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From: Kevin Tempest, Research Director & Zac Pinard, Research & GIS Associate
Clean & Prosperous

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RE: Comments Clean Energy Siting Council 2026 Legislative Report

Clean & Prosperous Comment

As mentioned in our [previous comment](#), Clean & Prosperous (C&P) strongly supports Washington's commitment to transitioning off of polluting, volatile fossil fuels to safer and more reliable clean energy. According to the Northwest Power and Conservation Council, the demand for clean power in the Pacific Northwest is [set to double by 2046](#), making the need to dramatically increase and manage our available clean energy all the more urgent.

The need to reduce our reliance on fossil fuels and increase the amount of clean power we generate presents a unique opportunity for Washington state. We can build an economy of the future that creates sustainable, good-paying jobs, encourages cutting-edge innovation, and preserves industries that have long made our state attractive for national - and international - investment. At C&P, we are at the forefront of this effort, having recently released the Build Sustainable High Impact Infrastructure Together (Build SHIIT) [report](#) and [map](#) to identify clean energy projects currently stuck in Washington's development pipeline and the economic, workforce, and energy capacity that they represent.

We are pleased to see that some of the recommendations [we commented on](#) from the Clean Energy Siting Council's previous annual reports have begun to be addressed. We support the development of the Washington Electric Transmission Authority (WETA) in response to the recommendation to address transmission capacity limitations. We commend the passage of HB 2496 in order to improve

tribal engagement and consultation with EFSEC. We also commend the passage of SB 6076 to streamline energy infrastructure procurement for COUs, among other developments designed to improve permitting and support clean energy development. These are steps in the right direction and show that the Legislature can act when given clear direction from this Council. But C&P 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.

Below please find our feedback on the Draft Recommendations set forth in 2026, in order of priority.

Draft Recommendation: Reduce barriers to transmission planning, siting and permitting

The development of transmission infrastructure is arguably the single most important step to overcoming Washington's clean energy development shortcomings. The Council should not limit its impact on transmission buildout to supporting WETA with technical assistance and roadmaps. Solely developing guidance does not reflect the level of urgency required.

We support moving forward with the more actionable recommendations for transmission from this Council. Grant funding to local governments and tribes for transmission planning and permitting should be reflected in specific biannual budget requests, and clear capacity goals with aggressive deadlines for project completion should be a major part of the selection criteria.

Regarding efficiencies in the state lands right-of-way process, C&P is part of the NextGen Highways coalition, and we strongly recommend co-locating key transmission infrastructure with existing interstates. This would dramatically cut the time and cost it would take to build transmission infrastructure by limiting the number of permits required for and veto points to obstruct new construction.

Draft Recommendation: Continue funding for agencies on clean energy siting and permitting

C&P is currently drafting funding recommendations for Climate Commitment Act (CCA) revenues, and siting/permitting clean energy is one of the most critical uses of that money in our view. Last year, [ProPublica and Oregon Public Broadcasting released a landmark report](#) that found that Washington state was dead last in the country in renewable energy growth. We were extremely alarmed that our pace of development does not in any way match our decarbonization ambitions.

Washington state needs to make significant investments to expedite clean energy development. Helping projects move through the pipeline more quickly will ensure communities can reap the benefits of clean power, and Washington can play its part in mitigating the effects of climate change.

C&P strongly believes the Council needs to provide more specific guidance to the Legislature as it relates to funding for clean energy siting. Rather than simply reinstalling previous funding, C&P recommends the Council identify specific agencies to lead specific components of clean energy siting and permitting. The Council should clearly lay out a vision of a streamlined process detailing which agencies will take on which responsibilities for getting clean energy projects sited and permitted. Specific funding allocations to each agency based on how much staffing the agency would need to efficiently complete its component of the process would be most useful in the Council's final recommendations.

Draft Recommendation: Develop Washington's clean energy information portal

C&P is especially active in the development of an information portal to promote public awareness of the status of clean energy development in Washington. Our Build SHIT [report](#) and [map](#) released in January identifies 258 Washington-based projects stuck in administrative and review pipelines. These projects represent 24 gigawatts (GW) of new electric generation capacity, \$149 billion dollars in economic output, and more than 580,000 jobs. We are currently updating the map to include transmission infrastructure, utility service areas, and other key information to communicate Washington's clean energy needs and progress.

The Council does not need to duplicate this work, but should rather review and amplify existing resources. C&P will be continuing to use our capacity to update

and improve the map and dashboard in a timely manner. We would be happy to partner with the Council and use our existing dataset as an information portal.

Draft Recommendation: Support geothermal collaborative process recommendations

Advanced geothermal is one of the most promising emerging clean energy technologies. C&P supports resolving obstacles to its development in Washington in order to unleash the potential of this game-changing technology. We have submitted [previous comments](#) on the preliminary recommendations in Ecology's draft update. We encourage the Council to set an actionable goal for Washington specifying a target for how many megawatts of geothermal power should be online by a certain year.

