Clean & Prosperous INSTITUTE

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RE: Comments Clean Energy Siting Council Legislative Report

Clean & Prosperous Institute Comment

Clean & Prosperous Institute (CPI) strongly supports Washington's demonstrated commitment to statewide decarbonization alongside efforts to accelerate clean energy siting in Washington state. The demand for clean power is set to grow rapidly in the coming months and years, making the need to dramatically increase and manage our available clean energy all the more urgent.

The dual need to mitigate the effects of climate change by reducing our reliance on fossil fuels AND increase the amount of clean power presents a unique opportunity for Washington state to build the economy of the future that creates sustainable, good-paying jobs, encourages cutting-edge innovations, and preserves the industries that have long made our state attractive for national - and international - investment

History & Context

Washington state law requires limiting greenhouse gas emissions to 45 percent below 1990 levels by 2030, eliminating all coal power generation by the end of 2025, and generating no more than 20 percent of power from any single utility from methane gas power plants by 2030. At the same time, Evolved Energy Research is predicting

Washington's electricity demand to grow by over 80 percent by 2050[1] due to increased load from electric vehicles and data centers.

Against this backdrop is two decades of delay. Over the last 20 years Washington has seen the slowest renewable growth of any state[2] and has been unable to offset a decrease in hydropower with an increase in generation of other renewables. The Bonneville Power Administration (BPA), our regional nonprofit federal power marketing administration, is central to these challenges. BPA has the lowest approval rate of any region since 2015 for large renewable energy projects waiting for grid connections, at just 0.2 percent, compared to 28 percent in Texas. This complete lack of growth not only puts the 2030 clean power targets in jeopardy, it also means innovative manufacturing, job growth, and overall pollution reduction targets are increasingly at risk.

Washington must accelerate the process for clean energy siting to scale deployment now while streamlining effective community engagement. The process needs to be scaled and sped up substantially for economic and environmental reasons.

This is not unprecedented or unattainable. CPI noted the rate of project approval and deployment currently achieved in Texas. BPA itself has proven more than capable, with more than 4,800 miles of high-voltage transmission lines from 1960 to 1990 cratering to just one single mile in the past five years[3].

CPI believes this report to the Legislature should clearly capture the urgency of building out our clean energy pathway. This can be done with an eye on the best deployment opportunities immediately, while still streamlining effective and collaborative engagement processes.

To that end, below CPI highlights some recommendations of our own regarding the Draft Recommendations set forth by the Interagency Clean Energy Siting Coordinating Council.

Address Transmission Capacity Limitations

Rapidly scaling transmission infrastructure and clean generating capacity is imperative, and requires going beyond toolkit development to deployment at scale in the immediate future.

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[1] WA Draft Comprehensive Climate Action Plan Technical Report (p. 26)
[2] OPB: *How the Pacific Northwest's dream of green energy fell apart*
[3] OPB: *How the Pacific Northwest's dream of green energy fell apart*

Toolkits and best practice resources are a good idea, but not at the expense of delay. Modeling from the ongoing Comprehensive Climate Action Plan process indicates that:

- Rapid development of transmission, including increased in-state transmission, lowers costs while leaving Washington's clean energy policies more resilient against potential roadblocks. This only happens by 2030 if the option is available and long development timelines are improved.
- Transmission, distribution, and interconnection along with geothermal construction and operations and maintenance are by far the largest supply-side investments needed for cost-effective achievement of clean energy goals.

The transmission infrastructure we build now will more than return that investment in job creation and innovation. Hubs for green manufacturing with global implications are already emerging in Washington in places like Moses Lake (Group 14, Sila Nanotechnologies, Twelve) and the Tri-Cities (Atlas Agro). These projects can provide economic windfalls to the communities they're located in, but they require a clear timeline and access to clean power. Otherwise, we risk future green manufacturing hubs, and the steady jobs that come with them, skipping over communities in Washington for places like Texas. Given that context, CPI urges this report to the legislature to capture the following:

- We emphatically support immediate efforts to improve capacity and efficiency of existing transmission infrastructure including high-performance conductors and use of GETs. These tend to be very cost-effective investments using existing right-of-ways, which is supported by two useful resources on this topic: an overview podcast and a study prepared by Electric Power Engineers for the American Council on Renewable Energy.
- Establish, rather than just analyze, high-priority transmission corridors based on the best available information and clearing any redundant or lengthy barriers to building them.
- Elevate deployment of infrastructure, leaning on years of work, community engagement, and best available studies already completed to identify low-to-no risk opportunities that can be rapidly scaled while toolkits and streamlined engagement continues.
- Decrease barriers through better processes including those acknowledged in the draft recommendations: jurisdictional requirements and overlap, working with the local utilities, meaningful collaborative engagement, right-of-way obtainment, SEPA/NEPA alignment on process, and the need for a repository of local codes/frameworks.

- Strive for better processes and tools, but recognize that this cannot come at the cost of deploying what are recognized as the lowest-conflict and best-available transmission opportunities. Iteration and reliance on years of hard work and best practices from other regions will be necessary.

Recommendations Referencing Tribal Engagement and Funding

Several recommendations are contained throughout regarding Tribes and Tribal engagement. These include:

- Provide long-term funding for Tribal project review;
- Engage with Tribes on SEPA categorical exemptions, and;
- Promote Tribal clean energy projects.

Tribal nations have a strong understanding of land use implications and opportunities to develop clean energy resources and facilities as partners and sovereign nations. CPI is supportive of recommendations to engage Tribes early and meaningfully, including through necessary financial support and on the topic of SEPA categorical exemptions. We believe that continued support for Tribal clean energy projects is consistent with the purpose of this report to the Legislature and fully aligned with the intent of investments made under the Climate Commitment Act.

Support Clean Energy Development

Resolving transmission barriers has the potential to unlock much of the necessary clean energy development. CPI is supportive of rapidly deploying least-to-no conflict clean energy resources under streamlined processes. In addition, we recognize cost savings and quicker deployment can be supported by the draft recommendations of: *Supporting development options that do not require transmission connections and incentivize upgrading existing energy infrastructure.* CPI supports specific efforts such as industrial symbiosis, distributed clean energy sources, and virtual power plants as cost-effective steps to ease some of the pressure on new generation and transmission.[4] However, this must complement and cannot substitute for concerted efforts to build new sites and meet transmission requirements.

[4] The Draft Comprehensive Climate Action Plan, which is currently under review, notes that: "According to a 2023 study by the Brattle Group, VPPs — technologies such as rooftop solar, smart thermostats, electric vehicles, and distributed batteries — can provide the same reliability of conventional power plants at 40–60% of the cost. VPPs can also be leveraged to manage large industrial loads, such as AI data centers, that may otherwise overwhelm the grid."

Address Emerging Technologies

CPI believes that innovation has a key role to play in meeting longer-term emissions reduction targets, particularly in hard-to-decarbonize sectors. To facilitate continued innovation in Washington state, we need to lay the necessary transmission infrastructure and develop an effective playbook and toolkit that can be updated to capture emerging clean technologies as they become feasible. We have long been supportive of opportunities to apply anaerobic dairy digesters to existing agriculture operations. Long-duration energy storage, small modular nuclear reactors, nuclear fusion, green hydrogen, sustainable aviation fuel, and geothermal energy also present compelling clean energy opportunities on various timescales.

CPI particularly supports efforts to explore geothermal energy as a cost-effective solution. Geothermal systems have great potential to scale rapidly and contribute to cost-effectively achieving our climate and clean energy ambitions. The state's Comprehensive Climate Action Plan draft modeling points to over $55 billion in investments for geothermal construction and O&M between 2025-2050.[5] Being prepared to unleash a technology that has heating and cooling applications, as well as the ability to provide baseload and flexible carbon-free power should not be overlooked.

Washington is an innovation state, and we should continue to have a strong role in the clean energy technologies of the 21st century. Preparing for and helping accelerate innovation should not come at the cost of the necessary and cost-effective legwork of near-term infrastructure needs such as transmission and renewables capacity or deploying cost-competitive anaerobic digester technology.

Improve Project Permitting Through Engagement and Planning / Develop Community Engagement and Benefits / Promote Regional and Local Clean Energy Development

CPI is supportive of efforts to streamline the process (*e.g.* categorial exemptions and a toolkit for local jurisdictions) in ways that elevate engagement while improving timelines. All efforts should be made to reduce redundancies and other movable barriers in order to speed up the process if we are serious about meeting our goals to deliver clean energy and pollution reduction benefits.

