CEBA Corporate Energy Buyers Association

Powering Progress: The Critical Role of Clean Energy Tariffs

Table of Contents

Authors and Acknowledgments

KEY AUTHORS AND CONTRIBUTORS

Priya Barua, Senior Director, Utility Partnerships and Innovation, CEBA

Rachel Ross, Consultant, CEBA

Katie Southworth, Deputy Director, Southeast Policy, CEBA

Leigh Yeatts, Senior Associate, Utility Partnerships and Innovation, CEBA

CEBA gratefully acknowledges the many individuals and organizations whose contributions and review helped inform the program details and case studies reflected in this publication. This includes representatives from member companies — Google, Meta, Amazon, and Microsoft — utilities, regulators, and other industry stakeholders.

Foreword

The U.S. electricity system is at an inflection point. Demand is rising faster than at any time in recent memory — driven by artificial intelligence, onshoring of domestic manufacturing, and electrification. Decisions made today about how to meet that demand will shape the energy system for decades. The question is not simply *how much* new capacity we build, but *what kind,* and *who drives that decision.*

Large commercial and industrial customers have been reliable partners to the grid for generations. By funding critical infrastructure costs and public purpose programs, paying their fair share of shared system investments, and providing the stable, long-term load that has underpinned major capital deployments across the country, large energy customers have helped build the electricity system we all depend on today.

CEBA's core objective is to evolve the status quo — to unlock meaningful partnership opportunities between large loads and utilities so our members, and large customers broadly, have real optionality on the grid, while continuing to support reliable, affordable electricity systems. **This publication — the second in our series, following CEBA's previous Green Tariff Reports — profiles the next generation of utility programs: clean energy tariffs and bilateral agreements that let customers bring capital, long-term demand signals, and risk tolerance to the table, catalyzing investments that benefit the whole system and American energy.**

While large customers have historically had limited say in utility planning and too few pathways to act on their carbon emissions-free energy commitments within vertically integrated markets, this is changing. The programs and agreements profiled in this publication are evidence of emerging models: ones in which customers and utilities are actively partnering to bring clean, reliable resources online — with large load customers providing long-term demand signals, sharing risk, and enabling investments that utilities might not otherwise make. These examples are not workarounds, but rather thoughtful, durable mechanisms built within existing regulatory frameworks and designed to protect other system ratepayers.

"Powering Progress: The Critical Role of Clean Energy Tariffs" is a practical resource for energy buyers ready to engage their utilities, for utilities looking to expand regulatory pathways and replicate what's working, and for regulators seeking frameworks to add clean energy resources to the grid in ways that strengthen — not strain — the system for all ratepayers.

We hope you find this publication helpful. As we continue to build on our series of publications on utility program offerings, one thing is clear: the path forward is not theoretical — it is being built, utility by utility, program by program. The groundwork has been laid. What happens next is up to us.

Nidhi Thakar
Senior Vice President, Policy
Corporate Energy Buyers Association

Priya Barua
Senior Director, Utility Partnerships & Innovation
Corporate Energy Buyers Association

Executive Summary

This publication provides an overview of emerging utility clean energy tariffs and bilateral customer utility agreements that are enabling accelerated deployment of clean generation resources across the United States. As U.S. electricity demand accelerates — driven by data center growth, manufacturing expansion, and electrification — large commercial and industrial (C&I) customers and electric utilities are increasingly collaborating on innovative rate structures that bring clean and clean firm capacity online without shifting costs to other ratepayers.

Together, these models represent a new class of utility solutions designed to address the intersecting challenges of projected load growth, affordability, and reliability by integrating large customer demand directly into utility system planning and procurement.

The Importance of Clean Energy Tariffs

Since 2014, corporate buyers have procured 143.8 gigawatts (GW) of clean energy in the U.S., largely through wholesale market power purchase agreements (PPAs). As utilities face rising peak demand and shrinking reserve margins, and as regulators prioritize affordability, there is growing interest and opportunity in mechanisms that allow customers to help bring new clean energy capacity onto the grid — without shifting costs to other ratepayers.

Clean energy tariffs respond to this moment. These programs allow large customers to identify, fund, and support specific clean or clean firm resources — including advanced geothermal, nuclear, long-duration storage, renewables with storage, and hydropower — that are integrated into the utility system and contribute to overall capacity and reliability. Importantly, they do so within existing regulatory frameworks, pairing customer-driven investment with strong ratepayer protections.

What This Report Covers

This publication profiles a growing set of emerging utility programs and illustrative bilateral agreements, including:

- Clean Transition Tariffs (CTTs) at utilities, such as NV Energy and Xcel Energy (Colorado);
- Special contract and companion tariffs at Georgia Power, Ameren Missouri, Dominion Energy Virginia, Evergy, Public Service Company of New Mexico (PNM), and Salt River Project (SRP); and
- Bilateral clean firm agreements with leading technology companies, including Google, Meta, Amazon, and Microsoft, some of which are explicitly designed to seed future clean energy tariffs.

Together, these examples demonstrate how customer demand and risk tolerance can catalyze investment in resources that utilities may not otherwise select through traditional integrated resource planning (IRP) processes — while keeping large loads integrated onto the grid and contributing to shared system costs.

Key Takeaways

1. **Clean energy tariffs are evolving — but share common design principles.** While program structures vary (standalone special contracts, riders to large load tariffs, or companions to existing rates), durable designs consistently:
    - Allocate associated costs exclusively to participating customers;
    - Embed capacity value — not just energy and renewable energy certificates (RECs) — into rate structures; and
    - Provide long-term revenue certainty necessary for capital-intensive, clean firm resources.
2. **Large load tariffs and clean energy tariffs are increasingly linked.** New state-mandated, large load tariffs establish minimum demand charges, collateral requirements, and long contract terms to protect ratepayers. Clean energy tariffs often build on these foundations, giving customers a pathway to pair load growth with new capacity, improving system economics rather than exacerbating them.
3. **Early collaboration produces better, more durable outcomes.** Programs profiled here underscore that early, good-faith engagement between customers, utilities, and regulators leads to more workable, scalable designs. Customers contribute market intelligence, risk absorption, and insights from other jurisdictions; utilities provide system, rate, and regulatory expertise. Trust built early helps to ensure workable programs that deliver broader electricity system benefits and safeguard other ratepayers.

Clean energy tariffs are vital to meeting the intersecting challenges of load growth, affordability, and reliability.

Well-designed tariffs enable customer-driven clean energy investment while protecting ratepayers and strengthening the grid.

Regulators are critical to building the enabling environment for scaling solutions.

4. **Bilateral agreements are shaping tomorrow's tariffs.** Many hyperscaler agreements profiled — across nuclear, geothermal, and hydro — are proof points but not end states. They demonstrate how customer-driven investment can de-risk emerging technologies and could help inform considerations in developing tariff structures that enable participation by a broader base of large energy customers.

5. **Clean energy tariffs can strengthen local outcomes.** Beyond emissions reductions, these programs increasingly support economic development, local reliability, and grid modernization, especially when clean energy resources are sited near growing loads. Large customers help anchor investment in host communities while keeping shared infrastructure costs broadly distributed.

6. **Regulators can play an important role in scaling solutions.** The experience of early adopters highlights clear opportunities for state regulators to enable replication and scale:

    - Standardize core tariff frameworks while preserving flexibility;
    - Provide clear, predictable approval pathways for both standard and nonstandard contracts;
    - Ensure timely cost-recovery certainty for utilities;
    - Encourage early collaboration before IRPs and large load filings; and
    - Explicitly recognize the reliability, affordability, and economic development value of clean firm resources.

Looking Ahead

Clean energy tariffs are not a niche solution — they are becoming a critical bridge between rising electricity demand, clean energy innovation, and system-level planning. When thoughtfully designed, these structures enable large customers to help finance next-generation clean firm resources, accelerate technology commercialization, and strengthen system reliability, all within established utility and regulatory frameworks.

This publication is intended to be both a practical resource and a call to action. By synthesizing early successes and emerging models, CEBA aims to equip policymakers, utilities, and energy buyers with the tools needed to scale what works. As load growth accelerates, thoughtful rate design and collaboration will be essential to building a clean, reliable, and affordable power system. Clean energy tariffs are increasingly central to that path forward.

Introduction

Background

The Corporate Energy Buyers Association (CEBA) has been tracking utility programs since 2020, with prior publications summarizing more than 50 green tariff programs at 40 utilities across 28 states.

Green tariffs, which first emerged in 2013, allow customers to access renewable energy resources like solar and wind through their utility. Customers receive credit for RECs — tradable documents that prove electricity was generated from renewable sources — and, in some cases, a financial credit on their bill reflecting the market value of the power generated.

First-generation green tariffs emerged as utilities responded to growing customer demands for cleaner, cost-competitive energy with stable or predictable pricing. By committing long-term demand and providing revenue certainty, customers played a catalytic role in creating early markets for emerging clean energy technologies — helping de-risk projects, enable first-of-a-kind deployments, and accelerate deployment at scale. The green tariff mechanism proved essential for facilitating investment in these renewable sources, and over time, renewables have become the most rapidly expanding electricity source in the U.S.

Expansion of Utility Green Tariff Programs

Although first-generation green tariff programs remain important today, the market is evolving. As U.S. electricity demand surges from new data centers, manufacturing facilities, and electrification, utilities must find new ways to bring additional clean resources onto the grid. This need has been compounded by rising electricity prices. Consequently, large load customers and electric utilities are now exploring new ways to build on utility green tariffs to unlock clean firm power without raising electricity rates for the broader customer base.

Clean firm power is dispatchable, carbon emissions-free generation, that is available on demand with high reliability. For the purposes of this report, clean firm technologies include nuclear (restarts of conventional nuclear plants, uprates, and new advanced nuclear), advanced geothermal, fusion,[2] hydropower (including uprates and new projects), long-duration energy storage, and gas with carbon capture and storage (CCS).

Additionally, certain new utility programs facilitate investment in transmission infrastructure, including advanced transmission technologies, as well as distributed energy resources (DERs) and demand-side management (DSM).

