

Clean Energy Implementation Plan



December 2025

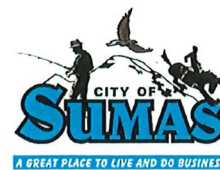


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1 About the CEIP

This Clean Energy Implementation Plan report serves as a supplement to the reporting template and describes each section of City of Sumas' CEIP in greater detail. It describes the development, goals, and specific plans reach milestones in the Clean Energy Transformation Act (CETA) in detail.

The Clean Energy Implementation Plan (CEIP) is a four-year roadmap that will guide the City of Sumas' clean energy actions, programs, and investments for the defined four-year period of 2026-2029. It's an important part of our energy planning efforts to meet the goals of Washington's Clean Energy Transformation Act (CETA). As the City transitions to meeting CETA's goals for carbon neutrality in 2030 and 100 percent clean energy in 2045, the City will be mindful that CETA's goals:

- Are based on best available climate science
- Represent a critical step in transforming our electricity system
- Represent a significant and swift reduction in GHG emissions

The Washington State Department of Commerce has adopted comprehensive reporting procedures for consumer-owned 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 goals. The CEIP is also a tool that defines and demonstrates how our customers are benefitting from the transition to clean energy through:

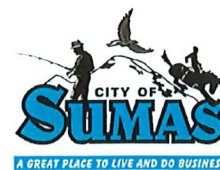
- Equitable distribution of energy and non-energy benefits and reduction of burdens to named communities
- Long-term and short-term public health and environmental benefits
- Energy security and resiliency

2 Targets and Actions

2.1 Bonneville Power Administration

The City of Sumas has a contract with Bonneville Power Administration (BPA) for the purchasing of Tier 2 power. This is the City's sole source of power. The City currently receives roughly 3 million kWh of power per month.

Based on BPA's 2022 and 2023 fuel mix reports, 82 percent of BPA power is assumed to be renewable (hydro and wind) and 11 percent is assumed to be non-emitting. Under CETA,



which requires utilities to be 80 percent renewable and/or non-emitting by 2030 and 100 percent carbon-free by 2045, BPA power would be 93 percent compliant.

2.2 Net Metering

The City of Sumas Net Metering Program allows electric customers who own personal electricity-generating systems, such as solar panels, which generates excess electricity, to sell the excess electricity to the City at full retail value. The maximum size of the customer's generating system must be 25 kW. The City may only buy back enough electricity as one-half percent of the peak demand during calendar year 1996. This equates to roughly 12 kWh. There is currently only one customer on the net metering program.

3 Highly Impacted Communities

The Washington Department of Health designates Highly Impacted Communities (HIC) as those ranking 9 or 10 on the Environment Health Disparities (EHD) map. Rankings are determined by the Department of Health on cumulative impact analyses by census tract. The census tract which includes the City of Sumas has an EHD ranking of 3 out of 10, meaning it does not meet the Washington Department of Health’s definition of a Highly Impacted Community.

