



2025 Electric Integrated Resource Plan
Technical Advisory Committee Meeting No. 2 Agenda
Tuesday, January 30, 2024
Virtual Meeting

| Topic | Time | Staff |
|---------------------------------------|-------------|-----------------|
| Introductions | 8:30 | John Lyons |
| How Avista Includes Equity Principles | 8:40 | Annette Brandon |
| Customer Benefit Indicators | 9:30 | Annette Brandon |
| Break | 10:30 | |
| How Avista Practices Equity Outcomes | 10:45 | Tamara Bradley |
| Equity Planning in the IRP | 11:30 | James Gall |
| Adjourn | 12:00 | |

Microsoft Teams meeting

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2025 IRP TAC 2 Introductions

John Lyons, Ph.D.
Technical Advisory Committee Meeting No. 2
January 30, 2024

Meeting Guidelines

- IRP team is in office Monday - Wednesday and also available by email, phone and Teams for questions and comments
- Stakeholder feedback responses shared with TAC at meetings, in Teams and in Appendix
- Working IRP data posted to Teams
- Virtual IRP meetings on Teams, in person available for full day meetings
- Final TAC presentations, meeting notes and recordings posted on IRP page

Virtual TAC Meeting Reminders

- Please mute mics unless speaking or asking a question
- Raise hand or use the chat box for questions or comments
- Respect the pause
- Please try not to speak over the presenter or a speaker
- Please state your name before commenting for the note taker
- This is a public advisory meeting – presentations and comments will be documented and recorded

Integrated Resource Planning

The Integrated Resource Plan (IRP):

- Required by Idaho and Washington* every other year
 - Washington now requires IRP every four years and update at two years
- Guides resource strategy over the next twenty years
- Current and projected load & resource position
- Develop alternative load/customer forecasts
- Resource strategies under different future policies
 - Generation resource choices
 - Energy efficiency / demand response
 - Transmission and distribution integration
 - Avoided costs
- Market and portfolio scenarios for uncertain future events and issues

Technical Advisory Committee

- The public process piece of the IRP – input on what to study, how to study, and review of assumptions and results
- Wide range of participants involved in all or parts of the process
 - Ask questions
 - Always looking for help with soliciting new TAC members
- Open forum while balancing need to get through topics
- Welcome requests for studies or different assumptions.
- Available by email or phone for questions or comments between meetings

Today's Agenda – Equity Focus

- 8:30 Introductions, John Lyons
- 8:40 How Avista Includes Equity Principles, Annette Brandon
- 9:30 Customer Benefit Indicators, Annette Brandon
- 10:30 Break
- 10:45 How Avista Practices Equity Outcomes, Tamara Bradley
- 11:30 Equity Planning in the IRP, James Gall
- 12:00 Adjourn



Equity in Utility Operations

Annette Brandon

Technical Advisory Committee Meeting No. 2

January 30, 2024





Overview of Equity

Annette Brandon



Dictionary Definition

equity [ek-wi-tee] [SHOW IPA](#)  

[See synonyms for equity on Thesaurus.com](#)

noun, plural eq·ui·ties.

1. the quality of being fair or impartial; [fairness](#); [impartiality](#): *the equity of Solomon.*
2. something that is fair and just: *The concepts and principles of health equities and inequities are important to society as a whole.*
3. the policy or practice of accounting for the differences in each individual's starting point when pursuing a goal or achievement, and working to remove barriers to equal opportunity, as by providing support based on the unique needs of individual students or employees.: Compare [equality \(def. 1\)](#).



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Equity at Avista

Focused on fair opportunities and access to resources which contribute to fair, equitable outcome

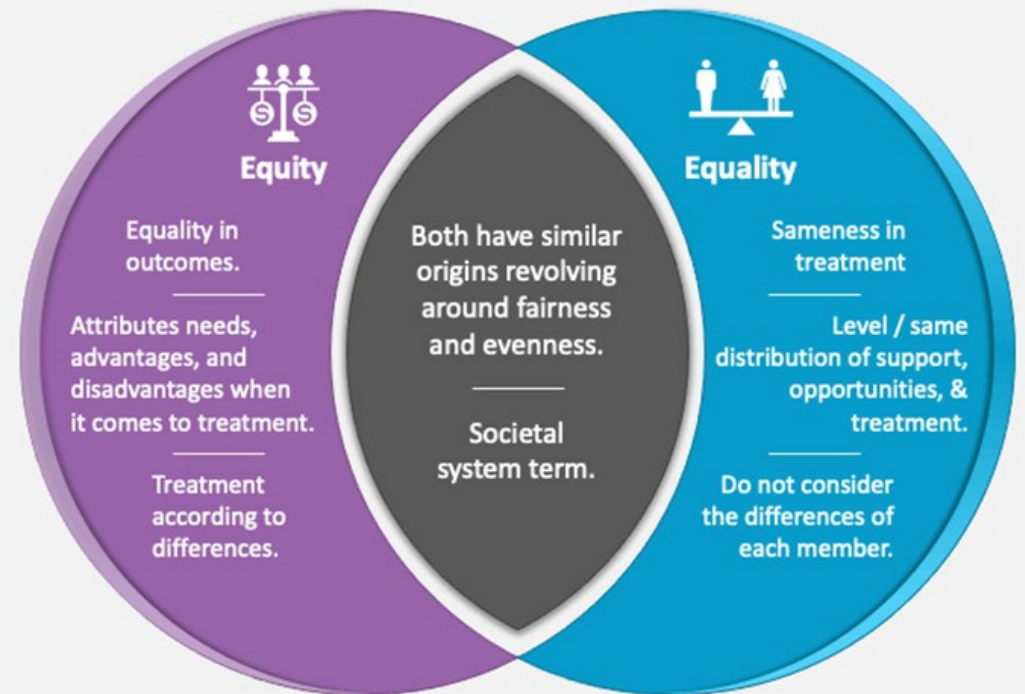
Fairness

- A “fair process” is defined as focus on ensuring no group of people share disproportional burden associated with policies, decisions or actions

Foundation: Meaningful participation

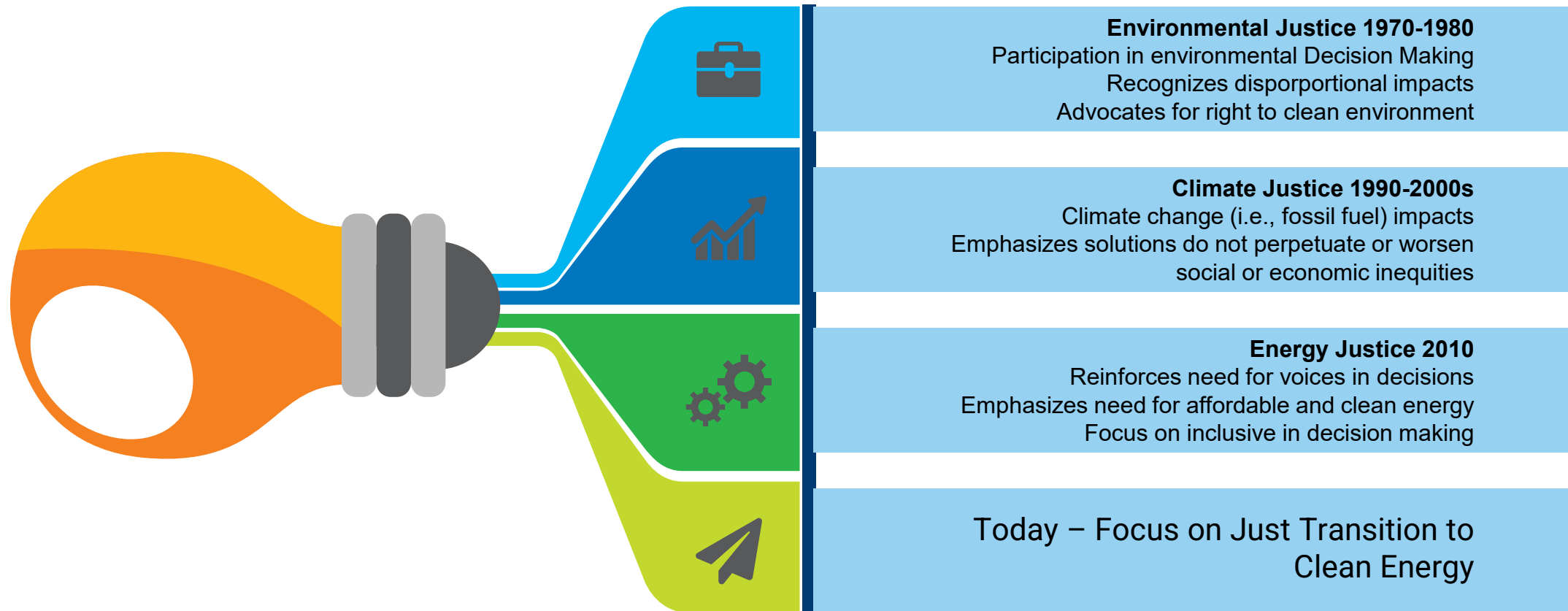
- awareness and opportunity to participate
- has the ability to influence decisions
- Is considered in the decision-making process
- outreach efforts seek out and facilitate involvement of those potentially affected.

EQUITY VS EQUALITY

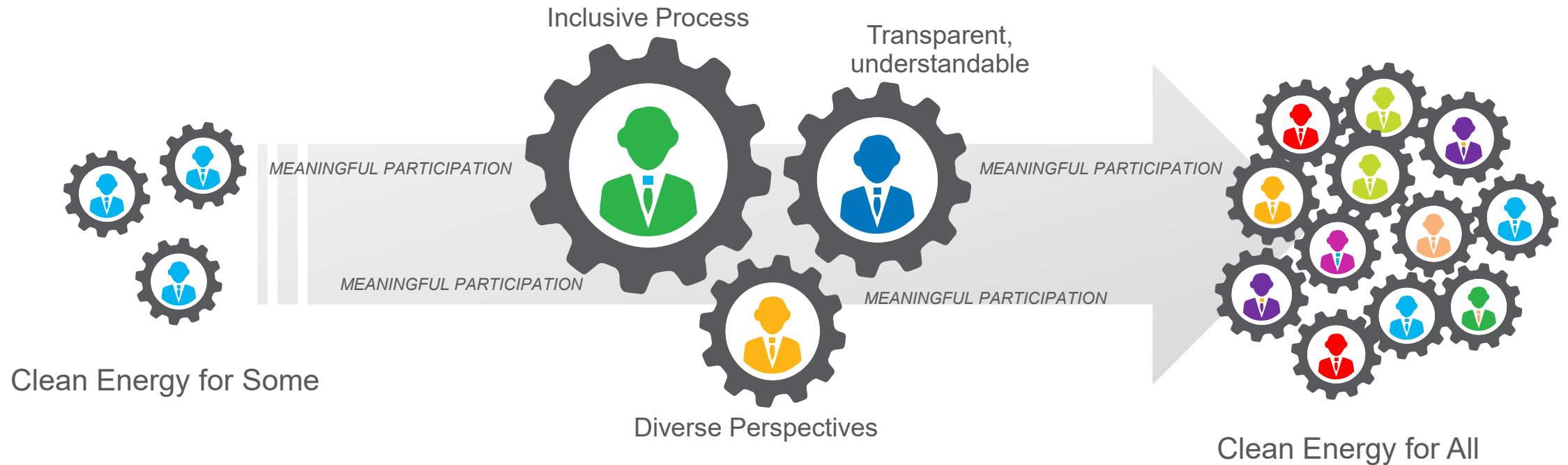


Evolution of Energy Justice

Equitably sharing the benefits and burdens involved in the production and consumption of energy services and **Fairness in how people and communities are treated in energy decision-making**

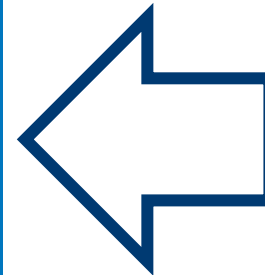
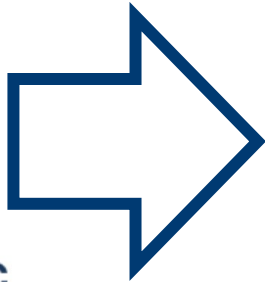


