



August 15, 2025

Submitted via email and web portal

Interagency Clean Energy Siting Coordinating Council
Attn: Dan Siemann, Senior Energy Policy Specialist; Diane Butorac, Clean Energy Section Manager

Re: Follow-Up on Draft Recommendations – Supporting Local Government Clean Energy Planning

To the Members of the Clean Energy Coordination Council,

Thank you for your continued leadership in advancing clean energy siting and permitting across Washington State. We appreciate the opportunity to provide feedback on the Council’s July 2025 draft recommendations and are encouraged to see several of Snohomish PUD’s earlier suggestions reflected in the current proposals.

We write today to expand on three specific recommendations under the “Support local governments’ plans for clean energy” section, which we believe are critical to enabling timely, equitable, and scalable clean energy development across the state. Importantly, we urge the Council to recognize that clean energy development is not limited to generation facilities—it also requires enabling infrastructure such as distribution systems and small-scale transmission. These components must be explicitly considered in any planning, zoning, and permitting reforms.

In light of current budgetary pressures facing the state, we also want to emphasize that amending local development codes is a cost-effective, low-barrier strategy. These changes can empower local governments and private industry to take on more of the planning and development burden, reducing the need for direct state investment while accelerating clean energy deployment.

Amending the Growth Management Act (GMA) to Include Clean Energy Development

Local governments play a pivotal role in shaping the future of clean energy infrastructure. However, the current GMA framework does not explicitly recognize clean energy development as a planning priority. Amending the GMA to include clean energy would:

- Ensure that comprehensive plans incorporate clean energy siting, zoning, and infrastructure needs—including distribution and small transmission upgrades.

- Provide a statutory foundation for integrating energy storage, distributed generation, and grid modernization into land use planning.
- Enable proactive coordination between utilities and local governments, reducing permitting delays and improving project predictability.

By leveraging existing planning processes and empowering local actors to take initiative, these changes would reduce the need for new state programs or funding while continuing to incentivize the development of clean energy and electric distribution.

Creating a Specific Section for “Clean Energy Facilities” Under Development Codes

As noted in our June 2025 response, the absence of standardized development code language for clean energy facilities often results in delays and uncertainty. Our experience for siting new energy storage facilities, where new code had to be created for an energy storage project, illustrates the need for a statewide model.

We recommend the Council support the creation of a model code section for “Clean Energy Facilities” that jurisdictions can adopt or adapt. This would:

- Clarify permitting pathways for emerging technologies and supporting infrastructure.
- Reduce administrative burdens on local governments.
- Encourage consistency across jurisdictions, benefiting developers and communities alike.

This is a low-cost, high-impact reform. By providing template language and guidance, the state can catalyze local action and unlock private investment.

Expanding the Definition of “Utility Facility” to Include Clean Energy and Energy Storage

Current definitions of “utility facility” often exclude modern clean energy technologies, limiting utilities’ ability to leverage streamlined permitting processes. Expanding this definition to include energy storage and clean energy would:

- Enable utilities to develop clean energy and energy storage projects under existing utility siting frameworks.
- Encourage utility-led innovation and investment in clean energy infrastructure.
- Align statutory language with the evolving role of utilities in Washington’s energy transition.

We recommend that the expanded definition also includes distribution and small transmission infrastructure necessary to support clean energy deployment. This change would allow utilities to more efficiently plan and build the systems needed to deliver clean energy to communities—again, without requiring new state funding.

Conclusion

We appreciate the Council's thoughtful approach and look forward to continued collaboration. Snohomish PUD remains committed to supporting policies that empower local governments, streamline permitting, and accelerate Washington's clean energy future—while ensuring that the infrastructure needed to deliver clean energy is not left behind.

Sincerely,

Ryan Collins
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