DRAFT 2026-2029 CLEAN ENERGY IMPLEMENTATION PLAN REPORT

Please Note: This is a working document. This report-style draft is created for Clark Public Utilities customers as a supplement to Washington State Department of Commerce's required Excel template report. Public comments received will be shared with applicable staff throughout the development of the utility's Clean Energy Implementation Plan.

Introduction

This Clean Energy Implementation Plan (CEIP) report serves as a supplement to the mandatory CEIP Excel reporting template developed by the Washington State Department of Commerce. This supplemental report describes each section of Clark Public Utilities' CEIP. It details the development, goals and specific actions to reach milestones outlined in the Clean Energy Transformation Act (CETA).

The Clean Energy Implementation Plan (CEIP) is a four-year roadmap that will guide Clark Public Utilities' clean energy actions, programs and investments for the defined four-year period of 2026 – 2029. Our energy planning efforts are designed to meet the requirements of Washington's Clean Energy Transformation Act (CETA). As Clark Public Utilities transitions to meeting CETA's requirements for carbon neutrality in 2030 and 100% clean energy in 2045, Clark Public Utilities will be mindful that CETA's goals:

- Represent a transformation of our electricity system
- Represent a significant reduction in the electric sector Green House Gas emissions

The Washington State Department of Commerce has adopted reporting procedures for consumer-owned utilities including public utility districts such as Clark Public Utilities. Washington's consumer-owned utilities are required to complete the CEIP and submit it to Commerce by January 1, 2026.

The goal of the CEIP is to develop an implementation plan of specific actions to be taken over the next four years to track progress being made toward meeting clean energy requirements for utilities. The CEIP is also a tool that defines and demonstrates how our customers are benefitting from the transition to clean energy through:

- Equitable distribution of energy and non-energy benefits and reduction of burdens to vulnerable populations and highly impacted communities (named communities)
- Long-term and short-term public health and environmental benefits
- Energy security and resiliency

Targets & Actions

Clark Public Utilities' contract to purchase the output of the Combine Hills II wind project, two solar projects and the Box Canyon hydroelectric project and its 18% share of the Packwood hydro project are all 100% renewable energy purchases. Based on Bonneville Power Administration's (BPA) 2022 and 2023 fuel mix reports, 82% of BPA power is assumed to be renewable (hydro and wind) and 11% of BPA power is assumed to be non-emitting. Under CETA, which requires utilities to be 80% renewable and/or non-emitting by 2030 and 100% carbon-free by 2045,

BPA power would be 93% compliant. Clark Public Utilities will become a BPA Load Following customer and BPA will serve Clark Public Utilities' hourly loads in excess of the utility's dedicated resources. Clark Public Utilities' resource portfolio includes two emitting resources: the natural gas-fired River Road Generating Plant (RRGP) and unspecified market purchases. Based on BPA's 2022 and 2023 fuel mix reports, 7% of BPA power is assumed to be sourced to unspecified market purchases.

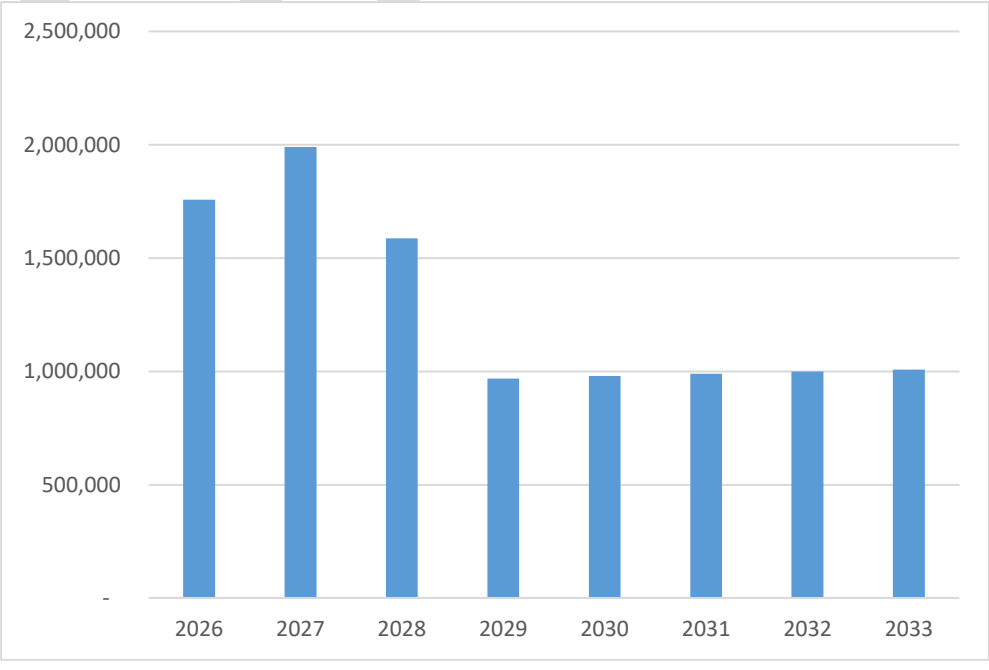
Clark Public Utilities has historically planned for RRGP to run 11 months each year allowing for a 1-month maintenance outage. As conditions change from planning to actual operations, opportunities arise when wholesale power can be procured from the market at prices less expensive than the cost of power produced at RRGP. This process is referred to as "economic displacement." With more solar and wind coming on-line throughout the Western Energy Coordinating Council territory, the opportunities to economically displace RRGP with renewable energy may increase in future years.