Transition to Clean Energy



Avista is Committed to a Clean Energy Future for all of our Customers

Balancing Multiple Objectives



Federal Justice40



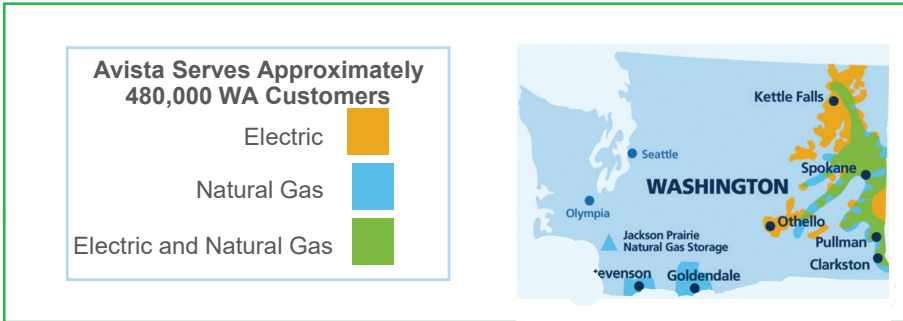
Clean Energy Transformation Act



Climate Commitment Act



Federal Energy Regulatory Commission





Regulatory Requirements

Washington State Equity Requirements

Clean Energy Implementation Plan 2019

- Focus on “just transition”
- Strong Public Participation
- Customer Benefit Indicators

Avista General Rate Case Conditions 2021

- “Capital Planning must consider and implement energy justice and its core tenets.”
 - Recognition, Procedural, Distributive, Restorative

Climate Commitment Act 2022

- Environmental Justice Council
 - Invest in those communities most impacted by climate change



Washington State
OFFICE OF EQUITY 

Clean Energy Implementation Plan Requirements



- Avista will apply **Non-Energy Impacts (NEIs) and Customer Benefit Indicators (CBIs) to all resource and program selections** in determining its Washington resource strategy
- Avista agrees to engage and consult with its applicable advisory groups (IRP Technical Advisory Committee (TAC) and Energy Efficiency Advisory Group (EEAG)) regarding an appropriate methodology for including NEIs and CBIs in its resource selection.
- **Avista will consult with its EAG after the development of this methodology to ensure the methodology does not result in inequitable results**

Non-Energy Impact

- Contribution of investments that goes beyond the energy and demand costs
- Impacts (either positive or negative) can come in the form of **economic, social, environmental, and/or personal ways.**

| Societal Benefits | |
|---------------------------------|----------------------|
| Public Health | Economic Development |
| Improved Air Quality | Increased Employment |
| Water quality and quantity | Energy Security |
| Benefits to Low Income families | |

| Participant Benefits | |
|----------------------|----------------------------------|
| O & M Savings | Employee Productivity Increase |
| Health Benefits | Property Value Increase |
| Comfort Increase | Benefits to Low Income Customers |

| Utility Benefits | |
|---------------------------------------|------------------------|
| Peak Load Reduction | Less Debt Write Off |
| Transmission and Distribution Savings | Lower Collection Costs |
| Reduced arrearages | Fewer customer calls |

General Rate Case Requirements: Energy Justice Core Tenets

“The processes or procedures Avista considers for all capital planning should consider and implement energy justice and its core tenets. The core tenets of energy justice are: recognition, procedural, distribution, restorative.



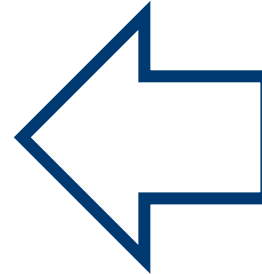
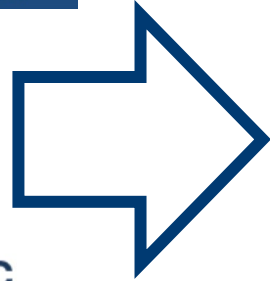
Balancing Requirements – While Keeping Customer at the Center



Federal Justice40



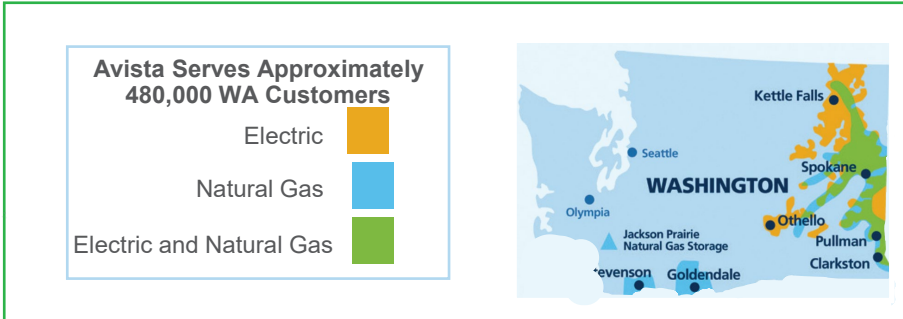
Clean Energy Transformation Act



Climate Commitment Act



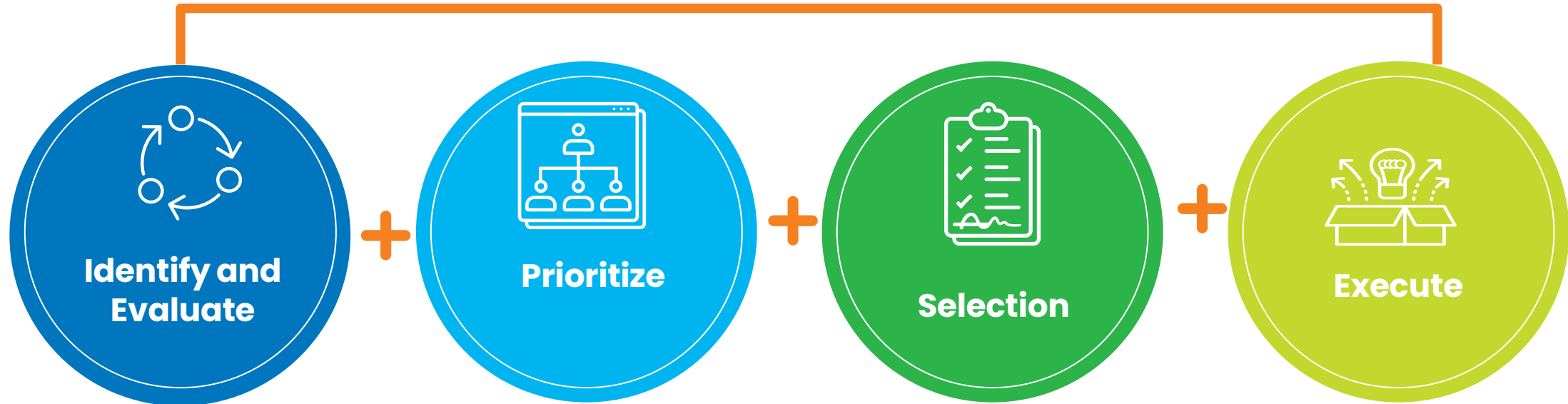
Federal Energy Regulatory Commission



Resource and Program lifecycle Evaluation

“No action is equity neutral....each action either corrects or perpetuates inequities”

Meaningful Participation



Integrated Resource Planning

Transmission, System & Distribution Planning

Energy Efficiency

Customer Requested

Financial & Risk

Operational Needs

Equity

Cost Effectiveness

Impact to Process or Performance Metrics

Total Company

Capacity, Energy

Cost Effectiveness

System vs. State

Power Purchase Agreement

Self-Build

Program Deployment

Project Delivery



Integrated Resource Plans

Process and Performance Metrics

Process and Performance Metrics

People

- Who has provided impact?
- Have we intentionally solicited input?
- Can I use feedback?
- Have I made modifications to meet barriers?

Process

- How will my project produce results?
- Are there alternatives?
- Am I making data-driven decisions?
- Predict change or trend?

Performance

- How did we do?
- How can we measure?
- Are there patterns?

Focus Areas

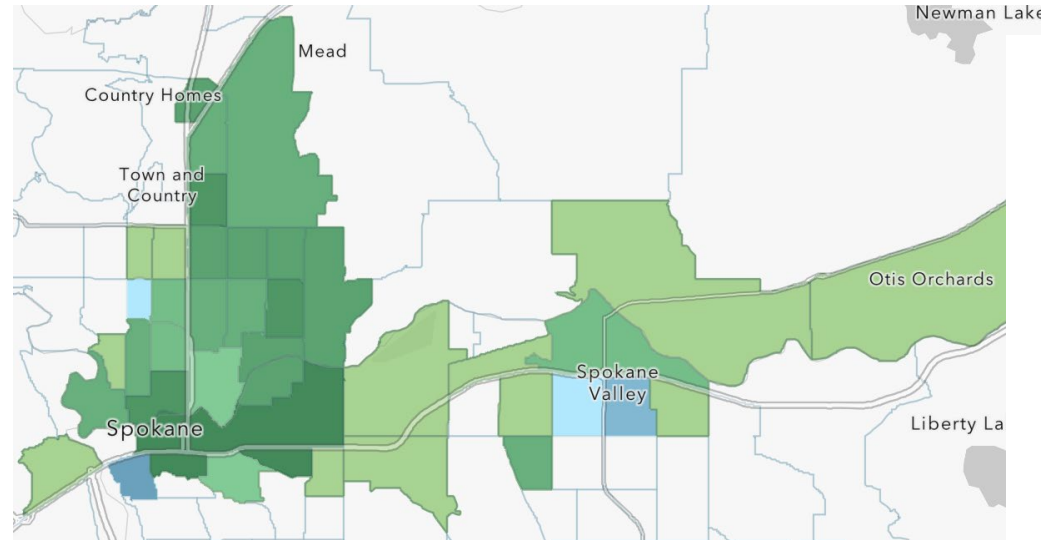
Who and Where we are focusing our equity efforts:

Highly Impacted Communities

Vulnerable Populations

- Sensitivities: physiological impacts
- Socioeconomic: housing, transportation, food and health care access, language barriers

Disadvantaged Populations



JUSTICE 40 POLICY PRIORITIES

Decrease energy burden in disadvantaged communities (DACs)

Decrease environmental exposure and burdens for DACs

Increase parity in clean energy technology access and adoption in DACs

Increase access to low-cost capital in DACs

Increase clean energy enterprise creation and contracting in DACs

Increase clean energy jobs, job pipeline, and job training for individuals from DACs

Increase energy resiliency in DACs

Increase energy democracy in DACs

Justice40: Spokane County, Washington tract 53063000400
Population: 3,844

Zoom to

This tract is identified as disadvantaged. It has 4 categories that meet the criteria.

- Energy
- Health
- Housing
- Legacy pollution

There are 33 disadvantaged tracts in Spokane County and 306 disadvantaged tracts in Washington.