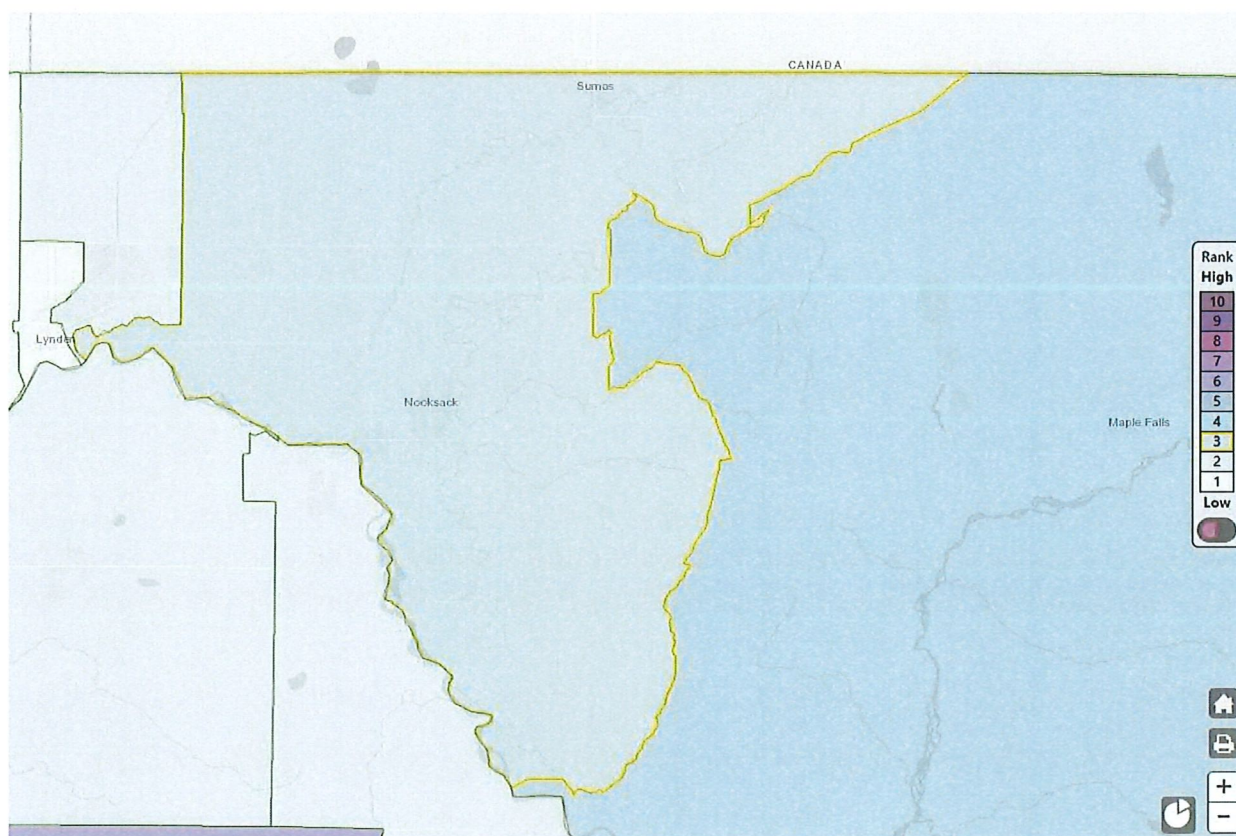


Figure 1: Sumas Environment Health Disparities (EHD) Rating Map

4 Vulnerable Populations

CETA defines vulnerable populations (VP) as “communities that experience 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.”

The Washington Department of Health’s Environment Health Disparities map provides additional information regarding certain socioeconomic factors and sensitive populations. The census tract that Sumas is in has a Socioeconomic Factors rating of 9 out of 10, scoring high in categories such as:

- No High School Diploma
- Population Living in Poverty (<=185% Federal Poverty Level)
- Transportation Expense
- Unemployment