Maintenance outage times vary from year to year depending on the planned maintenance work:

- 2026 maintenance outage is expected to last 10 weeks
- 2027 maintenance outage is expected to last 4 weeks
- 2028 maintenance outage is expected to last 8 weeks

The projected annual RRGP generation shown below includes the planned maintenance outages in 2026 through 2028. Projected annual generation is assumed to be 20 percent of retail load beginning in 2029.

FIGURE 1
2026-33 PROJECTED RRGP GENERATION (MWH)



Based on the assumptions discussed above, Clark Public Utilities' carbon-free electricity targets for each year of the four-year period are (note: CETA 2030 target is 80 percent over a 4-year compliance period):

- 2026: Renewable: 62%, Non-Emitting: 7%, Total: 69%
- 2027: Renewable: 61%, Non-Emitting: 7%, Total: 68%
- 2028: Renewable: 67%, Non-Emitting: 7%, Total: 74%
- 2029: Renewable: 77%, Non-Emitting: 8%, Total: 85%

Total renewable energy used to serve retail load over the four-year period 2026-2029 is projected to be 12,795,500 MWh or equal to 67% of the total retail load over the four-year period. As discussed above, renewable energy will be sourced to BPA purchases, the Packwood hydro project, the Box Canyon hydro project, the Combine Hills II Wind Project and the solar power purchase agreement (PPA).

Clark Public Utilities' 2025 Conservation Potential Assessment shows cost-effective 4-year (2026-2029) energy savings of 15.61 average megawatts (aMW) or 136,763 Megawatt hours (MWh) (as measured in first-year savings). Figures 2 and 3 below* show the cost-effective energy efficiency savings potential by sector over two-, four-, 10-, and 20-year periods. However, Lighthouse Consulting, who develops Clark Public Utilities' CPA has identified the modeling systems used to create the report only account for the energy efficiency savings derived from our residential home energy report program in years 2026 and 2027 due to the program having a one-year measure life. Therefore, Clark Public Utilities has estimated the achievable savings from the home energy report for years 2028 and 2029. That analysis shows an additional 1.03 aMW savings can be achieved in each of those two years, and our CEIP energy efficiency targets have been revised to account for those savings in 2028 and 2029.

Figure 2 & 3 forthcoming

Clark Public Utilities endeavors to meet or exceed the targets included in the 2025 CPA. Annual energy efficiency targets are as follows:

- 2026: 4.617 aMW or 40,447 MWh
- 2027: 4.705 aMW or 41,213 MWh
- 2028: 3.950 aMW or 34,603 MWh
- 2029: 4.402 aMW or 38,560 MWh

Clark Public Utilities' 2025 Demand Response Potential Assessment (DRPA), which was provided by Lighthouse Consulting, shows XX MW (note: this value is forthcoming) of annual demand response (DR) potential in the winter season and

XX MW (note: this value is forthcoming) of DR potential in the summer season. Most of the DR measures included in the DRPA typically require Advanced Metering Infrastructure (AMI), a technology that Clark Public Utilities is working towards implementing before the current CEIP period ends in 2029. As such, there will be additional opportunities to deploy new DR programs in the future.

Figure 4 forthcoming

In 2024 the Clark Public Utilities board of commissioners approved a budget allocation for demand response programming and approved staff to develop two DR pilot programs and participate and provide funding for the Northwest Energy Efficiency Alliance (NEEA) End Use Load Flex DR project.

- Residential EV Managed Charging Program: In 2024 Clark Public Utilities launched an EV Managed Charging program in partnership with Optiwatt. The program aims to shift residential EV charging load away from our seasonal peak demand times into low demand times. The program has experienced steady growth over the last two years and will play a pivotal role in meeting our annual DR targets identified in the CEIP.
- Industrial Demand Response Program: In 2024 Clark Public Utilities launched an Industrial Customer DR program. The program is a traditional DR program that aims to subscribe eligible industrial customers who can shift a fixed amount of their demand with day-ahead notice. The program has produced impressive results in the first two years of operations and accounts for the bulk of our annual DR targets in the CEIP.
- NEEA End Use Load Flex Program: In 2024 Clark Public Utilities joined nine other regional utilities to provide funding to NEEA to launch their End Use Load Flex (EULF) special project. The EULF project has a variety of objectives but ultimately NEEA hopes to develop a portfolio of market and technology tested DR and load management programs for Pacific NW utilities to implement. The project does not result in DR achievements for Clark Public Utilities and therefore does not impact our annual DR targets in the CEIP, but it is a crucial component of our overall DR and load management strategy. We are investing now to ensure our future includes an assortment of DR and load management programs that allow our customers to partner with the utility to achieve our clean energy goals and mandates.

