

# EFFECTIVE PARTICIPATION IN ENERGY STORAGE SITING PROCEEDINGS

This factsheet contains guidance for participating in energy storage siting proceedings through expert testimony and public comments. **Public comments** provide formal opportunities to share local knowledge, experiences, and concerns that may affect siting decisions. **Expert testimony** translates technical information into clear, evidence-based insights for decision-makers.

## KEY TAKEAWAYS

	Public Comments	Expert Testimony
What is it?	Written or oral statements submitted during formal comment periods that become part of the official decision record	Technical evidence presented by a qualified expert within a formal, contested case process and subject to specific procedural and evidentiary rules
Who can provide it?	All interested parties (submission may require registration as a formal docket participant)	Qualified expert witnesses invited or retained by a party to the docket to address specific technical issues
Where is it accepted?	Public comment periods or hearings where agencies review draft documents and proposals to identify issues, concerns, and potential impacts	Contested case hearings or proceedings where technical evidence is introduced and evaluated, particularly when issues are disputed or complex
How to make it effective?	<ul style="list-style-type: none"> <li>• Provide specific, focused input as early as allowed</li> <li>• Use relevant facts, data, and examples</li> <li>• Add value to the record by offering clear, timely, and original perspectives</li> </ul>	<ul style="list-style-type: none"> <li>• Explain methods, data, and assumptions</li> <li>• Ground opinions in standards and evidence</li> <li>• Follow professional ethical obligations</li> </ul>

## PUBLIC COMMENTS

### WHAT

Public comments are written or oral statements submitted by individuals, organizations, or stakeholders. The comments are received during a formal comment period to provide input on a proposed project, permit, or environmental review (e.g., energy storage siting and permitting through an environmental assessment or environmental impact statement)<sup>1</sup>.

### WHY

Public comments are a required part of many regulatory and environmental review processes and ensure that agencies consider perspectives from all interested parties. This includes local knowledge, community concerns, and advocacy interests, technical information, and potential impacts before making siting or permitting decisions.

### HOW

To make effective public comments, it's important to first decide if commenting is the best avenue for your goal. Commenting is one way to engage, but sometimes other input mechanisms, such as meetings or direct engagement, are also effective<sup>2</sup>. Comments that are common positions or broad concerns are less likely to be considered significant. Including relevant facts, data, and analysis can make public comments impactful<sup>3</sup>. Examples include site-specific observations, comparisons to similar projects, or local environmental and community statistics. References to applicable sections of regulatory documents can also make comments more impactful while anchoring points precisely to the topic under review.<sup>2</sup>

## GOOD PRACTICES

### Identify the comment

**opportunity:** Confirm the project, agency, docket number, and comment deadline. Determine whether comments are being accepted on a permit application, siting decision, or environmental review document.

### Review the relevant

**materials:** Read the proposal or environmental document. Focus on areas needing clarification, correction, or additional analysis.

### Define your perspective and

**purpose:** Clarify who you are and what you want the agency to consider, change, or further evaluate.

### Identify all your specific

**issues or impacts:** Some processes will not allow issues to be raised later if not identified early on.

### Support your points with

**context:** Use personal experience, local knowledge, data, or references to standards and studies where appropriate. Clearly explain how the context relates to the proposed project.

### Add value to the record:

It is fine to concur with previous comments but consider focusing on new insights or context rather than repeating points already raised.

### Use clear, respectful language:

Write in plain language and define technical terms when needed. Maintain a professional, respectful tone to ensure comments are taken seriously.

### Reference specific sections

**when possible:** Cite page numbers, sections, or figures from the proposal or environmental document to help reviewers understand your comments.

### Submit comments on time

**and through the correct channel:** Adhere to the stated deadline using the required method (i.e., online portal, email, or public hearing) so your comment will be considered.

## STRUCTURE YOUR COMMENT CLEARLY:

1

Introduce yourself and your interests

2

Summarize key points up front

3

State the issue or concern

4

Explain why it matters

5

Describe what action or consideration you are requesting

## EXPERT TESTIMONY

### WHAT

Expert testimony is a formal process in which qualified individuals are invited or designated to provide technical analysis under specific procedural and evidentiary rules. Those invited to provide expert testimony are considered **expert witnesses** who offer opinions based on their education, training, skill, or experience<sup>4</sup>. A presiding authority determines whether an individual qualifies as an expert based on expertise relevance, credentials, and experience with the issue at hand<sup>5</sup>.

