Washington Public Utility Districts Association (Travis Nelson)

The Washington Public Utility Districts Association (WPUDA) represents 27 public utility districts providing essential, not-for-profit energy, water and wastewater services across Washington.

We appreciate the opportunity to comment on the scoping for the Programmatic Environmental Impact Statement for Battery Energy Storage Systems in Washington state.

Policy Context

The development of Battery Energy Storage Systems (BESS) is essential to meeting the statutory mandates of the Clean Energy Transformation Act (CETA) and the Climate Commitment Act (CCA), which require Washington to achieve a 100% renewable or zero-carbon electrical grid by 2045 and net-zero greenhouse gas emissions by 2050. As state energy demand is projected to more than double by 2050, BESS facilities may provide the necessary grid stabilization to integrate intermittent clean energy sources, such as wind and solar, by storing surplus power for release during peak demand periods.

Siting and Land Use Consistency Recommendations

The PEIS should include a comprehensive analysis of siting stand-alone BESS facilities in a manner consistent and commensurate with light industrial uses, specifically retail distribution centers or big-box warehouses. Factual considerations for this recommendation include:

Physical Footprint: Utility-scale BESS are often housed within "warehouse-type" enclosures or standardized 40-foot shipping containers (approximately 8 feet wide and 8.5 feet tall) installed on concrete foundations.

Infrastructure Requirements: These facilities utilize standard industrial components, including heating, ventilation, and air conditioning (HVAC) units, auxiliary electrical systems, and graveled, fenced perimeters.

Siting Versatility: Unlike co-located BESS that cover large areas far from urban centers, stand-alone facilities are smaller in scale and can be sited in diverse locations, including areas in or near cities where electricity demand is highest.

Environmental Health and Safety Risks

While BESS is critical for the "green transformation," the PEIS must provide a rigorous evaluation of the risks associated with thermal runaway events. Research indicates that battery failures can lead to the leakage of electrolytes or ignition, releasing toxic gases that cause irritation to the skin and lungs.

The PEIS should specifically reference the 2025 Moss Landing incident in California, where a battery fire necessitated the 24-hour evacuation of approximately 1,200 residents.

Evaluation must be conducted on the potential for:
Significant environmental harm to local water resources and fish populations from fire suppression runoff or chemical leaks.

Impacts on public services, particularly the burden on local fire departments in remote locations with limited response capabilities for specialized lithium-ion fires.

Regulatory Alignment and Mitigation

Consistency with existing statute is essential when developing the PEIS. Current statute directs state agencies under RCW 43.21C.030 (b) Identify and develop methods and procedures, in consultation with the department of ecology and the ecological commission, which will ensure that presently unquantified environmental amenities and values will be given appropriate consideration in decision making along with economic and technical considerations;

As such, the economic and technical burden of these facilities must be fully evaluated, understood, and accounted for to ensure alignment with statutory requirements.

As of August 2026, Washington state has not yet adopted the most recent safety standards, such as the 2026 version of NFPA 855 or the latest UL 9540A performance testing standards. The PEIS should identify these regulatory gaps and recommend that project-level reviews utilize the most current national safety codes to establish adequate separation distances and fire suppression protocols.

In conclusion, the PEIS should provide a framework that facilitates the rapid deployment of BESS to support intermittent energy resources while establishing stringent siting and safety requirements to prevent the catastrophic environmental and public health outcomes associated with battery failure incidents.