

June 25, 2021

Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

**Re: Sustainable, Transparent and Efficient Practices (STEPS)**

To the Bureau:

People's Action for Clean Energy (PACE) submits the following comments as stakeholder feedback into the Department of Energy and Environmental Protection's ("DEEP's") Sustainable, Transparent, and Efficient Practices (STEPS) for Solar Development initiative, pursuant to the notice provided June 7, 2021.

PACE appreciates DEEP's convening of an engagement process regarding the siting and permitting of ground-mount solar systems in Connecticut. We laud DEEP's desire to seek input on practices that enable solar to be developed in a manner that also protects our natural resources. PACE supports the responsible expansion of solar in the state and wishes to highlight the unrealized potential of siting solar on canopies over parking lots and other impervious surfaces.

**Tentative Objectives**

- Objective 2: We recommend including consideration of local laws concerning zoning, the environment or public health and safety, and promote the adoption of local ordinances that support distributed solar development.
- Objective 4: We encourage DEEP to promote equity and environmental justice through community engagement and equitable distribution of solar sites throughout different communities.

**Facility Scope**

- The scope of this process should explore behind-the meter generation projects as well as in front of the meter projects. This should be done to create a more comprehensive plan for distributed solar energy siting that integrates projects of various scales. A more limited scope would undervalue distributed solar as a resource.

**Potential Topics**

- Topic 1: We recommend adding the following criteria: "electrical transmission distances and grid interconnection as factors."



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- Topic 3: We recommend adding the following objective: “prioritize siting solar on existing developed land before developing new land and maximizing multiple land uses, such as solar production, electric vehicle charging, and parking spaces.”
- Topic 4: We recommend expanding the scope of this topic to include state and local regulatory and permitting processes. The following is an example of wording for this topic: “Opportunities to optimize regulatory and permitting requirements and processes on a state-level and model best practices of local regulations for implementation by municipalities. These components will depend upon the size of the solar project...”
- Topic 5: We recommend adding parking lots as an example previously disturbed land.
- Topic 6: We recommend adding the following incentives: “add incentives for distributed energy technologies including but not limited to, solar canopies.”

As noted above, PACE wishes to highlight the potential of siting solar on canopies in the state. PACE has conducted groundbreaking research into this potential and has concluded that canopies could supply a significant share of the state’s electricity usage. Yet, there are challenges to implementation, including but not limited to cost, grid interconnection, net metering caps and local ordinances. We urge DEEP, in the STEPS initiative, to address these challenges so that Connecticut may realize the potential of solar canopies.

Thank you for the opportunity to provide comment into the STEPS initiative. Please let us know if you should have any questions.

Mark Scully, President  
Kieren Rudge, Operations Manager