AGENDA
UTILITY ADVISORY COMMITTEE
August 20, 2026

Hybrid Meeting In-person and via Zoom

https://us02web.zoom.us/s/83931522564

Accessibility

The City of Ellensburg strives to make our services, programs, and activities readily accessible.

- Closed Captioning is available to Zoom viewers. To enable closed captioning, you will need to click on the “CC” button at the bottom of your Zoom screen and then select either “Show Subtitle” or “View Full Transcript."
- Members of the public who do not speak English or who have limited proficiency may request an interpreter if they wish to participate in public meetings.
- The City will provide reasonable accommodation for members of the public with disabilities.

Rules for Public Comment

Any person engaging in conduct that disrupts, disturbs, or otherwise impedes the orderly conduct of the meeting including but not limited to:

1. Unduly repetitive or irrelevant remarks;
2. Use of intimidating, threatening. or abusive language;
3. disobedience of an order to be seated or to discontinue further comments;
4. and/or engaging in violent behavior,

will be deemed out of order and may be removed from the meeting and/or have his or her virtual microphone muted.

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CITY OF ELLENSBURG
UTILITY ADVISORY COMMITTEE AGENDA
Council Conference Room
501 North Anderson Street
Ellensburg, WA 98926
And remotely via Zoom - https://us02web.zoom.us/s/83931522564
Thursday, August 20, 2026
3:30 PM - Regular Meeting

1. **Call to Order and Roll Call**
2. **Approval of Agenda** (No Public Comment)
3. **Approval of Minutes**
   - 3.A Utility Advisory Committee Meeting 7-16-26 - Minutes
4. **Correspondence and Citizen Comments on Non-Agenda Items**
5. **Electric, Natural Gas, and Telecommunications Discussion Items**
6. **Energy Services Updates**
   - 6.A Natural Gas SOAR Award Presentation
   - 6.B Report on Compliance with the Clean Energy Transformation Act, Chapter 19.405 RCW — January 1, 2022–December 31, 2024
   - 6.C City of Ellensburg Natural Gas Utility — 2025 Washington Ecology Greenhouse Gas Verification Report
   - 6.D City of Ellensburg Electric Utility — 2025 Washington Ecology Greenhouse Gas Report
   - 6.E Energy Services Updates
7. **Commission Representative Update**
8. **Adjournment**

For more information on the Ellensburg Utility Advisory Committee, contact Finance Officer, Megan Bair, at 509-962-7124.

CITY OF ELLENSBURG **Minutes of Utility Advisory Committee, Regular Meeting**

Date of Meeting **July 16, 2026**

Time of Meeting **3:30 PM**

Place of Meeting **Council Conference Room**
501 North Anderson Street
Ellensburg, WA 98926
And remotely via Zoom
- https://us02web.zoom.us/s/83931522564

1. Call to Order and Roll Call
Chair Bousson called the meeting to order at 3:31pm.

Members present in person: Jeff Bousson, Chair/CWU, Delano Palmer, City Council, Fred Springsteen, Utility Customer, Nancy Lillquist, City Council, Frederick Padjen, Utility Customer, Camber Owlsym, Utility Customer.

Others present in person: City Manager Behrends Cerniwey, Energy Services Director Stanavich, Energy Resources Manager Baker, Gas Engineer Yusi, Finance Officer Bair, Telecom Manager Hiede, Rate Analyst Mooers, Sustainability and Energy Coordinator Holmes.

Others present remotely via Zoom: Charolette Tullos, Utility Customer, members of the public.

2. Approval of Agenda
Committee member Bouson moved to Approve the Agenda as presented. **Motion Approved 7-0**

3. Approval of Minutes

3.A Utility Advisory Committee Meeting 6-18-26 - Minutes
Utility Advisory Committee Meeting 6-18-26 Minutes Committee member Bouson moved to Approve the Minutes from the meeting. **Motion Approved 7-0**

4. Correspondence and Citizen Comments on Non-Agenda Items
No public comment.

5. Electric, Natural Gas, and Telecommunications Discussion Items

5.A Clean Energy Implementation Plan (CEIP) Outreach Plan for 2026-2029 CEIP
Sustainability and Energy Coordinator Holmes presented the Clean Energy Implementation Plan (CEIP) Outreach Plan for 2026-2029 CEIP. Sustainability and Energy Coordinator Holmes explained the Clean Energy Implementation

Plan is and what the goals are. Sustainability and Energy Coordinator Holmes discussed what the City has already completed to achieve the plan goals. Sustainability and Energy Coordinator Holmes discussed what the City's current energy efficiency programs and discussed the City's factors on vulnerability within the CEIP completed in 2025; these were housing, income and energy burden.
Committee member Frederick Springsteen asked if a member of the community was interested in participating in the program, how they would determine if they are eligible, and who determines if they qualify. Energy Resource Manager Baker answered that HopeSource will be responsible for determining eligibility.
Sustainability and Energy Coordinator Holmes closed out the presentation on the CEIP by explaining the implementation strategy and plan for execution over the next three years.
Chair Bousson asked if the City has any plans for student outreach. Committee member Lillquist mentioned the possibility of involvement with the High School environmental club or the High School sustainability club.

5.B Energy Resource Plan
Energy Resources Manager Baker presented the Energy Resource Plan and explained the data and forecasts provided from BPA. Energy Resources Manager Baker asked for a favorable recommendation to City Council on the Energy Resource Plan.
Committee member Padjen asked if this plan includes the solar farm. Energy Resource Manager Baker answered that the data does not include the solar farm. Committee member Bousson asked if there are any risks associated to this plan. Energy Services Director Stanavich answered no, the only risks that factor into energy resources are going to be with Bonneville Power.

Committee member Bousson moved to forward a favorable recommendation to City Council to approve the Energy Resource Plan. **Motion Approved 7-0**

5.C Community Solar Expansion Program — Participation
Rate Analyst Moores presented the CSEP, Community Solar Expansion Program. Rate Analyst Moores explained what the program is and how it works. Rate Analyst Moores explained what the cities role is in the program and who our resources are for the program. The city has a limit of $250,000 annually.

Committee Member Palmer asked if the City has offered this program in the past. Committee Member Owlsym asked if the program funding rolls over, if there are excess funds available in the upcoming year. Committee Member Lillquist asked what the City's plan is for public communication on the program.

Committee member Bousson asked where the source of the program funding is from. Rate Analyst Moores answered the program funding is from Commerce.

Committee member Bousson moved to forward a favorable recommendation to

City Council to approve the Community Solar Expansion Program. **Motion Approved 7-0**

6. Energy Services Updates

6.A Energy Services Updates

Committee Member Springsteen stated he received an automated text message from our Power Outage communication software. Energy Services Director Stanavich explained our outage software, and explained our attempts in sending out a text message to all subscribers.

Committee Member Bousson asked how the City if positioned to provide energy during the hot summer season, with increased utilization of power and potentially more hazards. Energy Services Director Stanavich explained we have an extremely reliable power provider, and we have no concerns.

7. Commission Representative Update

Committee member Palmer stated CWU is wrapping up their Geothermal project. Committee member Bousson encouraged members of the public and the City staff to explore the new Geothermal building on campus. Committee member Palmer explained their plan for public education and outreach on the project, how it works, and how it benefits our community.

8. Adjournment

Meeting adjourned at 4:14pm.

Meeting Date: August 20, 2026
City of Ellensburg
Utility Advisory Committee Agenda Report

Agenda Subject: Natural Gas SOAR Award Presentation
Submitted by: Darin Yusi, Gas Engineer
Department: Energy Services

Information:
The City of Ellensburg Gas Division has earned Gold-level recognition through the American Public Gas Association's System Operational Achievement Recognition program— better known as SOAR. Gold is the program's highest recognition level, placing Ellensburg among a select group of public natural gas utilities recognized nationally for operational excellence. Ellensburg is one of only 16 systems on APGA's current Gold roster, with recognition extending through 2028.

SOAR evaluates a utility's overall commitment to excellence in four areas: system integrity, system improvement, employee safety, and workforce development. Applications are reviewed by industry experts and scored according to rigorous program criteria. Unlike an award based on a single project or one year of performance, SOAR examines the policies, practices, investments, training, and organizational culture that support the long-term operation of a public natural gas system.

The application includes roughly 150 questions, with each question designed to evaluate practices that demonstrate continuous improvement and go beyond minimum regulatory requirements. The questions are regularly reviewed, with practices that have become commonplace removed and new criteria added to challenge utilities to continue advancing.

Ellensburg's deliberate journey toward Gold began in 2020, building upon the Gas Division's earlier SOAR recognition. Over the following years, employees continued strengthening operating procedures, safety programs, training, asset management, system planning, workforce development, environmental practices, and the use of industry best practices.

Other recognition earned by the Gas Division during this period closely aligns with the principles evaluated through SOAR. The Division has received the APGA Safety Contest Award for seven consecutive years, the 2023 Excellence in Environmental Stewardship Award, and the 2024 Good Samaritan Award. Together, these accomplishments demonstrate a consistent commitment to employee and public safety, responsible environmental stewardship, community service, and operational excellence.

For Gas Division employees, the Gold award validates countless improvements—both large and small—made over many years. For the City Council and the Ellensburg community, it provides meaningful peer recognition that the City is responsibly managing a critical public asset with a strong focus on system integrity, safety, reliability, employee development, and

long-term improvement.

A video presented at the APGA Awards Ceremony and the recent City Council Meeting will be played.

2026 APGA SOAR Survey Topic: Employee Safety			
Question		**Question Type**	**Maximum Points**
Does your system include a statement from management in your Safety Manual that expresses a commitment to safety that will be followed for all work practices?		Yes / No	2
Does your utility have a formal training program addressing employee safety?		Yes / No	2
Which of the topics listed below are included in your system's safety manual or are addressed in employee's safety training? *Check all that apply*	Properties and hazards of Natural Gas	Yes / No	1
	Odorant Safety *Also click if utility personnel do not handle odorant because the utility receives odorized gas and doesn't operate its own odorizers.*	Yes / No	0.5
	Fire safety/Use of fire extinguishers	Yes / No	0.5
	Personal Protective Equipment and Clothing	Yes / No	0.5
	Respiratory Protection/Use of respirators	Yes / No	0.5
	Ladder & Tool Safety	Yes / No	0.5
	Excavation, Trenching and Shoring	Yes / No	0.5
	Work Area Protection (barricading and traffic control)	Yes / No	0.5
	Pipe Purging	Yes / No	0.5
Does your utility conduct periodic safety meetings (e.g. 30 minutes or longer) for all field employees?		Yes, quarterly or more often = 2 Points Yes, less than quarterly but at least once per year = 1 Point No = 0 Points	2
Does gas system management attend safety meetings at least twice per year?		Yes / No	2
Does your utility conduct periodic short format safety briefings (e.g. 10-15 minutes) for all field employees?		Yes, at least monthly = 2 Points Less than monthly = 1 Point No = 0 Points	2
Does your company require pre-job safety briefings (e.g. JSA or "Tailgate") at all job sites?		Yes, even on routine jobs = 2 Points Sometimes, Only on "high risk" or non-routine jobs = 1 Point No = 0 Points	2
Does your utility have process for following up on submitted safety suggestions?		Yes / No	1
Does your system encourage and capture near miss information?		Yes / No	1
Does your system encourage employees to "stop the job" when they observe an unsafe practice or work environment?		Yes / No	1
Please describe how you verify that your employees feel empowered to "stop the job":		Open Ended Response [SOAR Working Group may award up to 1 Point]	1
Do 1st line supervisors attend at least 90% of all safety meetings with their crews?		Yes / No	1
Does your utility conduct safety meetings for administrative and office staff?		Yes / No	1
Is your system's safety program managed by or periodically evaluated by a trainer or manager/evaluator that is an employee safety SME? *Note: That individual may be a Certified Safety Professional or participated in training programs specific to employee safety.*		Yes / No	1
Does your utility have a formal or informal safety recognition program for your employees? For example: A formal program may reward your field employees with a steak lunch if they go a specified number of days without a safety incident. An informal program may simply recognize individuals for addressing a safety issue during a staff meeting.		Yes, we have a safety recognition program with stated goals = 2 Points Yes, we have a safety recognition program but no stated goals = 1 Point No = 0 Points	2
Does your utility provide fire-resistant clothing to field workers that may work in flammable gas atmospheres?		Yes / Our procedures do not allow workers to enter flammable gas atmospheres = 2 Points No = 0 Points	2
Does your safety program specify working conditions under which workers must wear fire-resistant clothing?		Yes or N/A = 1 Point No = 0 Points	1
Does your utility have a policy requiring contractors to have a suitable worker safety program?		Yes or N/A = 2 Points No = 0 Points	2
Does your utility have a formal written policy for vehicle safety?		Yes / No	1
Does the policy address (Check all that apply)?	Seat belt use	Yes	1
	Cell phone use	Yes	1
	No formal written policy		0