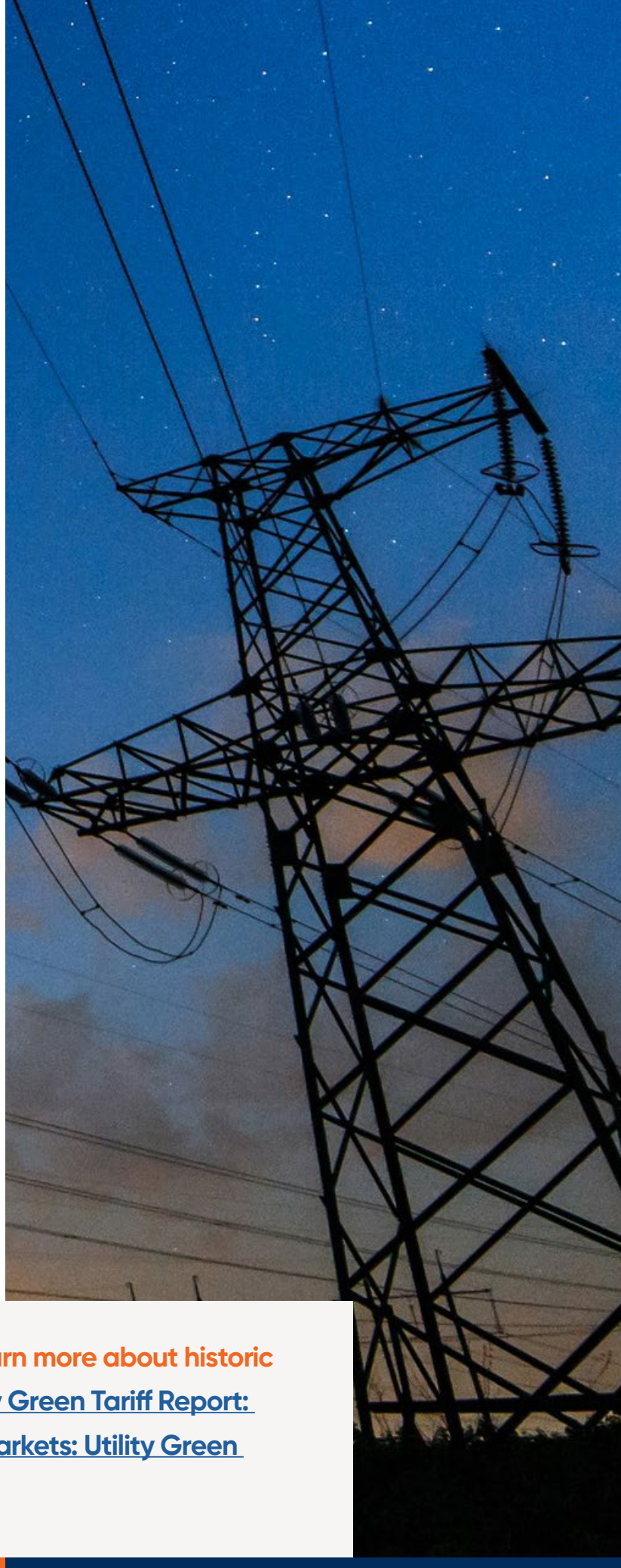
[2] Fusion energy is included in this definition for completeness as a potential future source of clean firm power. As of this publication, no fusion technology has reached commercial operation, and no utility clean energy tariff or bilateral agreement profiled in this report involves fusion. However, several fusion developers have announced timelines targeting demonstration plants in the late 2020s and early 2030s, and corporate energy buyers have begun executing early-stage agreements for future fusion output. Should fusion reach commercial viability, the tariff structures and procurement models described in this publication could be adapted to accommodate it.

Publication Scope

This CEBA publication focuses on innovative **utility clean energy tariffs,** which can enable large electricity customers to invest in clean firm resources and capacity optimization solutions on a utility's grid; influence utility resource planning; and bring downward pressure on rates. This publication also includes illustrative examples of recent clean firm energy projects and partnerships between utilities and large load customers, which offer lessons for creative procurement mechanisms and can lay the foundation for expanding on or introducing a new clean energy tariff in a given service territory.

Building on CEBA's history of tracking utility green tariffs, this publication serves as a resource for energy customers who may be interested in investing in new clean firm energy resources through emerging utility programs. This publication seeks to help utilities and regulators better understand program design elements in emerging clean energy tariffs and inform the development of future programs.

Given the focus on programs that unlock new clean firm resources on the grid, this publication excludes first-generation utility green tariffs, community solar programs (through which corporate customers act as anchor tenants for solar installations in their local communities), and green pricing programs (through which customers purchase unbundled RECs without a long-term commitment). In the coming year, CEBA will release another publication to capture the full landscape of available utility green and clean energy tariff programs.



If you are an energy customer looking to learn more about historic green tariff programs, see CEBA's U.S. Utility Green Tariff Report: January 2023 Update and U.S. Electricity Markets: Utility Green Tariff Update December 2020.

Trends in Corporate Procurement and Utility Tariffs

Corporate Clean Energy Procurement

Corporate clean energy procurement has totaled 143.8 GW of capacity since 2014, including 27.3 GW in 2025, according to CEBA's Deal Tracker. In total, 250 corporate buyers have announced deals in the U.S. since 2014, ranging from PPAs, green tariffs, bilateral deals with utilities, energy storage agreements, energy customer tax equity investments, and direct project ownership.

Since 2014, almost 10% of the capacity announced by corporate buyers has been through a green tariff program. The dominant procurement model has been wholesale market PPAs, representing over 70% of deals announced since 2014. These PPAs have helped corporate buyers deploy the lowest cost renewable resources, but they have done so largely outside of utility resource planning. Consequently, customers have continued to depend on fossil resources for baseload power to manage the intermittency of wind and solar.

Thus, large commercial and industrial (C&I) customers are pursuing clean firm resources to meet their growing energy demand, maintain progress toward their carbon emissions-free energy commitments, and support commercialization of emerging technologies while protecting other ratepayers.

In 2025, CEBA tracked over 5.8 GW of clean firm deals, involving nuclear, fusion, hydro, geothermal, and CCS projects, which represented over 21% percent of total corporate clean energy procurement that year. Nuclear energy has gained significant momentum in corporate energy procurement. In 2025, corporate buyers purchased 5.1 GW of nuclear energy capacity through contracts, overtaking wind as the second-greatest technology in terms of total capacity purchased by large voluntary corporate buyers that year. This highlights a shift in corporate clean energy strategies, with nuclear now playing a major role alongside solar and wind.

Emergence of Utility Clean Energy Tariffs

Many clean firm technologies are in their early stages and relatively costly and have, therefore, not yet been deployed by electric utilities at scale. CEBA members, particularly large technology companies, have been collaborating with electric utilities to design innovative rate structures to add emerging clean firm technologies to the grid. These clean energy tariffs allow large customers to pay for and drive the selection of specific resources that provide power to the utility's entire system. This includes selection of clean firm resources, with potentially higher upfront capital deployment costs and investment risk profiles, which the utility would not select through its traditional planning and procurement processes.

Clean energy tariffs are also designed to ensure costs are not shifted to nonparticipating customers. Utility ratepayers benefit from diversification of the utility's generation mix and investment in the next fleet of energy technologies. Additionally, as the commercial viability of these new technologies improves and deployment scales, costs may decline over the longer term, as evidenced by the increasing competitiveness of solar, wind, and battery technologies in recent years.

Alignment With Utility Large Load Tariffs

The emergence of clean energy tariffs is closely tied with the simultaneous development of large load tariffs, which address rising energy costs and C&I energy demand outstripping current supply. State-level policymakers are increasingly requiring utilities to create these large load tariffs, with various states enacting mandates in 2025, including Minnesota, Missouri, Oregon, Texas, and Virginia. As of March 2026, 77 large load tariffs were approved or pending across the country, including 29 approved in 2025, according to the Smart Electric Power Alliance (SEPA) and North Carolina Clean Energy Technology Center.

These large load tariffs have common features, such as long-term contract lengths, minimum demand charges, requirements for upfront collateral, and provisions for early exit or termination. Such measures were reinforced in the White House's recent Ratepayer Protection Pledge, a voluntary commitment signed by leading AI companies and hyperscalers.

Utility large load tariffs can also include riders or be paired with complementary tariffs that allow customers to identify and pay for generation resources, which can accelerate the process for bringing new generation capacity online. Clean energy tariffs featured in this report are designed to bring new **system resources** onto the grid, rather than behind-the-meter, islanded generation assets. This concept of "bring your own clean energy" has been adopted by early mover utilities, allowing C&I customers to identify and fund clean firm resources and renewables with battery storage that can be integrated into the utility's grid. Some of these clean energy tariffs are also accompanied by mechanisms that allow for investment in DERs, such as energy efficiency, as well as transmission (including advanced transmission technologies), which allows for greater grid optimization and benefits local communities.

Key Takeaways

Clean Energy Tariffs Come in Multiple Structural Forms

Clean energy tariffs can take several forms: a rider attached to a large load tariff, a "companion" added to a large load (or other baseline) tariff, or a standalone tariff that allows the utility and the customer to enter special contracts for each new clean firm energy project.

Within these options, either the utility or the customer can drive the procurement process. Utilities or a third-party provider can construct new clean firm energy projects. If the latter, the utility would use a "back-to-back" or "sleeved" PPA. In that case, the utility would have a PPA with the developer to buy power and associated environmental attribute certificates (EACs), followed by a separate PPA with the customer for resale of energy and attributes.

In some scenarios, the requesting customer does not directly receive energy or capacity from the incremental clean energy resources developed through the program. But they do receive a bill credit for the energy of the underlying clean energy resources, and in some cases for the capacity as well. Ideally, the tariff would provide customers with both energy and capacity credit for the new resource, as seen in emerging program designs. In addition to this bill credit, the load ratio share of any EACs associated with the new clean energy resource is transferred to the customer, accounted for, and either shared with the customer or retired on the customer's behalf.

For many of the clean energy tariffs included in this report, utilities are required to secure approval, whether from the regulators of investor-owned utilities or the boards of public power utilities, before they can add new clean firm capacity to the grid. For some tariffs, the approval process is directly tied to the IRP schedule for the utility, while others offer more flexibility.

Core Design Principles: Ratepayer Protection and Transparent Frameworks

A common design feature across many clean energy tariffs examined in this report is the mechanism to ring-fence costs, so only the requesting large load customer pays for the new clean firm resources to come online, and other ratepayers are insulated. Also, numerous utilities are seeking innovative clean energy tariff designs that create near-term, downward pressure on rates systemwide by replacing uneconomic fossil-fuel-based generation technologies with clean firm resources paid for by large load customers.

As clean energy tariffs are implemented and more data becomes available, it will be important for regulators and other independent entities to assess the impacts of these programs on rates and capture lessons learned for refining programs in the future.