### WHY

In energy storage siting proceedings, expert testimony helps decision-makers understand complex energy storage issues that fall outside the general knowledge of a judge, hearing officer, board, or zoning commission. Topics addressed may include:

- areas of uncertainty or conflicting viewpoints
- technical aspects of a proposed energy storage project
- compliance with engineering standards and safety protocols

- cost, benefit, and economic considerations
- grid impacts, system performance, and reliability implications
- technical factors relevant to siting and permitting decisions

### HOW

An expert testimony is typically developed by individuals invited or retained by a party to the docket to address specific technical issues<sup>4</sup>. Effective testimonies demonstrate integrity, clarity, objectivity, and professionalism so that opinions are perceived as credible technical analysis rather than advocacy.<sup>6</sup> Experts should also be transparent about their methodology by grounding opinions in relevant data or standards and clearly explaining data sources and assumptions. Experts should also remain within the scope of their professional expertise and adhere to applicable professional codes of ethics. When ethical obligations and legal strategies appear to conflict, the expert's professional ethical standards should guide their conduct and testimony<sup>7</sup>.

## GOOD PRACTICES



**Confirm your qualification and role:** Ensure your education, training, and professional experience directly relate to the proceeding.



**Define the technical question you are addressing:** Identify the specific issue, assumption, or uncertainty in the record that your testimony is intended to clarify.



**Develop opinions grounded in reliable evidence:** Use appropriate data, accepted practices, and applicable standards or guidelines, and avoid speculation or unsupported assumptions.



**Explain your methodology clearly:** Use transparent reasoning so others can track your conclusions.



**Communicate in clear, accessible language:** Use plain language where possible and define technical terms.



**Follow professional and ethical standards:** When ethical obligations and legal strategy appear to conflict, allow professional ethics to guide your testimony.



**Review your testimony:** Check for consistency, clarity, and alignment with the proceeding's scope.

---

<sup>1</sup> Council on Environmental Quality (CEQ). 2021. *A Citizen's Guide to the National Environmental Policy Act*. Executive Office of the President. <https://ceq.doe.gov/docs/get-involved/citizens-guide-to-nepa-2021.pdf/>

<sup>2</sup> EDGI. n.d. "How to Write Effective Public Comments." Accessed January 22, 2026. <https://envirodatagov.org/how-to-write-effective-public-comments/>.

<sup>3</sup> Natural Resources Defense Council. n.d. "How to Make an Effective Public Comment." Accessed January 22, 2026. <https://www.nrdc.org/stories/how-make-effective-public-comment>.

<sup>4</sup> Cornell Law School. n.d. "Rule 702. Testimony by Expert Witnesses." *Legal Information Institute*, Cornell Law School. Accessed January 22, 2026. [https://www.law.cornell.edu/rules/fre/rule\\_702](https://www.law.cornell.edu/rules/fre/rule_702).

<sup>5</sup> JurisPro. n.d. "Expert Witness FAQs." Accessed January 22, 2026. <https://www.jurispro.com/faqs>.

<sup>6</sup> National Institute of Justice. n.d. "Important Traits That Enhance Expert Witness Credibility." *Law 101: Legal Guide for the Forensic Expert*, Office of Justice Programs, U.S. Department of Justice. Accessed January 22, 2026. <https://nij.ojp.gov/nij-hosted-online-training-courses/law-101-legal-guide-forensic-expert/trial/direct-examination/important-traits-that-enhance-expert-witness-credibility>.

<sup>7</sup> ForensisGroup. n.d. "Ethics in Engineering Expert Testimony: Standards and Best Practices." Accessed January 22, 2026. <https://www.forensisgroup.com/resources/expert-legal-witness-blog/ethics-in-engineering-expert-testimony-standards-and-best-practices>.

SCAN THE QR CODE TO  
VIEW MORE RESOURCES  
AND INFORMATION  
ON **ENERGY STORAGE**  
**SITING AND PERMITTING**  
WORK AT PNNL.



## FOR MORE INFORMATION, CONTACT



**The Energy Storage Siting and Permitting Team**

[storage.champions@pnnl.gov](mailto:storage.champions@pnnl.gov)

**WWW.PNNL.GOV**

PNNL-SA-221303 | MARCH 2026