Does your utility offer safe driver training?	Yes = 2 Points No = 0 Points	2
Does your utility submit an OSHA form 300 or use another evaluation and tracking method that includes comparable incident rate and documentation?	Yes or equivalent = 1 Point No = 0 Points	1
Does gas system leadership review employee safety incident rate data at least annually?	Yes / No	1
Does your system have formal procedure for investigating injuries that meet the OSHA recordable definition? *Note: An OSHA recordable injury is any injury where the employee received medical treatment beyond first aid, lost consciousness, or resulted in an employee being placed on restricted work activity or transferred to another job.*	Yes / No	1
Do employee injury investigations result in written reports identifying causes and corrective actions?	Yes / No	1
Are findings and recommendations of safety, injury, near miss, or stop-the-job investigations shared with employees with similar jobs or work so that all employees may benefit from the knowledge gained from the specific incident? This anonymized information can be communicated via email, safety meetings or team meetings.	Yes / No	1
Does your system consider ergonomics for your workforce? *Note: This could include sit/stand desks for office personnel or steps for trucks for your field personnel, etc.*	Yes / No	1
Please describe one safety solution not listed in the previous question that your system uses, has used in the past, or has evaluated. For example, dash cameras on heavy duty vehicles, drone technology for visual inspections to minimize fall risk, fleet/vehicle monitoring system. **Your description must include how this safety solution is new or innovative for your system.**	Open Ended Response [SOAR Working Group may award 1 Point]	1
	Total Points Available	**43**

2026 APGA SOAR Survey Topic: System Improvement			
Question		**Question Type**	**Maximum Points**
Has your utility **evaluated** the use of and/or implemented any of the following technologies? (check all that apply) *Note: Your system need not have implemented these technologies to respond "Yes". You are only required to have evaluated the potential costs and benefits of the technology.*	SCADA and/or telemetry	Yes / No	1
	Geographic Information system (GIS)/Digital mapping	Yes / No	1
	Advanced Metering Infrastructure (AMI)	Yes / No	1
	Mobile workforce technology	Yes / No	1
	Mobile leak detection	Yes / No	1
	Corrosion Control Remote Monitoring	Yes / No	1
	Laser Methane Leak Detection	Yes / No	1
	Methane Capture, such as Cross Compression or Vacuum Purging	Yes / No	1
	Artificial Intelligence	Yes / No	1
Please describe one other technology not listed in the previous question that your system uses, has used in the past, or has evaluated. **Your description must include how this technology is new or innovative for your system. Please don't include gas system modeling as this is addressed in a question below.**		Open Ended Response [SOAR Working Group may award 1 Point]	1
Has your system implemented a meter change out program for ensuring meter accuracy?		Yes / No	1
Does your system utilize the actions identified in your Distribution Integrity Management Plan to drive your budget and/or manpower considerations?		Yes / No	3
Does your utility have a written process for reviewing inspection and maintenance records to determine the need to replace, repair, or monitor any portion of your distribution system? (i.e. implementation of actions identified in DIMP)		Yes / No	3
Do you (or a consultant on your behalf) utilize a network modeling software to perform capacity calculations for system planning? *Note: The utilization of the software should go beyond calculating pipe sizing.*		Yes / No	3
Do you know your operational cost of service for each customer group (residential, commercial, industrial) to ensure your rates are appropriately set? *Note: This question is asking systems whether they understand how much it costs them to serve each of their customer groups (costs associated with the operations, maintenance, overhead, etc.) so as to ensure they are appropriately setting rates for each customer group. This exercise can help systems understand if their rates (i.e. funding) can accommodate the costs to perform compliance activities and enable them constantly improve.*		Yes / No	3
Does your system contribute to gas industry research and development or participate in a technology pilot program? (Such as membership in the APGA Research Foundation)		Yes / No	1
Which of the following resources does your system utilize to stay abreast of current tools technology for gas distribution operations?	1. Membership in industry associations (national, regional, state). 2. Attendance at industry conferences or trade shows 3. Industry trade publications and magazines 4. Vendor Trainings or Seminars 5. Industry compliance tools (Windot)	More than 3 Tools = 2 Points 1-2 Tools = 1 Point No Tools = 0 Points	2
Has your system demonstrated its commitment to pipeline safety continuous improvement by using the framework provided in API RP 1173: Pipeline Safety Management Systems? *Note: This could be through an internal 'Commitment Statement' or the approval of resources, such as a job assignment or funding.*		Yes / No	1
Has your system compared its existing practices against those recommended in API RP 1173: Pipeline Safety Management Systems? *For example: the APGA Small Operator Gap Assessment or an equivalent.*		Yes / No	2

Has your system developed an action plan to address some (or all) of the gaps identified through your PSMS gap analysis? *Note: In the Plan-Do-Check-Adjust cycle, this is the "Do" phase.*	Yes / No	4
Has your system identified Key Performance Measures for your PSMS implementation? For example: Number of training hours, near miss submissions	Yes / No	1
Did your system complete the Industry PSMS Annual Survey distributed by APGA and the other trade associations each Fall? *Note: This is the 21-question survey that is utilized for developing industry metrics on voluntary adoption and for advocacy messaging.*	Yes / No	1
Describe two of the APGA Commitment to Environmental Stewardship action items your system is using to reduce methane emissions. See APGA Commitment to Environmental Stewardship (click for link)	Open Ended Response [SOAR Working Group may award up to 2 Points]	2
Has your system looked into or begun using geofencing to target specific stakeholders within your damage prevention program?	Yes / No	1
Total Points Available		**38**

2026 APGA SOAR Survey Topic: System Integrity		
Question	**Question Type**	**Maximum Points**
Do your procedures address what system pipe and facility asset records are retained? *Note: This includes construction, inspection, and maintenance records.*	Yes / No	1
Do you have a procedure that defines how long records are to be retained (life of pipe, 5 years, etc.)?	Yes / No	2
Do you have a system of record for your pipeline assets (GIS, organized paper copies)?	Yes / No	1
Does your utility have standard forms/formats for documenting inspections, repairs, 3rd party damages and other activities related to operations, maintenance and regulatory compliance?	Yes / No	2
Does your utility have a program in place for backing up critical hard copy and/or electronic records?	Yes / No	1
Does your system track emergency response time and have an internal goal?	Yes / No	2
Does your utility utilize the Incident Command System framework and if so are employees trained ?	Yes / No	1
Have all levels of personnel taken the free online NIMS ICS training courses	All Applicable Employees = 1 Point Emergency Responders Only = 0.5 Point No = 0 Points	1
Does your utility have a written checklist/script to be followed by utility personnel who receive odor complaints and other potential emergencies from customers and the general public?	Yes / No	3
How often does your system participate in table top exercises and/or mock emergency drills?	At least once per year = 2 Points At least once every 2 years = 1.5 Points At least once every 3 years = 1 Point Less frequently than every 3 years = 0.5 Point We have no fixed schedule = 0 Point Never = 0 Points	2
How often does your system perform table top exercises or mock drills with emergency responders? ***Note: Emergency Responders may include any entity who have an active role in emergency management and incident response according to Department of Homeland Security (DHS) National Incident Management System (NIMS) such as fire dept, police dept, 911 centers, EMTs, Emergency Management Agencies, hospitals, etc. The table top exercise or mock drill may include one or more of these entities.***	Annually = 2 Points Less than once per year = 1 Point Never = 0 Points	2
Does your system have mutual aid agreements in place with other utilities and/or trade associations, and/or contractors for gas related or general business continuation agreements in times of crisis or catastrophic events? (Such as the APGA Mutual Aid Agreement) ***Note: Not just electric mutual aid for combination joint utilities.***	Yes / No	1
In the past 3 years, has your state regulator identified a violation (or NOPV) that has not been resolved?	Yes / No	2
Does your utility conduct internal audits to identify potential violations of pipeline safety regulations and utility procedures?	Yes = 2 Points No = 0 Points	2
If yes, how often are internal audits conducted?	At least once per year = 3 Points At least once every 2 years = 2 Points Less frequently than once every 2 years = 1 Point No Fixed Schedule = 0.5 Point We don't conduct audits = 0 Points	3
How often do you review your DIMP plan?	Annually = 3 Points Every 3 Years = 1 Point Every 5 Years or Longer = 0 Points	3
Please provide two examples of Accelerated Actions identified in your DIMP program that your system performs and the corresponding Performance Measures.	Open Ended Response [SOAR Working Group may award up to 4 Points]	4