Clark Public Utilities' annual DR targets for the CEIP are as follows.

- 2026: 9.96 MW
- 2027: 10.12 MW

- 2028: 10.30 MW
- 2029: 10.52 MW

Specific Actions (Energy)

The specific actions Clark Public Utilities will take over the next interim performance period to demonstrate progress toward meeting Clark Public Utilities' interim targets and the 2030 GHG neutral and 2045 clean electricity standard (WAC 194-40-200(1)) are described below.

BPA Provider of Choice Power Contract

In October 2028 Clark Public Utilities will begin purchasing power under a new BPA power contract. Under the new contract, known as the Provider of Choice contract, RRGP's dedicated resource amount will decrease from 225 aMW to 102 aMW. Clark Public Utilities' allocation of BPA cost-based power (also known as its Contract High Water Mark) will increase from 320 aMW under the current contract, known as the Regional Dialogue contract, to 391 aMW under the Provider of Choice contract. Clark Public Utilities elected to continue as a BPA Load Following customer under the Provider of Choice contract. As a Load Following customer BPA will follow Clark Public Utilities' loads net of its dedicated resources (RRGP and the Packwood hydroelectric project) and resources committed to serve Above-High Water Mark load (annual load growth above Clark Public Utilities' Contract High Water Mark) on an hourly basis with Tier 1 power.

Box Canyon Hydroelectric Power Purchase Agreement

Starting in January 2026, Clark Public Utilities will begin purchasing the full output of the Box Canyon hydroelectric project. On an average annual basis Box Canyon will add 50 MW of renewable energy to Clark Public Utilities' resource portfolio.

Solar Power Purchase Agreement

In 2028 Clark Public Utilities will begin purchasing all of the generation from two solar projects with a total capacity of 191 MW. On an average annual basis the two projects are expected to add nearly 45 MW of renewable energy to Clark Public Utilities' resource portfolio.

Additional Renewable Resources

Clark Public Utilities and the owner/operator of the Combine Hills I and Combine Hills II wind projects have started discussion around the potential to increase the annual generation associated with the Combine Hills wind projects as early as 2030. Clark Public Utilities and the owner/operator are evaluating re-powering

options. Re-powering would include installing new, larger, higher capacity factor wind turbines. Re-powering could result in a 25% increase in plant generation. Clark Public Utilities continues to explore the potential to add 100% carbon-free geothermal generation to its resource portfolio beginning in the early 2030s. Geothermal generation can be designed to work with other renewables including the ability to ramp up power generation quickly enough to meet high evening demand when solar generation ramps down.

Additional Non-Emitting Resources

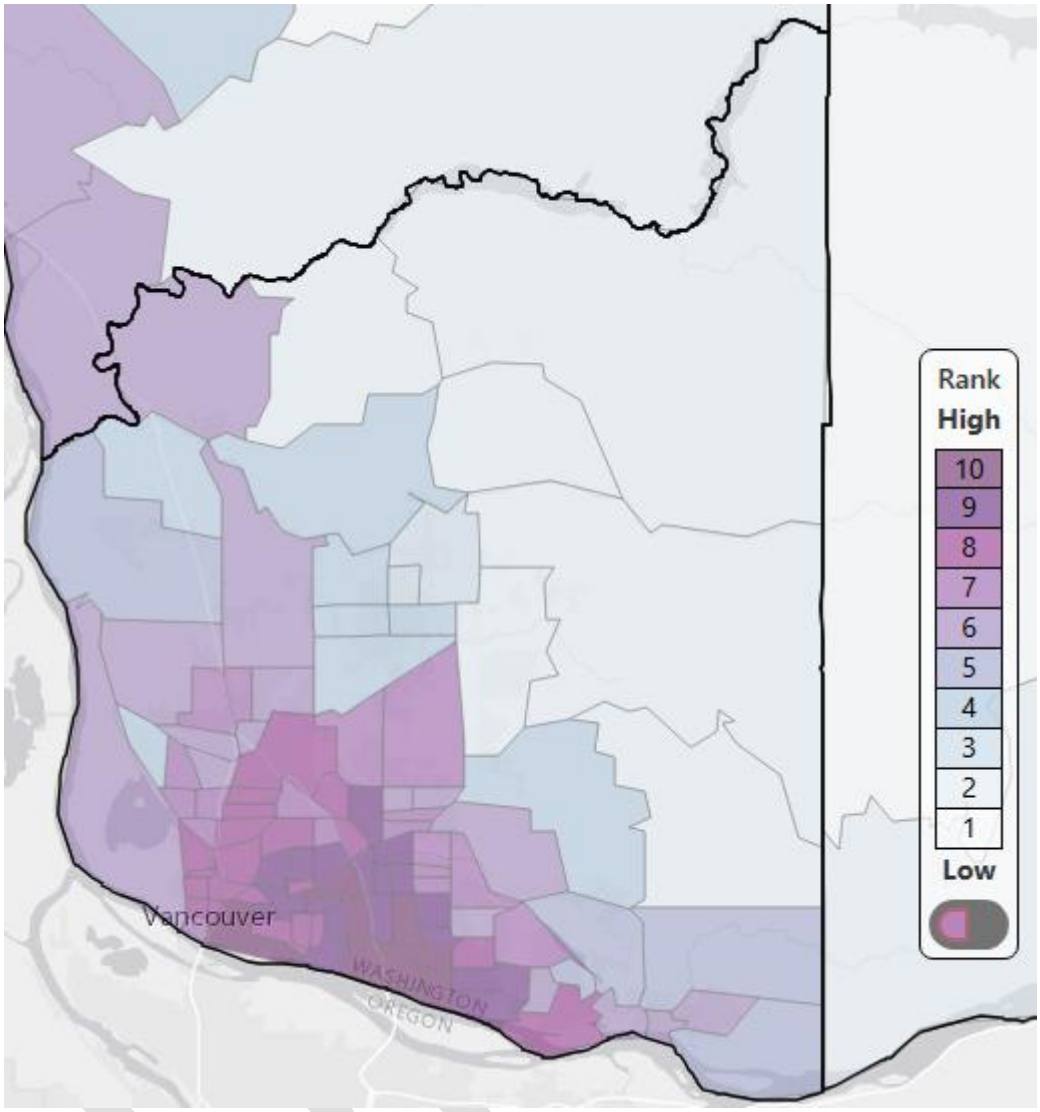
CETA requires carbon-free resources to be either renewable, such as hydro, solar, wind and geothermal or non-emitting, such as nuclear. Clark Public Utilities continues to explore the potential to add generation from Small Modular Reactors (SMRs) to its resource portfolio beginning in the early 2030s. The generation would be 100% carbon-free and would be included as “non-emitting” (nuclear) energy in Clark Public Utilities’ next CEIP. SMRs are designed to work with renewables and will have the ability to ramp up power generation quickly to follow wind and solar generation.

