



June 25, 2021

VIA ELECTRONIC MAIL

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

RE: Sustainable, Transparent and Efficient Practices (STEPS) for Solar Development

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) June 7, 2021 Notice of Proceeding, Scoping Meeting and Opportunity for Public Comment relating to Sustainable, Transparent and Efficient Practices (STEPS) for Solar Development.

Sierra Club supports the expeditious deployment of renewable energy sources in Connecticut to avert the worst impacts of climate change and to meet the binding commitments of the Global Warming Solutions Act (GWSA), which requires a reduction in greenhouse gas (GHG) emissions of 45 percent below 2001 levels by 2030, and 80 percent below 2001 levels by 2050.¹ In addition, rapid deployment of renewables is necessary to achieve a 100 percent zero carbon electric supply by 2040, as proposed in Governor Lamont's Executive Order 3 and recommended for codification by DEEP in its Draft 2020 Integrated Resources Plan (IRP). As DEEP correctly states in the Notice of Proceeding for this process, "[t]o address the climate crisis and meet the State's various decarbonization and clean energy goals, Connecticut will need to deploy significant amounts of renewable generation of various types."

In considering questions relating to the objectives and scope of this proceeding, Sierra Club emphasizes the purpose of this process—as envisioned by DEEP in the Draft 2020 IRP—which is to ensure Connecticut can act quickly and decisively to reduce carbon emissions through deployment of renewables. The Draft IRP emphasized that "[p]roviding clarity, predictability, and upfront assistance to developers to ensure projects can be built quickly and with minimal siting and permitting conflicts is critical to achieving DEEP's environmental missions while supporting the State's zero carbon energy goals."² To that end, the IRP

¹ Connecticut's greenhouse gas reduction requirements are codified at Conn. Gen. Stat. § 22a-200a.

² 2020 Draft IRP at 110.

recommended that DEEP “[c]onduct a stakeholder process to improve the transparency, predictability, and efficiency of solar siting and permitting in Connecticut.”³

Sierra Club emphasizes those goals—transparency, predictability, and efficiency—in framing the scope of the STEP process and urges that any recommendations emerging from this process should not create a system that proves unduly burdensome for deployment of solar resources. DEEP must be cautious to avoid blanket restrictions or creating a system in which unduly burdensome local regulations prevent development of renewables. At the same time, thoughtful siting criteria can help minimize impacts to valuable wildlife habitat and fragile ecosystems.

Specifically, Sierra Club recommends the following:

- The Tentative Objectives should be expanded to include that new solar generation projects should be able to proceed on a *known and knowable time frame*, assuming that developers come prepared with a predetermined set of information.
- The Tentative Objective to “[i]nclude consideration of local laws concerning zoning, the environment or public health and safety” should be expanded to state “[i]nclude consideration of local laws concerning zoning, the environment or public health and safety *that are not unduly burdensome*” to ensure that municipalities are not unreasonably restricting development of renewables. It is critical that the Connecticut Siting Council or other authorizing state agency have the ability to determine whether local laws are unduly burdensome.
- Regarding the Tentative Facility Scope, Sierra Club requests clarification regarding the definition of “larger projects” under the virtual net metering and/or LREC/ZREC programs in order to determine whether this is an appropriate scope for the proceeding.
- The stakeholder engagement process should be organized to ensure it is transparent, accessible, and inclusive of frontline communities. DEEP should take care to hold meetings at a range of times to allow those who do not have flexibility during the workday the opportunity to contribute. In addition, where appropriate or if requested, translation services should be provided.

Respectfully submitted,

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³ 2020 Draft IRP at 157.