Time is of the essence to turn key recommendations into actions as quickly as possible, even in advance of the legislative directives. Providing ample guidance to the Legislature ahead of the 2027 session should be a priority for state agencies, even as mapping and resource potential measurements continue. The Council can do this by supporting funding for exploration and development via the Climate Commitment Act, expanding agency coordination, updating the Washington State Energy Strategy to include more ambitious geothermal development scenarios, developing a programmatic EIS for geothermal, and supporting community and tribal engagement.

Draft Recommendation: Produce a Programmatic Environmental Impact Statement (PEIS) and provide technical assistance for local and tribal planning for stand-alone battery energy storage systems

A PEIS for battery energy storage systems (BESS) is crucial to reduce the bureaucratic burden that clean energy projects face in Washington. Compiling existing best practices for safety, emergency response, and training for first responders is important due diligence that should help project sponsors and local jurisdictions navigate community opposition to individual projects, which are exacerbated by online misinformation.

We recommend the Council similarly develop a PEIS for advanced geothermal systems to proactively remove unnecessary bureaucratic burdens and delays for another promising technology.

Draft Recommendation: Encourage siting of clean energy facilities near emerging large energy use facilities

While C&P supports the siting of clean energy facilities near emerging large load facilities, we cannot let the dual permitting of both energy supply and energy demand facilities become another source of delay. Once the clean energy infrastructure is sited and deemed essential, it should move through the review and permitting processes efficiently, regardless of where the demand facility is in the permitting process. Siting clean energy near large users is an excellent grid strategy to avoid significant transmission cost and delay, but this will not be possible in every situation.

Draft Recommendation: Develop public information to address safety and other concerns regarding clean energy technologies / Assess opportunities to reduce litigation delays / Advance community benefit agreements by collaboratively developing guidance and best practices

As mentioned above, we are supportive of efforts to compile information in order to address safety concerns for BESS and other clean energy technologies in a way that doesn't delay these imperative projects. Similarly, we are supportive of anything that can reduce litigation delays and commend the Council's recognition that lawsuits and appeals of permitting decisions for clean energy and transmission facilities have slowed clean energy development and increased costs for energy production.

While we support the assessment of legal appeals, the endeavor will only be successful if the findings have teeth. The Council's recommendations should be designed to keep the development pipeline moving by consolidating and providing a shot-clock within the number of litigation-eligible steps. While it is often difficult to evaluate litigation meant to delay projects versus those with merit, one indication is litigation against the same project at multiple steps in a long permitting process. A recent [report from Grid Strategies](#) cites "Appeals, Judicial

Review, and the Fragility of Finality” as an identified bottleneck in Washington’s clean energy permitting process, and recommends the state “adopt statutes requiring appeals to be filed within shorter windows, consolidated into a single forum, and resolved on an expedited schedule, while narrowing the scope of issues to those raised in the administrative record. The state could also limit serial appeals by requiring that all related claims be brought together.”

A statewide entity like EFSEC must have the authority to supersede any remaining litigation that attempts to delay a project and cause massive cost overruns. The state must be able to act in the face of these challenges to finish projects in a timely manner for the benefit of the people of Washington. It will also make the state a more attractive place for clean energy developers to invest in the future.

In order to foster a more cooperative and mutually beneficial dynamic between local communities and statewide clean energy goals, C&P strongly supports the development of community benefit agreements. Our recent study mission to Texas showed how important [localized community benefits](#) are for overcoming initial skepticism of clean energy technologies like BESS.

Other Recommendations

Clean & Prosperous supports guidance for developers through the pre-application, development, engagement and permitting process. However, developers are competent professionals capable of understanding existing statutes and processes. In addition to a toolkit for reference, we would recommend increasing agency staffing to provide direct, one-on-one technical assistance. Developers are more likely to benefit from a dialogue with a trained professional administrator at key inflection points in the process.

We also support identifying opportunities and risks for siting emerging clean energy technologies through a collaborative process, especially with tribes. Tribes are key partners in Washington, and we must work with them comprehensively, broadly, and early so that individual projects are sited from the beginning in tribal communities that want them there and stand to benefit. The Council should prioritize battery storage and advanced geothermal technologies for this work.

We also support the promotion of energy development in agricultural pivot corners, and agrivoltaics in general. Agrivoltaics has been well documented as a "dual-use" approach allowing farmers to earn extra revenue while benefiting the

health of the land via shading, cooling, and water retention. Focusing on underutilized pivot corners in agricultural land is an insightful and resourceful targeting of agrivoltaics that we commend.

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. While these recommendations are steps in the right direction, many of them are not focused or urgent enough to meaningfully address the problem of our failure to develop clean energy at scale.

Clean & Prosperous is ready to work with the Washington State Department of Ecology, Commerce, and all other parties to develop tools and dashboards, communicate project benefits, build broad coalitions, and provide technical expertise. Please do not hesitate to reach out with any questions or ideas on this comment.