

6/26/2026

To: Interagency Clean Energy Siting Coordinating Council

Re: Comments on Draft Recommendation Ideas for the 2026 Legislative Report

Dear Council Members,

Grant Public Utility District (Grant PUD) appreciates the opportunity to comment on the Draft Recommendation Ideas for the 2026 Annual Legislative Report. As a consumer-owned utility serving a region experiencing load growth and transmission constraints, Grant PUD supports the Council's efforts to improve the efficiency, predictability, and effectiveness of clean energy siting and permitting. The draft recommendations provide a useful starting point. To better support legislative action under RCW 43.394, however, the final report should more clearly identify where statutory changes, dedicated funding, and structural reforms are necessary to achieve the intended outcomes.

Specifically, our comments focus on the following sections of the report:

Reducing barriers to transmission planning, siting and permitting

We appreciate the inclusion of transmission planning, siting, and permitting as a priority issue. Transmission constraints are a challenging barrier to clean energy development in Washington. While the draft appropriately highlights the need for improved coordination and technical assistance, it should place greater emphasis on structural reforms, including permitting improvements for reconductoring. Legislative action should establish clearer state authority to coordinate multi-jurisdictional permitting processes, including explicit authority for cross-agency lead roles and consolidated timelines, and better align planning, siting, and cost-allocation frameworks.

The newly authorized Washington Electric Transmission Authority should be equipped with sufficient authority and support to coordinate multi-jurisdictional siting and permit efforts alongside its planning responsibilities. As locally elected governing bodies with established siting authority, public utility districts should be supported not overridden by new state processes. The final recommendations should avoid creating duplicative regulatory layers that slow transmission development and instead reinforce local decision-making capacity.

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

Grant PUD also supports the recommendation to develop a programmatic environmental impact statement and provide technical assistance for battery energy storage systems. Energy storage will be important for managing variability, supporting reliability, and integrating clean energy resources. But without clear statutory direction, a programmatic EIS may not deliver the intended streamlining benefits. Explicit SEPA tiering authority will be essential to ensure local reviews can rely on the programmatic analysis.

Legislative action should authorize SEPA tiering from the programmatic review and support the development of consistent statewide siting and safety standards. Resources for local governments to adopt and implement model ordinances will also be essential to reduce inconsistency, delay, and uncertainty.

Support geothermal collaborative process recommendations

We encourage the Council to include geothermal development as part of its broader clean energy siting and permitting recommendations. Geothermal resources, including emerging technologies such as enhanced geothermal systems, could provide valuable firm, dispatchable clean energy and help diversify Washington's resource portfolio. But Washington's geothermal regulatory framework remains outdated. [Chapter 332-17 WAC], the state's geothermal drilling rules, was last updated in 1979 and does not reflect current technologies or development pathways, resulting in delays due to unclear expectations and inconsistent permitting outcomes. The Legislature and relevant agencies should prioritize modernization of [WAC 332-17] so that exploration, drilling, reclamation, and environmental review requirements are clear, current, and appropriately tailored to both conventional and next-generation geothermal projects. A modernized framework would help reduce regulatory uncertainty, improve coordination across agencies, and position Washington to better evaluate geothermal as part of its long-term clean energy strategy.

Develop Washington's clean energy information portal

The proposed clean energy information portal presents a valuable opportunity to improve transparency and coordination across agencies, utilities, and developers. Legislative support will be necessary to establish consistent data standards, provide for ongoing maintenance, and ensure meaningful agency participation.

We appreciate the report's recognition that litigation can delay permitting decisions, but the recommendation to assess those delays should be expanded to include potential solutions. Lengthy or duplicative appeals processes can delay infrastructure, increase costs, and create uncertainty for utilities, developers, and communities alike. The Legislature should consider options to streamline appeals, such as consolidating SEPA and land-use appeals into a single venue and establishing predictable timelines while preserving opportunities for public and stakeholder input.

Continue funding for agencies on clean energy siting and permitting

The draft recommendations recognize the need for agency funding, but the final report should also identify local governments and tribes as essential partners in the siting and permitting process. Local jurisdictions often face capacity constraints in reviewing energy projects, and effective tribal consultation requires early engagement, sustained coordination, and adequate support. Dedicated funding would help ensure timely, informed, and meaningful participation throughout project development.

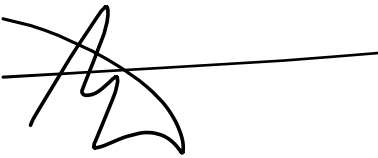
Identify mechanisms to effectively protect vital habitat, including shrub steppe, while supporting clean energy development

Grant PUD also supports the Council's focus on balancing clean energy development with the protection of vital habitats, including shrub-steppe ecosystems. To reduce project-by-project conflict and uncertainty, the state should consider more proactive planning tools, such as identifying lower-conflict shrub-steppe siting areas and common-sense mitigation frameworks. These approaches would provide certainty while helping ensure that environmental resources are protected in a consistent and durable way.

In summary the draft recommendations emphasize coordination, guidance, and technical tools, but they do not sufficiently identify the statutory changes, enforceable timelines, and system level planning reforms needed to address the root causes of siting and permitting delays, particularly transmission constraints, clean energy development, load growth, and fragmented authority.

We appreciate the Council's continued leadership on clean energy siting and permitting issues. Strengthening the final recommendations with clearer legislative pathways in the areas of transmission, geothermal, lower conflict shrub-steppe siting, battery storage deployment, and planning for load growth will be needed to achieve Washington's clean energy and economic development goals. We appreciate the opportunity to provide these comments and look forward to continued collaboration as this work progresses.

Sincerely,

A handwritten signature in black ink, appearing to be 'MH', with a long horizontal line extending to the right.

Matthew Harris
Senior Policy Analyst
Grant Public Utility District