



July 8, 2025

To: Brandon Reich, Marion County Planning Director
From: Diane Brandt, Policy and Legislative Affairs Director, Renewable Northwest
Re: **Marion County BESS Ordinance and Work Group**

Dear Mr. Reich:

Renewable Northwest is a regional, non-profit renewable energy advocacy organization based in Oregon, dedicated to strengthening and expanding clean energy infrastructure in the Pacific Northwest to support electricity demand, grid reliability and resilience, and decarbonization. Our members are a combination of renewable energy and energy storage industry and businesses, as well as environmental and consumer groups.

Renewable Northwest appreciates the opportunity to offer comments on updating existing Marion County code language for battery energy storage systems (BESS). Renewable Northwest is supportive and interested in the creation of standards for BESS that will allow the county to site this important electricity system resource responsibly and effectively. BESS is a growing and essential feature of a reliable electricity system, and plays a vital role in Oregon's reliable energy future.

BESS Importance for Electricity Reliability

Oregon and the Pacific Northwest region are facing an unprecedented time of growth in electricity demand and urgent need for transmission capacity expansion. Recent forecast projections estimate more than a 40% increase in the needed electricity in the next decade.¹ Much of this is to support development in the tech sector and high tech manufacturing in the region, but there is also required growth in electricity generation to maintain a reliable system. While Oregon utilities do need new electricity generation sources, there is also an important role for BESS to play in maintaining a reliable system in a transmission constrained system.

As the state and region transition to a cleaner electricity system that efficiently utilizes renewable energy resources, BESS play an essential role for local and grid resiliency as well as ensuring reliability. This can look like BESS capturing electricity when it is at an excess and then

¹ PNUCC's 10 year forecast:

<https://www.pnucc.org/wp-content/uploads/2022-PNUCC-Northwest-Regional-Forecast-final.pdf>

NW Power and Conservation Council's preliminary 20 year outlook:

<https://www.nwcouncil.org/news/2025/05/02/pacific-northwest-load-forecast-2025/>

dispatching the electricity at high-use times. BESS also offer cost savings for ratepayers - by capturing excess electricity when rates are low, it is able to put that low-cost electricity back on the grid for use at other times. A flexible resource that can be placed around the grid according to its best use, BESS offers a comprehensive list of benefits for Oregonians.²

BESS Siting: Safety and Location Matter

BESS are a flexible resource and the amount and location of land required can vary based on technology and how it will be used. For example, BESS can be co-located with electricity generation systems of all sizes – from residential roof-top solar to utility-scale located in remote areas. BESS can also be built as a stand-alone system in various locations around the grid – from remote areas as a transmission congestion service, or closer to where the electricity is consumed in load centers. This flexibility is important to keep in mind as Marion County contemplates zoning for BESS.

Based on Renewable Northwest’s previous engagement on BESS county ordinances, safety is a primary concern of communities. This can be addressed by having plans and requirements in place for fire-suppression and prevention. American Clean Power released a BESS model ordinance³ that reflects best practices as outlined by the National Fire Protection Association (NFPA). Specifically, NFPA 855⁴ is a fire safety standard local jurisdictions can adopt so that updates to those standards are incorporated by reference into local regulations, as updates to those standards are finalized. We understand that an update to this standard will be published this fall.

Renewable Northwest is also aware of other county ordinance updates from Washington State – Whatcom and Grant Counties – that have struck a productive balance between safety and allowing for BESS to be sited in the county.

Renewable Northwest appreciates the opportunity to provide comments on a county-level BESS ordinance update and stress the importance of maintaining flexibility for siting BESS. We would welcome the chance to support this effort and participate in conversations around the thoughtful siting of BESS and the essential role it plays in Oregon’s energy future.

Sincerely,
Diane Brandt
Policy and Legislative Affairs Director
Renewable Northwest

² Resources on the values of storage for the grid include energystorage.org; US EIA “Energy Today” [feature on storage](https://www.eia.gov/energytoday/), Jan 2018; and Resources for the Future “Charging Up: The State of Utility-Scale Electricity Storage in the United States”, April 2025.

³ <https://cleanpower.org/resources/model-ordinance-utility-scale-battery-energy-storage-systems/>

⁴ <https://www.nfpa.org/codes-and-standards/nfpa-855-standard-development/855>