It's important to note that large load tariffs often include minimum demand charges as an affordability and cost-recovery mechanism. Large load customers help de-risk utility system investments by making commitments through demand charges or similar mechanisms. However, without a transparent framework for crediting a customer for funding new capacity on the grid,

there can be a disincentive for customers to bring new clean firm projects forward. Working collaboratively with these customers to support their clean energy commitments — many of which are driven not only by decarbonization goals, but also by the need to hedge against fossil fuel price volatility and broader cost uncertainty — offers a mechanism to bring needed capacity onto the system without putting that burden on all ratepayers.

Also, the process of developing and securing approvals for new tariffs can be time and labor intensive. Thus, adequate staffing, training, and industry resources regarding rates and ratepayer protection could help ensure these tariffs work together to responsibly satisfy load growth to maximum effect and in a timely manner.

State-Level Policy Can Enable or Accelerate Tariff Development

Several of the clean energy tariffs and bilateral agreements included in this publication were developed in states where utilities are required by statute to reach a net-zero or 100% clean energy standard. As of March 2026, 19 U.S. states and territories have these binding clean energy requirements in place, including Michigan, Minnesota, New Mexico, Oregon, and Virginia, according to SEPA's Utility Carbon-Reduction Tracker. Such laws provide the needed regulatory certainty for utilities to invest in new clean energy resources. However, emissions reporting requirements are evolving, and further discussion is needed between buyers and utilities to address the accounting complexities that can emerge at the intersection of mandatory and voluntary procurement.

In Minnesota's statute, the state's Renewable Energy Standard requires utilities to have 100% carbon-free electricity generation by 2040. Furthermore, the state's 2025 data center law requires the Minnesota Public Utilities Commission to (a) approve any electricity service agreements between utilities and data centers, which must meet the state's renewable energy, solar, and carbon-free standards, and (b) require each electric utility to offer a clean energy and capacity tariff for C&I customers. Together, these laws created an enabling environment for a partnership between Google and Xcel Energy Minnesota for new solar and wind paired with battery storage to be added to the grid, pending the commission's approval, as well as longer-term development of a clean energy tariff.

Other state-level policies, such as incentives to attract and expand C&I businesses, can also support development of clean energy tariffs. For example, although Georgia does not have a clean energy mandate, alignment around other economic development objectives enabled CEBA, Georgia Power, and Georgia's Public Service Commission to reach an agreement on the Customer Identified Resource (CIR) program. This recently approved program will allow C&I customers to identify and fund new clean energy projects on Georgia Power's grid.

Early Collaboration Drives Durable Outcomes

Representatives from both utilities and CEBA member companies acknowledge the importance of collaboration early in the process for developing effective clean energy tariffs. The sooner a large load customer engages with a utility, whether through a series of convenings or a formal utility stakeholder process, the more time they have to understand needs and constraints across both parties. It also allows more time to design and refine programs that do no harm to nonparticipating customers, while effectively bringing needed capacity through new generation sources and grid optimization solutions.

Similarly, it is crucial for public utility commissions (PUCs) to demonstrate openness to innovative solutions, experimental tariffs, and new rate design structures that utilities and large energy buyers collaborate on, while ensuring that these support a reliable, efficient, and affordable electricity system for all customers. Since trust-building and collaboration take time, regulators could add value by encouraging such engagement prior to consideration of utility proposals intended to serve large loads.

Effective Collaboration Can Align Customers With Effective Grid Outcomes

Effective collaboration requires each party to bring specific strengths to the table. Large energy buyers bring market intelligence, willingness to absorb incremental costs, and insights on procurement structures from other jurisdictions that can strengthen program design. Utilities contribute essential knowledge of system operations, regulatory requirements, and rate design. Building this mutual understanding takes time, but the tariff programs profiled in this publication demonstrate that the investment in early collaboration produces more durable, well-balanced outcomes.

Clean energy tariffs offer a tool for utilities to attract and retain C&I customers with ambitious clean energy commitments. To collaboratively develop, negotiate, and gain approval for these new tariffs, customers need to articulate clear objectives, identify strengths and weaknesses of program design elements from other jurisdictions, and be transparent about their load growth timelines and technology preferences. Utilities need leadership buy-in to embrace creative solutions to meet load growth with clean firm resources, supported by adequate internal staffing to shepherd these programs.

While some utilities may initially perceive large buyer engagement as overreach into utility operations, the experience of programs profiled here suggests that sustained, good-faith collaboration builds the trust necessary for innovative program design. These programs also highlight the partnership that large load customers and their local utilities can develop through sustained engagement, better ensuring loads and generation remain part of the larger grid to ensure system benefits.

Customers Share Common Needs and Preferences for Procuring Clean Energy

A consistent theme across the tariff programs and bilateral agreements profiled in this report is the importance of **customer agency** in the procurement process. Large energy buyers seek the ability to influence or directly select the clean energy projects that will serve their load, including the option to work with a third-party developer to identify a specific project and bring it to the utility for procurement. This "bring your own resource" model gives customers a meaningful role in technology and project selection, rather than limiting them to the resources the utility chooses through its standard planning process.

Flexibility, in contract structure and terms, is another priority. While utilities typically require long-duration commitments to support project financing — often 10 to 30 years — customers benefit from having a range of term length options that can be matched to their own operational planning horizons, corporate commitment timelines, and technology risk tolerance. The tariff programs in this report reflect a range of approaches, each allowing term lengths to be tailored to the specific project and customer, while still ensuring costs are not shifted to other customers on the system.

Customers also value the ability to **aggregate demand**, both across their own facilities and with other buyers. Aggregation provisions — such as those in the Georgia Power, NV Energy, and SRP programs — allow customers to pool multiple sites under common ownership to meet minimum load thresholds. Beyond single-buyer aggregation, there is growing interest in structures that enable multiple customers to co-invest in a single project, sharing costs and output to achieve economies of scale that no individual buyer could reach alone. The Amazon–Energy Northwest small modular reactor (SMR) agreement, in which public utilities may purchase ownership stakes alongside Amazon, offers one model for this kind of multi-party participation.

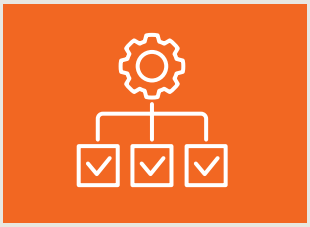
Large energy buyers increasingly view clean energy procurement as part of a broader strategy that includes **DSM, energy efficiency, transmission, and the possibility of aggregation of distributed resources for virtual power plants.** Programs that integrate or complement efficiency measures alongside new generation — such as Ameren Missouri's inclusion of DSM and energy efficiency within its Clean Energy Choice Program resource eligibility — allow customers to optimize their total energy footprint rather than treating supply-side procurement and demand reduction as separate efforts.

Finally, many large load customers are seeking to **bring clean energy investments to local communities** where their loads are growing, ensuring those communities are meaningfully engaged and are benefitting from economic development, improved grid optimization and reliability, and environmental benefits.

How Regulators Can Enable Replication and Scale

Based on the experience of these early movers, regulators have clear opportunities to enable broader replication through:

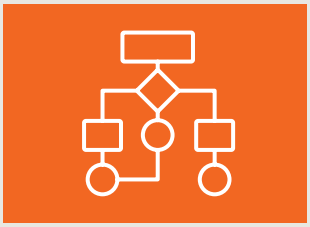
Greater standardization of tariff structures and core contract terms across different utilities, while preserving flexibility to negotiate customized contract terms and project-specific provisions that reflect distinct operational, financial, or technology needs;



Clear, predictable, collaborative, and efficient processes for reviewing and approving both standard and nonstandard tariff arrangements and contracts;

Timely cost-recovery certainty for utilities undertaking these projects, reducing financial risk and supporting system planning;

Proactive adoption of new models, so the state is ready and signaling early that it wants to leverage large loads for grid modernization;



A broad approach to **eligibility and applicability,** providing paths for both existing customers and those with new incremental load; and

A regulatory framework that **recognizes and values the reliability, environmental, and economic development benefits** of clean firm power projects.

Emerging Utility Clean Energy Tariffs

Below are program summaries of select utility clean energy tariffs. This is not an exhaustive list but rather a snapshot in time of emerging programs. Program summaries included below draw upon utility websites, PUC dockets, final tariff documents, and, if possible, direct engagement with utility executives.

Several emerging utility programs are not included below because the clean energy tariffs have yet to be filed with the respective PUCs, such as Indiana Michigan Power's anticipated CTT (as required by a 2024 settlement agreement) and Xcel Energy Minnesota's anticipated clean energy and capacity tariff (as required by statute).

CEBA will continue to produce updates on emerging utility clean energy programs over time. For complete and up-to-date details of each program, see the appropriate docket or filing number listed in the tables below, or contact the utility directly.

NV Energy

OVERVIEW

In June of 2024, NV Energy and Google announced the CTT, a first-in-kind, replicable mechanism for utilities and large load customers to accelerate deployment of clean firm resources, such as advanced geothermal, onto the grid. The CTT was also developed in response to guidance from the Public Utilities Commission of Nevada (PUCN), which recognized the need for such a tariff to service large load customers with dedicated clean energy resources.

Through the CTT, nonresidential customers with loads of 5 megawatts (MW) or more can partner with NV Energy to identify and fund clean resources that provide value to the overall system in a manner that does not shift costs to other ratepayers. The CTT allows for a collaborative process through which the utility and customer come together to mutually identify resources that (1) are accelerative and (2) meet the needs of the system and the customer.

Each participating customer signs with NV Energy a bespoke Energy Supply Agreement (ESA) for their requested new clean energy project, which must demonstrate to be in the public interest to secure PUCN approval. Participating customers then pay a premium rate for energy and capacity from a new clean energy project and receive credits on their bills for full retail-embedded energy and capacity costs. Through this structure, the CTT complements the customer's standard base rate tariff, enabling acceleration of investment in new clean energy resources to serve a portion of the customer's load while ensuring full payment for the customer's reliance on the shared system.

If the CTT's clean resources have not already been approved by the PUCN, the ESA needs to be filed with NV Energy's IRP or IRP Amendment.

To date, NV Energy and Google have leveraged the CTT for new geothermal projects, including:

- An ESA for 115 MW of advanced geothermal power (developed by Fervo Energy) was approved by the PUCN in May of 2025, and
- An ESA for up to 150 MW of new geothermal capacity (developed by Ormat) was signed in February of 2026 and is pending approval by the PUCN.

In addition, Las Vegas Convention and Visitors Authority successfully filed for reconsideration of its CTT under docket 24-06012 at the PUCN.

