



July 26, 2021

**VIA ELECTRONIC MAIL**

Connecticut Dept. of Energy and Env'tl. Protection  
79 Elm Street  
Hartford, CT 06106  
Email: Deep.Steps@ct.gov

**RE: Statewide Shared Clean Energy Facility (SCEF) Program—Bid Preference  
Written Comments**

To Whom It May Concern:

On behalf of its 40,000 members and supporters in Connecticut, Sierra Club respectfully submits the following comments in response to the Department of Energy and Environmental Protection's (DEEP's) July 8, 2021 Notice of Opportunity for Public Comment and Public Meeting relating to the Statewide Shared Clean Energy Facility (SCEF) Program. Sierra Club supports equitable and broad access to the benefits of solar through the SCEF program for customers who might otherwise lack the opportunity to install solar panels on their own property. Sierra Club notes that to the extent fuel cells are incentivized by the SCEF program, the program will be of diminished value in helping the state reduce carbon emissions from the electric sector, as fuel cells at present are produced with hydrogen generated from carbon-emitting fossil gas.

In considering the siting and bid preferences for the SCEF program, Sierra Club supports prioritization of solar projects that do not require conversion of greenfield land. Sierra Club urges that a bid preference for projects located on brownfields or landfills should continue to be applied for Year 3 of the program, and that prioritization of proposals that retain existing uses of a site, such as solar canopies on parking lots, should also be considered. Sierra Club notes that were ecosystem services and other benefits provided by trees and greenfield accurately accounted for the cost differential between solar development on greenfields and projects in developed areas such as solar canopies would likely be diminished. Sierra Club encourages DEEP to incorporate the value of ecosystem services provided by greenfields to better account for the climate and ecological benefits provided by such areas and more accurately reflect the costs of solar development in those areas.

With regard to siting of projects in distressed municipalities and/or environmental justice communities, Sierra Club encourages continued outreach and engagement with local community members to ensure projects have local support. As part of that outreach, the utilities should provide community members with a list of local solar companies that could be contacted to help assess the solar potential of individual sites. Utilities could also devote resources to assisting project advocates in obtaining information needed to submit a complete application.

Sierra Club appreciates the opportunity to submit these comments and looks forward to continuing to work with DEEP to achieve increased deployment of renewables in Connecticut.

Respectfully submitted,

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