Highly Impacted Communities

The Washington Department of Health designates Highly Impacted Communities (HIC) as those ranking 9 or 10, or Tribal Land, on the Environmental Health Disparities (EHD) v2.0 map. Rankings are determined by the Department of Health on cumulative impact analyses by census tract. There are 25 census tracts within Clark County that meet this designation: 24 tracts with a ranking of 9 or 10, and one Tribal Land tract.

Census Tract (11 digit FIPS code)	County	Tribal Lands (Yes/No)	EHD v2.0 Overall Rank
53011040301	Clark	Yes	4
53011041005	Clark	No	9
53011041110	Clark	No	9
53011041600	Clark	No	9
53011041309	Clark	No	9
53011042300	Clark	No	9
53011041330	Clark	No	9
53011042500	Clark	No	9
53011042900	Clark	No	9
53011043000	Clark	No	9
53011041322	Clark	No	9
53011041313	Clark	No	9
53011041317	Clark	No	9
53011041323	Clark	No	9
53011041203	Clark	No	9
53011041318	Clark	No	9
53011041333	Clark	No	9
53011041320	Clark	No	9
53011041007	Clark	No	10
53011041700	Clark	No	10
53011041800	Clark	No	10
53011041111	Clark	No	10
53011042400	Clark	No	10
53011042600	Clark	No	10
53011042700	Clark	No	10

HIGHLY IMPACTED COMMUNITIES MAP



Vulnerable Populations

CETA defines vulnerable populations (VP) as “communities that experience disproportionate cumulative risk from environmental burdens due to variety of factors, including socioeconomic factors and unemployment.”

Clark Public Utilities will continue to focus on assisting customers defined as having a high “energy burden” that spend 6% or more of household income on utility heating and cooling bills and customers in the most need of utility bill assistance. Future CEIP’s are likely to focus on additional factors.

Clark Public Utilities partnered with Empower Dataworks to perform an analysis and identify energy burdened customer populations. That work resulted in the identification of 15,200 households in Clark County that meet the energy burdened definition. Over the next four years Clark Public Utilities will work to provide targeted bill assistance and energy conservation programs to identified households.

Forecast of Impacts & Specific Actions (Equity)

Clark Public Utilities has identified specific utility actions, as well as customer benefit indicators, that will serve as a guide to ensure equitable transition to a clean energy future. The utility has also forecasted the impacts, or outcome metrics of each specific action aimed to ensure an equitable transition.

Also included in this effort was the development of specific “equity areas” related to the different utility services and operations that we will focus on to help ensure this equitable transition. Much of the work noted in the 2026-2029 CEIP includes the development of targeted energy assistance, energy conservation, transportation electrification, and demand response programs aimed at assisting customers that are in the most need. These efforts will focus on energy burdened customers, as well as customers who reside in highly impacted communities as identified using the Washington Department of Health Environmental and Health Disparities v2.0 mapping tool.

Distributed Renewable Energy Resource Program Development

In 2024 the Clark Public Utilities board of commissioners approved a new customer distributed energy resource (DER) program, the Net Billing program. Under Net Billing, customer generators can install up to 1 MW of distributed renewable generation. Renewable energy generated and consumed onsite receives the retail rate value under the program, and any renewable generation delivered back to the utility is compensated using our Avoided Cost Rate. The Net Billing program is offered in addition to the mandated Net Metering DER program.

