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Subject: Comments on Ecology's Scoping Document for the Programmatic Environmental Impact Statement on Utility Scale Battery Energy Storage Systems

The Mid-C PUDs (Chelan PUD, Douglas PUD, and Grant PUD) appreciate the opportunity to comment on the Washington State Department of Ecology's scoping document for the Programmatic Environmental Impact Statement (PEIS) addressing utility scale battery energy storage systems (BESS). We support preparation of a PEIS that can improve permitting efficiency, provide greater regulatory certainty, provide guidance on siting, and establish a consistent framework for evaluating environmental impacts associated with BESS development in Washington. Ecology states that the purpose of the PEIS is to support the state's clean energy transition while identifying potential environmental impacts and mitigation measures associated with utility scale BESS facilities, and we generally support these objectives.

We encourage Ecology to ensure that the PEIS not only evaluates potential adverse environmental impacts but also provides appropriate context regarding the public benefits associated with BESS deployment. We recognize that the statutory direction for preparation of programmatic environmental impact statements under RCW 43.21C.535 is focused on identifying, evaluating, and disclosing probable significant adverse environmental impacts and potential mitigation measures. The statute does not expressly require a corresponding evaluation of the reliability, economic, policy, or clean energy benefits associated with a particular technology, and Ecology may therefore conclude that a comprehensive benefits analysis falls outside the scope of its statutory mandate.

Because the PEIS intends to inform future decision makers, permitting authorities, project applicants, Tribes, and the public, we believe the document would be improved by acknowledging and discussing the principal public benefits associated with utility scale

battery energy storage systems. While the scoping document identifies numerous environmental resource areas for study, including environmental justice, water resources, biological resources, environmental health and safety, land use, and cumulative impacts, it does not similarly identify the broader public interests that may be served by deployment of energy storage resources.

The PEIS should also include a balanced discussion of the potential safety considerations associated with BESS facilities, including fire prevention, emergency response planning, facility design standards, and other measures intended to protect public health and safety. Providing clear and objective information regarding these issues can help address public questions during project siting and reduce uncertainty during subsequent permitting processes. Discussion of BESS safety considerations should inform project specific review and mitigation measures where warranted by site conditions but should not be interpreted as supporting uniform statewide siting restrictions, exclusion zones, mandatory setbacks, or presumptive mitigation requirements applicable to all projects. To the extent consistent with Ecology's statutory authority, the PEIS should provide context that allows decision makers to better understand both the potential impacts of battery storage development and the role battery storage may play in Washington's evolving electric system.

Ecology should acknowledge and describe grid reliability, resilience, and resource adequacy considerations associated with BESS deployment. The scoping document recognizes that BESS facilities can support reliability, resiliency, and integration of clean energy resources, but the proposed scope does not clearly indicate whether these considerations will be discussed as part of the PEIS. We recommend Ecology provide context regarding resource adequacy during winter and summer peak demand periods, reliability support during generation or transmission outages, circumstances in which BESS facilities may support black start and emergency response functions, resilience during extreme weather events, and the operational flexibility provided by storage resources. These considerations are important to understanding the broader public role of battery storage systems.

The PEIS should also address the relationship between battery storage and hydroelectric operations. Washington's electric system is uniquely dependent on hydroelectric generation, and the scoping document acknowledges that hydroelectric power accounts for a significant share of the state's electricity supply. Ecology should describe how battery storage may interact with and complement hydroelectric resources through improved integration of variable renewable resources, reduced ramping demands on hydroelectric facilities, enhanced operational flexibility during transmission constraints, improved management of surplus energy conditions, and increased reliability during periods of hydrologic variability.

Battery storage may also create opportunities to capture and shift energy that might otherwise be curtailed or constrained, thereby improving utilization of existing generation resources. In addition, ongoing research is examining whether operational flexibility associated with storage resources could create additional opportunities to balance fish, reliability, and generation objectives under certain operating conditions. Given the central role of hydropower in Washington's energy system, this relationship warrants explicit consideration within the PEIS.

Ecology should acknowledge the potential transmission and infrastructure considerations associated with strategically located BESS facilities. The scoping document notes that transmission capacity represents a significant challenge for future energy development. Depending on project location and system needs, battery storage may help relieve transmission congestion, improve utilization of existing transmission infrastructure, defer or reduce the need for transmission upgrades, and support reliability in constrained areas. These considerations are relevant context for understanding the role energy storage may play in the broader electric system.

The PEIS should also acknowledge the potential environmental and clean energy benefits commonly associated with battery storage deployment. BESS facilities can facilitate integration of renewable energy resources, reduce curtailment of clean energy generation, support electrification objectives, and improve utilization of existing low carbon generation resources. Discussion of these considerations would provide useful context for decision makers, even if formal evaluation of such benefits falls outside the primary scope of the PEIS.

