

**Clean Energy Transformation Act  
Frequently Asked Questions for Small Utilities  
Clean Energy Implementation Plan**

1. What's a small utility?

A utility that is not required by RCW 19.280.030(1) to prepare an integrated resource plan. These utilities have fewer than 25,000 customers or receive power from BPA under a load following contract.

2. The CEIP rule mentions a simplified reporting form for small utilities. Where can I find that form?

All utilities use the same [template form](#), which is an Excel file posted on the CETA Compliance and Reporting webpage. The information requirements are tied directly to requirements in the CETA statute, so the simplifications are minor. Throughout the template the format allows for less detailed reporting by utilities with a smaller service area or with a resource mix that already exceeds the 80% clean level. Also, most small utilities will not need to complete the tabs for alternative compliance options or incremental cost.

3. Do utilities that are not required to develop an integrated resource plan (RCW 19.280.030(1)) have to complete a Clean Energy Implementation plan?

Yes. The CEIP requirement applies to all utilities, even those that do not have to prepare IRPs. All electric utilities serving Washington customers must submit a Clean Energy Implementation Plan.

4. The fuel mix of my utility is currently 80% clean or better. Does that mean I have met my compliance obligation under the greenhouse gas neutral standard (RCW 19.405.040)?

Partially, and assuming that the utility maintains this resource mix and retires RECs as required. The GHG Neutral standard in RCW 19.405.040 includes other elements besides the requirement to use electricity from renewable and non-renewable sources in an amount equal to 100% of retail load. A complete reading of this statute shows that utilities are required to pursue all cost-effective, reliable, and feasible energy efficiency resources and demand response and must ensure that all customers are benefitting from the transition to clean energy.

5. Our utility does not have answers to some questions on the form. What should we do?

Two investor owned utilities have already submitted draft plans to the Utilities and Transportation Commission. It may be helpful to review those plans, keeping in mind that these are much bigger utilities.

- Avista ([UE-210628](#))
- PacifiCorp: not yet filed
- Puget Sound Energy ([UE-210795](#))

6. Could we submit the form later to develop better information about forecast of impacts or long-term plans?

The filing deadline of January 1, 2022, is specified in statute. If needed, a utility could update its CEIP later in 2022 with a more complete response.

7. I do not have any highly impacted communities in my service territory (as defined by RCW 19.405.020(23)). Does that mean I do not have to do the equity components of the CEIP?

No. The equity components of CETA in RCW 19.405.040(8) require that electric utilities ensure all customers benefit from the transition to clean energy. This includes vulnerable populations, who are not limited to specific geographic areas. In addition to identifying highly impacted communities, all utilities must identify vulnerable populations as directed under WAC 194-40-200(4).

8. How do I define and identify vulnerable populations as part of the CEIP?

This term is defined in the statute, in [RCW 19.405.020\(40\)](#). Utilities must identify vulnerable populations through a public process and according to the rules in WAC 194-40-200(4).

9. I have extra data or information that I want to include as part of my CEIP. How should I include it?

Attach supporting material when submitting the Excel spreadsheet. If appropriate, add additional rows to the spreadsheet.