Clark Public Utilities plans to promote the new Net Billing program throughout the second CEIP period. We recognize that Net Billing projects are a customer decision, and we do not have direct control over the volume of new customer projects, but by highlighting the benefits of the program we believe we can increase customer participation over the next four years.

In 2024 the Clark Public Utilities board of commissioners approved a new community solar project in 2025 – 2026 and to allocate 100% of the project’s capacity to low-income customers. Clark Public Utilities is currently coordinating with potential site host partners to develop the next community solar project in 2026. Our low-income

community solar design, which has previously been approved by WSU Energy, the state agency that regulates low-income community solar project, utilizes our internal donation-funded energy assistance program, Operation Warm Heart as the “low-income participant.” The design uses virtual net metering to provide the residential retail rate value for each kilowatt hour of solar energy produced, and annually the solar energy is monetized and deposited into the Operation Warm Heart program. Once the funds have been deposited into Operation Warm Heart they are distributed as energy assistance grants to our most vulnerable customers that qualify and are approved for the program.

Energy Assistance Program Development

Clark Public Utilities has been and will continue to develop CETA eligible energy assistance programs required to achieve the 2030 mandate of reducing energy burden and assistance need by 60% and are available to all customers who meet the CETA low-income definition. We will explore options to partner with community-based organizations to implement and distribute the benefits from the new assistance programs.

Demand Response and Load Management Program Development

In 2024 Clark Public Utilities began piloting two different demand response (DR) and load management programs. These programs provide an opportunity for customers to become partners in load management solutions. Clark Public Utilities will work to expand our DR and load management program offerings over the next CEIP period by deploying an online marketplace that offers instant rebates for eligible product purchases, as well as a streamlined enrollment process into new DR programs. We will look for opportunities to create participation options for both vulnerable populations and customers located in highly impacted communities.

Transportation Electrification and WA Clean Fuel Standard

Clark Public Utilities is a participating entity in the Washington Clean Fuel Standard (CFS) program and has been generating CFS credits since 2023. In 2025 the Clark Public Utilities board of commissioners approved the creation of two new transportation electrification (TE) programs that align with the Department of Ecology program rules and were designed to increase the amount of electric vehicle (EV) charging infrastructure at multifamily complexes located in a highly impacted communities (HIC) or that serve vulnerable and low-income residents. Both programs are funded exclusively with revenue earned by selling WA CFS credits.

1. Low-Income Multifamily Complexes: Utility incentive designed to cover 100% of eligible project costs, capped at $100,000 per multifamily complex.
2. Multifamily Complexes Located in a HIC: Utility incentive designed to cover up to 50% of eligible project costs.

Clark Public Utilities will continue to promote TE programs to increase the volume of EV charging infrastructure in eligible multifamily complexes. Promotion activities include direct outreach to vulnerable populations who reside in multifamily complexes, local affordable housing agencies who manage multifamily complexes, and program marketing in utility materials.

Customer Benefit Indicators

Clark Public Utilities has developed four customer benefit indicators for the Clean Energy Implementation Plan (CEIP) that will help ensure an equitable transition to a clean energy future that all customers benefit from. The development of these benefit indicators is done in coordination with local community-based organizations. As we transition away from carbon emitting resources, there will be a growing need for customers to work with the utility on a variety of new clean energy programs. Doing so will present opportunities for our customers, including vulnerable populations and highly impacted communities, to reduce their energy burden and increase their energy resiliency and access to clean energy.

Each of the four benefit indicators are aligned with a specific CETA category and include specific actions that Clark Public Utilities will take over the CEIP four-year period. Input metrics, output metrics, and outcome metrics have also been developed for each benefit indicator. These metrics list the resources that will be needed to achieve the objectives, or outcome metric, for each benefit indicator. The process allows us to develop impactful program opportunities for all our customers, measure the cost and effort to do so, benchmark progress, and ultimately result in the equitable transition we are committed to achieving.

Indicator	CETA Category	Specific Action	Input Metric	Output Metric	Outcome Metric
Increased energy affordability and increased access to clean energy.	Environmental Benefits, Reduction of Energy Burden	"Distributed Renewable Energy Resource Program Development" Develop at least one 100% low-income, 199kW, community solar project.	Utility staff time and resources, capital financing, project site host partner.	Subscription status of the project(s) and successful project development	Number of new low-income community solar project being developed. Each 199kW low-income community solar projects results in ~$20,000 in new annual

					funding to the Operation Warm Heart assistance program.
More Access to Clean Energy	Environmental Benefits, Public Health, and Energy Security and Resiliency	"Distributed Renewable Energy Resource Program Development" Promote increased customer participation in the Net Billing program through community engagement efforts.	Utility marketing materials, staff promotional activities through community engagement events, and customer education	Measure program participation and DER capacity growth	Number of megawatts of new customer distributed generation capacity under the Net Billing program.
Increased grid resilience, and increased public participation in utility programs from highly impacted communities and vulnerable populations	Energy Security and Resiliency	"Demand Response and Load Management Program Development" Create new demand response and load management programs available to all customers, including vulnerable populations and customers located in highly impacted communities.	Utility staff time and resources	Measure customer participation in new utility DR and load management programs	Number of new demand response or load management programs during the CEIP period that includes customer participants from highly impacted communities and vulnerable populations.
Increased energy affordability	Reduction of costs and risks	"Energy Assistance	Utility staff time,	Measure low-income customer	Percent of CETA defined low-

for low-income households		Program Development" Create new CETA compliant, energy assistance programs that are available to all customers who meet the CETA definition of low-income household.	funding, and resources.	participation rates in the new assistance programs. Benchmark progress towards meeting the CETA 2030 assistance need reduction mandate.	income households have an opportunity to participate in a utility assistance program.