Data Driven Consideration

Directly related to policy goals and the public interest

readily available

Focused on equitable outcomes

Clearly defined, articulated, and understandable

Based on dependable, pertinent, available data

Allows for comparison or trending

Transparent

Correlated with utility's actions; able to forecast

Updated regularly

Accurately reported regular reporting



CEIP Customer Benefit Indicators



Affordability

Participation in Company Programs
Households with High Energy Burden
Residential Arrears & Disconnects



Energy Security & Resilience

Energy Availability
Energy Generation Location



Access to Clean Energy

Methods/Modes of Outreach & Communication
Transportation Electrification



Environmental

Outdoor Air Quality
Greenhouse Gas Emissions



Community Development

Named Community Clean Energy
Investments in Named Communities



Public Health

Employee Diversity
Supplier Diversity
Indoor Air Quality

Customer Benefit Indicators in IRP



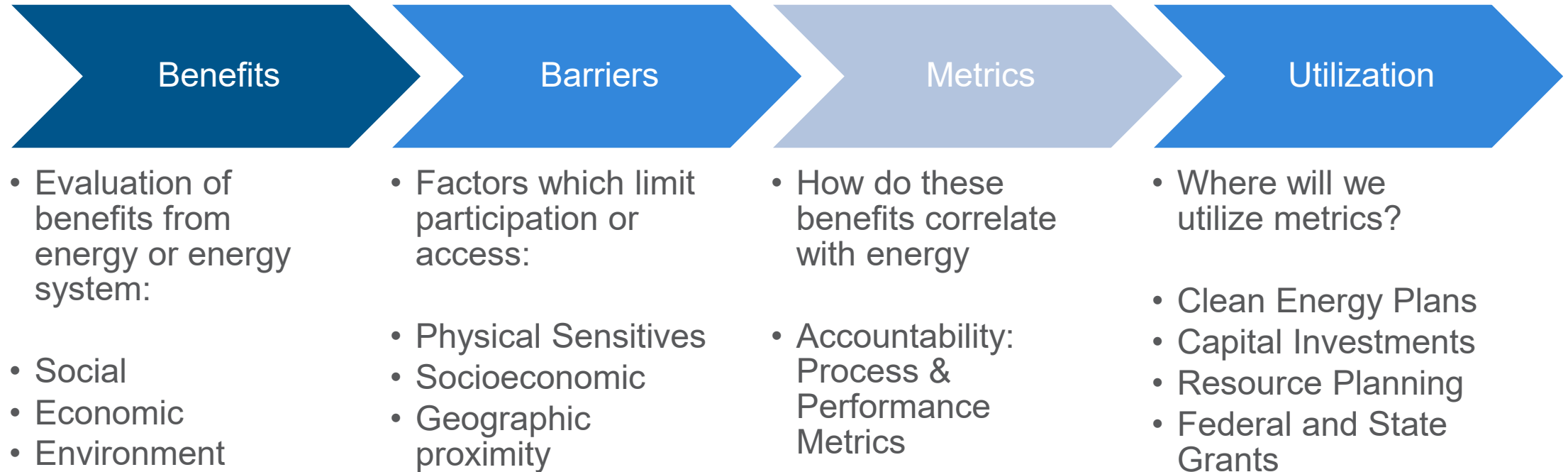
Existing Customer Benefit Indicators:

- 11 of the 31 CBIs are modeled with forecasted values for each metric over the 20-year planning horizon
- PRS does not consider CBIs in objective function

Criteria:

- Categorized in accordance with benefit areas: affordability, development/resilience, security & resilience, environmental & public health, environmental
- Baselines are established and readily available
- Data is quantifiable
- Metrics are granular enough to be meaningful

How Metrics are Developed



Understand Goal:

All customers, regardless of circumstance, have access to the energy they need for basic needs as well as social, economic and environmental needs.



Energy

Physical delivery
of power

Basic Needs



Social

Inclusive and
accessible
processes



Economic

Job creation,
economic growth,
reliable supply,
and affordability



Environmental

Public health,
indoor and outdoor
air quality, and
sustainability

Burdens and Barriers

Affordability

- Unemployment or Underemployment
- Awareness of Programs
- Housing Conditions
- Income Disparities
- Economic impacts on fossil fuel workers

Access

- Not easily accessible for all customers due to financing or other accountability structures
- Geographic Accessibility
- Renters do not have easy access
- Mobile homes not able to use technology etc.

Reliability

- Aging infrastructure
- Limited investment in grid updates
- Lack of redundancy of supply



Performance and Process Metrics



Performance (Lagging)

- How will we measure?
- Are customers impacted as intended?
- Accountability measurements or patterns

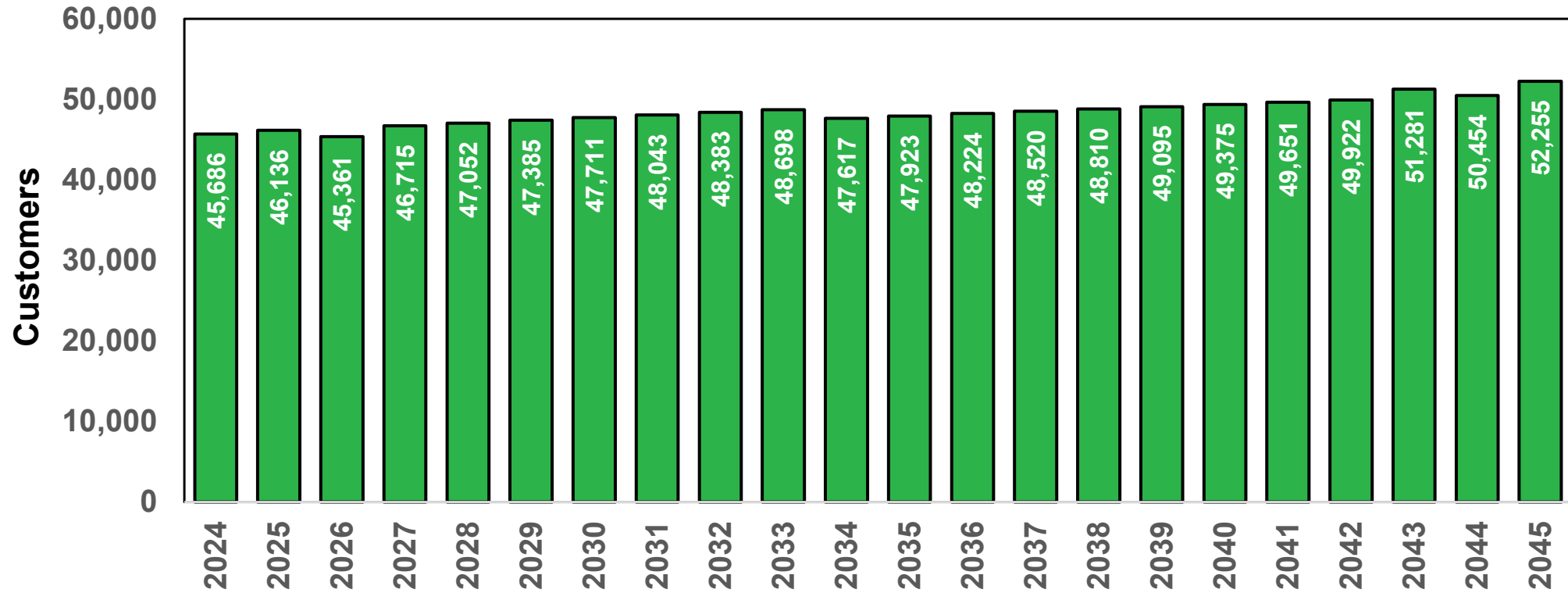
Process Metrics (Leading)

- How will we produce desired results?
- Useful to predict trends
- Mid-Cycle Adjustments