The PEIS should also recognize that the potential impacts and appropriate mitigation measures for BESS facilities may vary significantly depending on project location and existing site conditions. Utility scale BESS facilities proposed at existing utility, generation, transmission, or industrial sites often present different environmental and operational considerations than greenfield developments. Existing utility sites may benefit from established infrastructure, controlled access, security systems, trained operating personnel, existing emergency response protocols, and prior land disturbance. As a result, the nature and magnitude of potential impacts, as well as the effectiveness and necessity of mitigation measures, may differ from projects proposed on previously undeveloped lands. The PEIS should acknowledge these distinctions and avoid assumptions that all utility scale BESS projects present identical environmental risks or require identical mitigation approaches.

We encourage Ecology to ensure that any mitigation recommendations remain site specific and appropriately tied to future project level review. The scoping document states that the PEIS will not approve, deny, authorize, limit, or exclude projects on a site-specific basis and

that future projects will require project-level SEPA review. Ecology should clearly distinguish between mitigation measures identified for informational purposes under SEPA and binding requirements imposed under separate statutory, regulatory, code, or permitting authorities. The PEIS should avoid recommendations that could effectively function as de facto siting prohibitions, exclusion zones, mandatory setbacks, or presumptive permit conditions when applied without consideration of site-specific facts and applicable law.

Ecology should also consider the cumulative effect of multiple mitigation measures when evaluating potential recommendations. While individual mitigation measures may appear reasonable when evaluated independently, the combined effect of layering multiple requirements can materially increase project costs, extend development timelines, reduce design flexibility, and in some circumstances constrain otherwise viable projects. The PEIS should therefore consider mitigation measures not only individually but also in combination, recognizing that the cumulative burden of multiple requirements may affect project feasibility, permitting efficiency, deployment timelines, and achievement of state energy policy objectives. Such consideration would ensure that mitigation recommendations remain proportional to identified impacts and do not unintentionally create barriers to development.

To avoid confusion during future project reviews, Ecology should expressly state that mitigation measures identified in the PEIS are examples for consideration by the appropriate lead agency or permitting authority and must be evaluated based on site-specific facts, applicable law, and the jurisdiction of the agency making the permitting decision. Ecology should also ensure that the PEIS serves as a tool to streamline and inform future project level review rather than create additional procedural barriers or sources of delay. Consistent with the purposes of SEPA, future lead agencies should be able to efficiently incorporate, tier from, and rely upon the programmatic analysis where appropriate, thereby reducing duplication of effort and focusing project level review on issues that are genuinely site specific. The PEIS should expressly acknowledge that one of its intended outcomes is timelier and more predictable environmental review, greater regulatory certainty, and more efficient permitting decisions. Any recommendations, mitigation measures, or identified impact considerations should be framed to facilitate efficient project evaluation rather than establish new review thresholds, procedural requirements, or analytical expectations that could unnecessarily prolong permitting timelines.

Ecology should also consider how proposed mitigation measures may affect implementation of future projects and, indirectly, utility customers. Mitigation requirements may increase project costs, introduce scheduling delays, or reduce infrastructure flexibility. Where relevant to understanding the practical implications of

mitigation measures, the PEIS should acknowledge that such measures may affect project economics, infrastructure deployment, and the cost of electric service. A balanced review should recognize that mitigation measures may involve tradeoffs that are important for policymakers and permitting authorities to understand.

Ecology should also recognize that smaller utility owned battery systems may serve important reliability functions in isolated or remote electric systems, even where they fall below the proposed “utility-scale” threshold. Their scale, operating characteristics, siting constraints, and emergency response considerations may differ substantially from large grid connected BESS facilities. The PEIS should acknowledge these distinctions and avoid applying analytical or mitigation expectations developed for larger facilities inappropriately to smaller utility microgrid and reliability applications.

We support Ecology's effort to prepare a statewide PEIS for utility scale battery energy storage systems and appreciate the opportunity to participate during scoping. The PEIS has the potential to improve permitting consistency, provide valuable guidance to project applicants, agencies, Tribes, and the public, and facilitate more efficient environmental review. We encourage Ecology to ensure that the PEIS thoroughly evaluates potential environmental impacts and mitigation measures while also, to the extent consistent with its statutory authority, acknowledging the broader reliability, resilience, infrastructure, environmental, and clean energy considerations associated with battery storage deployment. By providing a timely, technically rigorous, and useful decision analysis, Ecology can develop a PEIS that supports informed decision making while preserving flexibility for future project-level review and permitting.