Long-Term Plans

This CEIP is consistent with Clark Public Utilities's 2024 Integrated Resource Plan (IRP). This CEIP is also consistent with the Clean Energy Action Plan (CEAP) included in the 2024 IRP.
Consistent with the CEAP, Clark Public Utilities is taking the following actions:

1. **Energy Efficiency**: Clark Public Utilities will acquire cost-effective conservation consistent with NWPCC models and Clark Public Utilities' 2025 CPA. Clark Public Utilities' 2025 CPA shows cost-effective 2-year (2026-27) energy savings of 9.32 aMW, 4-year savings of 17.67 aMW, 10-year savings of XX aMW (note: this value is forthcoming) and 20-year savings of XX aMW (note: this value is forthcoming). Clark Public Utilities will endeavor to meet or exceed the targets included in the 2025 CPA. Clark Public Utilities has also increased the offering of low-income conservation programs to help ensure all customers benefit from the clean energy transition.
2. **BPA Power**: Clark Public Utilities is purchasing all BPA Tier 1 power made available to us under the current BPA power contract that expires September 30, 2028 and has taken the steps necessary to purchase all power made available under the BPA Provider of Choice contract that begins October 1, 2028. In the Provider of Choice contract, the RRGP's dedicated resource amount will decrease by 123 aMW. In addition, Clark Public Utilities has encouraged BPA to provide a 100% carbon-free product under the Provider of Choice contract to serve Clark Public Utilities' load growth. Clark Public Utilities has elected to purchase power from BPA's Load Following product for the final three years of

the current contract and to continue purchasing power as a Load Following customer when the Provider of Choice contract begins in October 2028.

3. **River Road Generating Plant Operations**: In 2024 Clark Public Utilities upgraded the RRGP with the new equipment that increased plant capacity and enabled a reduction in carbon emissions and power costs. The new equipment resulted in a lower heat rate when operating at baseload generation and allows plant generation to be ramped down from its baseload generating level to a minimum operating level near 100 MW and replace plant generation with renewable generation (hydro, wind or solar) when it is cost-effective to do so. The reduction in heat rate when operating baseload generation results in less gas consumption on a per MWh basis and lower emissions.
4. **Solar Power Generation**: In 2024 Clark Public Utilities signed a Power Purchase Agreement (PPA) to purchase the entire output of two solar farms located in eastern Oregon. The solar farms have a combined capacity of 191 megawatts and will provide an estimated 45 average annual megawatts of carbon-free power. The solar farms are expected to begin commercial operation in July 2028. The PPA includes a term of 30 years.
5. **Wind Power Generation:** Clark Public Utilities will continue to explore the potential of adding more wind generation to its resource portfolio in the early 2030s, most likely through the re-powering of the Combine Hills wind project. The additional generation would be 100% carbon-free and could be included as "renewable" energy in Clark Public Utilities' next CEIP.
6. **Small Modular Reactors**: Clark Public Utilities continues to explore the potential to add generation from Small Modular Reactors to its resource portfolio in the early 2030s. The generation would be 100% carbon-free and could be included as "non-emitting" energy in Clark Public Utilities' next CEIP.
7. **Geothermal Generation**: Clark Public Utilities continues to explore the potential to add geothermal generation to its resource portfolio in the early 2030s. The generation would be 100% carbon-free and could be included as "renewable" energy in Clark Public Utilities' next CEIP.
8. **Demand Response**: In 2024 Clark Public Utilities' commissioners formally allocated a Demand Response program budget in the Clark Public Utilities Energy Resources department budget and provided the funding to launch two demand response programs, the residential EV Managed Charging program and the Industrial Demand Response program. Both programs are planned to run through 2029 and account for our demand response targets within this Clean Energy Implementation Plan. The 2025 DRPA identified additional cost-effective demand response opportunities that the utility may pursue in future years. Additionally, work to replace our existing customer meters with advanced metering infrastructure (AMI) is underway and once complete the utility will have additional capabilities to implement new demand response and load management programs.