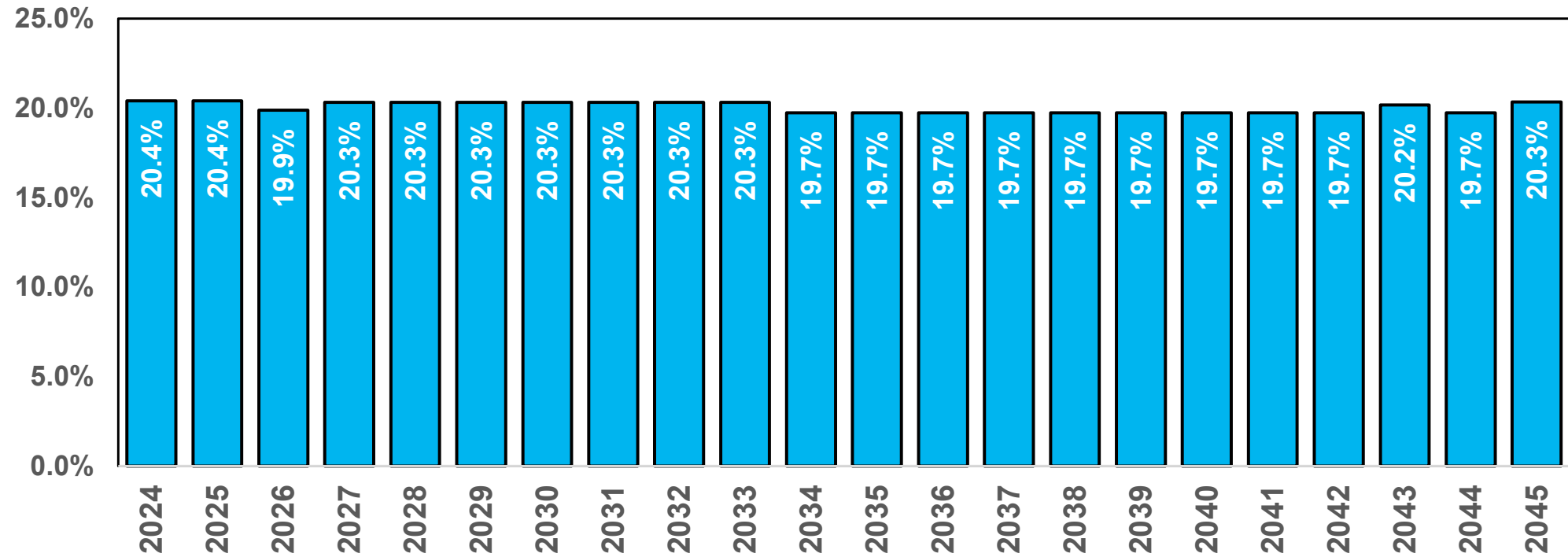


Supplemental

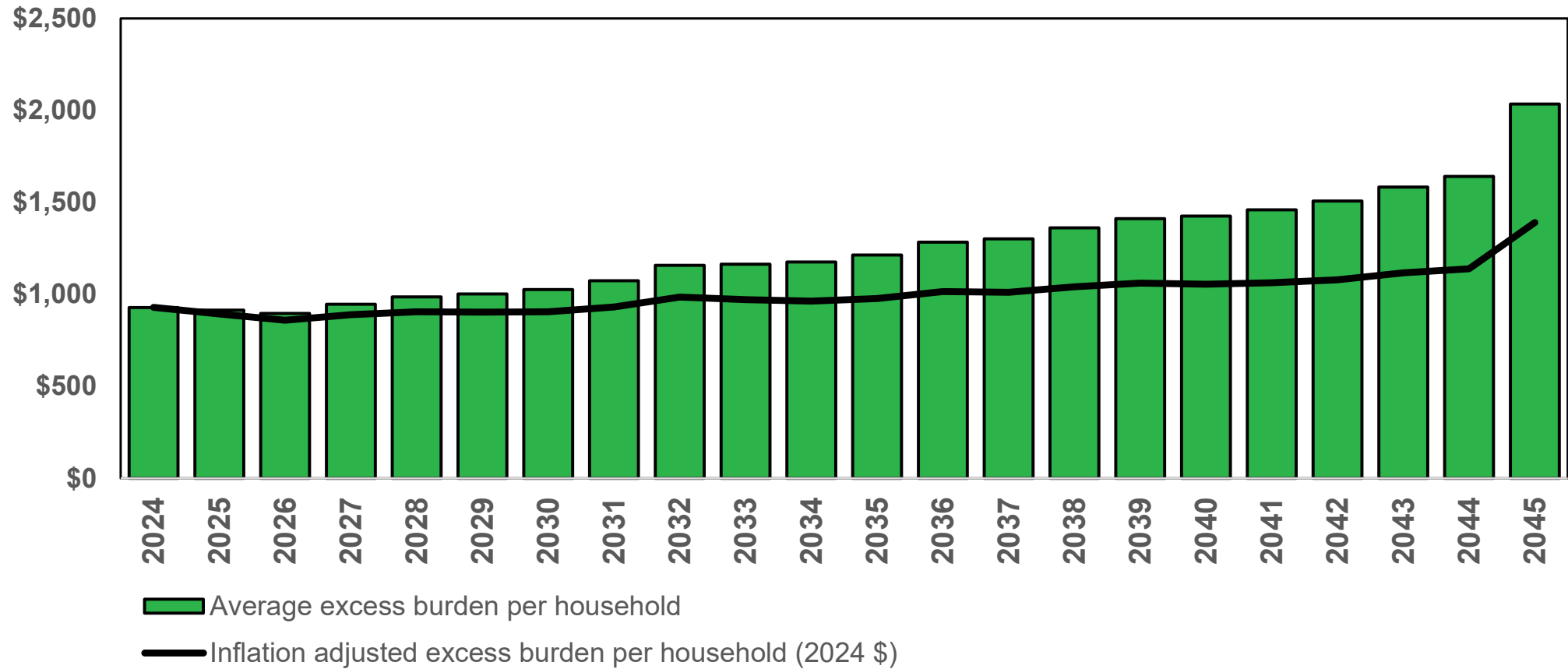
Customers with an Energy Burden



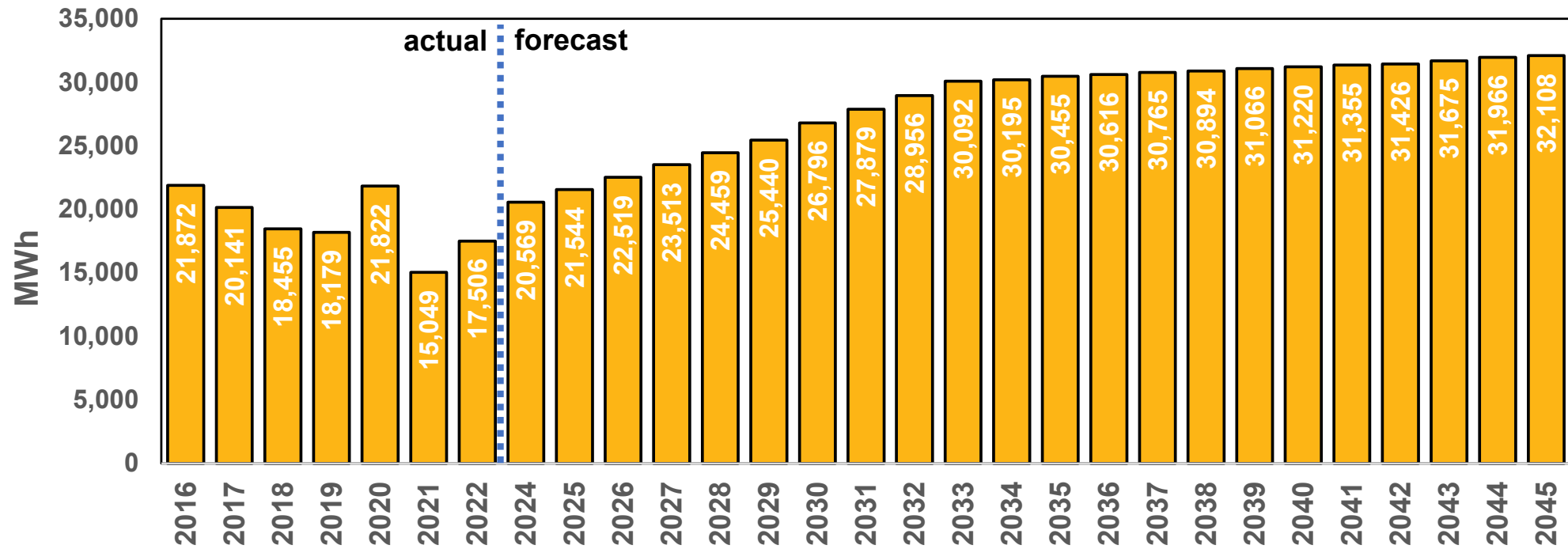
Percent of Customers with an Energy Burden



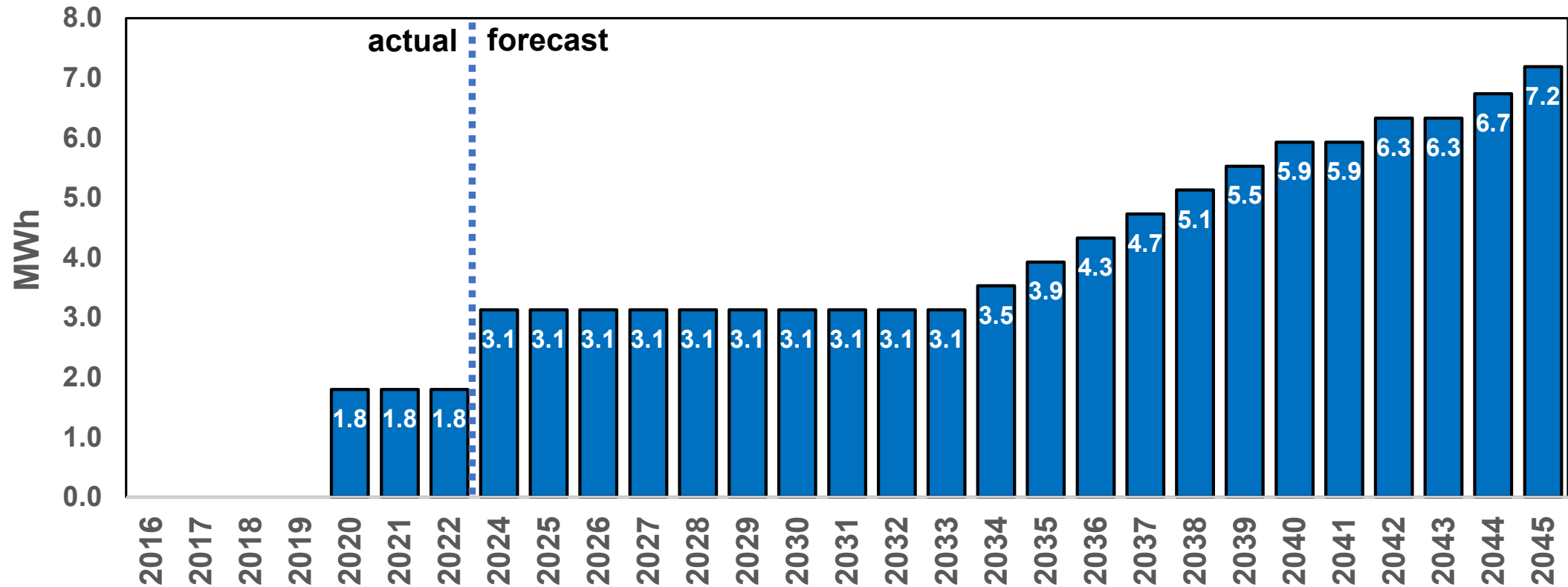
Average Excess Energy Burden



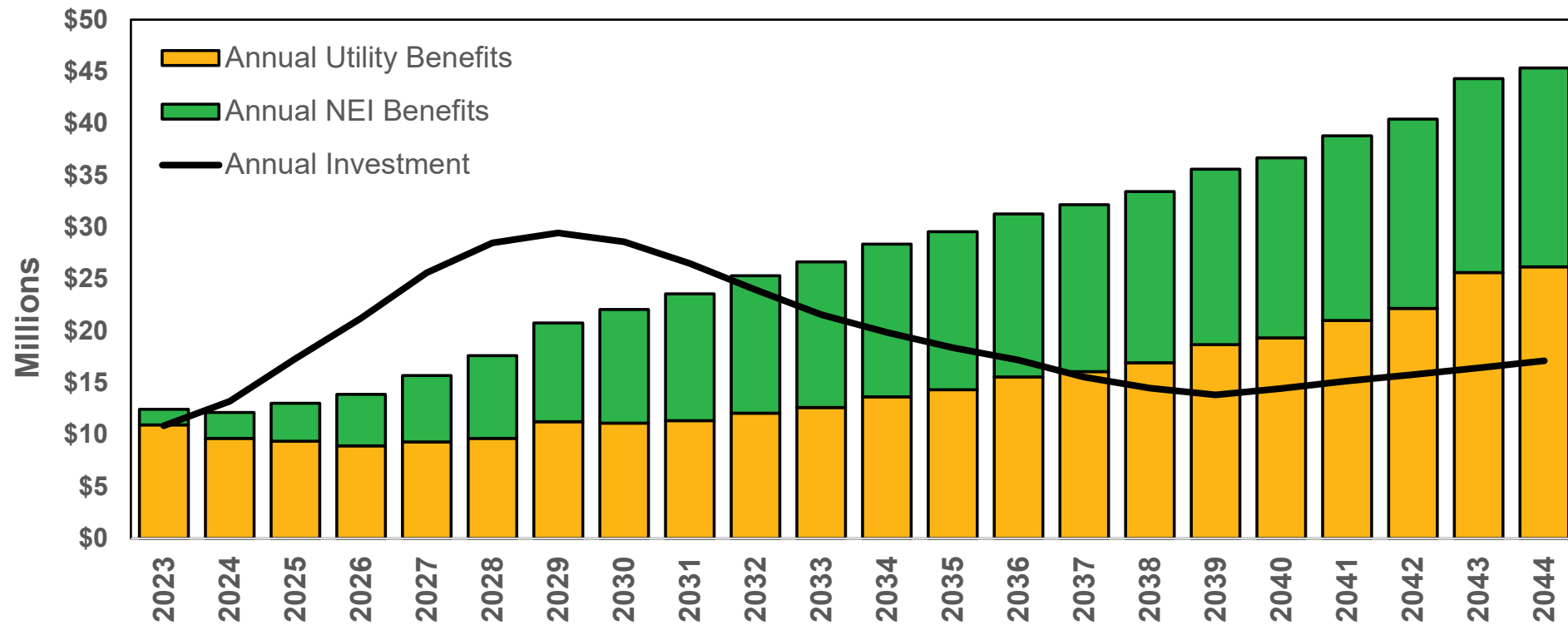
Total MWh of DERs in Named Communities



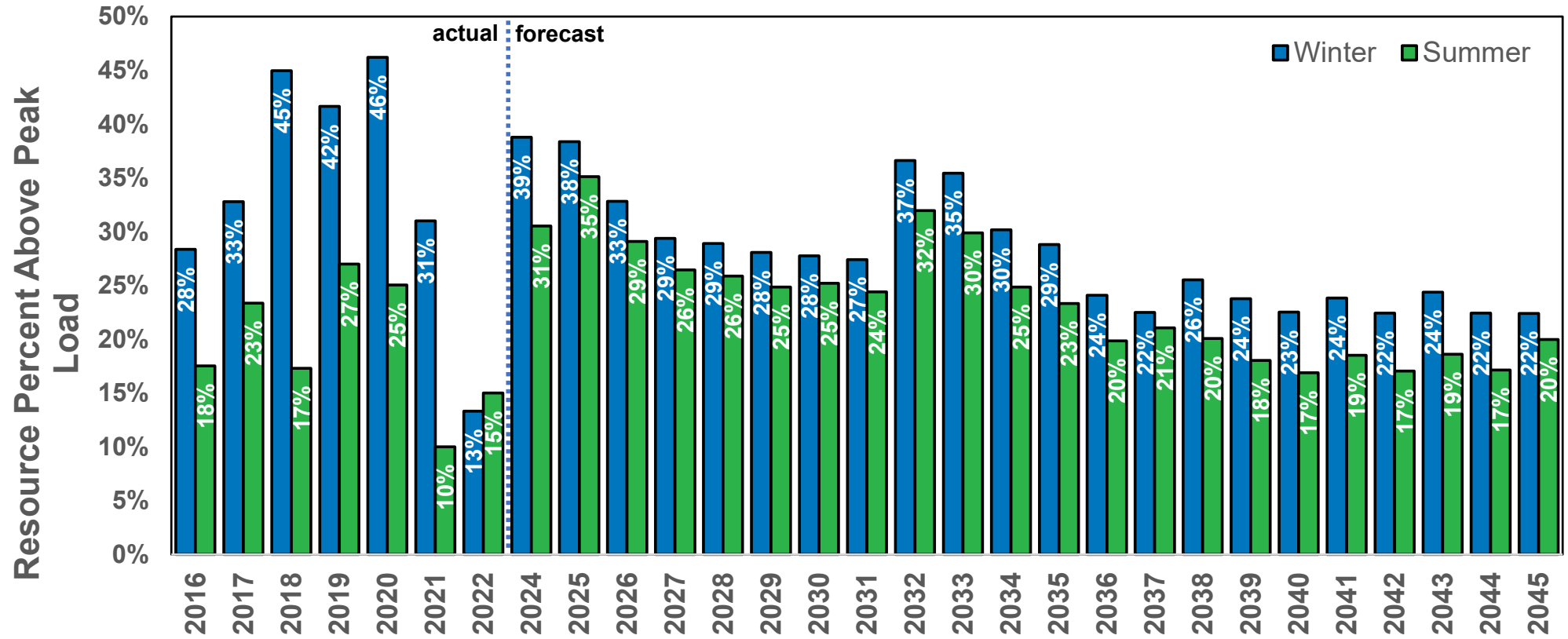
Total MWh Capability of Storage DER in Named Communities



