

Anthony Umek

**Anthony Umek, West Richland, WA 99353 Comments on Clean Energy Siting Council 2026
Annual Draft Report. May 29, 2026.**

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It appears we are focused on home grown administrative processes, apparently not looking for lessons learned from both the USA and worldwide. Washington State is somewhat unique in having a “Energy Facilities Site Evaluation Council (EFSEC). It appears there can be confusion and even duplication of effort with the “Interagency Clean Energy Siting Coordinating Council”. Other states have apparently simplified their processes. Examples are the California Energy Commission, Michigan Public Service Commission provide this function. Massachusetts has an “Energy Facilities Siting Board” that includes public members.

Overall, I am concerned with the burden that is being placed on actually building new energy sources that are “clean”, reliable and can operate 24 hours/day, seven days per week regardless of weather impacts. Currently only hydro and small modular nuclear power plants can meet that performance criteria. In addition, sources such as wind and solar, are typically located very distant from Washington State population centers, requiring vulnerable long distance transmission systems. As China is having an increase in larger population centers, China is rapidly developing small modular reactors and hydro to augment their coal, wind and solar projects. Europe has formed the “European Industrial Alliance on SMRs”. Neither Europe overall or the UK specific have any equivalent to a Clean Energy Siting Council Studying their processes for “lessons ‘earned” might be useful.

The following are comments on the Report itself:

1. The report is lengthy and info is duplicated several times, An efficiency review and edit would be useful.
2. Section 201, c 11 includes language regarding enforcement actions only for hydroelectric projects. It is not clear why any project that have been the subject of enforcement actions would not be also listed.
3. Creating another non “committee” or council is unnecessary
4. The Energy Facility Site Evaluation Council has overall authority for siting any projects, including “Clean Energy Projects”. Members are other Washington State Agencies. The Council could benefit from outside technical experts to assure an adequate “Life Cycle and Risk Analysis” has been performed. Such analyses have a proven record or identifying key unintended consequences and adverse impacts on environment, health and safety. Such analyses can include assessing:
 - a. Impacts on obtaining source materials (mining, excavation, etc.);
 - b. fabrication and manufacturing,. including country of origin;

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- c. national or international Codes and Standards including process regulations (e.g. ANSI, National Electric Code International Building Codes,
- d. expected operating lifetime, permitted waste disposal and ultimate decommissioning and restoration of impacted land or waters to pre project conditions.
- e. Authority Having Jurisdiction
- f. Utility and Interconnection Standards