SUMMARY TABLE

NV Energy	
Tariff Name	Schedule No. CTT – Clean Transition Tariff
Tariff Type	Standalone special contract tariff
Utility Type	Investor-owned utility
Program Size/Period	Not specified
Customer Eligibility	Nonresidential service customers with an average annual hourly load of 5 MW or more based on a consecutive 12-month rolling average.
Aggregation of Customer Facility Demand	Governmental entities can aggregate facilities under a common budget and common control. Nongovernmental entities that receive PUCN approval can aggregate facilities that individually have an average annual hourly load of 1 MW or more based on a consecutive twelve-month rolling average.
Resource Eligibility	CTT facilities are clean energy resources, including renewable energy resources listed in Nevada Revised Statutes § 704.7811, which are identified by name in the ESA and approved by the PUCN. According to Nevada Revised Statutes § 704.7811, "renewable energy" means biomass, geothermal energy, solar energy, waterpower, and wind. The term does not include coal, natural gas, oil, propane, or any other fossil fuel, or nuclear energy.
Contract Time Commitment	To be determined in each ESA, the term length must match the life of the CTT facility.
Contract Structure	To be determined in each ESA.
Customer Cost Structure/ Pricing and Credit Details	Participating customers will pay the following rates and charges: • The Basic Tariff General Rate of the customer's otherwise applicable rate schedule, with the cost of generation capacity and energy supply removed through bill credits • Demand charge(s), if applicable, under the otherwise applicable rate schedule • Facilities charge(s), if applicable, under the otherwise applicable rate schedule • The Basic Service Charge of the otherwise applicable rate schedule • The Universal Energy Charge (which goes to the Nevada Fund for Energy Assistance and Conservation State Plan) • Franchise fees, taxes and mill assessment that are assessed under the otherwise applicable rate schedule • Public program costs unless exempted by any applicable law or order of the PUCN • An energy charge as specified in the ESA between the customer and NV Energy Participating customers will not pay the net base tariff energy rate or deferred energy accounting adjustment, unless specified in the ESA.
Resource Procurement Process	Not specified
REC Management	NV Energy will retire, or transfer to the customer to retire, portfolio energy credits in compliance with the RPS.
Regulatory Process/Timeline	Application filed in May 2024, approved in March 2025, revised tariff filed in June 2025; ESA (for NV Energy-Google-Fervo 115-MW enhanced geothermal project) approved in May 2025.
Enrollment Process & Status	Not specified. Customers should reach out to their point of contact in the utility.
Docket Information	Docket No. 24-05023 and No. 24-05022 (CTT) Docket No. 24-06014 (ESA)
Utility Program Website/ Tariff Document	Not available

Xcel Energy – Colorado

OVERVIEW

On April 2, 2026, Public Service Company of Colorado (Xcel Energy) filed its large load tariff with the Colorado Public Utilities Commission, pursuant to commission direction in the Just Transition Solicitation (JTS) Phase I Decision (Decision No. C25-0747). At the time of releasing this CEBA publication in May 2026, the large load tariff remains under consideration with the commission and has not yet been approved.

The filing establishes a new customer class — Schedule TL (Transmission Large Service) — for new C&I customers with loads of 50 MW or greater. The filing also creates an optional Schedule CTT that allows eligible TL customers to voluntarily sponsor advanced clean energy resources. Together with updates to Xcel's Transmission Line Extension Policy, these schedules form an integrated framework designed to accommodate significant large load growth, primarily from data centers, while protecting existing ratepayers from cost shifts.

Schedule CTT is implemented through approval in the large load tariff proceeding, with individual resource selections proceeding under existing commission rules rather than separate Certificate of Public Convenience and Necessity (CPCN) proceedings and enrollment occurring after execution of an Electric Service Agreement and Interconnection Agreement. The CTT is limited to emerging and advanced carbon-free generation technologies consistent with the commission's Carbon Free Future Development (CFFD) definition, which excluded commercially mature wind, solar, and short-duration storage.

It is expected that the large load tariff proceedings will be discussed through the end of 2026, after which the tariff could be adopted. The final details could differ from the information captured in the summary table below.

SUMMARY TABLE

Xcel Energy – Colorado	
Tariff Name	Clean Transition Tariff (Schedule CTT)
Tariff Type	Optional rider, through a special contract tariff, paired with large load tariff
Utility Type	Investor-owned utility
Program Size/Period	No predefined program cap; participation is customer-driven. Project size and timing depend on customer elections and resource availability.
Customer Eligibility	Retail transmission-level electric service customers with new or incremental load ≥ 50 MW at a single premises who qualify as Transmission Large Customers and take service under Schedule TL; execution of an ESA and Interconnection Agreement (IA) is required.
Aggregation of Customer Facility Demand	Multiple large load customers may partner to support a single eligible CTT resource. Partnerships with non-large load customers may be considered, subject to commission review.
Resource Eligibility	Emerging and advanced carbon-free electric generating technologies consistent with the CFFD definition, including (but not limited to): geothermal, hydroelectric, hydrokinetic, nuclear, renewably sourced hydrogen, long-duration energy storage, and fossil generation with active carbon capture meeting U.S. Environmental Protection Agency (EPA) requirements. Excludes commercially mature wind, solar, short duration storage, and carbon-emitting generation without capture.
Contract Time Commitment	Governed by the ESA and IA minimum-term requirements approved for Schedule TL customers. Specific resource contracts associated with CTT projects may have technology-specific terms.
Contract Structure	Customer remains on Schedule TL rates and receives an additional CTT bill line item reflecting the incremental cost of the selected clean resource. This could be through back-to-back PPAs or utility-owned resource arrangements consistent with tariff terms.
Customer Cost Structure/ Pricing and Credit Details	Customer pays all incremental costs of the selected resource, including energy or revenue requirement, transmission and system integration costs, curtailment or fuel costs (if applicable), and administrative costs associated with the program. Under the proposal, the customer gets a full retail credit for the capacity and energy provided by the resource when matched with customer demand and an avoided cost credit for excess energy and capacity.
Resource Procurement Process	Resources may be identified through customer-specific proposals, CFFD solicitation pathways, or other commission-authorized procurement mechanisms.
REC Management	Environmental attributes (including RECs) are retained by Xcel Energy for the benefit of all customers. A customer may negotiate retention or transfer of attributes through the ESA at a commission-reviewed transfer price.
Regulatory Process/Timeline	Program proposed and filed with commission on April 2, 2026, as part of the large load tariff proceeding.
Enrollment Process & Status	Not yet open for enrollment, initial program proposal filed on April 2, 2026.
Docket Information	Colorado Public Utilities Commission, Proceeding No. 26AL-0137E
Utility Program Website/ Tariff Document	N/A

Public Service Company of New Mexico (PNM)

OVERVIEW

PNM originally developed Rate 36B, Special Service Rate – Renewable Energy Resources, in 2016 in collaboration with Greater Kudu and approved by the New Mexico Public Regulation Commission (NMPRC). Rate 36B has allowed Greater Kudu and PNM to enter into a Special Service Contract (SSC) for PNM to procure dedicated renewable energy to service the customer's load.

Over the years, PNM has revised Rate 36B on six occasions (most recently in 2025), in an effort to meet the customer's load growth and broaden the scope of clean resources to include storage. Rate 36B is now available to customers that meet key eligibility criteria, including 10 MW minimum demand, annual load factor of 60%, and requesting at least 10 MW of new clean energy resources on PNM's grid. Any SSC must be approved by the NMPRC.

Rate 36B includes measures to shield residential ratepayers from cross-subsidization. For example, participating large load customers must install, fund, own, operate, and maintain all substation and distribution transformers for utilizing PNM's service at 115 kV or higher, and pay for any transmission upgrades or extensions needed for their clean energy project.

Rate 36B has two companion riders: (a) PNM's Green Energy Rider (Rider 47) ensures the participating customer covers all costs associated with the clean energy resources procured to meet their load, and (b) PNM's Production Cost Allocation Rider (Rider No 49) protects other PNM customers from a potential under-allocation of production-related costs incurred to serve the Rate 36B customer(s).

To date, Rate 36B drives investments in wind and solar through PPAs, which can be paired with ESAs, between PNM, large load customers, and third-party developers.

SUMMARY TABLE

Public Service Company of New Mexico (PNM)	
Tariff Name	Special Service Rate – Renewable Energy Resources. Rate No. 36B
Tariff Type	Special contract tariff
Utility Type	Investor-owned utility
Program Size/Period	Not specified
Customer Eligibility	• New customers cannot have previously received electric service from PNM. • Customer must enter into an SSC for a term equal in length to their payment obligations for clean energy resources in the SSC and approved by the NMPRC. • Minimum customer demand of 10 MW. • Customer must maintain an annual load factor of at least 60%. • Any new customer must cause the addition of SSC resources of 10 MW-ac or more to be acquired by PNM. • Customer must meet all requirements of the Green Energy Rider (Rider No. 47).
Aggregation of Customer Facility Demand	Not specified. Currently, service is offered to one or more facilities located at a single site.
Resource Eligibility	Renewable energy under the current SSC is defined as: "...electrical energy generated from a source that (i) is not fossil carbon-based and (ii) constantly renews itself or that is regarded as practically inexhaustible, which may include without limitation solar, wind or geothermal technologies."
Contract Time Commitment	To be determined in the SSC, must coincide with length of the PPA/ESA
Contract Structure	To be determined in the SSC
Customer Cost Structure/ Pricing and Credit Details	Participating customer pays for the full cost of the clean energy resources.
Resource Procurement Process	PNM can issue a request for proposals on behalf of the customer, or customers can bring their own resources.
REC Management	To be determined in the SSC
Regulatory Process/Timeline	Originally approved in 2016; sixth revision application submitted in June 2025 and approved in December 2025.
Enrollment Process & Status	Not specified. Customers should reach out to their point of contact in the utility.
Docket Information	Case No. 25-00048-UT (Sixth revision of Rate 36B, amended Rider 47 and Rider 49, amended SSC with Greater Kudu, three PPAs and three ESAs).
Utility Program Website/ Tariff Document	Sixth Revised Rate 36B and Rider No. 47 Green Energy Rider (https://www.pnm.com/rates)

Georgia Power's Customer Identified Resource Option

OVERVIEW

CEBA first proposed a "bring your own"-style customer program for clean energy resources in Georgia Power's 2023 IRP update. Through that IRP process, CEBA and Georgia Power entered into a letter agreement through which they agreed to work together to develop a new program the utility would include in its 2025 IRP.

Georgia Power met with CEBA and CEBA member companies several times throughout 2024 to discuss customer needs and key program design elements. Georgia Power then proposed and received approval for the CIR option as part of its 2025 IRP, which outlined the framework for the new program. Additional details to implement the CIR program were filed in November 2025 and February 2026 and approved in a final version in April 2026. The CIR program will open to customers and project developers in June 2026.