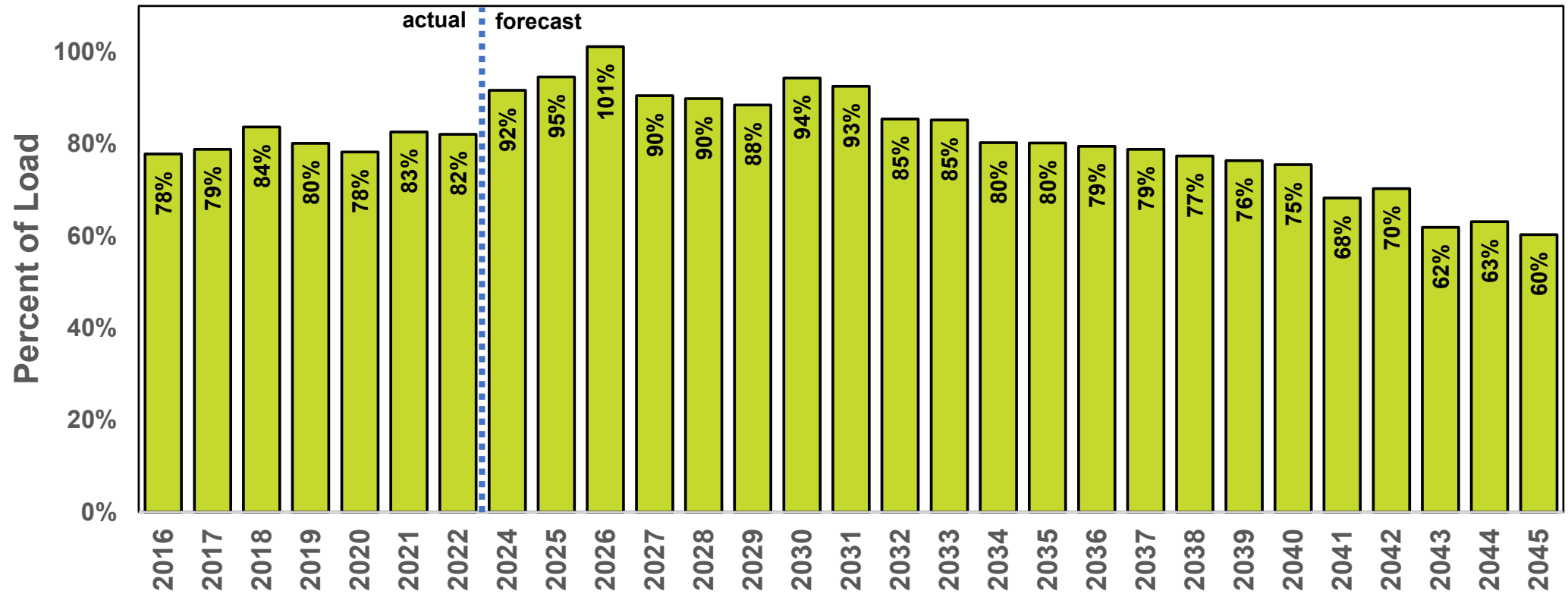
Annual Named Community Investment vs. Benefits



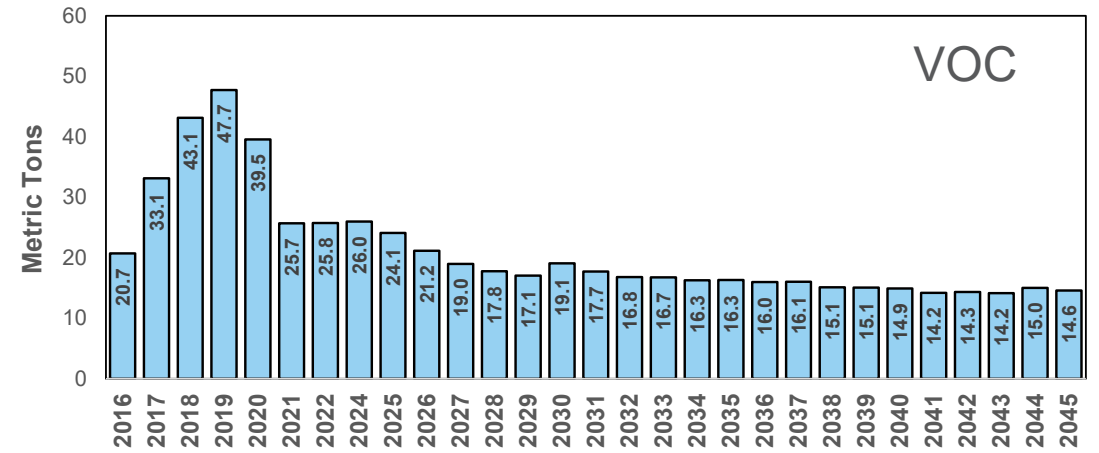
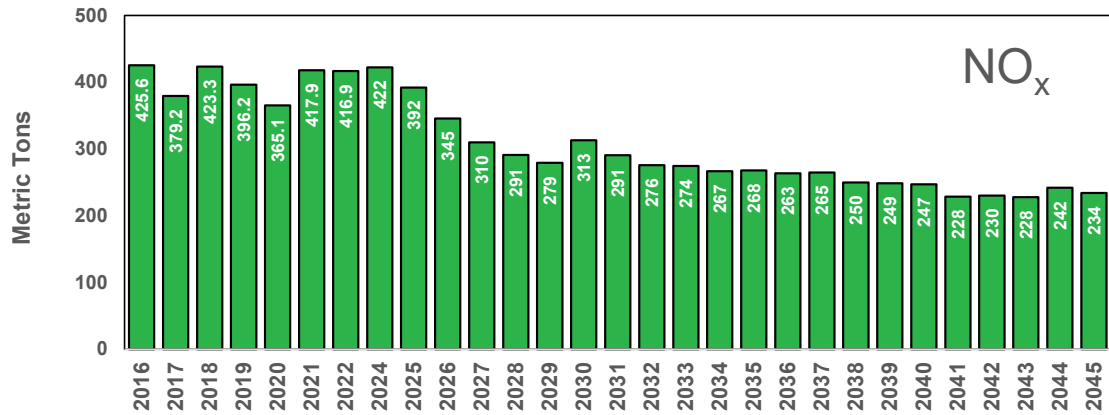
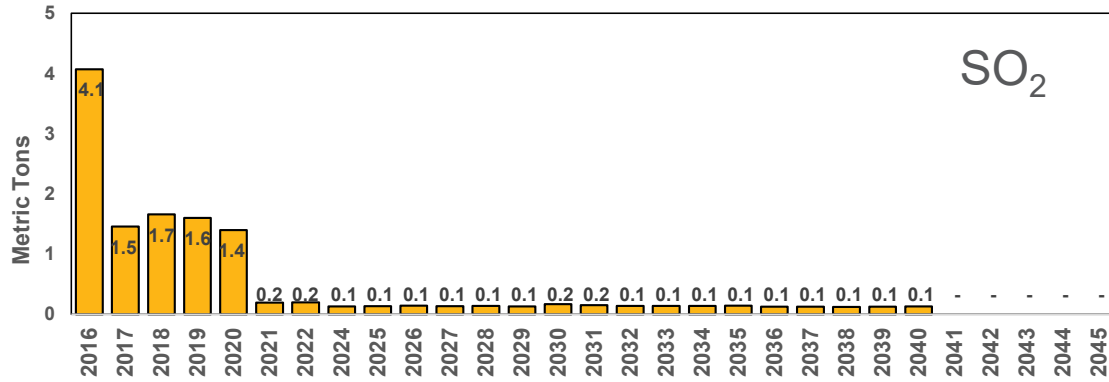
Planning Margin



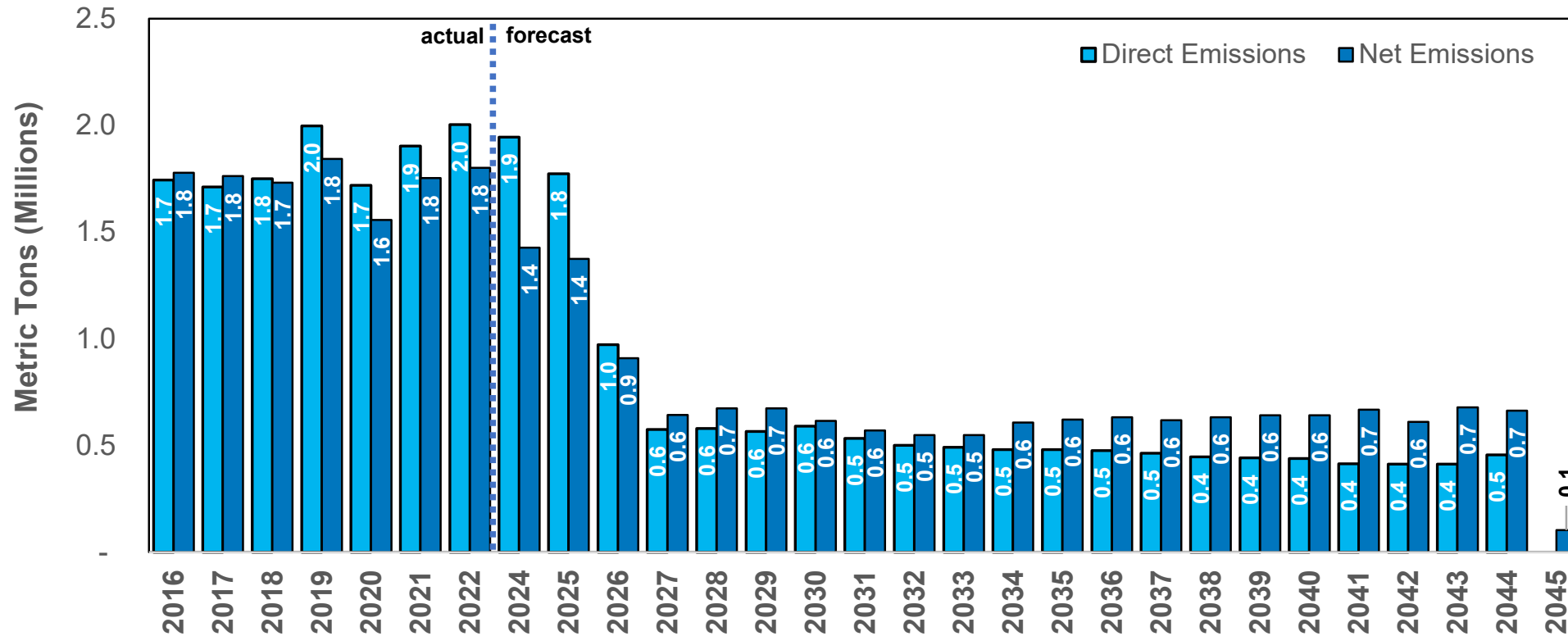
Generation in Washington State or Directly Connected to Avista Transmission