Does your utility participate in a utility coordination council or similar regional or local damage prevention group?	Yes = 2 Points There are no such groups in our area = 2 Points No = 0 Points	2
Is your utility current on all required surveys, monitoring and inspections required by your operations and maintenance manual and procedures?	All surveys, monitoring and inspections are current = 2 Points One survey, monitoring or inspection is overdue = 1 point Two or more surveys, monitoring or inspections are overdue = 0 points	2
Do you repair all Grade 2 leaks faster than 12 months? *Note: At the time of the 2026 SOAR application, please use whatever internal Leak Grading criteria you are using at your system.*	Yes / No	1
Do you schedule all Grade 3 leaks for repair? *Note: At the time of the 2026 SOAR application, please use whatever internal Leak Grading criteria you are using at your system.*	Yes / No	1
Does your utility have a clear, understandable and well-communicated chain of command? It does not have to be in writing as long as all employees understand who they report to, who reports to them and their level of authority.	Yes / No	1
Does the chain of command include provisions for addressing communications and management when one or more members are absent?	Yes / No	1
Is your utility's upper management involved in decisions concerning system safety and integrity?	Upper management is fully involved and committed = 4 Points Upper management is marginally involved = 2 Points Upper management is not involved = 0 Points	4
Does your system investigate the cause of an unexpected change in percent of UAF?	Yes / No	1
What was the UAF percent for your system 3-year weighted average based upon sales volume?	Less than 1 percent = 3 points 1-2 percent = 2 points 2-3 percent = 1.5 points 3-4 percent = 1 point 4-5 percent = 0.5 points >5% = 0 points	3
Does your utility have process for accurately accounting for gas used in utility operations (e.g. line heaters and other system use)? This can include actually measuring gas used in utility operations or estimating unmetered system use.	Yes = 1 Point N/A - We don't use any natural gas in our operations = 1 Point No = 0 Points	1
Does your utility analyze 3rd party damage findings?	Yes = 2 Points No = 0 Points	2
Does you utility submit information on excavation damages to the Common Ground Alliance DIRT (Damage Information Reporting Tool) Program?	Yes / No	1
Has your utility reviewed the Common Ground Alliance Best Practices and implemented those that are applicable?	Yes / No	1
Does you utility participate in the plastic pipe failure data collection project (http://www.apga.org/i4a/pages/index.cfm?pageid=3313)?	Yes / No	1
Does your system have the ability to access an enterprise fund should you need to perform emergency O&M or integrity management activities?	Yes / No	1
Does your system ensure that technology, procedural, equipment, and organizational changes have been reviewed and approved by the appropriate individual(s) at your system to maintain system integrity?	Yes / No	2
Do you document the approval process for these changes?	Yes / No	1
Does your system have a process in place to ensure changes that impact the safe operations of your system have been communicated to necessary employees?	Yes / No	2
Does your system have a procedure to minimize gas loss when purging? For example, using CGI when purging.	Yes / No	1
Does your utility have a procedure or process to identify and/or locate unlocatable lines?	Yes / No	1
Have you evaluated or heard of the Damage Prevention Institute accreditation?	Yes / No	0
	Total Points Available	**63**

2026 APGA SOAR Survey Topic: Workforce Development			
Question		**Question Type**	**Maximum Points**
Does your system have a policy concerning diversity in hiring practices?		Yes / No	1
Has your system reviewed its policies to ensure inclusivity of all employees? Note: This could include a statement explicitly affirming your position on inclusivity or a reframing of existing policies, for example: family leave instead of maternity leave.		Yes / No	1
Do employees from your system attend industry trade association meetings or events (remotely or in-person)? *Note: Industry trade associations can be national, regional or state associations.*		Yes / No	1
Are there employees from your system that participate (remotely or in-person) in an industry trade association committee?		Yes / No	2
Does the system provide opportunities (for employees at all levels) to seek certifications, training, or other education that can advance them within their career path or outside their career path?	In the employee's career path only Both inside and outside the employees career path No opportunities are provided	Career Only = 1 Point Both inside & outside = 2 Points No opportunities provided = 0 Points	2
Do you encourage your employees to be active within your community? *Note: This could include providing paid time off to participate in 501(c)(3) programs or employee payroll deductions for these organizations.*		Yes / No	1
Have written job descriptions been developed for all positions, describing the duties, responsibilities, required skills, training, knowledge and abilities of each position?		Yes / No	1
Does your organization capture institutional knowledge (key decisions, informal and formal practices, unwritten rules, critical partnerships, etc.) to ensure its availablity for current and future employees?		Yes / No	2
Does your system provide employees with guidance on how to progress within their current position through experience and training? *Note: These are sometimes called "Level Guides" or apprenticeship programs.*		Yes / No	2
Describe how you ensure your employees receive the necessary specialized training needed to perform their roles: *For example: Industry partnership (such as vendor and service provider trainings)*		Open Ended Response [SOAR Working Group may award up to 1 Point]	1
Does the utility have a written plan that covers:	Retention	Yes / No	1
	Recruitment	Yes / No	1
Does the utility have a written formal succession plan?		Yes, covering all positions = 2 Points Yes, covering some positions = 1 Point No written succession plan = 0 Points	2
When was the last time the succession plan was reviewed and, if necessary, updated?		Within the last year = 2 Points Within the last 2 years = 1.5 Points Within the last 3 years = 1 Points Has not been updated in last 3 years = 0 Points Not applicable - we have no succession plan = 0 Points	2

Does the utility have a formal written process to evaluate and advise employees of their performance at least annually?	Formal Written Performance Appraisals are Proved to the Employee on at least an Annual Basis = 2 Points …. Less Than an Annual Basis = 1 Point Formal Written Performance Appraisals are Not Performed = 0 Points	2
Does your system provide tools, resources, or programs to assist your employees' health and wellness outside of the workplace? *For example: Substance abuse programs, Wellness Programs, Employee Assistance Programs (EAP)*	Yes / No	1
Did your system participate in the 2024 APGA Salary Survey?	Yes / No	1
	Total Points Available	**24**


SOAR
System Operational Achievement Recognition
The American Public Gas Association
Hereby Recognizes
City of Ellensburg Natural Gas Division
For Excellence in the Operation of its Natural Gas System
BRONZE LEVEL
2020-2023
SOAR
System Operational Achievement Recognition
The American Public Gas Association
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SILVER LEVEL
2023-2026
SOAR
System Operational Achievement Recognition
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City of Ellensburg Natural Gas Division
For Excellence in the Operation of its Natural Gas System
GOLD LEVEL
2026-2029

Meeting Date: August 20, 2026
City of Ellensburg
Utility Advisory Committee Agenda Report

Agenda Subject:	Report on Compliance with the Clean Energy Transformation Act, Chapter 19.405 RCW — January 1, 2022–December 31, 2024
Submitted by:	Nichole Baker, Energy Resources Manager
Department:	Energy Services

Suggested Motion/Action:
Informational

Background/Summary:
Washington's Clean Energy Transformation Act (CETA), Chapter 19.405 RCW, establishes clean electricity, planning, reporting, and customer equity requirements for electric utilities serving retail customers in Washington. For consumer-owned utilities such as the City of Ellensburg, CETA requires the development of Clean Energy Implementation Plans (CEIP), assessment of energy efficiency and demand response resources, and availability of energy assistance programs and funding for qualifying low-income households. Low-income eligibility under CETA is based on the higher of 80% of area median income or 200% of the federal poverty level, adjusted for household size. Key related provisions include RCW 19.405.020 (definitions used in CETA), RCW 19.405.100 (rulemaking), RCW 19.405.120 (low-income energy assistance), and WAC 194-40-030 (related definitions).

Previous Council Action:
The City has taken several corrective actions related to prior Clean Energy Transformation Act (CETA) requirements. For the prior 2019–2021 examination period, the City fully corrected the finding related to CETA energy assistance reporting by expanding the low-income threshold for energy assistance, weatherization, and appliance upgrades to reach more energy-burdened households. The City's current eligibility definition uses the greater of 80% of area median income or 200% of the federal poverty level, consistent with CETA's low-income standard.

For clean energy planning, the City has partially corrected the prior finding related to development of its Clean Energy Implementation Plan (CEIP) energy efficiency target. In 2023, the City began working with Lighthouse Energy Consulting to perform the required assessments and support future CEIP development. Lighthouse completed a Conservation Potential Assessment using the Bonneville Power Administration's Utility Potential Calculator and a Demand Response Potential Assessment following methodology generally consistent with the Northwest Power and Conservation Council's approach.

Analysis:
The Washington State Auditor's Office completed its examination of the City of Ellensburg's

compliance with selected Clean Energy Transformation Act (CETA) requirements for the period January 1, 2022, through December 31, 2024. The audit resulted in a qualified opinion due to Finding 2024-001, which determined that the City's low-income energy assistance programs did not meet CETA eligibility requirements for the full examination period. Specifically, until May 1, 2024, some households that met CETA's definition of low income were not eligible for at least one City energy assistance program because eligibility was limited to households at or below 200% of the federal poverty level, rather than the higher of 80% of area median income or 200% of the federal poverty level, adjusted for household size.

The City addressed the identified program availability gap effective May 1, 2024, by implementing additional qualifying assistance options through the HEAR Grant and Clean Energy Credits Grant. The Auditor recommended that the City continue working with the Washington State Department of Commerce for guidance and annually review federal poverty level and area median income thresholds to ensure ongoing compliance with CETA low-income energy assistance requirements.

Financial Impact:
Up to $150,000 of Bonneville Power Administration Energy Efficiency Program designated for low-income eligible households, recommended by UAC on April 16, 2026 and approved by Council on May 4, 2024.

Budget Adjustment: No

Attachments:
1. 2022-2024 SAO Audit Report

Office of the Washington State Auditor
Pat McCarthy

Report on Compliance with the Clean Energy Transformation Act

City of Ellensburg

For the period January 1, 2022 through December 31, 2024

Published July 13, 2026

Report No. 1040168

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Office of the Washington State Auditor
Pat McCarthy

July 13, 2026

Mayor and City Council
City of Ellensburg
Ellensburg, Washington

Report on Compliance with the Clean Energy Transformation Act

In May 2019, the State of Washington enacted the Clean Energy Transformation Act into law. The Act requires all utilities engaged in the business of distributing electricity to more than one retail electric customer in the State to comply with its requirements.

Our Office is required to examine those consumer owned electric utilities under our jurisdiction for compliance with the Act's requirements. As of this reporting period, our Office was required to examine 39 such electric utilities with more than one customer operating in Washington State. The City of Ellensburg is one of those utilities.

Please find attached our report on the City's compliance with the Act.

Sincerely,

Pat McCarthy, State Auditor

Olympia, WA

Americans with Disabilities

In accordance with the Americans with Disabilities Act, we will make this document available in alternative formats. For more information, please contact our Office at (564) 999-0950, TDD Relay at (800) 833-6388, or email our webmaster at webmaster@sao.wa.gov.

INDEPENDENT ACCOUNTANT'S REPORT

City of Ellensburg
January 1, 2022 through December 31, 2024

Mayor and City Council
City of Ellensburg
Ellensburg, Washington

We have examined the City of Ellensburg's compliance with the following requirements of the Clean Energy Transformation Act codified in the Revised Code of Washington (RCW) 19.405 (the specified requirements). Specifically, we examined whether the City:

- Made energy assistance programs and funding available to low-income households during the period examined and developed its assessment and plans for reducing the energy burden of those households in accordance with the Act for the reporting period January 1, 2022 through December 31, 2023.
- Calculated its greenhouse gas content based on the fuel sources it reported annually in conformity with the Act. The annual compliance period was January 1, 2022 through December 31, 2022.

Management of the City is responsible for the City's compliance with the specified requirements. Our responsibility is to express an opinion on the City's compliance with the specified requirements based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestation engagements contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the City complied, in all material respects, with the specified requirements referenced above.

An examination involves performing procedures to obtain evidence about whether the City complied with the specified requirements. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material noncompliance, whether due to fraud or error. In making an assessment of the risks of material noncompliance, we considered and obtained an understanding of internal control relevant to compliance in order to design procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of internal control. Accordingly, we express no such opinion. We believe the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our qualified opinion.

We are required to be independent of the City and to meet our other ethical responsibilities in accordance with the relevant ethical requirements related to our engagement.

Our examination does not provide a legal determination on the City's compliance with specified requirements.

Our examination procedures were not designed to determine whether the City complied with the fuel mix reporting requirements of chapter 19.29A RCW. Accordingly, we express no such opinion.

Our examination disclosed the following material noncompliance with the specified requirements for low-income energy assistance program offerings. The City did not ensure its low-income energy assistance programs met the specified requirements during the entire period examined.

