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Subject: Interagency Clean Energy Siting Coordinating Council Draft Recommendations – July 2025

Dear Councilmembers:

On behalf of the Washington Public Utility Districts Association (WPUDA), we write to offer comments to the July 2025 Draft Recommendations. Our member utilities, authorized under RCW Title 54, are positioned to play an essential role in accelerating clean energy development, managing system reliability, and delivering equitable decarbonization outcomes, but only if supported by practical, implementation-ready policies and permitting pathways.

The scale of system changes envisioned in the state's decarbonization modeling, particularly electrification of transportation and buildings requires unprecedented levels of utility investment, coordination, and infrastructure deployment. Yet this transformation is at risk by real constraints on transmission capacity, long permitting timelines, and misaligned planning authorities. The Council's recommendations can and should be the vehicle to resolve these challenges through elevating the role of Public Utility Districts and integrating utility-led strategies that work in practice.

Infrastructure Scale, Reliability, and Implementation

The Pacific Northwest region electric grid is experiencing near-deficit conditions during peak events, and Washington needs tens of thousands of megawatts of new energy and capacity to meet projected load increases through 2035. The Council's report and the 2025 Draft Washington Comprehensive Climate Action Plan (CCAP) would exacerbate this need by seeking to decarbonize through electrification. Permitting of transmission and generation must be on pace with the quickly growing energy need if Washington state is to have any hope to avoid power shortages let alone achieve the carbon reduction goals along the timelines laid out in current public policy.

Given the urgent need for new electric infrastructure, WPUDA strongly recommends the Council propose actionable measures that will remove barriers to permitting that include the following priorities:

- **Develop and implement permitting streamlining mechanisms:**
 - Standardized and expedited timelines for permitting energy facilities
 - Simplified and expedited SEPA review for reconductoring in existing corridors and exploration activities for geothermal resources
 - Fast-track interconnection processes that improve timelines
 - Simplify procurement rules for acquiring electrical gear and infrastructure to accommodate for supply chain and demand challenges
- **Encourage technical pre-application discussion between developers and permitting authorities**, as supported by WPUDA and the Clean Energy Siting Council’s 2025 Annual Report, to identify and avoid delays early in the development phases.

Public Utility Districts: Statutory Authority and Implementation Expertise

PUDs serve more Washingtonians with electricity than any other utility class and have broad authority under RCW Title 54 to construct, own, and operate generation, transmission, and distribution systems. This gives PUDs an unmatched ability to site and deliver projects—but also means their participation is vital to any realistic clean energy siting and permitting strategy.

The Council’s recommendations should:

- **Recognize PUDs explicitly** as both transmission-owning partners and load serving entities. Effective planning and permitting frameworks will require coordination among local/regional transmission providers and with local utility distribution networks.
- **Highlight the alignment between PUD statutory authority and CETA implementation**, reinforcing how PUDs are not only stakeholders but essential delivery partners for Washington’s clean energy goals.
- **Emphasize the unique transparency and community accountability of public utilities**, whose elected boards and open planning processes are built for trusted local engagement.

Co-location of Resources and Load

Integrate and incentivize co-locating resources with load like the Chelan PUD’s partnership with Microsoft and Helion to site a fusion demonstration project alongside data center infrastructure. This co-location model exemplifies how public utilities can align advanced generation with local loads, reduce transmission need, and support economic development—all while protecting affordability and community trust.

The Council should emphasize this example under recommendations addressing “Emerging Technologies” and “Local Siting Solutions.” Doing so reinforces that effective, community-accepted siting can be achieved when utilities, private innovation, and public goals are aligned.

Promote Regional and Local Clean Energy Development

The siting of clean, renewable, reliable, and dispatchable power to meet current and forecasted energy demand is a shared interest of Tribes, the State, Federal, and Local governments, developers, environmental advocates and citizens across the state and the region.

WPUDA recommends expanding the focus of the Council’s recommendation concerning regional and local clean energy development to consider options to support Tribal as well as publicly owned clean energy projects, including joint development opportunities.

Regional Coordination and Planning Transparency

It is imperative to have greater transparency and engagement in regional transmission and cost allocation forums—including the Western Power Pool, WIEB, and WestTEC. These processes will help to shape our ability to build multi-state infrastructure—but currently operate with minimal utility or public visibility.

We urge the Council to recommend:

- **Formal engagement mechanisms** for public utilities in these forums,
- **Utility and BPA review prior to Washington State supporting specific cost allocation methodologies**, and
- **A public-facing and transparent process** to gather utility input on how Washington’s policy positions are being represented regionally.

Conclusion

WPUDA appreciates the Council’s commitment to advancing timely, coordinated siting solutions. We urge you to integrate and reflect the substance of WPUDA’s comments into your final recommendations, including:

- The **urgency of transmission and firm capacity development**,
- The **central role of PUDs and other types of electric utilities in transmission and permitting**,
- The **need for actionable, streamlined processes** at the state level, and
- The **value of utility-led innovation and partnerships**.

PUDs in Washington state along with fellow stakeholders are already working to implement a clean energy transition. To ensure we achieve a transition that is resilient, reliable, and rooted in community trust, we urge the Council to call out that significant permitting changes are needed to allow expeditious development and operation of new utility generation and transmission infrastructure.

Please don't hesitate to contact me at tnelson@wpuda.org or (360) 890-6681 if you would like to discuss any of these recommendations further.

A handwritten signature in black ink, appearing to read 'Travis Nelson', written in a cursive style.

Travis Nelson, Regulatory Affairs Manager
Washington Public Utility Districts Association