SUMMARY TABLE

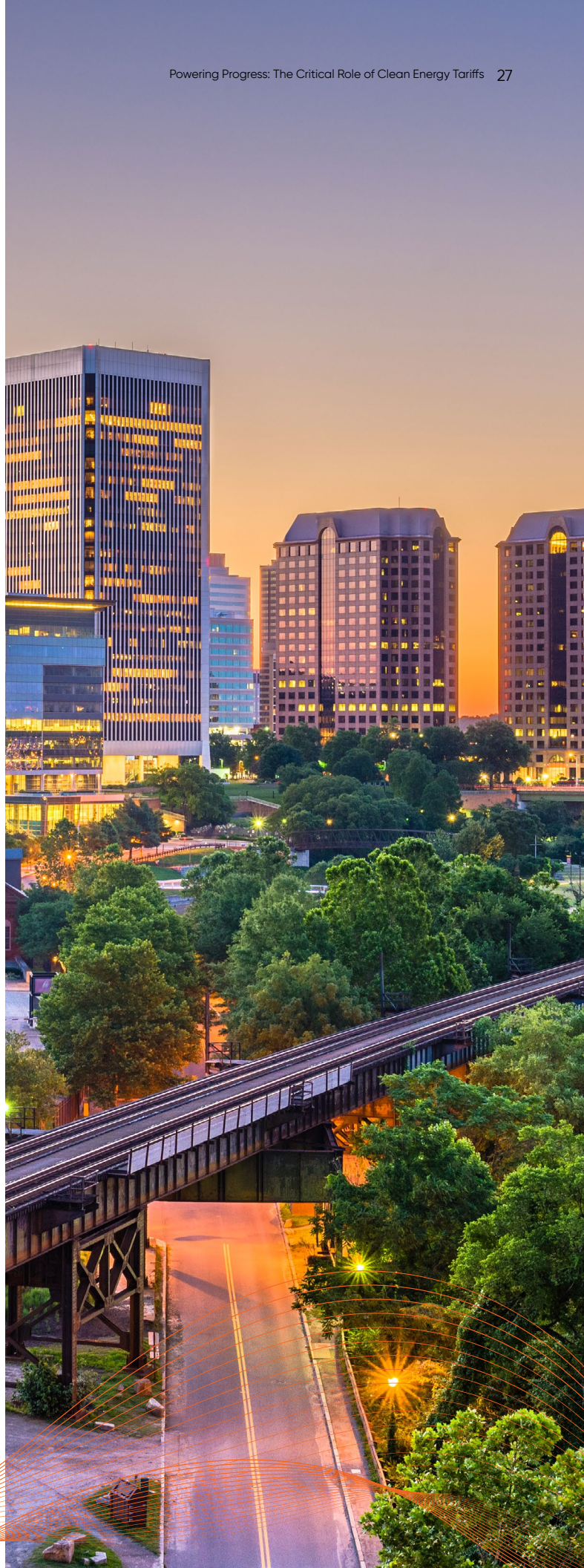
Georgia Power	
Tariff Name	Customer Identified Resource (CIR) Option [Under the Clean and Renewable Energy Subscription (CARES) Program]: Schedule CARES CR-1 and CARES DG-1
Tariff Type	Back-to-back PPA model
Utility Type	Investor-owned utility
Program Size/Period	Up to 3,000 MW by 2035
Customer Eligibility	• Utility-scale CIRs: C&I customers with annual peak demand of at least 3 MW • Distributed generation CIRs: C&I customers with annual peak demand between 1 MW to 3 MW
Aggregation of Customer Facility Demand	Customers may aggregate premises to reach the demand thresholds, provided premises are under a common ownership or control. NOTE: Multiple customers may also bring forward a single CIR project.
Resource Eligibility	Renewable energy resources, including renewables paired with storage. Utility-scale CIRs: Greater than 6 MWac Distributed generation CIRs: Greater than 250 kWac and ≤6 MWac
Contract Structure	Participation requires execution of a CARES CIR Customer Agreement between the customer and Georgia Power. The subscription term coincides with the CARES CIR Customer Agreement term selected. Georgia Power contracts for and owns or procures the energy from the customer identified renewable resource selected through the CARES CIR process. Customers continue to receive bundled electric service from Georgia Power, with CARES charges and credits applied through the tariff as a separate line item.
Customer Cost Structure/ Pricing and Credit Details	Standard general retail service applies, plus the CARES CIR program charge and credit. Pricing is structured as a set price per kWh (CARES CIR Price) and includes: • Levelized weighted average supply cost of the subscribed resource; • Levelized transmission cost (for utility-scale projects); • Renewable integration cost (per commission-approved rates at contracting); • A levelized additional sum; • An administrative fee; and • An optional community adder fee. Customers receive hourly CIR credits reflecting Georgia Power's hourly avoided operating costs of incremental generation. If hourly credits exceed the CARES CIR Price, excess value is shared 75/25 between participating customers and all retail customers via fuel cost recovery.
Administrative Fees	Administrative fees are embedded in the CARES CIR Price and applied for the full contract term: • $0.00035/kWh for Utility-Scale (CARES US) projects • $0.00085/kWh for Distributed Generation (CARES DG) projects In addition, customers must pay: • $1,000 fee to access CIR program website • Project evaluation fees of $15,000 (CARES US) or $3,750 (CARES DG) for each CIR submission, subject to waiver, reimbursement, or pro rata allocation if multiple customers subscribe to the same resource.

Georgia Power	
Resource Procurement Process	Resources are procured through an extended RFP period following Georgia Power's standard Utility Scale or Distributed Generation RFPs, if subscription demand remains unmet. Customers may: • Propose a CIR in partnership with an RFP participant; or • Select from a pool of CIR submissions offered during the extended RFP period. Georgia Power evaluates CIR submissions using the applicable RFP's evaluation criteria, including a net benefit test relative to the average net benefit of certified RFP projects. Customers may be required to adjust pricing or post collateral if a selected CIR does not meet the net-benefit threshold.
REC Management	RECs will be retired by Georgia Power on behalf of customers.
Contract Time Commitment	10, 15, 20, 25, or 30 years for utility-scale projects. Up to 35 years for DG projects
Regulatory Process/Timeline	• CIR framework approved as part of Georgia Power's 2025 IRP in July 2025 • CIR Addendum to 2025 CARES RFP: Approved December 2025 • CIR tariff filed February 2026 • Updated CIR tariff approved April 2026
Enrollment Process & Status	Eligible customers must: • Register through the CARES CIR website; • Pay applicable access and evaluation fees; • Select or propose a CIR during an extended RFP period; and • Execute a CARES CIR Customer Agreement upon successful evaluation. Enrollment remains open until available subscribed capacity is filled, the enrollment window closes, or the next RFP cycle begins.
Docket Information	2025 IRP: Georgia PSC Docket # 56002 CIR Addendum to 2025 CARES RFP: https://psc.ga.gov/search/facts-document/?documentId=224579 CARES Program: Georgia PSC Docket #44847
Utility Program Website/ Tariff Document	CARES FAQs

Dominion Energy Virginia

OVERVIEW

Dominion's Schedule CFG — Carbon-Free or Renewable Generation Supply Service — was approved in December 2024. Schedule CFG is an experimental, voluntary companion to approved nonresidential tariffs, replacing the predecessor green tariff, Schedule RG. Responding to requests from C&I customers, Dominion designed Schedule CFG to provide nonresidential customers the option to purchase carbon-free and renewable energy (and associated RECs) either from a new facility constructed by Dominion on the customer's behalf (while ring-fencing costs), or through a sleeved PPA with a third-party supplier.



SUMMARY TABLE

Dominion Energy Virginia	
Tariff Name	Schedule CFG: Carbon-Free or Renewable Generation Supply Service (Experimental)
Tariff Type	Companion tariff (i.e., sleeved PPA)
Utility Type	Investor-owned utility
Program Size/Period	Available to no more than 50 customers
Customer Eligibility	Nonresidential customers, including, but not limited to, the Company's Schedule GS-1, Schedule GS-2, Schedule GS-2T, Schedule GS-3, Schedule GS-4, Schedule 10, Schedule 27, Schedule 28, Schedule MBR, and Schedule SCR.
Aggregation of Customer Facility Demand	A single customer can select two or more accounts under a common legal parent to be billed through this schedule.
Resource Eligibility	• Carbon-free or renewable projects with at least 1 MW nameplate capacity. Facilities must be located within PJM. • Renewable energy resources include: solar, wind, hydro, biomass, landfill gas, municipal solid waste, wave motion, tides, and geothermal. • Carbon-free resource: derived from any electric-generating unit that does not emit carbon dioxide as a by-product of combusting fuel to generate electricity, including clean hydrogen or nuclear power.
Contract Time Commitment	Determined in each Schedule CFG Agreement
Contract Structure	• Customer executes a "Schedule CFG Agreement" that details the requirements associated with Dominion's supply of carbon-free or renewable generation to be delivered to the electrical grid on behalf of the customer. • If applicable, Dominion and a third-party supplier execute a PPA for the facility. • Customer purchases up to 100% of the net generation from a specified facility.
Customer Cost Structure/ Pricing and Credit Details	Net Schedule CFG Settlement charge or credit and an administrative charge of $500 per 30-day billing period for each facility.
Resource Procurement Process	Not specified. Clean energy facility can be owned by Dominion or contracted through a PPA.
REC Management	Retired by Dominion on behalf of the customer.
Regulatory Process/Timeline	Application filed in June 2024, approved in December 2024.
Enrollment Process & Status	Open for enrollment; customers should express interest to their key account manager.
Docket Information	PUR-2024-00114
Utility Program Website/ Tariff Document	Schedule CFG

Ameren Missouri

OVERVIEW

Ameren's Large Load Customer Service rate structure was approved in November 2025. Aligned with the 2025 state law, Missouri Senate Bill 4, this new rate structure is designed to ensure large load customers (requesting 75+ MW) pay for grid enhancements and energy costs in a way that protects other customers from unfair electricity charges.

For example, large load customers are required to pay upfront 100% of direct interconnection costs and upfront financial security and collateral requirements equivalent to two years of minimum monthly bills. They also pay a minimum monthly demand charge of 80% of their maximum requested electric demand, even if they use less, and they are required to use contract terms of 12–17 years and face penalties for early termination.

Several optional riders are available for large customers over 5 MW (Service Classification No. 11(M)), including large load customers over 75 MW, to advance their energy goals by supporting renewables, battery storage, or nuclear. These programs are complementary and can be combined to provide increased value for customers.