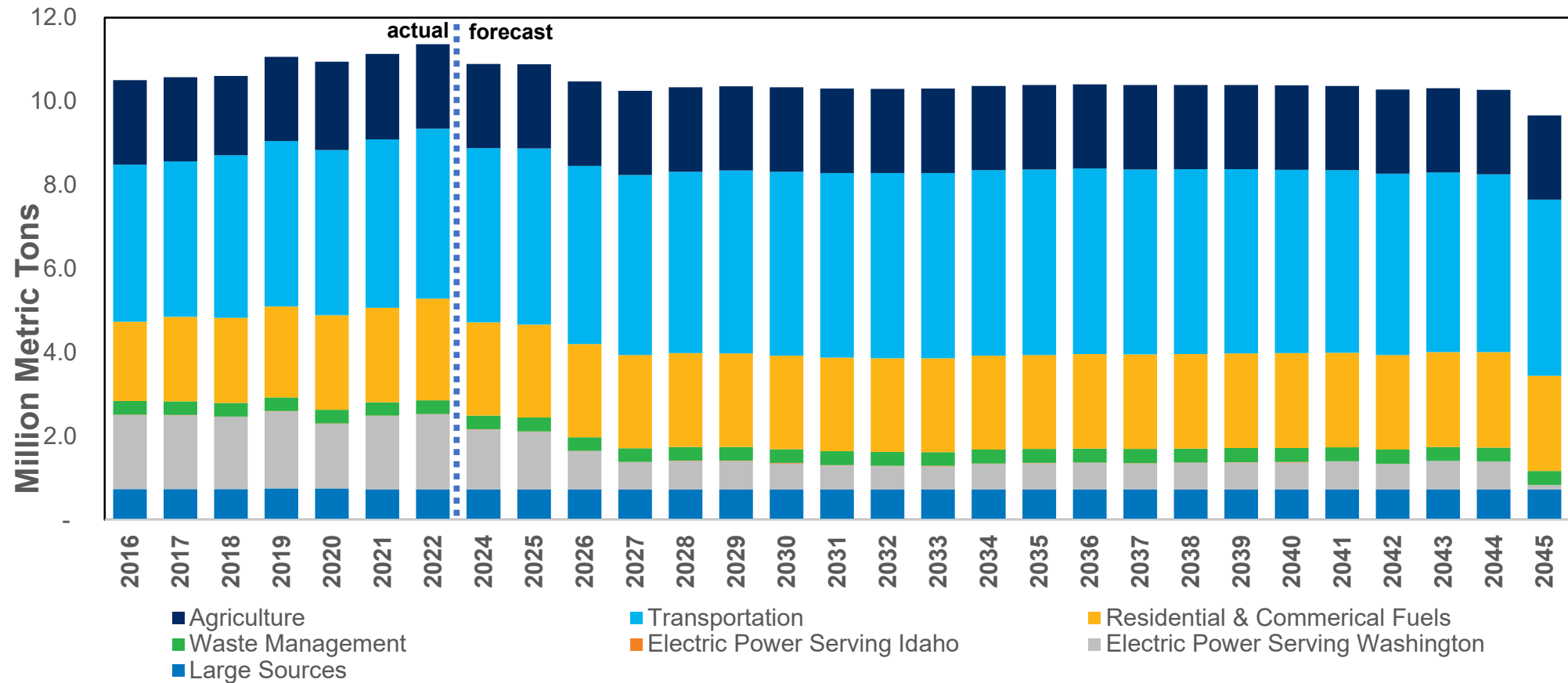
Washington Air Emissions



Greenhouse Gas Emissions (Washington Share)



Eastern Washington Greenhouse Gas Emissions



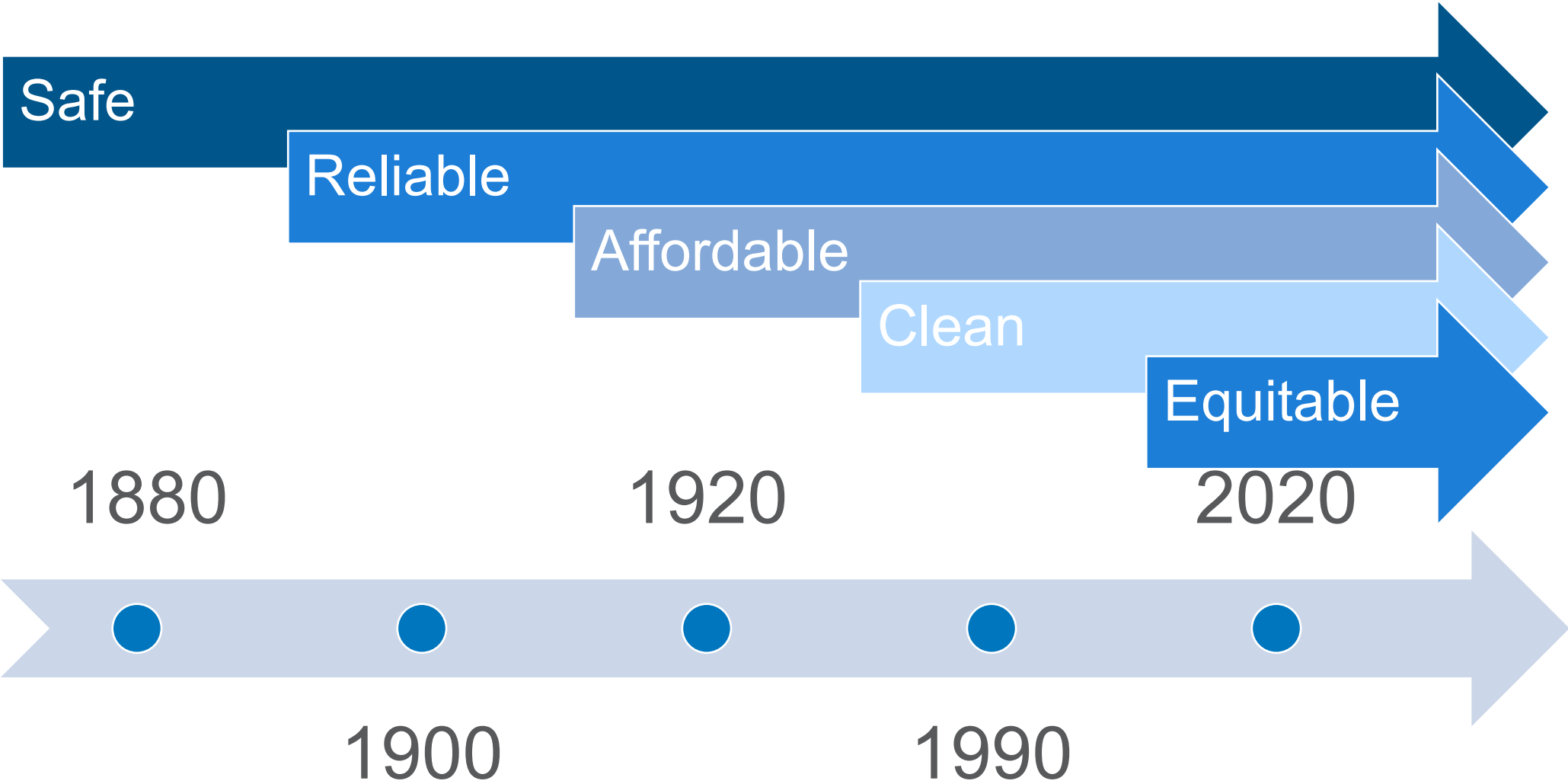


How Avista Practices Equitable Outcomes

Technical Advisory Committee Meeting No. 2

January 30, 2024

Evolution of Utility Industry



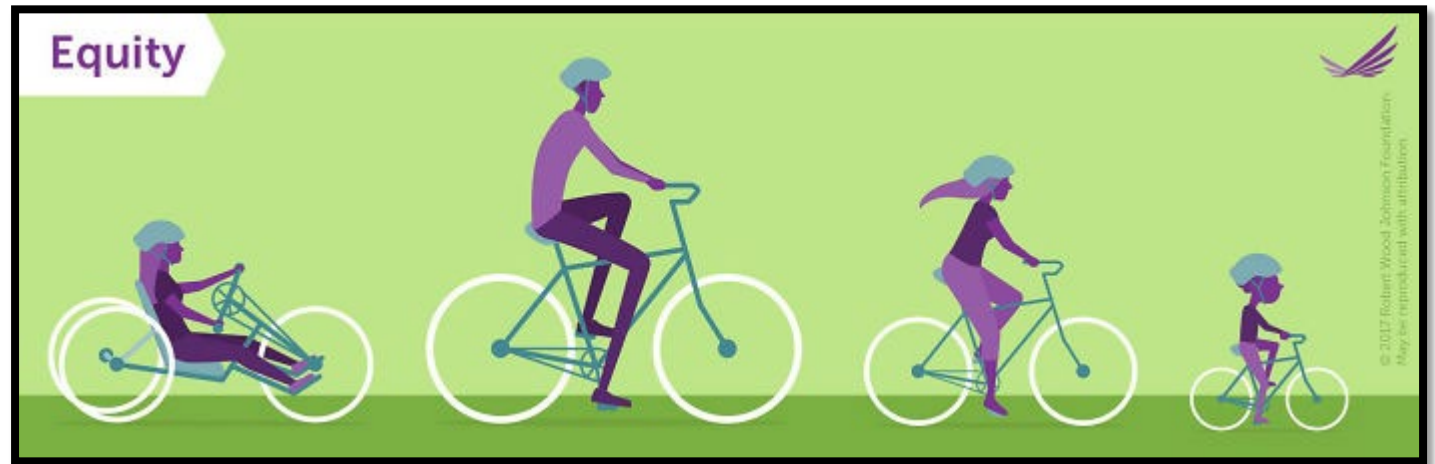
Equity Advisory Group

- Est. in Spring of 2021
- Significant input on our CEIP
- Ongoing monthly sessions
- 11/38 CEIP Conditions
- Oversee 500k of the Named Communities Investment Fund



Additional Advisory Groups

- Energy Assistance Advisory Group (EAAG)
- Energy Efficiency Advisory Group (EEAG)
- Distribution Planning Advisory Group (D-PAG)



CEIP Public Participation Strategy

- The Plan outlines barriers to participation in programs and services, strategies for reducing those barriers, and tools for increasing participation.
- Filed May 1, 2023
- Utility Language Strategy



| |
|--|
| Phase I Project Planning (August 4 - September 16, 2022) |
| Phase II Assessment of Current Practices (August 8 - September 30, 2022) |
| Phase III Survey of Preferences (September 5 - November 11, 2022) |
| Phase IV Public Participation Plan Development (November 7 - December 16, 2022) |

You'll be asked about your experiences with Avista in the past and how you'd like to be communicated with in the future. All questions are voluntary, and the entire survey should take about 3 minutes to complete.

Request translations or paper copies of the survey by emailing.info@pppconsulting.net or calling (919) 706-5449.

- + Queremos saber cómo involucrarle a usted y a otros clientes de Avista de manera más equitativa en futuros programas e iniciativas.
- + Мы стремимся найти оптимальные способы взаимодействия с вами и другими клиентами Avista в будущих программах и инициативах.
- + الآخرين بشكل أكثر إنصافاً في البرامج والمبادرات القادمة Avista نرغب في معرفة كيف يمكننا إشراكك وعملاء.
- + 我们希望知道如何让您和其他 Avista 客户能够更公平地参与到未来的计划和倡议之

Other Initiatives



Capital Planning



Federal/State Grants



Supplier/Employee Diversity

CEIP Customer Benefit Indicators



Affordability

- Participation in Company Programs
- Households with High Energy Burden
- Residential Arrears & Disconnects



Energy Security & Resilience

- Energy Availability
- Energy Generation Location



Access to Clean Energy

- Methods/Modes of Outreach & Communication
- Transportation Electrification



Environmental

- Outdoor Air Quality
- Greenhouse Gas Emissions



Community Development

- Named Community Clean Energy
- Investments in Named Communities



Public Health

- Employee Diversity
- Supplier Diversity
- Indoor Air Quality



Affordability Initiative

How Bill Assistance is Increasing Customer Affordability & Promoting Equity

Kelsey Solberg, Energy Program Manager

Alignment to CEIP

Customer Benefit Indicators



Affordability

Participation in Company Programs
Households with High Energy Burden
Residential Arrears & Disconnects



Energy Security & Resilience

Energy Availability
Energy Generation Location



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Public Health

Employee Diversity
Supplier Diversity
Indoor Air Quality

Bill Assistance & Affordability

What is bill assistance?

