



November 7, 2025

## Minority Views, Governor Ferguson's Data Center Workgroup

As a participant of the Data Center Workgroup (“Workgroup”), Renewable Northwest (“RNW”) submits the following minority views on the Workgroup’s recommendations which are primarily suggestions for further clarification and strengthening of the recommendations. RNW is not submitting any minority views on the Workgroup’s findings. RNW is a nonprofit organization that advocates for the rapid and responsible decarbonization of the electricity grid across Washington, Oregon, Idaho, and Montana. Our unique organization draws knowledge from our diverse membership, which includes clean energy developers, manufacturers, consulting firms, environmental and consumer advocates, and clean energy buyers including data center companies.

We appreciate the efforts made by the Governor’s Office and Department of Revenue to produce factual, balanced findings and evidence-based recommendations, and these minority views are largely supplemental.

### Recommendations

#### *2. Strengthen ratepayer protections*

RNW supported this recommendation. We would also support mandatory long-term contracts with minimum off-take provisions, in order to minimize stranded costs. We would also frame this as a recommendation for the UTC and consumer-owned utilities to *consider* establishment of a new rate class, rather than mandating they do so, to allow them flexibility to consider and respond to their unique situations.

#### *3. Incentivize load flexibility and best practices for energy efficiency*

RNW supported this recommendation. We would also add a 4th element to this recommendation: “Consider offering programs and/or incentives that allow for flexible grid assets—such as battery storage—to be co-located with a data center to increase the ability of data centers to shift load off-peak. Such programs and/or incentives should be tailored to match the commensurate benefit of shifting peak load.”

#### *6. Improve resource forecasting*

RNW supported this recommendation. We suggest an important language clarification in the first bullet point:

“Direct the UTC and the Department of Commerce to create reporting standardization for *forecasting the impacts of* new large loads across regulated and public utilities, which could include data quality, documentation, and information about associated transmission needs.”

*7. Enhance transmission capacity*

RNW supported this recommendation. We suggest an additional point to include in this recommendation: “Enable transmission planning that prioritizes least-regrets solutions and enhances capacity in the most needed areas of the grid.” We also recommend working in a direct reference to battery storage as a transmission asset and the importance of considering and deploying grid enhancing technologies for enhancing transmission capacity.

*8. Accelerate siting and permitting of transmission and clean energy generation.*

RNW supported this recommendation. We strongly urge adding a direct reference to battery storage as it is unique and complementary to clean energy generation and transmission. It can also support “bring your own generation” approaches for data centers and enhance general grid reliability.

Thank you to the Governor’s Office and Department of Revenue for your efforts over the course of 2025 to engage deeply in this critically important issue. RNW stands ready as a resource for any future engagement or questions around large loads and maximizing clean energy infrastructure.

Sincerely,

/s/

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Washington Policy Manager  
Renewable Northwest