



Sep. 14, 2023

To: Tony Doan, Chair, State Building Code Council
Members, State Building Code Council

From: Kate Brouns, Washington Policy Manager, Renewable Northwest

Re: **Off-Cycle Rule Related to Energy Storage Systems - 2021 IFC/Chapter 12.**

Dear Chair Doan and Members of the Council:

Renewable Northwest is a regional, non-profit renewable energy advocacy organization, dedicated to decarbonizing the region by accelerating the transition to renewable electricity. Our members are a combination of renewable energy businesses—including battery energy storage system developers—and environmental and consumer groups.

Renewable Northwest would like to express support and **urge your adoption of these amendments to the 2021 International Fire Code as soon as possible.**

The Clean Energy Transformation Act has set Washington on a path to 100% clean electricity, and the Climate Commitment Act has created a cap-and-invest system to drive emissions out of other sectors of Washington's economy. As a result, the CCA will likely drive more energy users to the grid as a source of clean, reliable energy. Battery storage systems are fundamentally necessary to our clean energy transition, as they allow us to store and release clean power at the time it is needed most.

Because of this, battery projects across the state have been set in motion and are in various stages of development, but Renewable Northwest has heard increasing concern from local Washington jurisdictions that they need guidance on appropriate safety protocols and considerations for these storage systems. Without a statewide code, these jurisdictions are stuck reinventing the wheel, slowing the development of battery storage systems, and hampering the state's progress towards a clean electricity grid.

Renewable Northwest encourages the Council to not delay implementation of IFC 2021 until January, but instead move immediately to adopt and implement this important guidance to support local governments across the state. We believe this code will ensure safe development of battery storage statewide, and will ensure Washington can effectively transition to clean electricity.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Kate Brouns". The signature is written in a cursive style with a large, stylized "K" and "B".

Kate Brouns
Washington Policy Manager
Renewable Northwest
kate@renewablenw.org