In our opinion, except for the material noncompliance described in the preceding paragraph and finding 2024-001, the City complied, in all material respects, with the aforementioned requirements applicable during the three-year period ended December 31, 2024.

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we are required to report all deficiencies that are considered to be significant deficiencies or material weaknesses in internal control; and fraud or noncompliance with provisions of laws, regulations, contracts, or grant agreements that have a material effect on compliance with the specified requirements. We are also required to obtain and report the views of management concerning the findings, conclusions, and recommendations, as well as any planned corrective actions. We performed our examination to express an opinion on compliance with the specified requirements and not for the purpose of expressing an opinion on the internal control over compliance and other matters; accordingly, we express no such opinions.

Our examination disclosed certain findings that are required to be reported under *Government Auditing Standards* and those findings, along with the views of management, are described in the accompanying Schedule of Findings and Responses as Finding 2024-001. We also noted certain additional matters that we have reported to the management of the City in a separate letter dated July 7, 2026.

City's Response to Findings

The City's response to the findings identified in our examination are described in the accompanying Schedule of Findings and Responses. The City's response was not subjected to the procedures applied in the examination and, accordingly, we express no opinion on the response.

Pat McCarthy, State Auditor

Olympia, WA

July 7, 2026

City of Ellensburg
January 1, 2022 through December 31, 2024

2024-001 The City did not ensure its low-income energy assistance programs met the requirements of the Clean Energy Transformation Act during the entire period examined.

Background

The Clean Energy Transformation Act (CETA) requires all electric utilities to make programs and funding for energy assistance available to low-income households. CETA defines "low-income" households as those with annual incomes that do not exceed the higher of 80% of area median income (AMI) or 200% of the federal poverty level (FPL), adjusted for household size. CETA defines "energy assistance" as a program undertaken by a utility to reduce the energy burden of its customers.

The legislature assigned rule-making authority to the Washington State Department of Commerce to ensure the proper implementation of the statute supporting CETA by consumer-owned utilities. Based on information provided by Commerce, CETA requires utilities to offer more than one energy assistance program for low-income households. Specifically, utilities must provide low-income households the opportunity to receive some form of energy assistance from their suite of low-income programs. Utilities may offer energy assistance in several ways, and to prioritize customers with high energy burden effectively, utilities might provide different services to different customers based on their circumstances.

In applying CETA's definition of "low income," utilities are required to identify the income level that represents the higher of 80% AMI or 200% FPL, adjusted for household size. Utilities then must ensure all households who meet that income level have the opportunity to receive energy assistance from at least one of the low-income energy assistance programs they offer.

We independently compared the AMI and FPL income levels applicable during the examination period using 2022-2024 FPL data from the U.S. Department of Health and Human Services and 2022-2024 AMI data for Kittitas County from the U.S. Department of Housing and Urban Development. Our independent comparison showed:

- During 2022 and 2024, income levels at 80% AMI were more than those at 200% FPL for household sizes of one to seven and income levels at 200% FPL were more than those at 80% AMI for household sizes of eight or more.
- During 2023, income levels at 80% AMI were more than those at 200% FPL for household sizes of one to six and income levels at 200% FPL were more than those at 80% AMI for household sizes of seven or more.

Description of Condition

While the City made four low-income energy assistance programs and funding available to customers, some households considered "low income" by CETA's definition were not eligible to benefit from at least one of those programs during the entire period. Until May 2024, only those households with incomes at or below 200% FPL were able to obtain some form of energy assistance from the two low-income programs the City offered at that time.

Effective May 1, 2024, the City brought its programs into compliance with CETA when it implemented two additional temporary grant programs through the Department of Commerce; the HEAR grant and the Clean Energy Credits Grant.

Cause of Condition

Based on its interpretation of the CETA, City management originally determined its low-income energy assistance programs were compliant with CETA's requirements. City management needed to obtain clarification on this requirement through the results of our previous examination.

Effect of Condition

The City did not comply with the CETA's low-income energy assistance program offering requirements for 28 months of the 36-month period we examined. Specifically, the City did not make energy assistance available to households with annual income between 200% FPL and 80% AMI until May 1, 2024.

Recommendation

We recommend the City continue to work with Commerce in obtaining guidance and clarification on how it is to comply with requirements and retain that guidance in support of its actions.

Although the City asserted it made changes to the eligibility requirements of its low-income energy efficiency program in November 2025 to match CETA's definition of "low income," we recommend the City annually review the eligibility requirements of its programs against FPL income data from the U.S. Department of Health and Human Services and AMI income data for Kittitas County from the U.S. Department of Housing and Urban Development to ensure all households meeting CETA's definition of "low income" are able to obtain energy assistance.

City's Response

The City of Ellensburg appreciates the opportunity to review and respond to this finding.

The City generally agrees with the finding's description that, during a portion of the examination period, the City's low-income energy assistance program structure did not fully align with the Clean Energy Transformation Act standard requiring eligibility to extend to households meeting the higher of 80% of area median income or 200% of the federal poverty level, adjusted for household size.

As noted in the finding, the City implemented additional qualifying assistance options effective May 1, 2024, through the HEAR Grant and Clean Energy Credits Grant, and thereby addressed the program availability gap identified during the examination period. The City also updated eligibility requirements for its low-income energy efficiency program in November 2025 to align with the applicable CETA low-income definition.

Going forward, the City will continue to work with the Washington State Department of Commerce and will strengthen its internal compliance review process to ensure that:

1. annual federal poverty level and area median income thresholds are reviewed and documented each year;

2. all low-income energy assistance offerings are evaluated against the current CETA standard; and

3. supporting guidance and compliance determinations are retained in the City's records.

The City appreciates the Auditor's Office review and will continue its efforts to maintain compliance with CETA requirements.

Auditor's Remarks

We thank the City for its efforts to resolve this issue and the cooperation and assistance its management provided during the examination. We will review the status of this issue in our next compliance examination.

Applicable Laws and Regulations

RCW 19.405.100, Rule making

RCW 19.405.120, Energy assistance for low-income households.

RCW 19.405.020, Definitions.

WAC 194-40-030, Definitions.

Government Auditing Standards, 2018 Revision, Technical Update April 2021, paragraph 7.42 establishes reporting requirements related to significant deficiencies or material weaknesses in internal control.

CITY OF ELLENSBURG
501 North Anderson Street
Ellensburg, WA 98926
Ph: (509) 962-7221 Fax: (509) 962-7143

SUMMARY SCHEDULE OF PRIOR FINDINGS

City of Ellensburg
January 1, 2022 through December 31, 2024

This schedule presents the status of findings reported in prior audit periods.

Examination Period:	**Report Ref. No.:**	**Finding Ref. No.:**
January 1, 2019 through December 31, 2021	1036435	2021-001

Finding Caption:

The City did not fully comply with all the energy assistance reporting requirements of the Clean Energy Transformation Act.

Background:

The Clean Energy Transformation Act (CETA) requires electric utilities to demonstrate their progress toward making energy assistance funds available to low-income households. Every two years, electric utilities must report to the Washington State Department of Commerce (Commerce) an assessment of the effectiveness of the energy assistance programs and funding they provided to low-income households to reduce their energy burden.

As part of the report, each utility must include a cumulative assessment of the previous energy assistance funding it provided compared to the funding levels needed to meet:

- Whichever is greater: 60% of its current energy assistance need, or an increase of energy assistance by 15% more than the amount it provided in 2018, by 2030; and
- 90% of its current energy assistance need by 2050

Our examination found the City did not report to Commerce its previous energy assistance funding levels compared to those needed to meet its 2030 and 2050 energy assistance funding goals as required by CETA.

We examined the City's estimate of current energy assistance need during the examination and observed it did not consider annual household energy bills across all fuel types. The City had incorrectly based its estimate solely on annual household electric energy bills and considered annual household energy costs more than 4.5% of household annual income instead of 6% per CETA's definition of "energy assistance need."

Status of Corrective Action: (check one)

X Fully Corrected	☐ Partially Corrected	☐ Not Corrected	☐ Finding is considered no longer valid

Corrective Action Taken:

The City expanded the low-income threshold for energy assistance, weatherization, and appliance upgrades to reach more energy burdened households. The City's definition; the greater of <80% of AMI or <200% of FPL is now in compliance with CETA.

Current methodology relies on collecting customer-level data, modeling missing attributes, then aggregating energy assistance need across the service area. Energy usage and bills were obtained from the utility's Customer Information System (CIS). Demographic data was procured from a third-party data vendor. For households with missing income data, an estimated income was calculated as the average of the incomes of the five geographically closest households. The incomes for all households were then adjusted by a constant percent so that the median income agreed with the median household income from the DOE LEAD tool and Federal Reserve data for 2024-25. To estimate total household energy assistance need for non-electrically heated households, we assume that a portion of income (3%) is used for alternate fuel expenses. The remaining 3% of income is the budget available for electricity bills. Any electricity expenses in excess of 3% of income count towards the energy assistance need for non-electric heat customers. For electric heat customers, electricity expenses in excess of 6% of income count towards the energy assistance need. Adding up all the excess electricity expenses for customers across the service area gives an estimate of the total energy assistance need.

The City offers an energy assistance Low-income Discount Program all fuel types supplied by the City, electric and natural gas. The current qualified list consists of 153 customers.

Examination Period:	Report Ref. No.:	Finding Ref. No.:
January 1, 2019 through December 31, 2021	1036435	2021-002

Finding Caption:

The City did not develop the energy efficiency target it reported in its Clean Energy Implementation Plan in accordance with the requirements of the Clean Energy Transformation Act.

Background:

The Clean Energy Transformation Act (CETA) requires each electric utility to develop and formally adopt a clean energy implementation plan (CEIP) every four years. As part of that plan, each utility must propose specific targets to pursue all cost-effective, reliable and feasible energy efficiency resources and demand response resources during the plan period based on assessments of its energy efficiency and demand response potential, incorporating the social cost of greenhouse gas emissions values prescribed by Commerce as a cost adder in those assessments.

Our examination found City management did not correctly perform the required assessment of its energy conservation potential to support the energy efficiency target it reported in the adopted CEIP it reported to Commerce. The 6,041 megawatt-hour (MWh) target it adopted was based on an average of energy efficiency resources it acquired over the previous four years.

The auditor did not include the City's compliance with this requirement in the scope of the current examination as the city is currently drafting its next plan for submittal to Commerce after December 2025. The auditor will follow up on the status of this issue in the next compliance examination scheduled in 2027.

Status of Corrective Action: (check one)

☐ Fully Corrected	X Partially Corrected	☐ Not Corrected	☐ Finding is considered no longer valid

Corrective Action Taken:

The City started working with Lighthouse Energy Consulting in 2023 to perform the required assessments and intends to continue working with Lighthouse on future CEIPs. A Conservation Potential Assessment was performed in 2023 by Lighthouse Energy Consulting (Lighthouse) for the City of Ellensburg (City) using the Utility Potential Calculator developed by the Bonneville Power Administration. A Demand Response Potential Assessment was performed in 2023 by Lighthouse Energy Consulting (Lighthouse) for the City. The assessment generally followed the methodology used by the Northwest Power and Conservation Council (Council) in the draft 2021 Power Plan.

ABOUT THE STATE AUDITOR'S OFFICE

The State Auditor's Office is established in the Washington State Constitution and is part of the executive branch of state government. The State Auditor is elected by the people of Washington and serves four-year terms.