Bill assistance aims to reduce the **energy burden** of limited-income households



Energy Burden is the percentage of household income that goes towards energy costs



High energy burden = >6%
Severe energy burden = >10%







Most forms of **bill assistance** are aimed at reducing energy burden to <6%



Result: Increased Affordability!

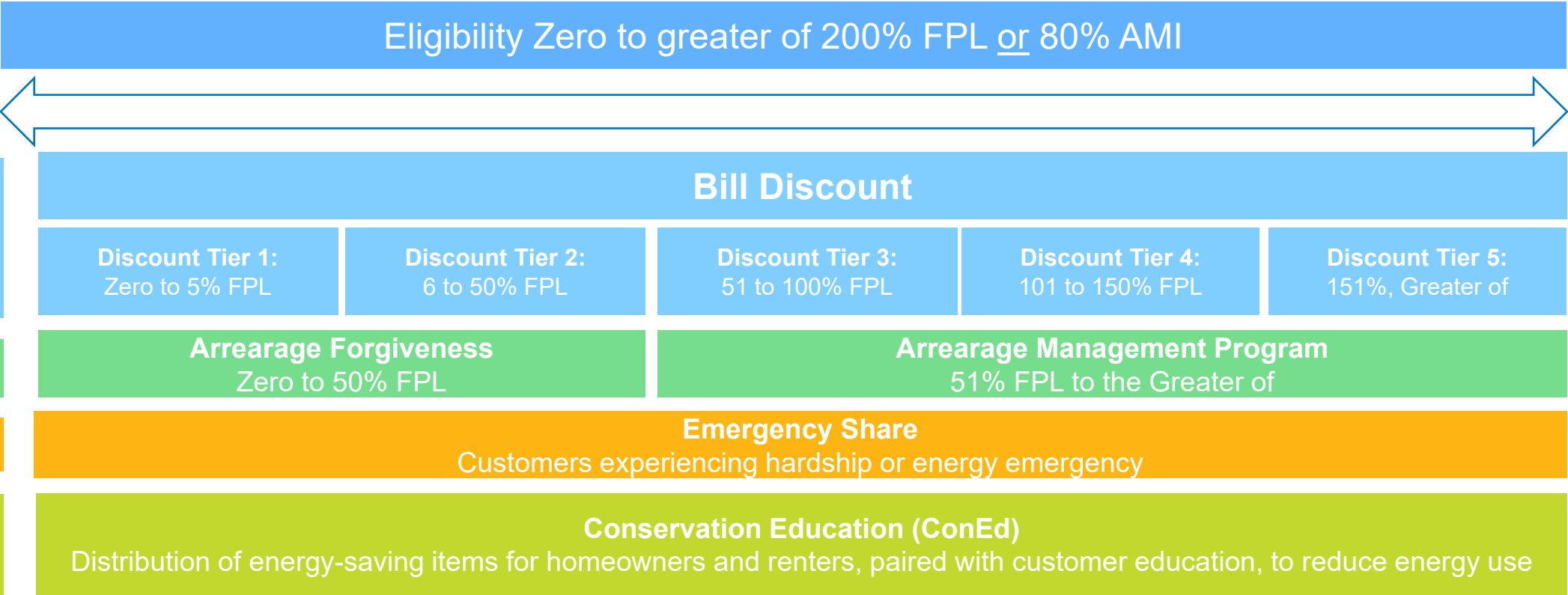


Bill Assistance at Avista: Goals & Purpose

-  Increase Affordability
-  Address Past-Due Balances
-  Provide Support During Hardships
-  Educate on Energy Conservation

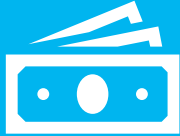
Washington Low-Income Rate Assistance Program (LIRAP)

At-a-glance



Increasing Affordability

Introducing My Energy Discount



Discounts are based on self-declared monthly or annual income



Jointly administered between Avista and agencies means more avenues for access



Nearly 18,000 customers who received income-qualifying assistance were auto-enrolled in October 2023



No paperwork or income verification required



Participants remain eligible for other helpful programs through their local agencies, as well as other energy assistance



6% of enrolled customers will be randomly selected to verify their income through their CAA

Addressing Past-Due Balances

Washington Customer Arrears

**29,170 customers with past due
balances totaling \$6.3M**



Average Past-Due Balance: \$216

Addressing Past-Due Balances

Avista's LIRAP arrearage assistance is comprised of two unique programs

Each program has distinct eligibility criteria and benefit amounts, and are intended to provide relief for income-qualified, residential customers who have unmanageable past-due balances (arrears) on their bills.

Avista works closely with community action agencies to ensure the customer has access to the benefit when they need it most.



**Arrearage Forgiveness
Program (AFP)**



**Arrearage Management
Program (AMP)**

Program Enrollment Snapshot

My Energy Discount:

28,044 Active Participants

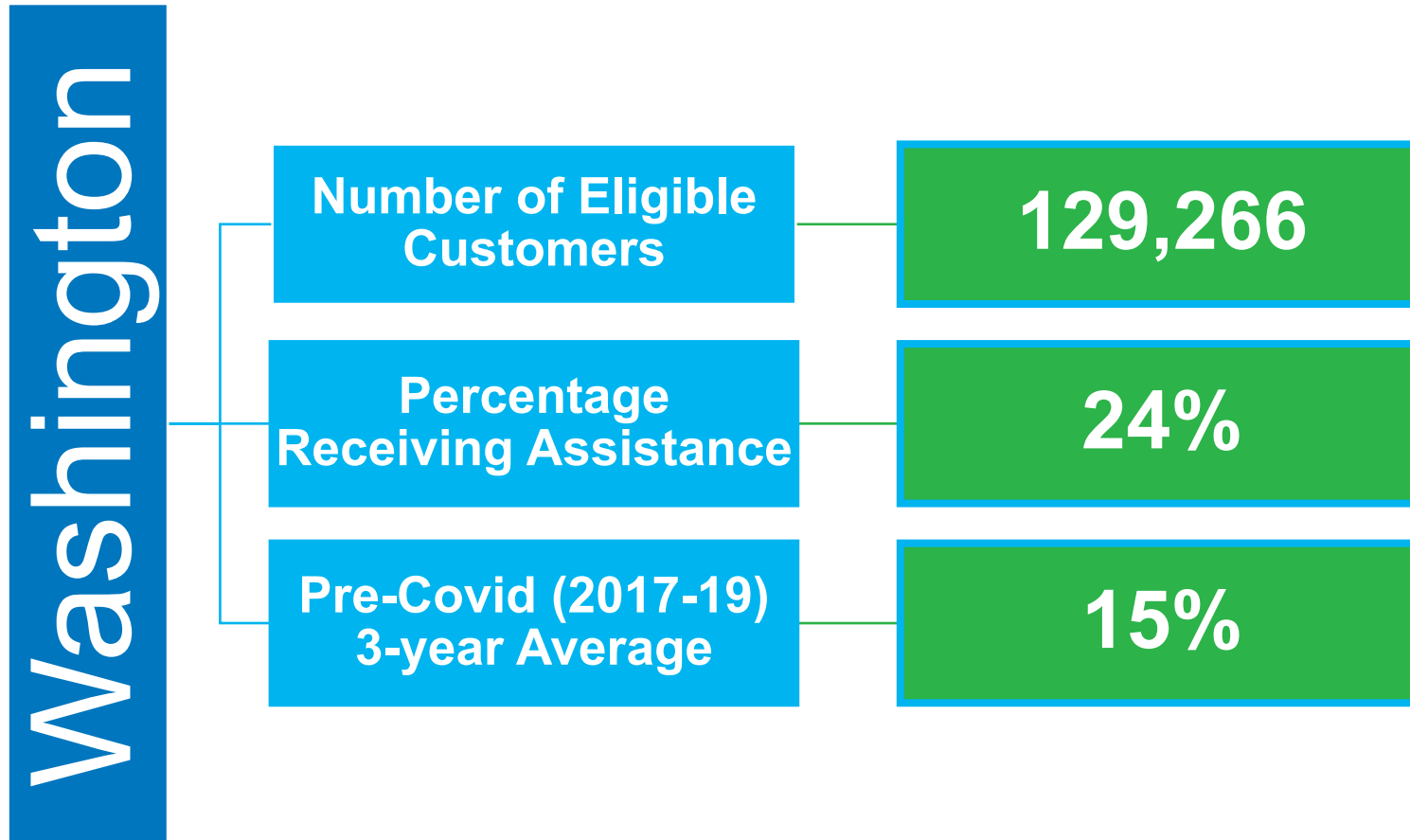
Arrearage Forgiveness Program:

351 Recipients (Oct-Dec 2023)

Arrearage Management Program:

662 Active Participants

2023 Saturation Rate



Saturation Rate equals the percentage of estimated eligible customers who are receiving any form of bill assistance. Data is reviewed and updated quarterly. Beginning in 2023 the Washington estimated eligible of 129,266 was calculated using Avista's 2022 Performance-Based Ratemaking data.

Equity in Program Design

Program features designed with equity in mind



Removing barriers with self-attestation of household income and size



Discount percentages designed to specifically address differential income tiers



Multi-lingual resources on the web, through customer service, and in outreach materials



Increased readability of Avista website, customer letters, promotional materials, etc.



Named Communities Investment Fund

Kristine Meyer, Avista Foundation Executive Director
Ana Matthews, Sr. Energy Efficiency Program Manager

Avista's Named Communities

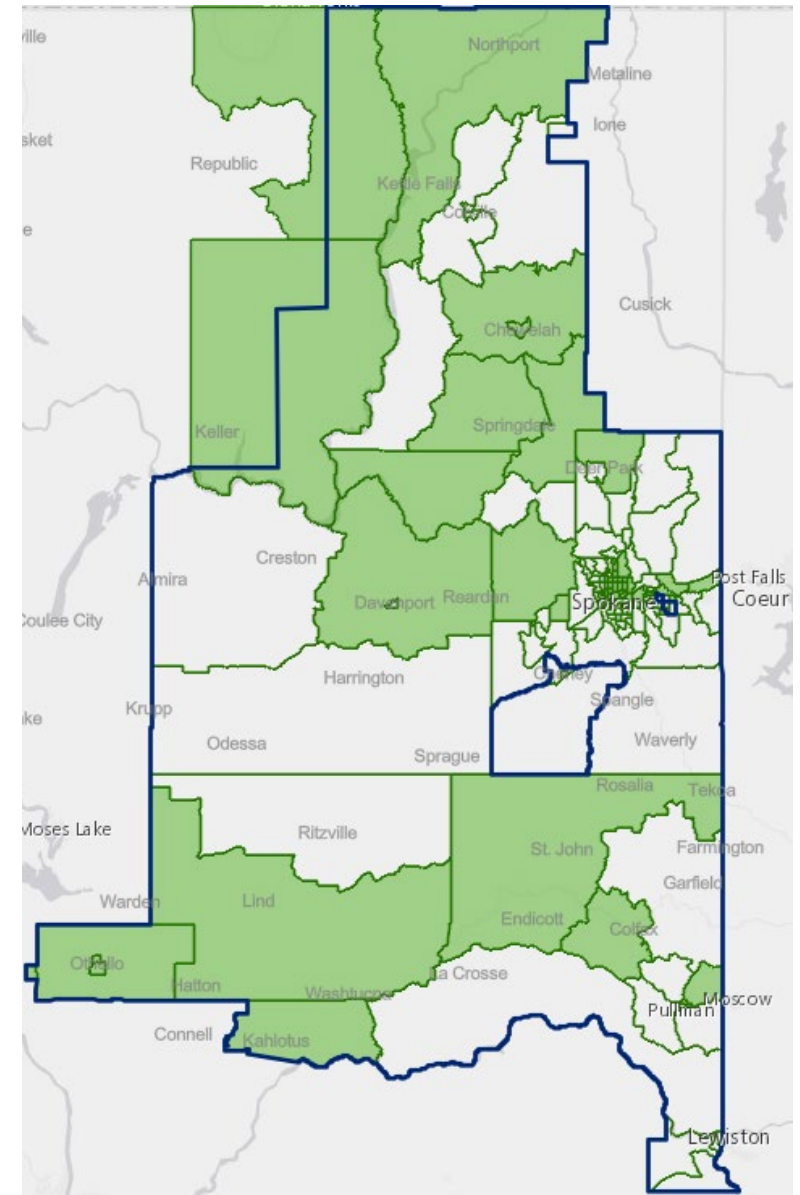
Specific Target and Actions for ensuring that all customers are benefiting from the transition to clean energy the equitable distribution of energy and nonenergy benefits and reduction of burdens to Vulnerable Populations and Highly Impacted Communities (Named Communities)