The **Renewable Solutions Program** is Ameren's first-generation green tariff that allows customers to subscribe to a portion of existing (or new) wind and solar projects.

The **Nuclear Energy Credit (NEC) Program** allows customers to subscribe to receive NECs associated with Ameren's nuclear energy resources. Until an NEC registry is established, Ameren will track NECs assigned to each customer annually.

The **Clean Capacity Advancement Program** provides customers a capacity product that enables storage of clean energy. Participating customers will see a charge on each monthly bill that is tied proportionally to the nameplate capacity of the Ameren-owned, commercially operational energy storage system(s) they support.

The **Clean Energy Choice Program** offers customers an option to influence Ameren's generation portfolio by requesting clean energy resources be deployed in place of (or in addition to) one or more resources selected from Ameren's IRP Preferred Resource Portfolio. This is a unique requirement that could allow for accelerated retirement of existing fossil fuel resources. Eligible resources can also include DERs, DSM, energy efficiency, and battery storage. Requesting customers will need to fully cover the incremental costs of those clean energy resources, and details will be included in a "Clean Energy Choice Agreement" that will be subject to commission approval.

SUMMARY TABLE

Ameren Missouri	
Tariff Name	Clean Energy Choice Program (Rider CEC)
Tariff Type	Optional clean energy rider for large load tariff
Utility Type	Investor-owned utility
Program Size/Period	Not specified
Customer Eligibility	Available to large customers (Service Classification No. 11(M)), with minimum monthly billing demand of 5 MW, including large load customers over 75 MW.
Aggregation of Customer Facility Demand	Ameren has discretion to aggregate multiple customer facilities if appropriate when determining applicability of large load provisions of Rate 11.
Resource Eligibility	Resources that do not contribute any net carbon emissions to the atmosphere, including DERs, DSM, energy efficiency, and battery storage.
Contract Time Commitment	To be determined in a Clean Energy Choice Agreement.
Resource Procurement Process	Within Ameren's IRP, an eligible customer can request one or more clean energy resources be deployed in place of (or in addition to) one or more resources selected in Ameren's Preferred Resource Portfolio. Ameren would prepare a separate "Clean Energy Preferred Resource Plan," which would call for the addition of the generation resources requested and funded by the participating customer, to be approved by the commission.
Customer Cost Structure/ Pricing and Credit Details	Each participating customer must cover costs associated with its specific request for clean resources.
Contract Structure	To be determined in a Clean Energy Choice Agreement.
REC Management	REC management will be determined in each Clean Energy Choice Agreement. RECs will either be retired by Ameren or transferred to the customer.
Regulatory Process/Timeline	Application filed in May 2025; approved in November 2025; revised in December 2025.
Enrollment Process & Status	Open for enrollment; visit intake website
Docket Information	ET-2025-0184
Utility Program Website/ Tariff Document	Rider CEC

Evergy Kansas and Missouri

OVERVIEW

Evergy's Large Load Power Service (LLPS) rate plan was approved in November 2025 in both Kansas and Missouri. The Missouri tariff is aligned with the 2025 state law, Missouri Senate Bill 4, and the Kansas tariff is similarly designed to ensure large load customers (with peak load over 75 MW) cover incremental costs associated with their load growth while preventing other ratepayers from subsidizing such growth.

LLPS customers in Kansas and Missouri are required to use contract terms of 12–17 years and face penalties for early termination. Regardless of actual usage, they pay a minimum monthly bill based on 80% of their contract demand, and they are required to provide two years of minimum monthly bills for collateral. LLPS customers are required to fully cover any system upgrades that are needed solely for their use.

Several optional riders are available for LLPS and other customers to participate in additional clean generation and capacity programs. These programs are complementary and can be combined to provide increased value for customers.

The **Renewable Energy Program Rider (RENEW)** is a voluntary, month-to-month program where customers can subscribe to purchase RECs with no upfront costs or contracts required.

The **Green Solution Connections Rider** allows nonresidential customers with average monthly peak demand greater than 200 kilowatts (kW) to subscribe to future-year renewable energy attributes associated with new renewable wind and/or solar generation resources for terms of 10 or 15 years.

The **Alternative Energy Credit (AEC) Rider** allows nonresidential customers with average monthly peak demand greater than 200 kW to subscribe to AECs associated with nuclear energy resources owned by Evergy. Subscription terms can be one, three, or five years.

The **Customer Capacity Rider** offers LLPS customers with their own clean energy generation capacity the option to contract directly with Evergy to help satisfy their load. Rather than selling onto the open market, customers receive a credit to their Evergy bill for using their generation capacity as Southwest Power Pool-accredited capacity.

The **Clean Energy Rider** provides LLPS customers a mechanism to influence Evergy's IRP process by requesting that clean generation resources be deployed in place of (or in addition to) one or more resources selected in Evergy's Preferred Resource Portfolio. Eligible resources can also include DERs, DSM, energy efficiency, and battery storage. Participating customers and Evergy would negotiate a commercial agreement that determines cost recovery for the selected clean resources and other details. Participating customers will receive their load-ratio share of any renewable attributes associated with their selected clean energy resource. Energy and capacity from the selected resource is used for service to all Evergy customers.

SUMMARY TABLE

Evergy Kansas and Missouri	
Tariff Name	Clean Energy Rider
Tariff Type	Optional rider for large load tariff
Utility Type	Investor-owned utility
Program Size/Period	Not specified
Customer Eligibility	Available to customers receiving permanent electric service under Evergy's LLPS rate schedule, or any prospective customers who have executed an LLPS Service Agreement with Evergy but have not yet received service under the LLPS rate schedule.
Aggregation of Customer Facility Demand	Evergy has discretion to aggregate multiple customer meters or premises when determining eligibility for Schedule LLPS.
Resource Eligibility	Clean resources can include supply-side solutions, DERs, DSM, energy efficiency, and battery storage.
Contract Time Commitment	Terms and conditions will be determined between Evergy and the participating customer in a commercial agreement. The term will be no greater than the expected life of the selected clean energy resource(s).
Contract Structure	To be determined in the commercial agreement.
Resource Procurement Process	If Evergy accepts a customer's request to deploy a clean generation resource in place of (or in addition to) one or more resources selected in Evergy's Preferred Resource Portfolio, Evergy will analyze alternative resource scenarios and develop a separate Clean Energy Preferred Resource Plan. The commission would review the Clean Energy Preferred Resource Plan as well as the commercial agreement for the clean generation resource.
Customer Cost Structure/ Pricing and Credit Details	Participating customers must cover differential costs associated with the selected clean energy resources in the Clean Energy Preferred Resource Plan, as well as administrative and other costs. The commercial agreement will determine cost recovery from the participating customer for the selected clean energy resources and any credits to the customer's bill (e.g., RECs).
REC Management	The treatment of RECs and renewable attributes associated with the Clean Energy Preferred Plan will be negotiated by the participating customer and Evergy in their commercial agreement.
Regulatory Process/Timeline	Application filed in Missouri in February 2025; approved in February 2026. Application filed in Kansas in February 2025; approved in November 2025.
Enrollment Process & Status	Prior to the execution of an IRP cycle (e.g., in Q4), existing LLPS customers should notify Evergy via their customer solutions representative that they are interested in modifying Evergy's Preferred Resource Plan. New customers should express interest during the "Path to Power" onboarding and queueing process for loads greater than 25 MW.
Docket Information	EO-2025-0154 (Evergy Missouri) 25-EKME-315-TAR (Evergy Kansas)
Utility Program Website/ Tariff Document	Clean Energy Rider for Evergy Missouri West, Evergy Missouri Metro, Evergy Kansas Central, Evergy Kansas Metro

Salt River Project

OVERVIEW

As a public power utility, SRP sets its own rates that are approved by the elected District Board of Directors rather than the Arizona Corporation Commission.

In February 2025, SRP's price plan modifications were approved and went into effect in November 2025. This included changes to the E-67 Price Plan for Large Load Accounts (with loads of 20 MW or more), which intended to prevent cost-shifting from large energy consumers to residential ratepayers. This 20-MW threshold is lower than other large load tariff thresholds. In the adopted tariff, large load customers pay a demand charge based on the greater of their actual demand or 80% of their forecasted load. If SRP agrees to procure or develop infrastructure solely to meet the large load customer's energy needs, the customer will need to reimburse SRP for the associated costs.

Several complementary, optional riders are available for large load customers to partner with SRP to bring new clean firm resources onto the grid.

The **Full Electric Service Requirements Rider** is a long-standing mechanism that allows customers with loads of 1 MW or more to sign a term contract for alternative energy and receive discounts on their SRP bills.

The **Energy Attribute Certificate (EAC) Rider** enables customers to participate in EAC programs that support SRP's carbon-free energy projects by adding a premium to their bills for purchase of EACs. The recent price plan transitioned the previous REC Pilot Rider into a permanent rider and broadened from RECs to include other EACs.

The new **Carbon Reduction Rider** enables customers to participate in SRP's carbon-reduction programs. This includes the purchase of offsets, allowances, or credits associated with carbon dioxide emissions reduction, removal, avoidance, capture, or sequestration.

The **Buyback Service Rider** allows customers with on-site generation or energy storage to export energy back to SRP and receive a credit on their bills.

The **Customized Interruptible Rider** enables customers with a minimum curtailable load of 100 kW to receive bill credits in exchange for curtailments or making load available for curtailment at the request of SRP.

A combination of these optional riders has been used to bring on a combination of new assets, such as wind, solar, and storage projects to support load growth in SRP's territory.

SUMMARY TABLE

Salt River Project	
Tariff Name	Full Electric Service Requirements Rider
Tariff Type	Optional rider to large load price plan
Utility Type	Public power utility
Program Size/Period	Not specified
Customer Eligibility	Available to customers with loads of at least 1 MW; applicable to customers on General Service or Large General Service Price Plan.
Aggregation of Customer Facility Demand	A customer can aggregate their load to reach the 1-MW threshold.
Resource Eligibility	Not specified
Contract Time Commitment	To be determined in term agreement
Contract Structure	To be determined in term agreement
Resource Procurement Process	Not specified
Customer Cost Structure/ Pricing and Credit Details	If customers have current or potential energy alternatives, they can receive discounts on the Energy and Fuel and Purchased Power Adjustment Mechanism components of their bills. Prices, post-discount, are commensurate with each customer's cost for energy alternative(s). Customers must sign a term agreement in exchange for discounts. Energy revenue from each customer must exceed the marginal cost of serving that customer over the term of the contract. On a quarterly basis, SRP will report terms, conditions, and discounts of new agreements to the Board.
REC Management	Addressed in EAC Rider
Regulatory Process/Timeline	N/A
Enrollment Process & Status	Not specified. Customers should reach out to their point of contact in the utility.
Docket Information	N/A
Utility Program Website/ Tariff Document	Standard Electric Price Plans – Prices Effective with November 2025 Billing Cycle

CASE STUDIES

Bilateral Customer-Utility Clean Firm Agreements

In addition to developing new tariffs, utilities continue to contract directly with large load customers and third-party developers to bring new clean firm capacity online. According to BloombergNEF, hyperscalers Meta, Amazon, Google, and Microsoft represented 49% of all corporate clean energy PPAs globally in 2025, with a growing share of investments in nuclear, hydropower, and geothermal.