We work with state agencies, local governments and the public to achieve our vision of increasing trust in government by helping governments work better and deliver higher value.

In fulfilling our mission to provide citizens with independent and transparent examinations of how state and local governments use public funds, we hold ourselves to those same standards by continually improving our audit quality and operational efficiency, and by developing highly engaged and committed employees.

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Meeting Date: August 20, 2026
City of Ellensburg
Utility Advisory Committee Agenda Report

Agenda Subject:	City of Ellensburg Natural Gas Utility — 2025 Washington Ecology Greenhouse Gas Verification Report
Submitted by:	Nichole Baker, Energy Resources Manager
Department:	Energy Services

Suggested Motion/Action:
Informational

Background/Summary:
The City of Ellensburg Natural Gas Utility completes an annual greenhouse gas emissions report (RCW 70A.15.2200) and third-party verification (WAC 173-441-085) to comply with Washington State greenhouse gas reporting requirements administered by the Washington State Department of Ecology. Washington's Climate Commitment Act (RCW 70A.65), which established the cap-and-invest program relies on verified greenhouse gas emissions data for covered entities and market compliance. As a municipal natural gas local distribution utility, the City receives natural gas at its city gate and distributes that gas to residential, commercial, and industrial customers within the service area. The City is therefore subject to greenhouse gas reporting requirements applicable to natural gas suppliers and local distribution.

Previous Council Action:
For the 2024 reporting year, the City of Ellensburg reported 39,620 $MTCO_2e$. The corresponding greenhouse gas emissions verification report was submitted to the Washington Department of Ecology on August 6, 2025.

Analysis:
The 2025 reporting year verification report was completed to evaluate the accuracy and completeness of the City's reported greenhouse gas emissions data. The report specifically verifies carbon dioxide equivalent emissions associated with natural gas received by the City of Ellensburg at the city gate. The verification report states that its format conforms to Washington Department of Ecology's Reporting of Emissions of Greenhouse Gases rule, WAC 173-441, and that the City is subject to reporting under both 40 CFR Part 98, Subpart NN and WAC 173-441.

The verification report supports these statutory and regulatory programs by ensuring that Ellensburg's reported emissions data is reliable for state greenhouse gas inventories, regulatory compliance, and any applicable Climate Commitment Act obligations. For Reporting Year 2025, the verifier determined with reasonable assurance that the City's reported greenhouse gas emissions were accurate within the 5 percent materiality threshold (allowable margin used to determine whether an error in the greenhouse gas emissions

report is significant enough to affect compliance) and conformed with WAC 173-441.

The 2025 greenhouse gas emissions verification report was submitted to the Washington Department of Ecology on August 2, 2026. For the 2025 reporting year, the City of Ellensburg reported 37,606 $MTCO_2e$

Financial Impact:
The financial impact associated with this report includes the cost of third-party verification services, $10,975, and internal staff time required to prepare, review, revise, and certify the City's greenhouse gas emissions reporting.

Budget Adjustment: No

Attachments:
1. City of Ellensburg - WA Ecology - Verification Report - RY 2025

Verification Report

Prepared for:
City of Ellensburg
501 North Anderson Street
Ellensburg, WA 98926
GHGRPID# 725296

Prepared by:
James J. Groome, Lead Verifier
Carbon Verification Service, LLC
1178 Broadway, 3rd Floor
New York, NY 10001

August 2, 2026

CARBON VERIFICATION SERVICE

TABLE OF CONTENTS

Introduction

The format of this Verification Report conforms to the requirements of the Washington Department of Ecology Reporting of Emissions of Greenhouse Gases rule, WAC 173-441. The report summarizes verification activities concerning The City of Ellensburg – Natural Gas Division (Ellensburg), GHGRPID 725296. The scope of the verification included all CO2e emissions from the natural gas received by Ellensburg at the City Gate.

The verification process consisted of the following:

- Ellensburg submitted its RY 2025 GHG emission report via WEDGE on March 30, 2026.
- Carbon Verification Service, LLC (CVS) was selected as Ellensburg's verifier on April 3, 2026.
- A Conflict of Interest (COI) review and Notification of Verification services was submitted to the Washington Department of Ecology (Ecology). The COI assessment was conducted to identify any potential conflicts of interest between Ellensburg and Carbon Verification Service, LLC.
- WA Ecology approved the COI Review and NVS on April 27, 2026.
- A Request for Information was issued to Ellensburg on April 27, 2026.
- A Verification Plan was prepared by CVS and issued on May 8, 2026.
- A Sampling Plan and strategic analysis were completed on April 27, 2026 detailing the scope and risks associated with the emissions reported by Ellensburg. The Sampling Plan was revised on May 15, 2026.
- A review and evaluation of GHG management systems, data collection and handling, emission calculations and procedures was conducted during the data assessment during May and June 2026.
- An Issues Log was developed and maintained through the data checks process. The Issues Log was provided to Ellensburg during the verification for review and response. Additional information requests were issued as necessary to address issues as they arose.
- The GHG emissions data report was revised by Ellensburg on July 23, 2026 and July 27, 2027 and re-certified in WA Ecology WEDGE.
- The Verification Report was prepared and sent for Independent Review on July 27, 2026.

Verification Team

The verification was performed by:

James J. Groome, Lead Verifier
Sunil Pandey, Independent Reviewer
James J. Groome III, Verifier

Mr. Groome and Mr. Pandey are accredited by WA Ecology as Lead Verifiers and as transaction specialists. Mr. Groome III is accredited by WA Ecology as a General Verifier, the California Air Resources Board (CARB) as a Lead Verifier, and Oregon Department of Environmental Quality as a Verifier.

Entity Description

The City of Ellensburg is located in central Washington approximately 88 miles southeast of Seattle. It is approximately 8.5 square miles. Ellensburg is a Local Distribution Company (LDC). Ellensburg purchases natural gas from the Williams Northwest Pipeline Corporation. It distributes natural gas via pipelines to

its residential, commercial, industrial and educational customers. Ellensburg is subject to reporting its GHG emissions as required by Subpart NN of 40 CFR 98 and WAC 173-441.

Ellensburg has no natural gas storage facilities. Natural gas is not delivered directly to the City of Ellensburg's gas system from producers or natural gas processing plants. The largest customer on the City of Ellensburg's gas system is Central Washington University (CWU), which uses approximately 200 MMcf annually.

Data Acquisition, Tracking and Emission Calculation Systems

The annual volume of natural gas received by the City of Ellensburg at its City Gate Station is from the Northwest Pipeline meter data. Additionally, the natural gas volume is checked by the City of Ellensburg check meter at the City Gate Station at 3261 Kittitas Highway, also known as the Kittitas Tap Station.

Heat content/higher heating value (HHV) values are provided by Williams Northwest Pipeline from the measured gas supply based on Northwest Pipeline chromatograph data.

Northwest Pipeline maintains its meter at the City Gate Metering Station. This is a revenue meter and is presumed accurate. The City of Ellensburg used the Northwest Pipeline meter readings to calculate emissions. This is due to the Northwest Pipeline meter being more accurate, and due to the check meter used at the City Gate Station being bypassed for periodic maintenance. The check meter used at the City Gate Station is calibrated and maintained in accordance with Section 9.5 in the Operation and Maintenance Manual. The six meters at Ellenburg's only large end user, Central Washington University (CWU), are also calibrated and maintained in accordance with Section 9.5 in the Operation and Maintenance Manual.

Ellensburg provided its GHG Monitoring Plan which was reviewed by the Lead Verifier. This document explained how Ellensburg prepared its GHG emission data report. Ellensburg used the Northwest Pipeline meter data and Equation NN-1 as modified by WA Ecology Rules. The equation to calculate CO2e emissions is locked into the WA Ecology Reporting Tool spreadsheet, so the only values Ellensburg entered were annual Mscf and annual MMBTu. The emission factor is a default value and is also locked into the WA Ecology reporting tool spreadsheet.

Verification Plan

The Verification Plan is included in Attachment 1.

Data Checks

Data Checks are included in Attachment 2.

Access to the entire data trail (from the City Gate meter to internal tracking spreadsheets to the GHG emission report) allowed for a high degree of confidence in the reported data. Spreadsheets were searched for missing dates and times. A review of invoices and gas usage spreadsheets was also conducted.

Data Check Discrepancies

Any discrepancy between reported GHG emissions and verified GHG emissions were investigated and resolved. Details are included in the Issues Log.

Issues Log

The Issues Log is included in Attachment 3. All issues were resolved.

Documents Reviewed

Carbon Verification Service reviewed the following documents:

2026-03-02NaturalGasSupplierReportingToolEY2025V4.0Submission3
2025_11_Section24GreenhouseGasMonitoringPlan
3_Meter Set Maintenace Form - Kittitas Tap Station
3_Meter Set Maintenance Form - CWU Physical Plant
3_Meter Set Maintenance Form - Twin City Foods
NW Pipeline Invoices
2025 Dec
2025 Jan
2025 Feb
2025 Nov
5 6 7 8 _2025 Gas Billing
eia176_2025 Data
Gas Rate Calculation 2025 – Revised
Gas Rate Calculation 2025

Qualifying Comments

Carbon Verification Service has no comments qualifying its positive verification statement.

Materiality Assessment

The materiality determination is based on the following equation:

$$\text{Percent Error} = \sum \frac{(\text{Discrepancies + Omissions + Misreporting } MTCO_2e) * 100\%}{\text{Total reported covered emissions } (MTCO_2e)}$$

Sum of Discrepancies, Omissions and Misreporting:	33.8
Total reported covered emissions ($MTCO_2e$):	37,606
Materiality Assessment Percent Error:	0.09%

The result of this equation must be less than 5% to find that there is no material misstatement of reported GHG emissions. Based on the data checks, there were no omissions, discrepancies or mis-reporting.

Findings

The Verification Team has determined with reasonable assurance that reported GHG emissions are accurate within 5%. The Verification Team reviewed methods and factors used to develop the emissions data report and found them to be in conformance with the Washington Department of Ecology Reporting of Emissions of Greenhouse Gases rule, WAC 173-441. The Verification Report is true, accurate, and complete to the best of our knowledge and belief.

The Lead Verifier attests that the verification team has carried out all verification services required by the Washington Department of Ecology Reporting of Emissions of Greenhouse Gases rule, WAC 173-441. The Independent Reviewer attests that the independent review was conducted on behalf of Carbon Verification Service, LLC and concurs with the verification findings.

James J. Groome, Lead Verifier

Sunil Pandey, Independent Reviewer

August 2, 2026
Date

Attachment 1 – Verification Plan

Verification Plan

Prepared For:

City of Ellensburg
501 North Anderson St
Ellensburg, WA 98926
GHGRPID No. 725296

Prepared by:

James J. Groome, Lead Verifier
Carbon Verification Service, LLC
1178 Broadway, 3rd Floor
New York, NY 10001

May 8, 2026

Introduction

The format of this Verification Plan conforms to the requirements of Washington Ecology WAC 173-441-085(4)(b)(iv), Third-Party Verification.

