PUGET SOUND ENERGY

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Shorelines and Environmental Assistance Program
Washington State Department of Ecology
Olympia, Washington

RE: BESS Programmatic Environmental Impact Statement – Scoping Document

Dear SEPA Responsible Official,

Puget Sound Energy, Inc. (PSE) appreciates the opportunity to comment on the *Scoping Document For Programmatic Environmental Impact Statement on Battery Energy Storage System Facilities in Washington State*. As the largest private utility in Washington, PSE has a strong interest in land use policies that support responsible energy development while maintaining environmental protections. We also have a vested interest in an efficient and appropriately scoped environmental review being conducted for Battery Energy Storage Systems (BESS) as these facilities have proven to be particularly difficult to site in Washington.

Adding BESS to our energy generation and delivery system is critical to PSE's plans to provide reliable power to our customers while at the same time meeting Washington's aggressive clean energy requirements. Currently, PSE needs an estimated 1,500 MW of energy storage by 2030 and is evaluating multiple opportunities across the state. The results of this programmatic EIS will hopefully facilitate siting and timely permitting of BESS.

With that understanding PSE has the following specific comments on the scoping document:

Section 1.3 PEIS Process: The first paragraph indicates that the environmental review will "consider potential significant impacts from general types of utility-scale lithium-ion BESS facilities." While an EIS typically only needs to address significant impacts, a programmatic EIS should also disclose impacts that are not significant. This is important as it allows agencies to understand what impacts do not typically reach the significant and adverse level and potentially dismiss those from project level SEPA review.

Section 3.1.1 What is a BESS?: The first paragraph includes numerous assumptions about BESS and how they are used, including discussion of surplus and peak demands. Ecology should start with the simplest discussion of a BESS and then provide further detail on how they are used in the operation of the grid. At its simplest level, a BESS stores electrical power for later use and the specific use is not necessarily relevant to the impacts of them.

Section 3.1.2 Types of BESS:

- There are multiple battery technologies available, and limiting the EIS to lithium-ion technologies undermines the ultimate utility of this PEIS. At a minimum, the PEIS should

include analysis around other technologies and how impacts could be different than those of lithium-ion.

- The scoping document specifies a split between Residential/Commercial and Utility Scale facilities at 1 MW. The EIS should specify the reason for this split so that it can help inform jurisdictions on the impacts or lack of impacts from non-utility scale facilities. Tiering should allow tailoring of BESS zoning and permitting regulations that appropriately balance community values and interests with the benefits that BESS can provide.
- The EIS should also discuss impacts based on scale regardless of its designation as utility scale. For example, a 5 MW BESS for a microgrid project, although greater than 1 MW, would likely have substantially different impacts than a 100 MW facility based on the potential footprint alone. Some local jurisdictions recognize this in local codes. For example, Pierce County adopted a three-level system including facilities up to 2 MW, those from 2-7 MW and 7 MW and above
- The EIS should include a discussion of sizing that not only includes power capacity but also includes energy capacity.

Section 3.1.2.1 Lithium-ion batteries: In addition to identifying applicable health and safety codes, the EIS should consider the requirements of the code in addressing potential impacts.

Section 4 Related BESS Impact Analysis – Table 1: This table is not clear on whether the identified impacts are specific to the BESS element of a combined project or the overall project. This should be clarified if it has the potential to affect the contents of the PEIS.

Section 5.4 Evaluating impacts and mitigation in the PEIS: This appears to list all environmental topics while Table 1 only lists a small number of potential significant environmental impacts. With this consideration, can the remaining elements be dismissed from further review after noting that impacts to the other elements of the environment are not significant?

Thank you for the opportunity to provide these comments.

Sincerely,

Brian Carrico
Puget Sound Energy
Major Facility Siting