Below are illustrative examples of how these technology companies are contracting bilaterally with utilities for clean firm power projects and paving the way for new tariffs and broader replication as technologies prove commercially viable.

Google

Google has emerged as a leading architect of scalable clean energy tariff structures, working in close collaboration with utilities to design rate frameworks that explicitly embed capacity value and make new clean firm investments viable.

Unlike many corporate procurement strategies that rely on bespoke, one off bilateral contracts, Google has focused on developing agreements that are intentionally designed to evolve from individual ESAs into standardized tariffs that can be accessed by a broader base of large load customers. By aligning its procurement demand with utility system capacity needs — and by ring fencing the incremental costs and risks of new clean firm resources to the subscribing customer — Google has helped utilities address a long standing design challenge: how to deploy capital intensive, first of a kind clean firm generation without shifting costs or risks onto other ratepayers.

The foundation of this approach is the CTT, developed with NV Energy and approved by the PUCN in 2025. The CTT established a replicable template that allows non residential customers with 5 MW or more of load to partner with a utility to identify and fund clean firm resources that provide system value, while paying a premium that holds the broader ratepayer base harmless. In the years since its approval, Google has applied this same core architecture across multiple service territories and regulatory frameworks, most notably with Xcel Energy Minnesota and DTE Energy.[2]

Across these agreements, a consistent set of design features distinguishes the CTT family of tariffs. First, by embedding capacity value directly into the rate structure — rather than treating clean firm resources as energy only contracts — these models ensure that customer driven procurement contributes to system reliability and capacity adequacy alongside emissions reductions. Second, by structuring each agreement to transition from a bilateral ESA to a generally available tariff, the model creates a clear pathway from demonstration to scale. Third, the collaborative resource identification process, in which utilities and customers jointly select accelerative resources aligned with system needs, has proven portable across diverse regulatory and market contexts. This portability is precisely what makes the model scalable and reflects the role of sustained utility-customer partnership, rather than adversarial procurement, in producing designs regulators are willing to approve.

Beyond tariff based structures, Google has extended this collaborative, risk sharing approach to adjacent clean firm investments. These include a 2025 partnership with the Tennessee Valley Authority (TVA) and Kairos Power, in which Google and Kairos absorb the financial risk of a first of a kind 50-MW Generation IV nuclear facility to shield TVA customers from cost exposure, as well as a 2025 research collaboration with SRP to demonstrate emerging long duration energy storage technologies on the Arizona grid. While not structured as clean energy tariffs, these efforts reflect the same underlying principle that anchors the CTT framework: **customer demand can be used to absorb early stage risk and create proof points that enable utilities to bring new clean firm technologies onto the system.**

---

[2] February 2026, Google and Xcel Energy Minnesota announced an ESA structured around the Clean Energy Accelerator Charge (CEAC), covering a portfolio that includes 1,400 MW of wind, 200 MW of solar, 300 MW of long duration energy storage from Form Energy, and investments in Xcel's Capacity*Connect distributed capacity program. Filed with the Minnesota Public Utilities Commission in April 2026, the ESA includes analysis showing an estimated $1.1 billion in net benefits to nonparticipating customers and concludes that the clean firm components of the portfolio would not be cost effective under standard resource planning absent the financial support provided by the CEAC. The CEAC design embedded in the bilateral agreement is expected to inform a generally available tariff offering for other large load customers in Minnesota.

Similarly, in March 2026, Google and DTE Energy announced a bilateral ESA under the Clean Capacity Acceleration Agreement (CCAA) for 2.7 GW of new resources, including solar, advanced storage, and demand flexibility. The agreement, currently under review by the Michigan Public Service Commission, applies the same CTT derived design principles to Michigan's regulatory context and is intended to serve as a template that other large DTE customers could replicate if approved.

Meta

In 2025, Meta contracted for more clean energy capacity in the U.S. than any other buyer, signing over 10 GW of deals, underscoring the scale of its demand and the ambition of its decarbonization goals. Among its most significant partnerships is a landmark agreement announced in June 2025 with XGS Energy to develop 150 MW of advanced geothermal energy in New Mexico. The project represents one of the first large-scale deployments of next-generation, closed-loop geothermal technology and, if successful, could establish a new model for utility-scale clean firm generation that is dispatchable, waterless, and geographically flexible.

The Meta–XGS project will be developed in two phases, both projected to be operational by 2030. The first phase will be smaller in scale, serving as a commercial demonstration, with the second phase expanding to the full 150 MW capacity. The project will be sited within New Mexico and delivered to PNM's service territory.

When the project reaches the stage requiring regulatory approvals, it is anticipated that Meta will use PNM's Rate 36B. As noted in the utility program summaries above, to date, Rate 36B has been used exclusively for wind and solar projects (some paired with battery storage); utilizing it for advanced geothermal would represent an expansion of the tariff's scope and establish a precedent for how existing tariff frameworks can accommodate emerging clean firm technologies. While New Mexico PRC approval would be required for the specific resource, the current tariff allows 36B to contract for any resource type that complies with New Mexico's Energy Transformation Act without requiring entirely new regulatory instruments.

The Meta–XGS agreement is notable for several reasons. First, it demonstrates that closed-loop geothermal — a technology that decouples geothermal energy production from its historical dependence on specific geological conditions and water availability — can attract major corporate offtake commitments at utility scale. Second, by siting the project in New Mexico, the partnership could begin to unlock what the independent geothermal organization Project InnerSpace estimates to be over 160 GW of untapped geothermal potential in the state, positioning New Mexico as a national leader in advanced geothermal deployment. Third, the use of an existing tariff mechanism — Rate 36B — to facilitate a novel technology demonstrates the adaptability of well-designed clean energy tariffs and their potential to serve as durable procurement frameworks across multiple technology generations.

If the project performs as expected, it could provide a replicable tariff model for other utilities and large load customers seeking dispatchable, carbon-free generation that does not depend on weather conditions, water resources, or the narrow set of geologic formations that have historically constrained geothermal development.

Amazon

In December 2024, Amazon and Energy Northwest announced a strategic agreement to develop SMR capacity in Washington state, using X-energy's Xe-100 technology with an initial phase of approximately 320 MW. Under the agreement, Amazon funds upfront siting and development costs — absorbing the early-stage risk that has historically stalled advanced nuclear projects — and receives a 50% ownership share in the facility. Participating public utilities retain the option to purchase up to 50% of the remaining ownership once the project reaches commercial operation, with Amazon holding a right of first refusal on any unsubscribed capacity. The result is a structure that guarantees offtake for the project regardless of utility participation levels, materially de-risking the financing pathway for a capital-intensive, long-lead clean firm resource.

This structure is notable because it addresses one of the central challenges in deploying capital-intensive clean firm resources: who bears the development-phase risk before a project is commercially proven. By absorbing early-stage siting and development costs, Amazon effectively de-risks the project for public power partners that might not otherwise be positioned to justify ratepayer-funded investment in emerging technology. The utility option to buy in at commercial operation — rather than at project inception — removes a significant barrier for regulated entities, while the right of first refusal on unsubscribed capacity ensures the project's financial viability is not dependent on utility uptake.

Although the Amazon–Energy Northwest agreement is a bilateral arrangement rather than a formalized tariff, it offers a potential template for enabling advanced nuclear and other long-lead clean firm resources within regulated and public power markets.

The model parallels several design principles seen in the clean energy tariffs featured in this publication: ring-fencing costs to the requesting customer, preserving optionality for the host utility, and creating a structured pathway for new generation capacity that would not otherwise emerge through traditional resource planning. The Pacific Northwest context is particularly relevant, as the region faces growing load from data centers and manufacturing alongside ambitious clean energy mandates, with limited options for new dispatchable, zero-carbon generation beyond existing hydropower. As SMR technology matures and early projects demonstrate cost and schedule performance, this co-investment structure could inform future tariff designs that enable broader customer participation in advanced nuclear procurement.

Microsoft

Microsoft has entered into a long-term wholesale PPA with Brookfield Asset Management to support the repowering and operational upgrade of existing hydroelectric facilities in the PJM Interconnection territory near Lancaster, Pennsylvania. The deal covers approximately 670 MW of existing hydropower capacity that Brookfield owns and operates in the region. Under the agreement, Microsoft's contracted offtake provides Brookfield with the revenue certainty needed to restructure existing project debt and fund capital improvements to aging turbines, civil works, and grid interconnection infrastructure. The transaction is part of a broader 10.5-GW framework agreement between Microsoft and Brookfield spanning multiple clean energy technologies and geographies.

This structure is notable because it demonstrates how corporate procurement can unlock clean firm capacity that already exists but is at risk of degradation or underinvestment. Unlike agreements focused on new-build generation, the Microsoft–Brookfield arrangement channels private capital toward preserving and enhancing operational hydropower assets — a category of resource that is dispatchable, zero-carbon, and already interconnected, but that often lacks a clear reinvestment pathway under conventional market structures. By providing long-term revenue visibility, the PPA enables Brookfield to justify capital expenditures that extend asset life and improve output, effectively treating existing hydro as a resource that can be "re-procured" rather than allowed to decline. The wholesale structure also allows Microsoft to secure clean firm energy attributes — including the dispatchability and reliability characteristics that intermittent renewables cannot provide — at a cost basis that reflects brownfield economics rather than greenfield development risk.

Although the Microsoft–Brookfield agreement is a bilateral wholesale PPA rather than a utility-administered tariff, it surfaces a procurement model with direct relevance to the tariff structures profiled in this publication. Several of the design principles seen in emerging clean energy tariffs — cost ring-fencing to the subscribing customer, long-term commitment to support capital-intensive assets, and structured offtake that would not emerge through short-term market signals alone — are present in this arrangement. The deal also highlights a category of clean firm resource that is largely absent from current tariff discussions: existing hydropower in need of reinvestment.