City of Ellensburg Boundaries, Operations and Natural Gas Transactions

The City of Ellensburg (Ellensburg) is located in central Washington approximately 88 miles southeast of Seattle. It is approximately 8.5 square miles. Ellensburg is a Local Distribution Company (LDC). Ellensburg purchases natural gas from the Pacific Northwest Pipeline Corporation. It distributes natural gas via pipelines to its residential, commercial, industrial, and educational customers. Ellensburg is subject to reporting its GHG emissions as required by Subpart NN of 40 CFR 98 and WAC 173-441.

Ellensburg has no natural gas storage facilities. Natural gas is not delivered directly to the City of Ellensburg's gas system from producers or natural gas processing plants. The largest customer on the City of Ellensburg's gas system is Central Washington University (CWU), which uses approximately 200 MMcf annually.

Qualifications of Personnel Involved in Developing the GHG Report

The City's Energy Resources Manager is responsible for ensuring compliance with the EPA and Ecology reporting requirements. The Gas Engineer is responsible for the composition and publication of the Gas Division's Operation and Maintenance Manual Section 24, as well as any Section related to the GHG Monitoring Plan. The Gas Engineer is also responsible for the annual review of Section 24 and ensuring that any changes in policy, rules, regulations, and/or code requirements are reflected in Section updates.

Methodologies Used to Quantify and Report Natural Gas Transactions

The annual volume of natural gas received by Ellensburg at its City Gate Station is based upon Northwest Pipeline meter readings. Additionally, this natural gas volume is checked by Ellensburg which has a check meter at the City Gate Station at 3261 Kittitas Highway.

Ellensburg calculated the HHV by using the BTU values provided by Pacific Northwest Pipeline from the measured gas supply. Ellensburg uses the Calculation Methodology 1 (Equation NN-1) to calculate GHG emissions for reporting to EPA and Ecology.

The data and methodologies Carbon Verification Service will use to verify Ellensburg's RY 2025 GHG Report are summarized in the following Table:

GHG Report Item	Data to be Reviewed	Verification Methodology
Natural gas received at the city gate and associated GHG emissions	Daily meter readings from Northwest Pipeline website.	Sum total of natural gas received at the city gate. Calculate GHG emissions using Equation NN-1.
Natural gas delivered to each large end-user and associated GHG emissions	Central Washington University meter data and calibration records.	Error Check Gas Rate Calculation 2025 spreadsheet. Compare reported value to verified value.
Residential, Commercial and Industrial Volume Delivered	Review 2025 Gas Billing spreadsheet	Error check and filter spreadsheet to residential commercial and industrial.

Data Management System Information used to Track Natural Gas Transactions

The annual volume of natural gas received by Ellensburg at its City Gate Station is based upon the Northwest Pipeline city gate meter readings. This natural gas volume is checked by Ellensburg which has a check meter at the City Gate Station at 3261 Kittitas Highway. The City of Ellensburg used the Northwest Pipeline meter readings to calculate emissions. This is due to the Northwest Pipeline meter being more accurate, and due to the check meter used at the City Gate Station being bypassed for periodic maintenance.

Previous Verification Reports

Carbon Verification Service verified City of Ellensburg's GHG Emission Data Reports for reporting years 2023 and 2024. The verification reports and the issues logs from 2023 and 2024 were reviewed to develop this Verification Plan.

Dates of Proposed Meetings and Interviews with Reporting Facility Personnel

Carbon Verification Service will interview Ellensburg personnel via teleconference as necessary as questions arise during the verification process.

Date of Proposed Site Visit

Since Ellensburg received a positive verification statement for RY 2024, there is no site visit required for RY 2025.

Types of Proposed Document and Data Review

Carbon Verification Service issued a Request for Information dated April 27, 2026. The Lead Verifier will review the following information:

1. The GHG Monitoring Plan required by 40 CFR 98 Subpart NN.
2. HHV monthly measurements by the City of the delivering pipeline.
3. Evidence that a standard test published by a consensus-based standards organization as per § 98.404 was used to measure HHV if the City measured it.
4. How sales are recorded i.e. invoices, real-time data, etc.
5. Sales information for all of calendar year 2025.
6. Missing data information or how it is known there is no missing data for 2025.
7. Confirm that sales to CWU-Ellensburg accurately address all meters/accounts in facility boundaries and is consistent with 2024.
8. Calibration records for equipment used to measure CO2 emissions.

Expected Date for Completing Verification Services

The verification schedule is expected to proceed as follows:

Task	Estimated Completion date
Complete draft Sampling Plan	May 15, 2026
Complete Data Review and Assessment	June 1, 2026
Issue Verification Report and Verification Statement	No later than August 10, 2026

This Verification Plan may be revised as necessary during the course of the verification should circumstances warrant.

Attachment 2 – Data Checks

Natural Gas Data Check

The following data is from Northwest Pipeline meter which is recorded in the "Gas Rate Calculation 2025" spreadsheet.

	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Total
Mscf	114,379	99,905	69,838	47,400	32,526	22,433	18,921	18,050	22,951	57,782	71,829	90,010	666,024
HHV	1,062	1,066	1,065	1,060	1,066	1,055	1,064	1,081	1,065	1,067	1,051	1,068	1,064
MMBTu	121,470	106,499	74,377	50,244	34,673	23,667	20,132	19,512	24,443	61,653	75,492	96,131	708,650
NW Pipeline Website Meter Readings	121,463	106,508	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	75,472	95,938	

The following tables summarize the reported quantity of natural gas versus the verified quantity of natural gas:

		Source
Reported Natural Gas Received at City Gate (Mscf)	666,024	Cell B6, Aggregate emissions tab, GHG report
Verified Natural Gas Received at City Gate (Mscf)	666,024	The total Mscf tabulated in the table above.
Difference	0	NA
% Difference	0.0%	NA

The difference is due to gas used by NW Pipeline to fuel compressors to transport the gas through the pipeline.

		Source
Reported Natural Gas Receipts (mmbtus)	708,011	Cell C6, Aggregate emissions tab, GHG report
Verified Natural Gas Receipts (mmbtus)	708,649.54	The total mmbtus tabulated in the table above.
Difference	(639)	NA
% Difference	-0.09%	NA

The difference is due to gas used by NW Pipeline to fuel compressors to transport the gas through the pipeline.

GHG Emissions Data Check

Equation NN-1 was used to calculate the verified CO_2 emissions resulting from the combustion of natural gas.

$CO2_i = 1\times10{-}3 \sum Fuel_h\ HHV_h\ EF_h$ (Eq. NN-1)

Where:

CO2i = Annual CO2 mass emissions that would result from combustion of each product "h" for redelivery to all recipients (metric tons).

Fuelh = Total annual heat input of product "h" supplied (MMBTu)

HHVh = Higher heating value of product "h" supplied (MMBtu/Mscf)

EFh = CO2 emission factor of product "h" (kg CO2/MMBtu).

1 × 10−3 = Conversion factor from kilograms to metric tons (MT/kg)

The tables below summarize the factors used in the equation above to calculate CO_2, CH_4, and N_2O emissions using verified natural gas receipts.

Equation Variable	Value	Units	Source
Fuel	708,649.54	MMBTu	The total MMBtu tabulated above.
HHV	Not applicable as per WA Ecology GHG Rule.	NA	NA
EF	53.06	kg CO2/MMBTu	WA Ecology approved emission factor
Conversion Factor kg to MT	0.001	NA	NA
CO2	37,600.94	Metric Tons CO2	Result of calculation

Equation Variable	Value	Units	Source
Fuel	708,649.54	MMBTu	The total MMBtu tabulated above.
HHV	Not applicable as per WA Ecology GHG Rule.	NA	NA
EF	0.001	kg CH4/MMBTu	WA Ecology approved emission factor
Conversion Factor kg to MT	0.001	NA	NA
CH4	0.71	Metric Tons CH4	Result of calculation

Equation Variable	Value	Units	Source
Fuel	708,649.54	MMBTu	The total MMBtu tabulated above.
HHV	Not applicable as per WA Ecology GHG Rule.	NA	NA
EF	0.0001	kg N2O/MMBTu	WA Ecology approved emission factor
Conversion Factor kg to MT	0.001	NA	NA
N2O	0.07	Metric Tons N2O	Result of calculation

The table below compares the reported CO_2 emissions and verified CO_2 emissions.

		Source
Reported CO2 Emissions (Metric Tons)	37,567	Cell H6, Aggregate emissions tab, GHG report
Verified CO2 emissions (Metric Tons)	37,600.94	CO2 emissions calculation table above.
Difference	(34)	NA
% Difference	-0.09%	NA

The difference is attributable to the gas used by the pipeline to fuel compressors to transport the gas through the pipeline.

The table below compares the reported MT CO_2e and the verified MT CO_2e. The verified MT CO2e is the sum of the verified CO_2 emissions shown in the table above, and the CH_4 and N_2O emissions multiplied by their respective Global Warming Potential values, (25 for CH_4 and 298 for N_2O).

		Source
Reported MTCO2e	37,606	Cell N6, Aggregate emissions tab, GHG report
Verified MT CO2e	37,639.78	Explained in excerpt above this table
Difference	(33.8)	NA
% Difference	-0.09%	NA

The difference is attributable to the gas used by the pipeline to fuel compressors to transport the gas through the pipeline.

Emissions Summary

The percentage of reported emissions covered by data checks was 100%:

Reported covered emissions as per the July 27, 2026 GHG Report: 37,606 MTCO2e
Verified covered emissions: 37,639.78 MTCO2e

% Difference: -0.09%

Change in Year-Over-Year Emissions

In RY 2024, Ellensburg's emissions were 39,620 MTCO2e. In RY 2025, emissions were 37,606 MTCO2e. This is a decrease of 5.1%.

Large End User Volume Data Check – Central Washington University

The data below is from the "5 6 7 8 _2025 Gas Billing" spreadsheet file. The data is from six meters at CWU. The meter maintenance records were reviewed.

Month	G300 Meter (Main meter)			G100 Meter			G200 Meter			G205 Meter			G207 Meter			G210 Meter		
	Mscf	Average HHV	MMBTu	ccf	Average HHV	MMBTu	ccf	Average HHV	MMBTu	ccf	Average HHV	MMBTu	ccf	Average HHV	MMBTu	ccf	Average HHV	MMBTu
Jan-25	29,746	1.062	31,590	26	1.062	27.6	3,171	1.062	3,368	2,358	1.062	2,504	2,380	1.062	2,527.6	31,299	1.062	33,240
Feb-25	25,956	1.066	27,669	881	1.066	939.1	2,970	1.066	3,166	2,577	1.066	2,747	2,681	1.066	2,857.9	28,762	1.066	30,660
Mar-25	20,205	1.065	21,518	706	1.065	751.9	2,518	1.065	2,682	2,225	1.065	2,370	2,791	1.065	2,972.4	37,198	1.065	39,616
Apr-25	15,350	1.06	16,271	453	1.06	480.2	1,978	1.06	2,097	1,719	1.06	1,822	2,378	1.06	2,520.7	28,507	1.06	30,217
May-25	12,445	1.066	13,266	284	1.066	302.7	1,266	1.066	1,350	1,193	1.066	1,272	2,675	1.066	2,851.6	21,119	1.066	22,513
Jun-25	8,119	1.055	8,566	183	1.055	193.1	821	1.055	866	936	1.055	987	2,618	1.055	2,762.0	16,024	1.055	16,905
Jul-25	5,799	1.064	6,170	86	1.064	91.5	109	1.064	116	915	1.064	974	1,905	1.064	2,026.9	6,007	1.064	6,391
Aug-25	3,804	1.081	4,112	88	1.081	95.1	2	1.081	2	1,265	1.081	1,367	1,224	1.081	1,323.1	3,634	1.081	3,928
Sep-25	7,351	1.065	7,829	69	1.065	73.5	-	1.065	-	974	1.065	1,037	1,206	1.065	1,284.4	2,954	1.065	3,146
Oct-25	17,145	1.067	18,294	56	1.067	59.8	63	1.067	67	960	1.067	1,024	1,603	1.067	1,710.4	4,045	1.067	4,316
Nov-25	21,555	1.051	22,654	362	1.051	380.5	1,152	1.051	1,211	1,385	1.051	1,456	2,523	1.051	2,651.7	14,675	1.051	15,423
Dec-25	25,843	1.068	27,600	454	1.068	484.9	1,429	1.068	1,526	1,397	1.068	1,492	5,227	1.068	5,582.4	16,144	1.068	17,242
Total	**193,318**	**mscf**	**205,540**	3,648		3,880	15,479		16,450	17,904		19,053	29,211		31,071	210,368		223,598
				365	**mscf**		**1,548**	**mscf**		**1,790**	**mscf**		**2,921**	**mscf**		**21,037**	**mscf**	

Verified total gas usage for all 6 meters was 220,979 mscf.

