 2028 | 2029 | Total |
| $ - | $ - | $ - | $ - | $ - |
| $ - | $ - | $ - | $ - | $ - |
| $ - | $ - | $ - | $ - | $ - |
| $ - | $ - | $ - | $ - | $ - |
| $ - | $ - | $ - | $ - | $ - |
| $ - | $ - | $ - | $ - | $ - |
| $ - | $ - | $ - | $ - | $ - |
| $ - | $ - | $ - | $ - | $ - |
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