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June 25, 2021

Written Comments of VCP, LLC dba Verogy on CT DEEP's Sustainable Transparent and Efficient Practices (STEPS) for Solar Development – Solar Siting and Permitting Process and Scope

Commissioner Dykes and members of CT DEEP's STEPs for Solar Development:

Thank you very much for the opportunity to submit comments on the proposed solar siting and permitting process and scope document. VCP, LLC dba Verogy ("Verogy") is a Hartford-based solar development company that has been operating in the state since the beginning of 2018. The management team of Verogy has been active in the solar industry here in Connecticut since 2012.

We support the State of Connecticut clean energy goal of 100% zero-carbon electricity supply by 2040 and the goal of providing transparent and sustainable practices for the development of solar and other renewable energy sources. We also recognize that the state has a process for the review and approval for the siting of power facilities through the Connecticut Siting Council ("CSC"). One of the CSC's responsibilities is "balancing the need for adequate and reliable public utility services at the lowest reasonable cost to consumers with the need to protect the environment and ecology of the state and to minimize damage to scenic, historic, and recreational values;"<sup>1</sup>

We have reviewed the STEPs for Solar Development Tentative Objectives, Tentative Facility Scope and Potential Topics for the stakeholder engagement process and have the following comments:

Tentative Objectives Comments:

- As part of the first bullet "Ensure that.....efficient, and transparent manner." We think that "regardless of which state it is being sited in." should be added to the bullet. If the state is going to impose certain restrictions on solar development in the state it should apply those same restrictions to any solar development that the state is purchasing power from outside of Connecticut.
- Under the "Include" consideration bullet, electrical interconnection availability (grid capacity) and the cost of such interconnection should be added as it is one of the most critical steps in selecting a project site for development.

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<sup>1</sup> See Connecticut Siting Council responsibilities found at: <https://portal.ct.gov/CSC/Common-Elements/Common-Elements/Connecticut-Siting-Council---Description>

### Tentative Facility Comments:

- Remove the statement “developed in Connecticut”
  - Paragraph 2 on page one says “Not all of this solar generation will be built in Connecticut”. If the Department believes that requiring specific restrictions as it relates to things such as slopes, wetlands, core forest, etc. to solar development in Connecticut will help the environment; than any requirement placed on development in Connecticut should apply to any solar or other power plant development that the state is purchasing power from. If the resources are to be protected, they should be protected through any of the state’s procurement process as well.

### Potential Topics Comments:

The following items should be considered as added potential topics:

- Review of development process and constraints beyond environmental, such as electrical interconnection, that have an impact on the siting of solar. (i.e. Haddam has been trying to put solar on their landfill for years but the cost of interconnection is too high. The closest 3-Phase distribution is almost 2 miles away and the substation that circuit ties into doesn’t have available hosting capacity either).
- Review the Interconnection process to be sure that projects are moving forward and not taking up available capacity if they are not moving forward.
- Benefits of solar facilities over traditional development (i.e. residential, big box, and warehouse facilities) including their temporary nature, ability to co-locate with agriculture, and provision for intermittent greenspace—and, of course, zero carbon emission energy production.
- Review of Stormwater Requirements for Solar Projects and the effectiveness of Appendix I. Comparison of stormwater requirements for solar projects versus other types of development.
- Review of technical research of solar development’s impact on the environment. (i.e. information from National Renewable Energy Laboratory)
- Look at adding solar carports into the discussions of incentives for previously disturbed lands. (i.e. Rhode Island has a \$0.05 per kWh (over a 20-year tariff) adder for carports to account for the added costs associated with their installation and to accommodate their priorities of site selection).

How should the stakeholder engagement process be organized?

- The stakeholder engagement process should be organized in a way that all voices are heard but in a way that ensures that facts are a critical component of the decision-making process.

What entities or stakeholders should be included or consulted?

- Local government representatives
- Local Planers and Inland Wetland Agents
- Environmental Groups
- Utility Companies Distributed Generation Groups
- Solar Developers
- Solar Business Groups
- Construction Contractors



Finally, notwithstanding all of the foregoing, we believe that the CSC's existing process for the permitting of solar projects here in the state covers many of the issues/concerns raised in this engagement process. We urge DEEP to review those protections and processes already in place before crafting an entirely separate process that could stagnate viable (and desirable) carbon-free solar energy projects.

Thank you very much for your time and consideration,

A handwritten signature in blue ink, appearing to read "BJP", followed by a horizontal line.

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