Materiality Assessment - CWU

	Reported (Mscf)	Verified (Mscf)	% Difference
Central Washington University	220,581	220,979	-0.2%

Reported (mmBtu)	Verified (mmBtu)	% Difference
232,934	235,122	-0.94%

Reported MTCO2e	Verified MTCO2e	% Difference
12,372	12,488	-0.94%

The tables below represent the comparison between the reported deliveries and verified deliveries of natural gas to Central Washington University in Mscf and mmBtu.

Materiality Assessment - Central Washington University (CWU)

Reported	220,581	Mscf	Reported	232,934	mmBtu
Verified	220,979	Mscf	Verified	235,122	mmBtu
Difference	(398)	Mscf	Difference	(2,188)	mmBtu
% Difference	-0.18%		% Difference	-0.94%	

Difference is due to rounding.

Product Data - Data Check

The following table shows the reported quantities of natural gas for each end-use category which will be verified. This data was from the 'End-users and large customers' tab of the GHG report.

Category delivered to	Reported Annual volume delivered (Mscf)	Reported Annual energy delivered (mmBtu)
Residential consumers	218,970	231,232
Commercial consumers	433,601	457,883
Industrial consumers	28,186	29,764
Electricity generating facilities		
Other end-users not identified in categories above		
All WA end-users*	680,757	718,879

Residential Consumers

The following table was created to verify the Reported Annual volume delivered for the 'Residential Consumers' category in the table above. The data was taken from the "5 6 7 8 _2025 Gas Billing" spreadsheet.

2025 Natural Gas Consumption Residential Consumers (Ccf billed)	
Month	Residential
JAN	560
FEB	432,111
MAR	295,846
APR	189,861
MAY	113,561
JUN	60,401
JUL	42,390
AUG	36,971
SEP	37,830
OCT	78,119
NOV	206,507
DEC	270,497
Prorated	425,047
TOTAL (ccf)	2,189,701

Converting Ccf to Mscf, **2,189,701** Ccf = **218,970 Mscf**

To convert the total Mscf of 218,970 Mscf to mmBtu, we took the average HHV from the Northwest Pipeline meter readings for January to December. The average HHV was 1064 btu/cf or 1.064 mmBtu/Mscf. Therefore, 218,970 Mscf = 232,984 mmBtu

Commercial Consumers

The following table was created to verify the Reported Annual volume delivered for the 'Commercial Consumers' category in the table above. The data was taken from the "5 6 7 8 _2025 Gas Billing" spreadsheet.

2025 Natural Gas Consumption: Commercial Consumers (Ccf billed)	
Month	Commercial
JAN	118
FEB	373,125
MAR	362,748
APR	248,718
MAY	169,074
JUN	116,885
JUL	75,859
AUG	72,306
SEP	67,359
OCT	75,366
NOV	190,926
DEC	236,403
Prorated	413,947
TOTAL (ccf)	2,402,834

Converting Ccf to Mscf, **2,402,834** Ccf = **240,283 Mscf**

We need to add 193,318 MSCF to account for Central Washington University, so 240,283 +193,318 = 433,601 Mscf.

To convert the total Mscf of 433,601 Mscf to mmBtu, we took the average HHV from the Northwest Pipeline meter readings for January to December. The average HHV was 1064 btu/cf or 1.064 mmBtu/Mscf. Therefore, 433,601 Mscf = 461,352 mmBtu

Industrial Consumers

The following table was created to verify the Reported Annual volume delivered for the 'Industrial Consumers' category in the table above. The data was taken from the "5 6 7 8 _2025 Gas Billing" spreadsheet.

2025 Natural Gas Consumption: Industrial Consumers (Ccf billed)	
Month	Twin City Foods
JAN	0
FEB	0
MAR	12,840
APR	12,270
MAY	10,010
JUN	8,780
JUL	23,600
AUG	25,750
SEP	39,360
OCT	41,390
NOV	68,390
DEC	12,480
Prorated	26,987
TOTAL (ccf)	281,857

Converting Ccf to Mscf, **281,857** Ccf = **28,186 Mscf**

To convert the total Mscf of 28,186 Mscf to mmBtu, we took the average HHV from the Northwest Pipeline meter readings for January to December. The average HHV was 1064 btu/cf or 1.064 mmBtu/Mscf. Therefore, 28,186 Mscf = 29,990 mmBtu.

Product Data - Summary

The following table shows a comparison between the reported and verified values of natural gas for each end-use category. The verified values come from the data check calculations shown on pages 15-17.

Product Data Materiality Assessment								
Category delivered to	Reported Annual volume delivered (MScf)	Reported Annual energy delivered (MMBtu)	Verified Annual volume delivered (Mscf)	Verified Annual energy delivered (MMBtu)	Annual volume delivered Difference	Annual energy delivered Difference	Annual volume delivered % Difference	Annual energy delivered % Difference
Residential consumers	218,970	231,232	218,970	232,984	0	-1,752	0.0%	-0.8%
Commercial consumers	433,601	457,883	433,601	461,352	0	-3,469	0.0%	-0.8%
Industrial consumers	28,186	29,764	28,186	29,990	0	-226	0.0%	-0.8%
All WA end-users	680,757	718,879	680,757	724,326	0	-5,447	0.0%	-0.8%

NAICS Code Verification

Ellensburg reported their NAICS code as 221210 in the GHG Report dated July 23, 2026. A review of the NAICS website (https://www.naics.com/search/) shows this code to apply to Natural Gas Distribution.

Attachment 3 – Issues Log

Facility Name:
City of Ellensburg

Lead Verifier:
J. Groome

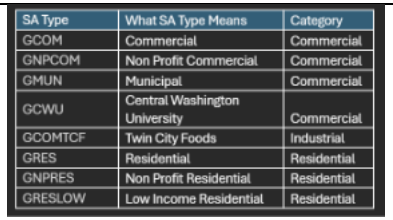
Issues Log - 2025 Reporting Year

No.	Date	Description of Issue/Source	WAC or 40 CFR 98 Citation	Potential Impact on GHG Data (Non-Conformance or Materiality)	Action Required by Reporter	Resolution and Date
1	5/8/2026	Please provide a download of data from the NW Pipeline website showing the daily meter readings from January, February, November and December 2025.	173-441-050(6)(e)(B)	Non-conformance	Provide the requested daily meter readings.	On 5/19/2026, Ellensburg provided Excel spreadsheets for all 4 months requested with meter readings downloaded from the NW Pipeline website. **Issue resolved.**
2	5/8/2026	The reported Fossil Annual Volume of natural gas to meter (Mscf) was 227, 028 Mscf (cell G6 of the "End-users and large customers tab of the GHG Report. The verified value was 193,318 Mscf. This is a difference of 14.8%. Please explain the discrepancy.	173-441-122(1)	Materiality	Explain the difference between the reported and verified values.	5/22/26 Ellensburg responded: 227,028 is the combined total for all CWU meters. This means CWU's substation plus all their other gas accounts combined for 2025. 193,318 is just the substation on its own. On 5/31/2026 CVS responded : 5 6 7 8 2025 Gas Billing.xlsx reviewed and is sufficient evidence. **Issue resolved.**
3	5/8/2026	Please explain where the reported residential, commercial and industrial annual volume delivered (Mscf) comes from. Also, please confirm that the reported values include only calendar year 2025.	173-441-122(4)(b)(2)	Non-conformance	Explain where the reported values can be found in the documentation provided.	5/22/26 Ellensburg responded: These amounts come from C2M, which is billing software. These are all consumed amounts billed in 2025. CVS 5/22/2026: **Issue resolved.**
4	5/8/2026	Page 3 of the GHG Monitoring Plan says in section 24.1.1 that the annual volume of natural gas received by the city at the City Gate will be collected from NW Pipeline invoices. However, it appears that GHG emission calculations are based on daily meter readings taken from NW Pipeline's website. Please clarify which is correct.	40 CFR 98.3(5)(i)	Non-conformance	Clarify which data is used to calculate GHG emissions. Revise the GHG Monitoring Plan if necessary.	5/22/26 Ellensburg responded: It should be City Gate and attached a spreadsheet with 2025 City Gate amounts. CVS 5/31/2026: Please revise the GHG Monitoring Plan to reflect the data source (i.e. NW Pipeline website meter readings) used to calculate GHG emissions. Ellensburg response 6/5/2026: The daily reads and the invoicing are checked against one another; they are the same. I provided the easier to digest/see information. Attached are the 2025 Pipeline Invoices. We will retain the current language in the GHG Monitoring Plan." CVS response 6/13/2026: **Issue resolved.**

Facility Name:
City of Ellensburg

Lead Verifier:
J. Groome

Issues Log - 2025 Reporting Year

No.	Date	Description of Issue/Source	WAC or 40 CFR 98 Citation	Potential Impact on GHG Data (Non-Conformance or Materiality)	Action Required by Reporter	Resolution and Date
5	5/31/2026	On the spreadsheet "5 6 7 8 _2025 Gas Billing" in Column B, please explain what to filter to come up with "Residential, Industrial, and Commercial natural gas volumes.	173-441-122(4)(b)(2)	Information request	Please explain how to filter Column B in the spreadsheet.	 On 6/5/2026, Ellensburg provided the screenshot above showing how to filter for Residential, Commercial, and Industrial. However, please advise which column represents consumption. CVS response 6/28/2026: The only end category that can be verified is "Industrial". "Commercial" and "Residential" still different by more than 5%. CVS response 7/18/2026: We were able to verify the commercial and residential end use categories successfully. **Issue resolved.**
6	6/13/2026	In the "5 6 7 8 _2025 Gas Billing, in the "jan" tab, the consumption period is November 30, 2024 to December 31, 2024. Please provide only the consumption for January 1, 2025 to December 31, 2025.	173-441-122(4)(d)(ii)(E)	Materiality	Provide usage data only for calendar year 2025 for Commercial, residential and industrial end users.	In an email dated 7/16/2026 from WA Ecology, GHGReporting@ECY.WA.GOV to City of Ellensburg: "At first findings, I see on EY2024 Verification Report that Carbon Verification Service said that: "Please provide CWU meter data documentation for all accounts from 1/1/2024 to 12/31/2024 only. Natural gas usage based on billing dates is not adequate for verification." It was in No. 5 of the Issues Log - 2024 Reporting Year if you want to review the entire section. I am looking into it further still in our records, but have you

