

2021 CLEAN ENERGY
IMPLEMENTATION PLAN

TOWN OF STEILACOOM

December 7, 2021

Utility Targets and Actions

While CETA has no targets for clean energy in the four-year interim compliance period covered by this CEIP, CETA's upcoming targets suggest the total renewable and nonemitting resource must be at least 80%. Information provided by the Bonneville Power Administration (BPA) indicates the power provided by BPA meets these requirements.

Percentage of BPA's Retail Load to be Served Using Renewable and Nonemitting Resources

Resource	2022	2023	2024	2025	4-year Period
Renewable	82%	82%	82%	82%	82%
Nonemitting	10%	10%	10%	10%	10%
Total	92%	92%	92%	92%	92%

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

Resource	Amount	
Energy Efficiency	364.659	MWh to be acquired over the interim performance period (measured in first-year savings).
Renewable Energy	129,314.711	MWh to be used during the interim performance period.
Demand Response	0	MWh to be acquired over the interim performance period.

In the 2022-2025 interim compliance period covered by this CEIP, no further action is needed to comply with the requirements. In 2030, CETA requires that all retail sales be greenhouse gas neutral, with at least 80% coming from clean (non-emitting or renewable) resources, while the remaining 20% can be made greenhouse gas neutral through several alternative compliance mechanisms.

BPA's energy mix meets and is projected to continue to meet the 2030 and 2045 CETA standards (WAC 194-40-200(2)). The Town obtains 100% of its power requirements from BPA. The Town of Steilacoom expects to meet the statutory clean energy standard established by CETA by continuing our contract/relationship with BPA.

Specific Actions Based on the Identified Target Goals:

The following specific actions are recommended for the Town of Steilacoom to meet the identified target goals:

1. Continue contracting with BPA for energy requirements.
2. Continue the Town's energy efficiency programs to meet identified target.
The Town of Steilacoom should continue to implement energy efficiency programs, to meet the energy efficiency target identified for this CEIP. Pursuing cost-effective energy efficiency will help reduce the need for clean energy resources to comply with CETA's future clean energy standards.

of highly impacted community. This allowed for a greater breadth (across different populations) to be reached through virtual (rather than in-person) meetings, and this approach was considered more feasible given current precautions around the COVID-19 pandemic.

Identification of Vulnerable Populations:

Vulnerable populations are those facing higher risks due to adverse socioeconomic factors, including unemployment, high housing and transportation costs, access to food and health care, and language barriers as well as sensitivity factors, such as low birth weight and higher rates of hospitalization. CETA requires each utility to identify vulnerable populations based on these factors through a public process. Through the Town's survey and knowledge of our community, the Town of Steilacoom identified one socio-economic group encompassing members from all race and ethnic backgrounds at risk during the clean energy transition. The Town of Steilacoom has chosen to focus on the following vulnerable population in the first CEIP interim compliance period:

Utility customers with a history of late payments, in arrears, or who have received a utility shut-off notice.

The Town's plan to address this group will be to continue our utility assistance program.

Identification of Indicators and Forecasting the Distribution of Costs and Benefits:

CETA requires utilities to identify one or more indicators to forecast the distribution of costs and benefits of the utility specific actions—the utility's planned actions on energy efficiency, demand response, and clean or renewable energy.

Through the Town's survey and discussion at the December 7, 2021 Council meeting, the Town shared how its actions in this compliance period would primarily be in the areas of energy efficiency, utility assistance, and planning to reduce significant outages.

The indicators best suited to measure the distribution of energy efficiency program costs and benefits would be the distributions of program participation and program incentive dollars across its program participants. While all Town of Steilacoom customers benefit from the acquisition of energy efficiency as a low-cost resource, benefits such as program incentives and home improvements often go only to those who can afford the cost of purchasing energy efficient equipment.

The Town of Steilacoom's planned actions to reduce risks to highly impacted community members and vulnerable populations will help the highly impacted community members and vulnerable populations receive more of the benefits from the transition to clean energy by continuing to offer a utility assistance program.

All members of the community including highly impacted communities and vulnerable populations will receive benefits from increased system reliability by the Town planning and implementing a back-up power feed to be used when significant maintenance is being performed by BPA on the single substation feeding the Town.

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EXHIBITS

Town of Steilacoom

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)
Ex. COVID cases	Cases by race and ethnicity	Department of Health COVID-19 data dashboard	2021	1,000
Customers with a history of late payments, in arrears, or have received a shut-off notice.	Customers with a history of late payments, in arrears, or have received a shut-off notice.	Vision billing system and shut-off listing maintained by Utility Billing Clerk.	Updated monthly.	200

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

No changes.

Town of Steilacoom

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.

The Town of Steilacoom identified the cost of power as the primary risk of transition to clean energy. To this end, the Town will continue to provide and fund a utility assistance program which benefits the highly impacted communities and vulnerable populations. The Town will also continue to provide energy efficiency programs.

Town of Steilacoom

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):

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

COMMENT:

The Town of Steilacoom does not plan to use the alternative compliance options during this interim compliance period.

Methods of measurement

BPA uses its Resource Program, which includes a Needs Assessment that examines on a 10-year forecast basis, the uncertainty in customer loads, expected water conditions affecting federal hydro production (including Biological Opinion requirements), resource availability, natural gas prices, and electricity market prices, to develop a least-cost portfolio of resources that meet Bonneville's obligations. The goal of the Needs Assessment, which is one of the early steps in the Resource Program, is to measure Bonneville's existing system, in relative isolation, against Bonneville's obligations to supply power to show whether any long-term energy and/or capacity shortfalls may occur over the 10-year study horizon. The Needs Assessment forecasts Bonneville's needs for long-term energy and capacity based on resource capabilities and projected obligations to serve power. The Needs Assessment informs later steps of the Resource Program, where resource optimization techniques are used to evaluate and select potential solutions for meeting Bonneville's long-term needs based on cost and risks.

The Needs Assessment uses the following four metrics to assess Bonneville's long-term energy and capacity needs:

- Annual Energy: Evaluates the annual energy surplus/deficit under 1937 critical water conditions, using forecasted load obligations and expected Columbia Generating Station output.
- P10 Heavy Load Hour: Evaluates the 10th percentile (P10) surplus deficit over heavy load hours, by month, given variability in hydropower generation, load obligations, and Columbia Generating Station output amounts.
- P10 Superpeak: Evaluates the P10 surplus/deficit over the six peak load hours per weekday by month, given variability in hydropower generation, load obligations, and Columbia Generating Station output.
- 18-Hour Capacity: Evaluates the surplus/deficit over the six peak load hours per day during three-day extreme weather events and assuming median water conditions. Winter and summer extreme

Town of Steilacoom

Annual cost threshold (WAC 194-40-200(9))

Enter information in the blue column only. The rest will pre-populate.

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

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 amounts
2021						
2022		\$	4	\$.00		
2023		\$	3	\$.00	\$.00	\$.00
2024		\$	2	\$.00		
2025		\$	1	\$.00		
Annual threshold amount as a percentage of average retail revenue requirement						#DIV/0!

COMMENT:

The Town of Steilacoom does not plan to use the incremental cost approach during this interim compliance period.