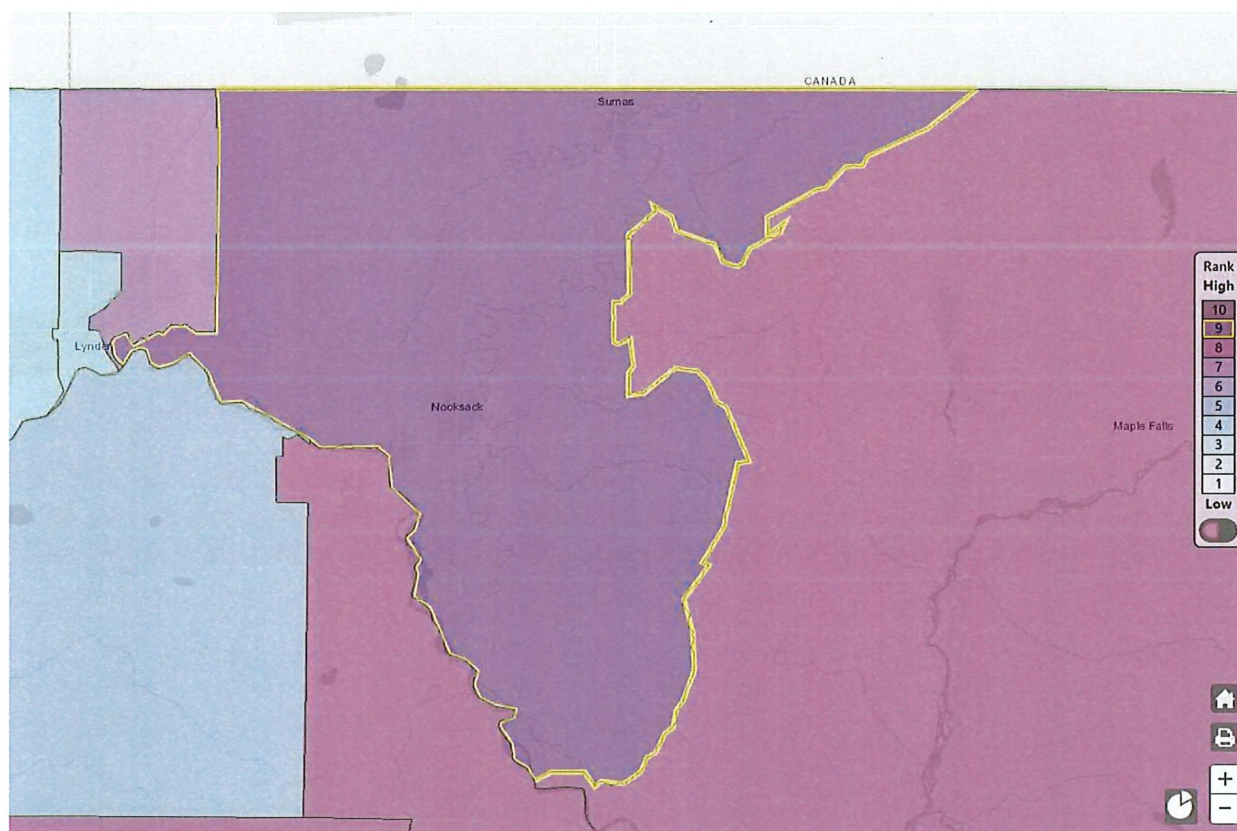


Figure 2: Sumas EHD Socioeconomic Factors Map

The census tract that Sumas is in has a Sensitive Populations rank of 3, scoring a 5 in “Death from Cardiovascular Disease” and a 3 in “Low Birth Weight”.