Issues Log - 2025 Reporting Year

No.	Date	Description of Issue/Source	WAC or 40 CFR 98 Citation	Potential Impact on GHG Data (Non-Conformance or Materiality)	Action Required by Reporter	Resolution and Date
						expressed the problem to your verifier already? You may be able to work collaboratively to provide the report they need. If the third-party verifier believes that billed by date would be sufficient (or better) as well given your circumstances. We are also happy to hear their perspective. I wouldn't want to provide guidance that the third-party verifier will reject regardless." CVS response 7/18/2026: CVS reviewed the WA Ecology and Federal EPA GHG Reporting Rules, as well as the Instructions for Form EIA-176. All refer to the calendar year as the required reporting period. Please revise the GHG Report to reflect deliveries to commercial, residential and industrial end users on a 2025 calendar year basis. On 7/23/2026 and 7/27/2026, Ellensburg sent a revised GHG report, "2026-07 23NaturalGasSupplierReportingToolEY2025V4.0" which reflects deliveries to commercial, residential and industrial end users on a 2025 calendar year basis. **Issue resolved.**
7	7/1/2026	The end use categories Residential, Industrial, and Commercial includes usage in 2024. Please only include usage in 2025.	173-441-122(4)(b)(2)	Non-conformance	Revise the GHG Report to include gas delivered to end users only during CY 2025.	On 7/23/2026 and 7/27/2026, Ellensburg sent a revised GHG report, "2026-07-23NaturalGasSupplierReportingToolEY2025V4.0", which reflects deliveries to commercial, residential and industrial end users on a 2025 calendar year basis. They also provided a breakdown of each category and how it was prorated. **Issue resolved.**

Facility Name:
City of Ellensburg

Lead Verifier:
J. Groome

Issues Log - 2025 Reporting Year

No.	Date	Description of Issue/Source	WAC or 40 CFR 98 Citation	Potential Impact on GHG Data (Non-Conformance or Materiality)	Action Required by Reporter	Resolution and Date
8	7/2/2026	On 7/2/2026, Ellensburg provided the "Book2" spreadsheet, which states the total natural gas for the entire year is 688,355 MSCF. When calculating the total by filtering the "5 6 7 8 _2025 Gas Billing" spreadsheet, we calculated 688,355 MSCF as well. However, the reported value on the GHG report "2026-03-02NaturalGasSupplierReportingToolEY2025V4.0Submission3" is 683,855 MSCF. This is a difference of 4,500 MSCF. Please explain the discrepancy.	173-441-122(4)(b)(2)	Materiality	Please explain the discrepancy.	Ellensburg response 7/16/2026: It will need to resubmit 2026-03-02NaturalGasSupplierReportingToolEY2025V4.0Submission 3 for the corrected amount. The correct amount is 688,355 MSCF. The commercial amount was input incorrectly. CVS response 7/16/2026: Issue resolved pending revision of the "2026-03-02NaturalGasSupplierReportingToolEY2025V4.0Submission 3" workbook. On 7/23/2026 and 7/27/2026, Ellensburg sent a revised GHG report, "2026-07-23NaturalGasSupplierReportingToolEY2025V4.0", which reflects deliveries to commercial, residential and industrial end users on a 2025 calendar year basis. They also provided a breakdown of each category and how it was prorated. **Issue resolved.**

Meeting Date: August 20, 2026
City of Ellensburg
Utility Advisory Committee Agenda Report

Agenda Subject:	City of Ellensburg Electric Utility — 2025 Washington Ecology Greenhouse Gas Report
Submitted by:	Nichole Baker, Energy Resources Manager
Department:	Energy Services

Suggested Motion/Action:
Informational

Background/Summary:
Washington law requires electric power entities (EPEs) that import or deliver electricity with associated emissions at or above the mandatory reporting threshold to report greenhouse gas (GHG) emissions to the Washington State Department of Ecology. Under WAC 173-441-030 and WAC 173-441-120, that threshold is 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year. The City of Ellensburg first met this threshold in 2025.

The City is not currently required to obtain third-party verification. In addition, although Washington's Climate Commitment Act established the state's cap-and-invest program, the City remains below the 25,000 $MTCO_2e$ threshold for program coverage.

Previous Council Action:
For the 2024 reporting year, the City of Ellensburg reported 3,620 $MTCO_2e$. The corresponding greenhouse gas emissions report was not required to be submitted to the Washington Department of Ecology (Ecology). The 2025 report was originally submitted to Ecology on April 4 2026 which reported 10,235 $MTCO_2e$.

Analysis:
The City of Ellensburg resubmitted its 2025 greenhouse gas emissions report to the Washington State Department of Ecology on August 10, 2026. The City reported total 2025 emissions of 10,035 metric tons of carbon dioxide equivalent ($MTCO_2e$).

Following guidance from Ecology and The Energy Authority (TEA), the report was revised to update the transmission loss (TL) factor from 1.02 to 1.00. Under Washington Administrative Code requirements for calculating greenhouse gas emissions from imported electricity supplied by asset-controlling suppliers, a TL factor of 1.00 applies when electricity deliveries are measured at the first point of receipt within the balancing authority area of the asset-controlling supplier.

An asset-controlling supplier is an electricity supplier that has operational control over specified generating resources and associated electricity deliveries, allowing the supplier to

report the greenhouse gas emissions associated with those resources. Bonneville Power Administration (BPA) qualifies as an asset-controlling supplier.

Financial Impact:
The financial impact associated with this report is included in The Energy Authority (TEA) membership and internal staff time required to prepare data, review, and revise the City's greenhouse gas emissions reporting.

Budget Adjustment: No

Attachments:
1. 2025 Washington Ecology Greenhouse Gas Report

EPE Information:	
Entity Name	City of Ellensburg
WA GHG ID If you do not know your GHG ID, contact Ecology GHGReporting@ecy.wa.gov	935225
EPE Type	COU
Emission Year	2025
NAICS Code	2211
Comments (optional)	

Washington Retail Sales: (report all sales in **MWh**)	
Are you a Retail Provider in Washington? If Yes, continue reporting retail sales information in this section. If No, continue to the next section.	Yes
Balancing Authority Area in which Retail Customers are Located If not listed in dropdown, enter BAA directly into cell - not a searchable list.	BPAT
Total Washington Retail Sales - WAC 173-441-124(3)(c) (MWh)	221,853
Data Source for Reported Retail Sales Value Optional - Required for EIM Purchasers	EIA
Add description if "Other"	

Electrification - WAC 173-441-124(3)(c)(ii) - Optional Subset of retail sales serving electrification of shipping ports, truck stops, and motor vehicle (MWh)	

EIM Purchaser:

Did you purchase any electricity through the Energy Imbalance Market (EIM) to serve Washington load in the data year?	Yes
EIM Power Purchased (MWh)	1,434

EPE Emissions (MT CO2e)

The following cells tabulate emissions from data reported in the Tool. Select the calculated value to view the formula in the formula bar.

Specified Imports =	10,034.7923
Specified Exempt =	0.0000
Specified Covered =	10,034.7923
Unspecified Imports =	0.0000
Unspecified Electricity Netted by Exports =	0.0000
TOTAL REPORTED EMISSIONS =	10,034.7923
Total CCA Covered Emissions =	10,034.7923

Fill out the following table if any of the following situations are applicable:

Were there any changes to emission data calculation methodologies since the last reporting year or during the reporting year? WAC 173-441-050(4).	No
Emission data method change explanation:	
Were any missing data procedures used this reporting year? WAC 173-441-050(6)(d).	No
List each data element for which a missing data procedure (40 CFR § 98.395) was used and the total number of hours in the year that a missing data procedure was used for each data element:	
Did emissions increase or decrease more than 5% relative to the previous year? WAC 173-441-050(3)(p)	Yes
Description of cause of increase or decrease in emissions, if the increase or decrease is more than 5% in GHGs relative to the previous year:	Bonneville Power Administration (BPA) emission factor increased from 0.0160 to 0.0452 MTCO2e/MWh for EY2025 - a 2.825x increase
Were operations ceased for more than 90 calendar days, other than routine maintenance or seasonal shutdown? WAC 173-441-050(3)(o).	No
If operations ceased, provide: - Anticipated type of cessation (closure or curtailment) - Date cessation began - Date cessation ended (if applicable) - Reason for cessation and/or resumption of operation	

GHG Inventory Program Documentation - WAC 173-441-124(4)
Shall be made available within 15 business days upon the request by Ecology.

Energy Services Monthly Report

Date: 08/20/2026

Electric:

- The RESIP (renewable energy system incentive program) annual to WSU has completed – Chapter 504-49 WAC.
- The CSEP (community solar energy program) was approved by Council 8/3/2026 - HB 1814. – RCW 82.16.183.
- The Resource Plan was approved by Council on 8/3/2026 and submitted on 8/4/2026. RCW 19.280.
- The Energy Services Department participated at the Comprehensive Plan Update Open House on 7/22/2026.
- Bonneville Power Administration (BPA) Comfort Ready Homel, Heat Pump and Heat Pump Water Heaters Workshop scheduled for Sept. 24 at Hal Holmes (CEIP Outreach WAC 194-40-200 outreach)
- The Electric Utility greenhouse gas (GHG) report was resubmitted on 8/10/2026, concluding the annual state GHG reporting requirements. WAC 173-441-030
- The light department hired a new lineman Corbin Richardson. Corbin's first day was August 1st.
- Magnum power completed milestone on the Feeder 1 Line Extension by finishing the installation of the underground portion of feeder 1 along Anderson Rd. Allowing for the removal of the overhead pole line along Anderson Rd.
- Riverline Power, the city's dock crew, completed the cable and transformer installation at Rolling Medows.
- Picture from Renewable Park education outreach, 7/14/2026:

Gas:

- The Natural Gas Utility greenhouse gas (GHG) verification was submitted on 8/2/2026, concluding the annual state GHG reporting requirements. WAC 173-441-085
- Decarb Roadmap Request for Qualifications R26-06 closed 7/31/2026, consultant selection process ongoing. Commerce contract number 25-53310-002.
- Very positive first month using Tenaska as the City's natural gas supplier.
- Crews recently completed annual regulator station maintenance at the Kittitas Take Station, Seattle Gate Station, Twin City Foods, and the CWU Physical Plant.
- Staff and crews were given hands on training to find and eliminate electrical shorts in the cathodic protection system. A Cascade Natural Gas employee provided the training.

Telecom:

- Telecom staff is working to develop plan with City IT to transition MAN services to Dark Fiber services. Working with NoaNet to get quotes for fiber discovery and splicing for this project.
- Working with Noanet to obtain quotes from providing the City with diverse connections of internet to both City Hall HUB and Ellensburg Police Station HUB sites to ensure redundant paths are prepared and operated.
- Staff working with Lightcurve and City's Urban Forestry Tech Kelli Capps to have county remove a tree that is weakening and causing hazardous condition with Lightcurve's phone line on E 8th Ave & N Poplar St. Notice has been sent to Kittitas Valley Event Center director requesting them to remove hazardous tree as this is Kittitas County property.