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Chair Brian Rybarik
Commissioner Ann Rendahl
Commissioner Milt Doumit
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA
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Via email

Cc: Mary E. Kipp, PSE
Mayor James Mayhew, City of Snoqualmie
Snoqualmie City Councilmembers Dan Murphy, Rob Wotton, Bryan Holloway, Louis Washington, Cat Cotton, and Jo Johnson
King County Council Chair Sarah Perry
King County Executive Girmay Zahilay

Via email

Proposed PSE Selection of Snoqualmie Valley BESS Site

Snoqualmie Valley for Responsible Energy ("SVRE") respectfully asks the Commission to scrutinize Puget Sound Energy's handling of any interconnection support, procurement alignment, commercial entanglement, or related facilitation for the proposed Cascadia Ridge Resiliency battery energy storage (BESS) project at the Mt. Si substation near Snoqualmie.

We recognize that aspects of generator interconnection are governed by federal tariff processes and that PSE may describe its role as merely administrative. But prudence, customer protection, transparency, and public-interest concerns do not disappear simply because a project enters through an interconnection pathway rather than through a direct self-build. The Commission should be especially alert where a regulated monopoly's utility infrastructure and procurement practices materially intersect.

PSE's own materials show that community compatibility is a legitimate siting consideration. In a PSE-commissioned energy storage location study, candidate sites were expected to pass a "Good Neighbor" test emphasizing land-use compatibility, minimal disruption, use of existing encumbered property, early public involvement, and lower-impact alternatives. That same study treated heavy residential presence, schools, hospitals, and similar nearby uses as indicators of less desirable storage siting. **PSE's 2024 Distributed Solar and Storage RFP likewise states that projects will be evaluated with regard to local zoning, advocates commercial, industrial, or other compatible zones, and notes that jurisdictions in PSE's service area have historically not allowed BESS development in high-density residential zones.**

Against that backdrop, a project connected through Mt. Si and sited next to a modern suburban residential community raises **a serious prudence question**. If PSE is willing to enable or facilitate such a project notwithstanding its own siting logic, the Commission should ask whether PSE is appropriately balancing technical opportunity against community risk, local government burden, and customer impacts.

The tolling structure itself warrants Commission scrutiny. Under an agreement between PSE and Cascadia Ridge Resiliency LLC ("Cascadia") dated August 22, 2025, PSE is not merely providing passive interconnection access; it receives the project's storage services, discharged energy, ancillary and other attributes, and holds exclusive dispatch rights, while Cascadia operates and maintains the project, secures permits and insurance, bears site-operational obligations, and **indemnifies PSE against third-party claims tied to Cascadia's performance, including property damage, bodily injury, and death.** The same agreement disclaims any PSE ownership interest in the project, disavows any agency or joint venture, and states that PSE has no liability under the agreement for actions taken in its separate transmission-provider role. In substance, that means **PSE may capture much of the commercial and system value of the BESS while contractually shifting substantial project-site risk downstream.** That allocation may protect PSE as between the contracting parties, but it does not answer whether the arrangement is prudent, transparent, and in the public interest when the project is proposed adjacent to a suburban residential community. The Commission should therefore examine not only whether PSE is commercially participating in Cascadia**, but whether the contract has been structured to insulate PSE while leaving local communities exposed to risks that may far exceed the minimum financial backstops required by local code.**

Requested actions

- Compel clear answers from PSE as to whether it is acting solely as an interconnection utility or also as a commercial counterparty through any tolling, capacity, energy, or comparable agreement related to Cascadia.
- Assess whether PSE is applying a consistent and prudent standard when its own siting materials point away from suburban residential adjacency but utility support or facilitation nonetheless proceeds.
- Require greater transparency from PSE where interconnection support, procurement policy, siting compatibility, and public-interest considerations materially intersect.

- Consider whether any future review of PSE battery-storage practices should explicitly account for the utility's own Good Neighbor siting principles, stated preference for compatible zones, and the need for complete hazard information before support is advanced.
- Determine whether any prudence finding, cost recovery, or other Commission acceptance of the Cascadia Ridge arrangement should be conditioned on full disclosure of the agreement's risk-allocation terms, including **indemnity, insurance, ownership disclaimers, separation-of-functions language, and any mismatch between project-site risks and the minimum financial responsibility required under local law.**
- **If within the WUTC's discretion or powers, order PSE to pause or stop all current and future development efforts of the Cascadia Ridge BESS pending determination of these issues.**

We are not asking the Commission to prejudge every storage project or to conflate all interconnection activity with utility sponsorship. We are asking the Commission to recognize that where PSE's own siting principles, commercial agreements, and utility infrastructure converge in a highly sensitive suburban setting, the public interest requires clear answers before momentum hardens into outcome.

Respectfully,

Danielle Wallace
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