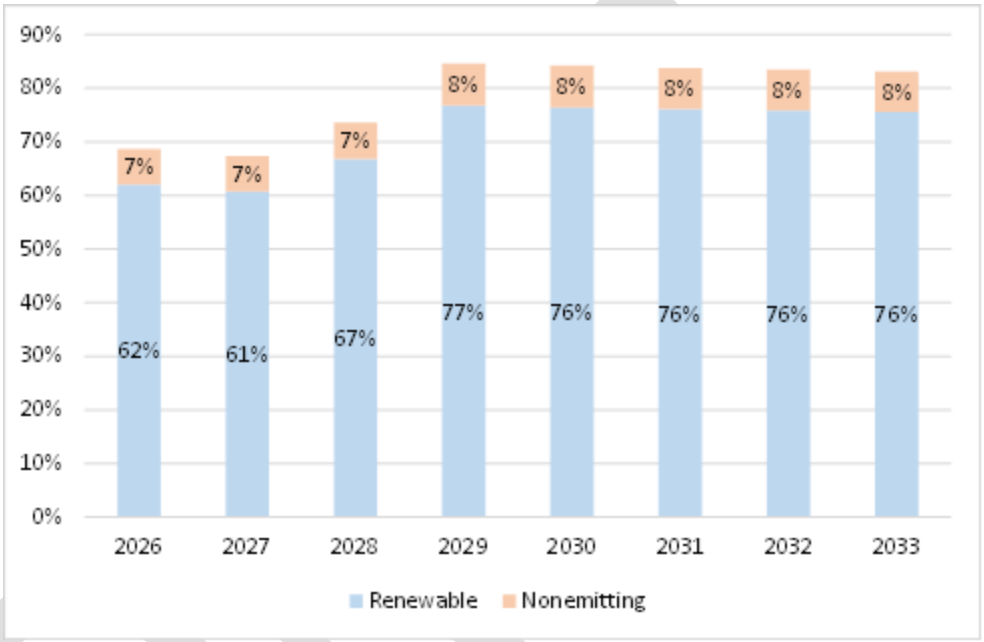
9. **Renewable Distributed Generation**: Clark Public Utilities currently operates 1,118 kW of installed community solar sited within the county. In 2019, the Board of Commissioners allocated 5%, approximately 15 kW, of the community solar array to one of the utility's low-income programs, Operation Warm Heart. This design change allowed many members of our most vulnerable populations to realize the benefit of local, renewable energy resources. Clark Public Utilities leveraged that lesson when developing the second community solar program, Community Solar East, in 2023 and allocated 199kW of the project's capacity to low-income customers through the Operation Warm Heart program. Going forward the utility has a successful model to deploy additional low-income community solar projects. Additionally, in 2024 the Clark Public Utilities commissioners approved the Net Billing distributed energy resource program that allows customers to install up to one megawatt of onsite renewable generation. Under the Net Billing program all renewable energy produced and consumed onsite receives the retail rate value, but renewable energy delivered back to the utility grid is compensated using the Avoided Cost Rate (ACR). Clark Public Utilities continues to offer customers the Net Metering program and has achieved just over 60% of the state mandated threshold for installed net metered generation found in RCW 80.60.
10. **Electric Vehicle Programs**: In March 2021, Clark Public Utilities launched the Transportation Electrification Plan (TEP). Under the TEP all residential customers are eligible for a $500 rebate for the installation of a connected, Energy Star rated, Level II EV charger and a $100 rebate for the installation of a non-connected Level II charger. Low-income customers are eligible for a rebate of up to $2,000 for the purchase and Clark County registration of an EV with a purchase price of less than $20,000. The plan also includes an Electric Vehicle Grant Opportunity (EV-GO) through which local and state governmental agencies, non-profit organizations and municipalities can apply for grants to cover up to 50% of the cost of installing EV charging equipment including site preparation and electric service upgrades. Clark Public Utilities will continue to explore opportunities to encourage the installation of EV charging equipment through the TEP. There is a statutory limit of ¼ of 1% of Clark Public Utilities' retail revenue requirement, placing a ceiling on available funds.
    Clark Public Utilities is a registered participating entity in Washington's Clean Fuel Standard (CFS) and in 2025 the utility commissioners approved three new transportation electrification (TE) programs that will be fully funded with the revenues earned by selling CFS credits. All three of the new programs have been designed to expand TE opportunities for disadvantaged communities within our service territory; two programs are targeted to EV charging infrastructure at multifamily complexes that are either located in a Highly Impacted Community or serve low-income residents. The third new program will support EV Ride-Share programs in our service territory that benefit low-income customers.

For a detailed look at Clark Public Utilities resource portfolio and future planning, customers can read our most current Integrated Resource Plan on the web at ClarkPublicUtilities.com/IRP.

Projected Renewable and Non-Emitting Resources

Clark Public Utilities projected renewable and non-emitting resources are shown below as percentages of retail load.

2026-33 PROJECTED RENEWABLE AND NON-EMITTING RESOURCES



The projections shown above are based on Clark Public Utilities contracted for and owned resources including the BPA Provider of Choice contract. Clark Public Utilities will purchase approximately 391 average annual megawatts of power sourced to BPA's Tier 1 system which includes carbon-free generation from the Federal Columbia River Hydro System (renewable) and the Columbia Generating Station (non-emitting). The renewable percentages shown above assume that BPA power is 93% renewable and non-emitting in all years. This assumption is based on the average of the 2022 and 2023 BPA fuel mix reports. Renewable resources also include the Combine Hills wind project, the Solar PPA, the Box Canyon hydroelectric project and the Packwood hydroelectric project.