[5] WA Draft Comprehensive Climate Action Plan Technical Report (p. 151)

We support the promotion of pre-application discussions for clean energy projects and the rapid designation of Clean Energy Preferred Zones that streamline permitting of projects within them. Beyond "assessing the feasibility" of a Build-Ready Clean Energy Program, we must design and implement this program as a best practice to establish clean energy hubs that unlock significant economic opportunities for their local communities, build momentum for green industries, and meet state emissions reduction targets. We believe that the Council has an opportunity to accelerate the work of previous efforts that identified least-conflict clean energy deployment (one example being The Nature Conservancy's Power of Place study) and other efforts already undertaken by state agencies and partners.

Clean energy development and upgrading our infrastructure can and should be a positive multiplier. We encourage the state to emphasize the importance and benefits of siting clean energy and the risks of dirty alternatives that do not meet the challenges of the decades ahead.

WA is Lagging Behind Other Subnationals

Washington State Department of Commerce director Joe Nguyen explained in a recent Seattle Times article that "the limitations [to building clean energy and transmission infrastructure] are not technical. They're bureaucracy. It's red tape, it's regulation…those things we impose on ourselves." By contrast, one of the very best states for building clean energy right now is Texas. According to the EIA, Texas has added over 50,000 gigawatt-hours since Washington released its 2021 State Energy Strategy. Meanwhile, Washington has actually decreased its share of non-hydro renewable energy generation from a peak in 2021 and trails all other states[6] in the share of renewable energy brought online between 2005-2014 and 2015-2024. While Washington is moving slowly in the wrong direction, Texas is catapulting itself into a leading role in green energy.

In 2013, Texas completed the Competitive Renewable Energy Zones (CREZ) program to take wind power from the western part of the state to its eastern population centers. This resulted in the development of roughly 3,600 miles of transmission lines capable of carrying 18,500 MW of electricity, and a spike in transmission capability. CREZ is generally recognized as a tremendous infrastructure success story, allowing Texas to unlock the clean energy potential it is realizing today. This is a powerful demonstration of the possibility and the benefits available should Washington undertake this kind of project to upgrade its transmission infrastructure throughout the state. These include

[6] OPB: *How the Pacific Northwest's dream of green energy fell apart*

economic and job opportunities in Eastern Washington's clean manufacturing hubs like those in Moses Lake and the Tri-Cities.

Additional evaluations of the nation-leading success in deploying clean power in Texas have noted that:

- "Texas also has the best regulatory environment for energy permitting of any state. While other states require wind and solar projects to go through some form of laborious state or local permitting process, energy developers in Texas who can reach agreements with landowners can build and connect to the grid easily." (R Street)[7]
- "Texas also is friendly to developers in terms of obtaining permits to build projects and connect to the grid. This, too, is different from most of the country, where developers often need to work through years of obstacles from local governments, state regulators and regional grid operators." (Inside Climate News)[8]
- "Texas' streamlined permitting and interconnection processes enable solar projects to become operational notoriously fast. As a result, 2024 saw more capacity additions to the Texas grid from solar and battery storage than any other energy source. In the first week of March 2025, Texas set the record for the most solar generation, wind production, and energy storage discharge. (Columbia Business School)[9]

Conclusion

Washington state has a clear and unwavering commitment to ambitious pollution reduction goals. Achieving those goals requires a focused, urgent effort to ramp up the meaningful availability of efficient and impactful transmission and clean power generation.

We at CPI are ready to work with the Washington State Department of Ecology, Commerce, and all other parties to help develop tools and dashboards, communicate project benefits, build broad coalitions, and provide technical expertise.

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[7] Josiah Neeley: *Why Texas Remains a Clean Energy Leader* (June 2025)
[8] Dan Gearino. *Texas Leads U.S. Renewable Energy Generation by a Country Mile* (March 2025)
[9] Isabel Hoyos and Gernot Wagner. *How States Like Texas Are Driving the Clean Energy Boom in the Trump Era* (March 2025)