Vulnerable Populations

Highly Impacted Communities

142 census tracts in Avista's service territory

- 36 Health Disparities
- 12 Socioeconomic or sensitive populations indicators



Named Communities Investment Fund

- Specific Action dedicated to the equitable distribution of energy and non-energy benefits and reduction in burdens to Named Communities
- Funding is limited to 1% or approximately \$5.0 million of electric revenues, annually

\$2M
Supplement Energy Efficiency

\$1M
Investments in Distribution Resiliency

\$1M
Incentives & Grants for customers or third parties

\$500,000
Outreach & Engagement

\$500,000
Other Projects, Programs or Initiatives

Energy Efficiency NCIF

The cleanest energy is the energy that is never used.

40% or up to \$2M

Supplement and support **energy efficiency** efforts targeted to Named Communities

Community Identified
Projects

Multifamily Building
Split Incentive

Health & Safety for
Manufactured & Mobile
Homes

Named Community
Single Family
Weatherization

Community & Small
Business Energy
Efficiency

Equity in Practice: Outreach & Engagement

Multiple avenues to learn about and apply for NCIF



Online Applications



Existing Community Relationships

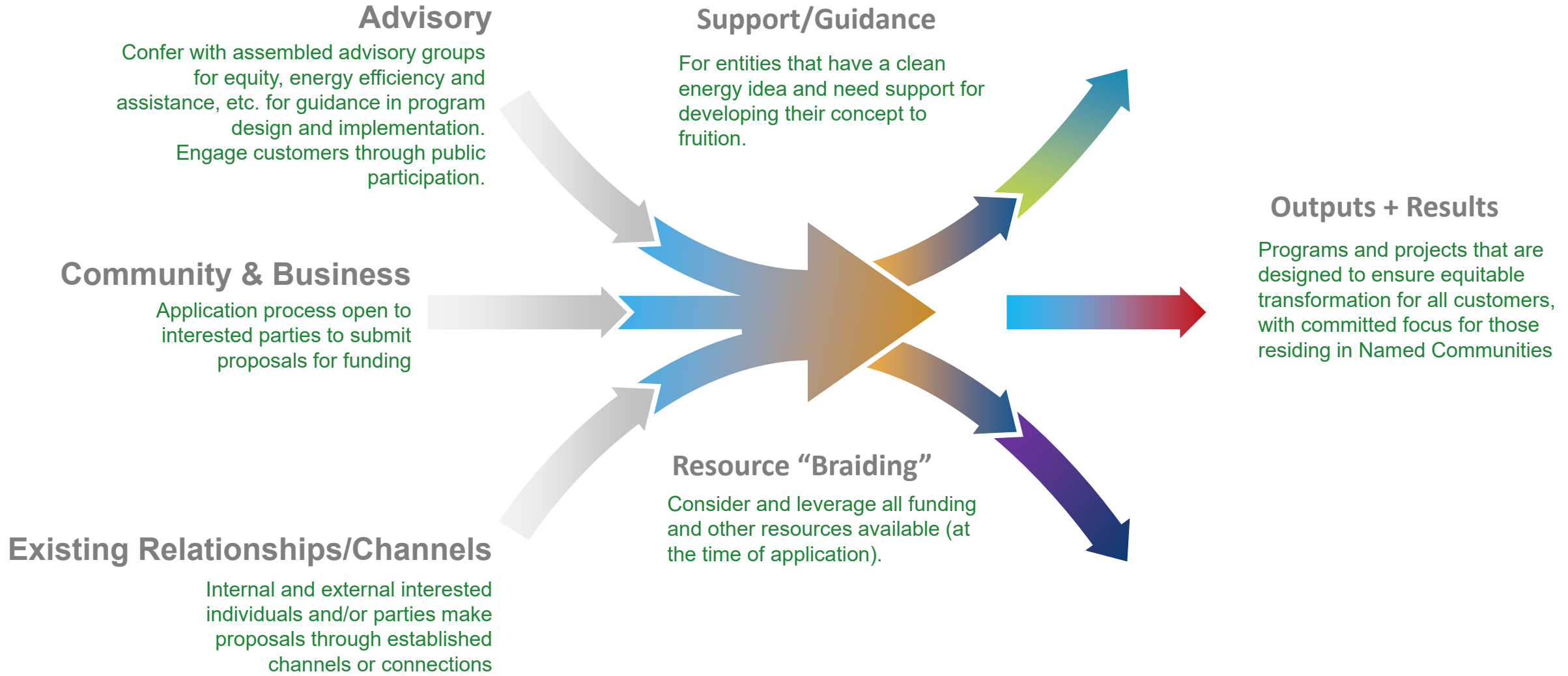


Informational Sessions
virtual and in-person



Enhancement to
company programs and
projects

NCIF Process



Factors for NCIF Consideration: Equity Assured

| Equity | Customer Benefit Indicators | Implementation Plan Specific Actions | Equity Advisory Group Initiatives |
|--|---|--|---|
| <ul style="list-style-type: none">▪ Affordability▪ Access to Clean Energy▪ Community Development▪ Energy Security▪ Environmental▪ Public Health <p><i>Equity lens requires unique consideration for each proposed project</i></p> | <ol style="list-style-type: none">(1) Participation in Company Programs(2) Number of households with a High Energy Burden (>6%)(3) Availability of Methods/Modes of Outreach and Communication(4) Transportation Electrification(5) Named Community Clean Energy(6) Investments in Named Communities(7) Energy Availability(8) Energy Generation Location(9) Outdoor Air Quality(10) Greenhouse Gas Emissions(11) Employee Diversity(12) Supplier Diversity(13) Indoor Air Quality | <ul style="list-style-type: none">▪ Community Identified Project▪ Multifamily Building Split Incentive▪ Health & Safety for manufactured and mobile home▪ Single Family Weatherization▪ Community Energy Assistance▪ Small Business Energy Assistance | <p>Energy Efficiency in Named Communities</p> <ol style="list-style-type: none">(1) Improved awareness and energy efficiency for Spokane Tribe, multi-family and manufactured homes(2) Increased Tree Canopy(3) Increased access to products and appliances(4) Increased awareness and engagement in EE programs(5) Matching funds for EE grant applications(6) Improved EE for those without stable housing |

2023 Commitments & Funding: Equity Outcomes

| Energy Efficiency |
|---|
| Spokane Tribe reservation energy audits |
| Lincoln County Fairgrounds lighting |
| Malden homes weatherization |
| KW Energy Duct Sealing for manufactured and mobile home in Stevens, Ferry and Pend Oreille counties |
| Walnut Corners affordable housing PTAC (AC & Heating units) replacement |
| SNAP Pine Villa affordable housing Phase 1 renovation (windows, insulation and doors) |
| the.Supper Club new refrigerator and freezer |
| Health & Safety for Manufactured Homes for two neighborhoods in Spokane County |



Affordability

Participation in Company Programs
Households with High Energy Burden
Residential Arrears & Disconnects



Energy Security & Resilience

Energy Availability
Energy Generation Location



Access to Clean Energy

Methods/Modes of Outreach & Communication
Transportation Electrification



Environmental

Outdoor Air Quality
Greenhouse Gas Emissions



Community Development

Named Community Clean Energy
Investments in Named Communities



Public Health

Employee Diversity
Supplier Diversity
Indoor Air Quality

Community & Resilience

- Martin Luther King Community Center solar assessment
- Medical equipment and air conditioning for customers with power dependency pilot
- City of Spokane Parks & Recreation Tree Plotter software subscription

Combined

- Online application
- Martin Luther King Community Center HVAC retro-commissioning report, lighting, and windows
- Kettle Falls Community Chest facility renovation

Thank you!



Equity Planning in the 2023 IRP

James Gall
Technical Advisory Committee Meeting No. 2
January 30, 2024

Equity Related Items included in 2023 IRP Modeling

- Energy Efficiency
- Named Community Investment Fund (NCIF)
- Customer Benefit Indicators (CBIs)
- Resource Non-Energy Impacts (NEIs)
- Social Cost of Greenhouse Gas
- Maximum Customer Benefit Scenario

Energy Efficiency

- Split energy efficiency measures between “low-income” and non-low income
- Low-income includes higher NEI values where applicable
- Low-income measures can use a different cost value
- 2025 IRP will explore using named community potential rather than low-income

How impacts the plan:

Selects greater amounts of energy efficiency to serve future energy demand

Named Community Investment Fund (NCIF)

- Model must select \$2 million (+) of the least cost, non-cost-effective energy efficiency per year
 - Increases energy efficiency targets
 - Shows possible future programs
- Model must “spend” \$400,000 per year on incremental Distributed Energy Resources (DERs), including community solar
 - Demonstrates ways to increase DER in named communities
 - Impacts CBI metrics

How impacts the plan:

- 1) Quantifies the lowest cost, non-cost-effective low-income energy efficiency projects given the budget.
- 2) Selects generation/energy storage given the budget

Non-Energy Impacts

- Quantification of indirect and social impacts of resource decisions not included in resource costs
- DNV conducted the study for the 2023 IRP for resource selection if quantitative values are known or estimated
- DNV qualitatively identified costs for other impacts

How impacts the plan:

- 1) Energy Efficiency and Resource are on an even playing field for selection
- 2) Sets priority for CBIs using quantifiable measures

Non-Energy Impacts in IRP

Supply-Side Resources

Public Health
PM2.5, SO2, NOx

Safety
Direct and indirect
fatalities per GWh

Environment
Land use, water use,
wildfire risk

Economic
Jobs, earnings, output,
value add added

Demand-Side Resources*

Income & Health
Economic Develop. (income)
less missed days of work

Health
Related to avoided costs such as
medical

Property Value
Noise, visual air/temperature

Energy Burden
Reduction in costs related to utility
bill

IRP Resource Selection

- Not all NEIs are able to be quantified due to lack of data or difficulty in obtaining data.
- Phase II Energy Efficiency NEI Study in 2022.
- Avista is not planning a Phase II Supply Resource Study at this time.

Resource Acquisition Equity Considerations

- Resources are required to go through rigorous public process to be permitted
- RFP Resource selection includes
 - NEIs in economic analysis
 - Resources are selected based on scoring matrix including
 - Customer Energy Impact (**cost**): 40%
 - Risk Management (**construction/solvency**): 20%
 - Price Risk (**change in price**): 5%
 - Electric Factors (**deliverability and technology risks**): 20%
 - Environmental (**permitting risk & air quality**): 10%
 - Qualitative Non-Energy Impacts: 5%
 - **Community involvement, Named Community impacts, location, local labor force, supplier and owner diversity**

Maximum Customer Benefit Scenario

- Required in Washington IRP rules
- 2023 IRP included the following assumptions
 - In-state/connected renewables requirement (i.e. no Montana wind)
 - No ammonia/power to gas CTs (fuel cell allowed)
 - Lowering of excess energy burden required via community solar
 - No nuclear energy
- What do you like about the assumptions?
- What would you change?