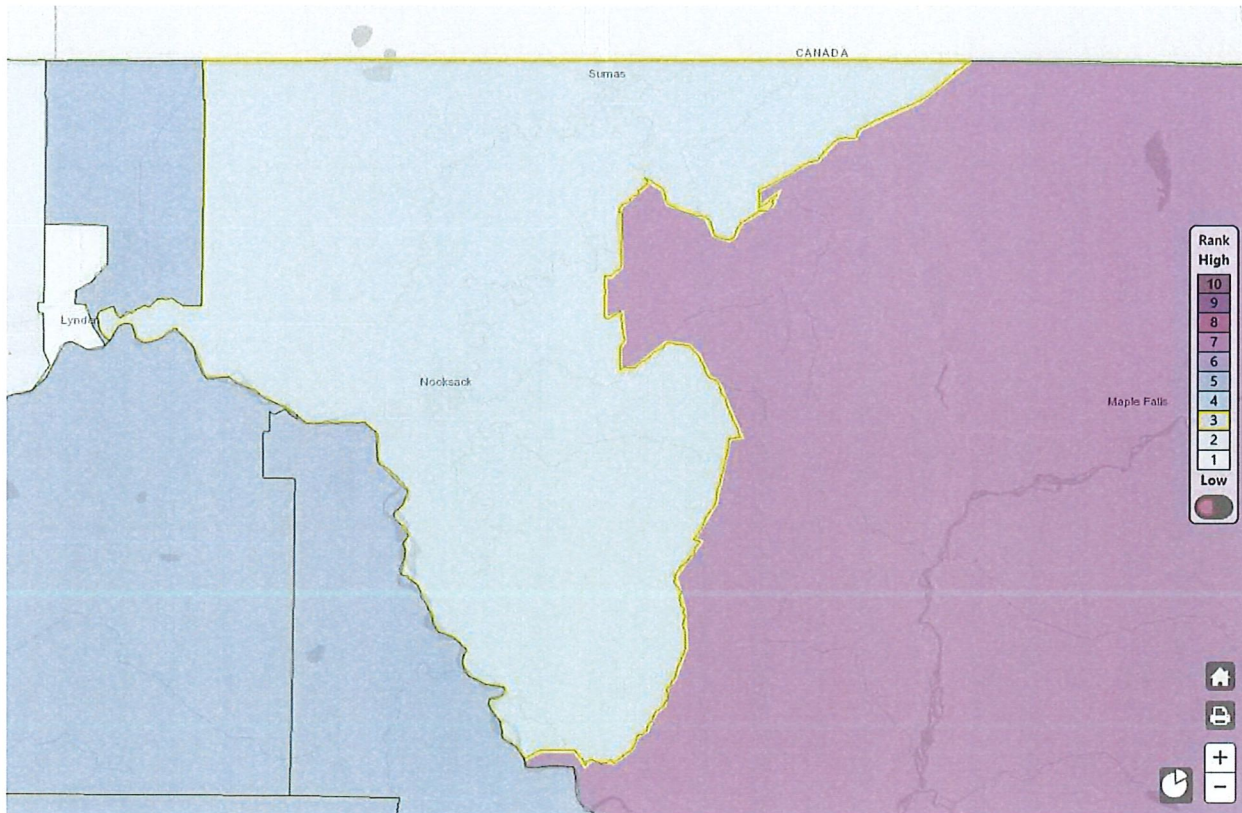


Figure 3: Sumas EHD Sensitive Populations Map

5 Forecast of Impacts

The City has identified specific energy equity target categories that we will strive towards on our way to complete energy equity. The City has also identified specific indicators that will show us how much of an effect our programs will have on reaching those equity goals.

6 Reducing Risks to Vulnerable Populations and Highly Impacted Communities

The City of Sumas has recently implemented several energy assistance programs which provide affordable options for vulnerable members of the community. These programs were introduced in late 2024. Currently, 8 residents have applied for these programs. The following is a description of each program and their eligibility requirements.

The primary qualifier to be eligible for these programs is based on a variable income threshold based on family size. The following is the income limits for qualification in 2024.

2024 Qualifying Income Limits	
Family Size	Greater of 80% AMI or 200% FPL
1	\$59,150
2	\$67,550
3	\$76,050
4	\$84,450
5	\$91,200
6	\$98,000
7	\$104,750
8	\$111,500
9	\$118,250
10	\$126,960
11	\$137,720
12	\$148,480
13	\$159,240
14	\$170,000

6.1 Electric Base Fee Waiver

The Electric Base Fee Waiver is an energy assistance program fully funded by the City of Sumas. This program allows the City of Sumas to waive the electric base fee on the electric bill of approved applications. This program is available to all households who meet the qualifying requirements.

Qualifying Criteria:

1. Applying person must be on the utility account.
2. Total household income must be at or below the income threshold.

6.2 Senior Electric Discount Program

The Senior Electric Discount Program is an energy assistance program that is fully funded by the City of Sumas. This program allows for every qualifying household to receive a 5% discount on their electric bill.

Qualifying Criteria:

1. Applying person must be on the utility account.
2. Total household income must be at or below the income threshold.
3. Age 62 or older.

6.3 Electric Bill Donation Recipient Program

The Electric Bill Donation Program is fully funded by donations that are received by the City of Sumas. Any donations that are received by the City will be held in a fund until December of each year. In December, all donations received in the previous year will be distributed equally to all approved qualifying applicants' electric bill. This program is determined based on donations received; there is no guarantee of the amount of funds that will be available to distribute. If there are no donations received, there will be no funds available to apply to utility accounts.

The program began in August 2024. No donations were received in time to distribute funds to qualified applicants in 2024, however, donations in the amount of \$306 have been received for 2025 and will be distributed in December.

7 Public Participation

The City of Sumas invited customers to participate in the shaping of this Clean Energy Implementation Plan through a city-wide community outreach survey directed at receiving feedback regarding the City's electric utility and generating input on how to improve the utility. The survey was advertised via a mailer that was sent to all Sumas utility customers. The mailer was written in both English and Spanish. Through this effort, the City received 23 responses.

Survey Responses are provided in Appendix A of this plan. These responses show a generally positive attitude towards Sumas' electric utility. A strong majority of written responses expressed gratitude for the City's linemen who work at all hours to fix outages when they occur. They also expressed gratitude for the City in general for keeping rates at reasonable levels.

8 Alternative Compliance

The City of Sumas does not intend to use alternative compliance options in 2025-2029.

9 Resource Adequacy Standard

9.1 Resource Adequacy Standard

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

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

9.2 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 risk.

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 weather events, such as cold snaps or heat waves, are

analyzed, both of which assume maximum delivery of the Canadian Entitlement outside of the region, zero wind generation, and limited energy market purchases. Winter events assume reduced stream flows due to impacts from ice forming in reservoirs. Summer events assume reduced Columbia Generating Station output due to adverse weather conditions, as the plant must power down during high temperatures for safety reasons.

10 Incremental Cost

The City of Sumas does not intend to meet compliance requirements using the 2% incremental cost approach.