The renewable percentage increases from 67 to 77% between 2028 and 2029 because the assumed increase in Clark Public Utilities' allocation of BPA power begins in October 2028; 2029 is the first full year with the increased BPA allocation. In addition, the analysis assumes the solar projects come on-line in July 2028 and 2029 is the first

full year with the solar projects operating. The Combine Hills II wind project expires at the end of 2029. However, Clark Public Utilities has a first right of refusal to continue purchasing the output of the Combine Hills project beyond 2029. The analysis assumes that Clark Public Utilities exercises that option and continues to purchase project output beyond 2029; the megawatt-hours of annual wind generation is assumed to be the same in all years.

Reducing Risks to Vulnerable Populations and Highly Impacted Communities

Clark Public Utilities has a long history of implementing successful energy conservation and energy efficiency initiatives. These programs provide all customers the opportunity to participate and enjoy benefits including lower costs and increased comfort. Energy conservation and energy efficiency programs of all scales help keep rates low for all customers, including vulnerable populations and customers in highly impacted communities. Incentives are available for many measures to help offset costs.

Clark Public Utilities offers bill assistance and energy efficiency programs to low- and limited-income customers, many unique to the industry. Since the adoption of CETA our utility has created new CETA-compliant assistance programs to complement our long-standing assistance programs. These efforts include:

New CETA Program: **Program details forthcoming*

Low Income Home Energy Assistance Program (LIHEAP): Clark Public Utilities partners with Clark County to administer the LIHEAP program for all eligible customers, regardless of heating fuel type.

Senior Rate Credit: Customers age 62 and over who have lived in Clark County at least one year may qualify for a credit based on their January through April billings. Annual household income limits apply.

Operation Warm Heart: An income-based, donation-funded program that provides grants to customers with electric heat who are in financial crisis and may not qualify for other forms of energy assistance. Further, Operation Warm Heart serves as our low-income participant in community solar projects and receives annual financial despots through virtual net metering.

Low Income Weatherization Program: A partnership with Clark County to offer weatherization and ductless heat pump installations to low-income customers. The program is available to owner-occupied and rental homes, including manufactured homes, if income guidelines are met.

Limited Income Used Electric Vehicle Program: Rebate program provides a rebate equal to 10% of the used EV purchase price, with a minimum of $1,000, depending on

household income level. Clark County registration is required, and the used EV price must be under $20,000.

Utility Reserve: Surplus funds held in reserve that may be applied toward Resource Adequacy, compliance with CETA, or other uses as determined by the Board of Commissioners.

Public Participation

Clark Public Utilities engages customers in the Clean Energy Implementation Plan through a multi-pronged outreach, awareness and public process plan throughout the CEIP development.

Public awareness in development of the CEIP includes:

- Engagement with local, community-based organizations focused on low- and limited-income populations
- CEIP webpage on public website: ClarkPublicUtilities.com/ceip
- CEIP written report hosted on the utility's public website. English, Spanish and Russian versions are available in addition to general website accessibility translations
- Currents customer newsletter (monthly newsletter sent to all utility customers)

Comment collection and public process options include:

- Web comment form on CEIP webpage
- Public comments at regularly scheduled Commission meetings
- In-person engagement with local community-based organizations, accompanied by an online survey related to customer benefit indicators

The CEIP page on our website (ClarkPublicUtilities.com/CEIP) contains additional information about the CEIP. The CEIP comment period opened on August 4, 2025 and the public comment portal will remain open for new comments until board adoption scheduled for October 21, 2025.

All public comments received through the web comment portal on our CEIP webpage are reviewed, considered and shared with staff throughout the open comment period.

Resource Adequacy

The Western Power Pool (WPP) is a voluntary organization consisting primarily of major generating utilities serving the Pacific Northwest of the U.S. and the Pacific Southwest of Canada. The WPP primarily focuses on utility operations, planning, and operating reserve sharing. From these common interests, in late 2019 Resource Adequacy (RA)

emerged as a topic of great interest to the WPP membership and the WPP began a journey toward developing an RA program for its members. Over the past six years the WPP developed and began implementing the Western Resource Adequacy Program (WRAP). Under the WRAP, seasonal planning reserve margins are determined for summer and winter periods and expressed as a percentage of the 1-in-2-year seasonal peak load forecast.

WRAP participants plan to a common RA standard. The program developed common capacity counting methods for generating resources and allows for the pooling of resources to meet the reliability needs of participants and unlock diversity benefits. A centralized entity administers and executes the RA program on behalf of members.

As a BPA Load Following customer Clark Public Utilities participates in WRAP through BPA. The Qualified Capacity Contribution of Clark Public Utilities owned and contracted for resources are included in BPA's portfolio of WRAP resources. Clark Public Utilities load will be included in WRAP along with the loads of BPA's other Load Following customers. Clark Public Utilities WRAP obligations are included in Clark Public Utilities' BPA Provider of Choice contract. Under the contract any WRAP penalties assessed to BPA that are caused by Clark Public Utilities not meeting its contractual obligations will be passed on to Clark Public Utilities.