



Puget Sound Energy  
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July 26, 2024

Clean Energy Siting Council  
P.O. Box 43172  
Olympia, WA 98504

Re: Clean Energy Siting Council's 2024 Draft Recommendations

Dear Clean Energy Siting Council,

Thank you for the opportunity to comment on the Clean Energy Siting Council's (CESC's) Draft Recommendations for its 2024 Legislative Report ("Draft Recommendations"). As CESC is aware, Puget Sound Energy, Inc. (PSE) is a public utility serving customers in Washington. PSE provides electric power service to approximately 1.2 million customers and natural gas service to 900,000 customers across ten counties in Washington.

Today, PSE owns a diversified mix of energy generation resources, including natural gas, wind, solar, and hydropower as well as coal that will come off of our system by the end of 2025. PSE is particularly proud to have developed major wind and transmission resources in Washington. As we diversify and decarbonize our electric system— both to comply with Washington's Clean Energy Transformation Act (CETA) and advance our own Beyond Net Zero goals— PSE projects a need for more than 6,700 MW nameplate of new, carbon-free electric generating capacity to meet our 2030 compliance targets. By 2045, PSE expects the need for new, carbon-free resources to total more than 15,000 MW of nameplate capacity.

To this end, PSE is diligently pursuing acquisition of clean energy from established resources, such as wind and solar, and supporting the development of emerging clean energy economies, such as hydrogen, and technologies, such as utility scale battery storage. To site clean energy at the pace needed to address increasing energy demands and climate change, Washington needs to improve efficiency and certainty in permitting timelines (whether resulting in an approval or denial) and to increase funding to EFSEC. Further, to ensure that the economic benefits of siting clean energy facilities stay in Washington, we need an approach that doesn't cause the costs or timelines of clean energy siting in Washington to be noncompetitive with what can be achieved in other states.

Based on our experience building and operating clean energy resources and transmission in Washington we support the continued development of the following programs proposed in the CESC's Draft Recommendations:

- *Designation of Clean Energy Preferred Zones.* PSE supports efforts to identify priority areas for clean energy development as long as those areas are defined broadly and primarily on the sufficiency of a given resource (e.g., for wind facilities, areas with a minimum wind speed of at least 6.0 m/s (13.4 mph)). Projects within such designations could then be evaluated (both by the public and applicable jurisdictions) on a project-specific basis under applicable statutes, local codes, and the State Environmental Policy Act (SEPA). PSE supports the recommendation that development be prioritized in already disturbed areas and recommends that this concept be applied consistently. For example, WDFW is updating its wind development guidelines and is adding solar-specific guidelines. Consistent with their 2009 guidance, WDFW's recommendations should not include mitigation requirements for previously disturbed lands.
- *Integrate Clean Energy Development into Local Planning and Zoning.* PSE supports this effort and specifically advocates that the Draft Recommendations include a recommendation that utility scale clean energy facilities be designated as Essential Public Facilities or, at minimum, that local jurisdictions should not be able to preclude utility scale renewable energy facilities outright. Meeting CETA's goals will take an all-hands approach and prohibiting them in any part of the state is contrary to this effort. Moreover, the suitability of a project's siting is best evaluated on the project-specific basis that occurs in state permitting and SEPA review.
- *Local Government Support for Battery Energy Storage System (BESS) Siting.* The siting of BESS is critical to meeting CETA's decarbonization mandates and timelines. Local jurisdictions struggle to understand safety and siting considerations associated with BESS. PSE believes that BESS can be sited safely throughout our service area and supports any state effort to increase BESS-related education, particularly as it relates to utility scale BESS.
- *Tribal Engagement and Consultation.* PSE fully supports the CESC's recommendations on tribal engagement, consultation and coordination. Washington tribes are under significant pressure to evaluate and comment on what's regularly hundreds of development actions. To the extent that the CESC can work to facilitate information

exchanges on a specific tribe's priorities and concerns, clean energy development will benefit.

PSE has the following comments on the balance of recommendations made in the Draft Recommendations:

- *Need to Consider Major Transmission Permitting.* PSE appreciates the significant work that went into the Draft Recommendations. Absent from the recommendations, however, are recommendations on major transmission siting in Washington. The existing transmission system in Washington is constrained and PSE and other Washington utilities will need new major transmission facilities to meet CETA's mandate. Our recent experience permitting and constructing the Energize Eastside project—in which it took more than a decade to permit and build a 16-mile transmission line upgrade *in an existing corridor*—makes it clear that without transmission-specific state policy reform, we may not be able to reach our clean energy goals on the mandated timelines.
- *Build-Ready Clean Energy Program is Not Needed.* In the last five years, Washington state has enacted far reaching clean energy laws, including CETA and HB 1216 which requires the creation of a Clean Energy Projects of Statewide Significance program run by the Department of Ecology. This program is in addition to the expedited permitting pathways available in the state's Energy Facility Site Evaluation Council (EFSEC). Both Ecology and EFSEC lack sufficient staff and resources to timely complete their review of projects. PSE is concerned that the creation of a new program, which would compete with the existing programs for resources, would dilute the efforts already underway to facilitate a more predictable permitting pathway. For this reason, PSE does not support the creation of new, overlapping state run clean energy program.
- *Mitigation Guidance Must be based on Best Available Science and Proportional to Project-Specific Impacts.* In our communities, PSE is more than a developer or grid operator. We are a clean energy partner that takes our mitigation and community obligations seriously. In Washington, however, mitigation can only be required where there is a project-related impact (or nexus) and where the required mitigation is proportional to the project's impact. PSE supports the development of mitigation guidance, including WDFW's guidance updates, to increase development certainty. We are concerned, however that any such guidance could include mitigation ratios that lack a basis in best available science and seek to shift cumulative harms from all development onto specific renewable energy projects. Clean energy development is taking on the



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challenge of decarbonizing our energy and transportation sectors, it cannot also bear the costs of restoring ecological systems or achieving a net gain in ecological function without potentially adversely affecting Washington rate payers or making Washington projects non-competitive with out of state options. The CESC should carefully review any state agency guidance process and weigh in to ensure that any published guidance is within an agency's statutory authority and meets the nexus/proportionality test.

PSE again appreciates this opportunity to comment and CESC's work to develop clean energy siting recommendations. Please let us know if you have any questions on the comments above and we look forward to continuing this clean energy siting dialogue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sara Leverette', is written over a horizontal line.

Sara Leverette  
Director Environmental Services  
Asst. General Counsel