



November 4, 2025

Board of County Commissioners
Thurston County
2000 Lakeridge Drive SW Olympia, WA 98502

RE: Thurston County Comprehensive Plan 2045 and Code Amendments – Chapter 20.55C – Alternative Energy Storage Solutions

Dear Commissioners,

Renewable Northwest (RNW) appreciates the opportunity to provide testimony on the Thurston County ("County") Comprehensive Plan 2045 draft dated November 4, 2025, ("Comprehensive Plan") and related proposed County Code revisions.

RNW is a 501(c)3 nonprofit organization that advocates for affordable, reliable, and carbon-free energy infrastructure across Washington, Oregon, Idaho, and Montana. Our membership includes clean energy and storage developers, manufacturers, consultants, law firms, and other nonprofit organizations including ratepayer advocates and environmental NGOs.

RNW applauds the County's thoughtful discussion of climate issues in chapter two of "Thurston 2045", including the note that electricity usage is the single largest source of County emissions. This emissions profile is not unusual, which is one reason Washington State passed the Clean Energy Transformation Act (CETA) requiring utilities to provide 100% clean electricity by 2045.

Meeting this mandate will not be possible without significant investment in energy storage, so we appreciate the direct reference to the importance of advancing battery storage facilities development in Goal 1, Objective D, to increase the production of local renewable energy. There is no question Battery Energy Storage Systems (BESS) will enhance the County's ability to incorporate clean electricity, as well as provide resilience to the County's energy infrastructure.

In these comments, our goal is to provide constructive ideas for how the Comprehensive Plan can be improved to better incorporate BESS into Thurston County's energy future.

Benefits of BESS

The benefits of BESS units extend beyond supporting integration of clean energy. BESS also helps optimize overall electric grid functionality by storing energy generated closer to Thurston County during times of excess supply, which can then be used during periods of peak demand.

BESS units provide many value streams, including:

- Increased stability and resiliency of the electric grid
- Supporting affordable rates for local homes and businesses
- Added energy capacity during times of peak demand or emergencies
- Ability to deliver electricity very quickly and flexibly, on demand
- Help integrating intermittent power generation supply from sources like solar and wind

Capturing the Benefits of BESS

Because BESS can help Thurston County meet comprehensive planning goals, and Washington State's electricity mandates, while broadly benefiting the electricity grid, the Comprehensive Plan should ensure BESS units can safely and affordably be built in the County. There are two provisions of the draft County Code that RNW respectfully suggests the County consider amending:

1. BESS Unit Size

The battery size limits defining Tier 1 and Tier 2 of the current draft code are fairly small by today's BESS unit standards. RNW recommends considering a third Tier for BESS units of 6 MWac or greater and increasing the limit of Tier 2 systems up to 6 MWac. This will create a code consistent with how BESS units are being deployed today, including those that are utility scale.

2. Development Zones

BESS units that fall into the recommended Tier 3 category are most useful when they are closest to where power is needed—near existing transmission lines, substations, and businesses. Allowing Tier 3 BESS units near this existing infrastructure will minimize visual impacts, increase efficiency, and reduce the need for new transmission construction.

RNW recommends the County identify Zoning districts that meet these criteria, and encourage BESS development in these areas by allowing BESS units to be approved via Special Use Permits. This will still allow the County to work with individual project proponents early in the conceptual stages of a project to identify site-specific opportunities and related concerns.

BESS units in Tier 1 and Tier 2 should be permitted in any zone.

Further discussion

RNW regularly engages with counties throughout the Pacific NW who are considering ordinances guiding development of BESS. We are familiar with concerns about fire and safety and applaud the county's reference to NFPA 855; this standard can be useful in defining reasonable setbacks and other components of an ordinance that allows the county to benefit from BESS units while ensuring the safety of residents. RNW would also be happy to discuss provisions other counties in the region have adopted or are considering, or help provide connections to BESS developers, safety professionals, siting and permitting experts, or others within our membership.

Again, we appreciate the opportunity to provide these inputs and stand ready to offer support to the county as needed.

Sincerely,

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