As utilities and regulators consider how to retain and upgrade aging zero-carbon assets alongside building new capacity, the Microsoft–Brookfield model offers a template for how corporate demand and long-term contracting can bridge the investment gap. The PJM context is particularly relevant, given the region's growing data center load, tightening capacity margins, and ongoing debates about resource adequacy in a decarbonizing grid.

Summary

Taken together, these bilateral agreements illustrate that large load customers are not waiting for utility tariff structures to catch up with the pace of clean energy demand — they are actively creating the commercial frameworks that will shape those tariffs. Across technologies as varied as advanced nuclear, advanced geothermal, hydropower repowering, and utility-scale solar plus storage, the hyperscalers profiled here are absorbing development-phase risk, providing long-term revenue certainty, and structuring offtake in ways that unlock capital for clean firm resources that would not otherwise advance through traditional utility procurement or wholesale market signals alone. Simultaneous to these benefits, continued integration of large loads into utility systems ensures that the fixed costs of operating the grid are shared amongst a large pool of customers. Because these costs are frequently tied to load profiles, large load customers effectively pay for significant portions of energy infrastructure and associated operating costs for the grid.

Several common design principles emerge across these case studies, despite differences in technology, geography, and regulatory context. First, each agreement ring-fences costs to the subscribing customer, insulating the broader ratepayer base from the financial risk of first-of-a-kind or capital-intensive projects. Second, the contracts provide the long-term commitment — often spanning decades — that developers and lenders require to finance assets with high upfront costs and extended construction timelines. Third, many of these bilateral structures are explicitly designed to seed broader access: Google's CTT-derived agreements with Xcel and DTE are intended to inform standalone tariffs available to other large customers, and the Amazon–Energy Northwest model preserves a buy-in pathway for public utilities once commercial viability is demonstrated.

Critically, the line between bilateral agreements and formalized tariffs is increasingly blurred. Several of the deals profiled in this report are either filed for regulatory review, structured as precursors to general-access tariffs, or designed to demonstrate commercial models that regulators can adapt. This progression — from bespoke bilateral contract to replicable tariff — reflects a broader dynamic in clean energy procurement: corporate buyers serve as anchor tenants whose demand and risk tolerance create proof points, and utility commissions then evaluate whether those structures merit extension to other customers and resource types.

As load growth accelerates and grid reliability concerns intensify, the bilateral agreements documented in this section are likely to become templates for the next generation of clean energy tariffs rather than exceptions to conventional procurement practice.

Common Design Principles Across Bilateral Agreements

Shared structural elements emerging from hyperscaler clean firm procurement

01

Cost Ring-Fencing

Each agreement isolates project costs to the subscribing customer, insulating the broader ratepayer base from the financial risk of first-of-a-kind or capital-intensive clean firm projects

CASE STUDY EXAMPLES

- **Google-Xcel CEAC**
- **Google-DTE CCAA**
- **Amazon-Energy NW SMR**

02

Long-Term Revenue Commitment

Contracts spanning decades provide the revenue certainty that developers and lenders require to finance assets with high upfront capital costs and extended construction or upgrade timelines.

CASE STUDY EXAMPLES

- **Amazon-Energy NW SMR**
- **Microsoft-Brookfield Hydro**
- **Google-TVA-Kairos Nuclear**

03

Seeding Broader Access

Bilateral structures are explicity designed as precursors to general-access tariffs, creating proof points that regulators can evaluate and extend to other customers and resource types.

CASE STUDY EXAMPLES

- **Google-Xcel CEAC**
- **Google-DTE CCAA**
- **Amazon-Energy NW SMR**

Conclusion

This publication is intended to serve as both a practical resource and a call to action. By documenting and synthesizing early examples of innovative rate and tariff structures, our objective is to equip policymakers, utilities, and large energy buyers with a clearer understanding of what is possible today — and what can be scaled tomorrow. At a time of accelerating load growth, these approaches offer a pathway to bring more clean, firm resources onto the grid while keeping large customers integrated into the broader system in ways that support affordability, reliability, and shared system benefits. Taken together, the examples in this publication demonstrate how thoughtful rate design and collaboration can unlock new clean energy investment opportunities while helping manage overall grid costs and enabling a more durable, cost-effective clean energy transition.

Glossary

Aggregation of Customer Facility Demand

Determines whether customers are permitted to aggregate accounts to reach minimum participation threshold requirements.

Capacity

The maximum amount of electricity a generator can produce at a given time, typically measured in MW or kW, which helps utilities project how much electricity load a generator can handle and ensure there is enough power to meet peak demand. Capacity charges on a customer's utility bill reflect the cost of procuring sufficient energy supply to meet their facility's peak load.

Clean Energy Tariffs

Utility programs that enable large load customers to pay for and drive the selection of specific clean and clean firm resources that provide power to the utility's entire system.

Clean Firm Power

Dispatchable, carbon emissions-free generation, available on demand with high reliability, including but not limited to nuclear (restarts of conventional nuclear, uprates, and new advanced nuclear), advanced geothermal, fusion, hydropower (including uprates and new projects), long-duration energy storage, and thermal generation with CCS.

Green Tariffs

Utility programs that allow customers to access renewable energy resources like solar and wind energy while receiving credit for RECs and in some cases receiving a financial credit on their bill reflecting the value of the renewable resource.

Integrated Resource Planning

IRP is a long-term strategy used by electric utilities to meet their customers' needs for reliable and fairly priced energy services. The plan identifies how a utility will meet its customers' demand for electricity at the lowest cost, typically using a mix of supply-side resources (generation, transmission, and distribution), DSM (demand response and energy efficiency), and storage.

Large Load Customers

A class of utility customers with high-demand facilities that meet certain thresholds for requiring substantial power, and they are often subject to specialized tariffs or service agreements with the utility.

PPA

Power purchase agreement.

Procurement Lead

Identifies which party (for example, the utility or the customer) leads the relationship with the developer and initiates the clean energy project negotiations.

PUC (or PRC, PSC)

State Public Utility Commission (or Public Regulation Commission or Public Service Commission) that regulates electric utilities in a given state.

Renewable Energy Certificate (REC) or Environmental Attribute Certificate (EAC)

A market-based instrument that represents the rights to the environmental attributes of renewable electricity generation. One REC/EAC represents one megawatt-hour of electricity generated from a renewable resource.

Rider

Additional rate applied to an electricity tariff.

RPS

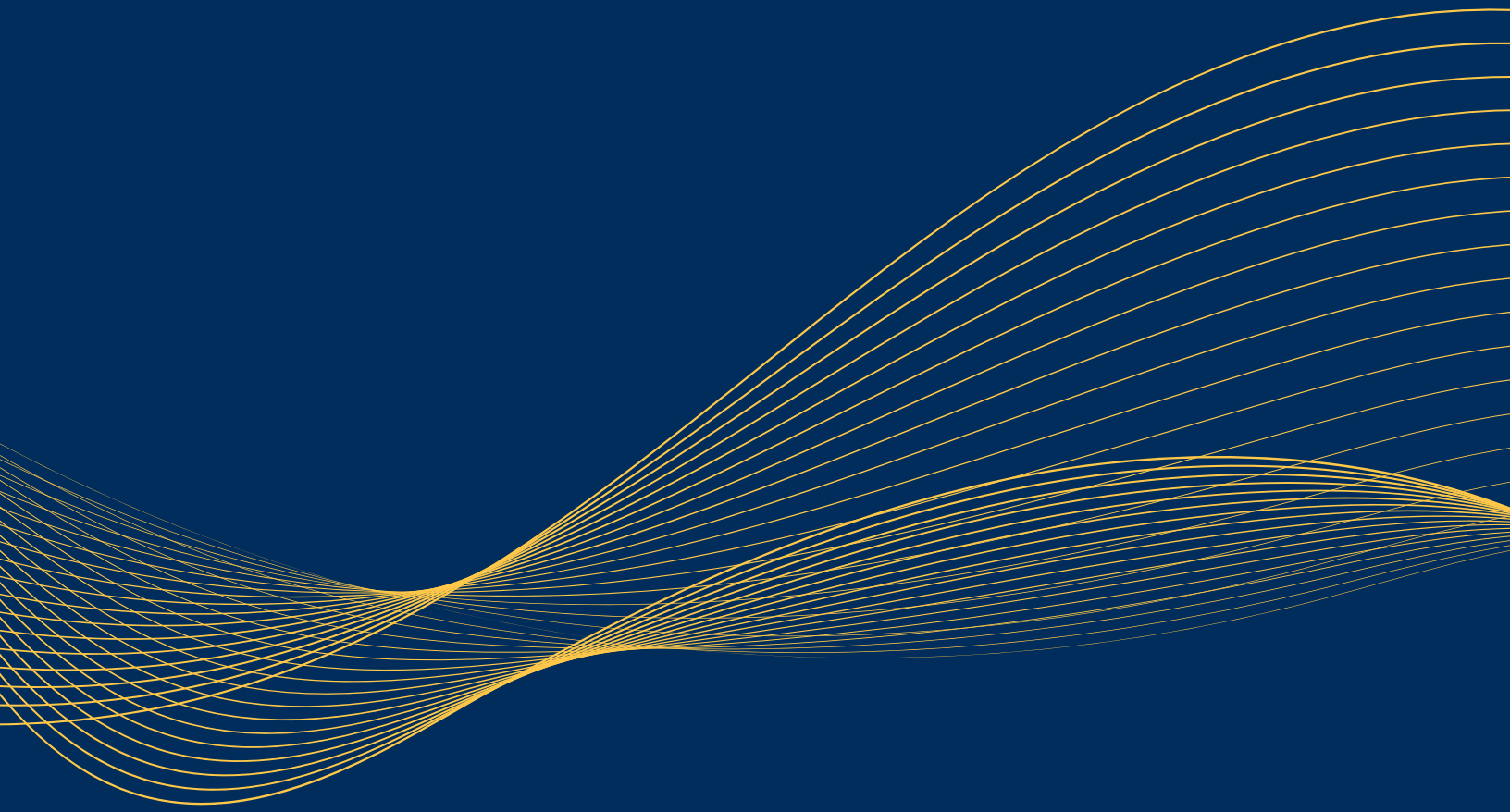
Renewable Portfolio Standard, a regulation that requires electricity suppliers to provide a minimum share of electricity from eligible renewable resources.

Sleeved Or Back-To-Back PPA

A contracting arrangement where a utility signs a PPA with a developer to buy power and associated EACs, followed by a separate PPA with the utility's customer for resale of energy and attributes.

Tariff

Electricity price, and price structure, charged to utility customers.



Corporate Energy Buyers Association
1501 M Street NW, Washington, DC 20005

Email/Web
info@ceba.org
www.ceba.org

CEBA Corporate Energy Buyers Association