



March 17, 2026

To: Marion County Board of Commissioners
From: Diane Brandt, Policy and Legislative Affairs Director, Renewable Northwest

Re: Considerations for Stand-Alone Battery Energy Storage Systems in Marion County

Renewable Northwest (“RNW”) is a regional, non-profit renewable energy advocacy organization headquartered 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. RNW is also participating in the current Marion County BESS Advisory Committee (“BAC”). We would like to offer the following comments on Battery Energy Storage Systems (“BESS”) as the Board of Commissioners (“Board”) considers the **Administrative Review Case #25-015, which is scheduled for a hearing on March 18, 2026.**

Need for Siting BESS in Marion County

BESS¹ are critical pieces of Oregon’s current and future energy infrastructure. Oregon, like many other states, is facing serious electrical transmission system (“grid”) constraints making it more difficult to ensure reliable electricity delivery during times of high demand. BESS, and in this case stand-alone systems, help improve grid reliability by alleviating some of these grid pressures: by storing electricity locally when there is excess capacity on the grid and discharging that power locally during times when electricity usage is high and the grid is challenged to move in sufficient electricity, BESS offer a local-focused solution. BESS were designed for communities like Marion County where all three “utilities” (PGE, PacifiCorp, and BPA serve public power entities) with service territory in the County are looking for solutions to significant transmission constraints. BESS offer decreased stress on transmission lines, which saves money by reducing the need for expensive new power lines, and increased reliability of electricity service to local businesses, farms, and households, all of which are essential to economic development. Stand-alone BESS are also critical for local resilience: they help maintain local reliable service during extreme weather events like ice storms, heat waves, or wildfire.

¹ BESS can be installed in a few ways - there are the smaller “on site” backup power storage systems, co-location with large wind and solar generation projects, and as “stand-alone” systems near substations to support the grid. It is this last category that is most relevant for Marion County.

Stand-alone BESS: Utility Facility

When BESS are installed as stand-alone systems, they are viewed as grid and transmission assets supporting utility substations and do not generate electricity. In Oregon, this means they can be permitted as a utility facility necessary for public use. Given the role BESS plays in ensuring local reliability and power resilience, and that they are most efficiently sited near existing substations, stand-alone BESS are typically considered utility facilities or electricity facilities.² In Oregon, utility facilities include equipment and infrastructure used by public, private, or cooperative entities to provide essential services like electricity. This is consistent with the operations and reliability services provided by a stand-alone BESS.

Renewable Northwest appreciates the opportunity to provide these brief, focused comments on stand-alone BESS and welcome any follow up questions if needed. BESS offer many benefits to Marion County as they can reduce utility bills, support economic growth through reliable electricity service, avoid the need for new transmission lines, and increase local electricity resilience during extreme weather events. We acknowledge there are many other important topics to discuss around siting stand-alone BESS in Marion County, and we look forward to our continued engagement at the BAC. We welcome any questions and discussion around BESS as a utility facility and the essential role these systems play in Oregon's reliable and affordable energy future.

Sincerely,

Diane Brandt
Policy and Legislative Affairs Director
Renewable Northwest

² Considerations for Government Partners on Energy Storage Siting & Permitting: https://cleanpower.org/wp-content/uploads/gateway/2023/03/Storage_SitingPermitting_March-2023.pdf
Discusses siting and permitting considerations at a high level for BESS