

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

RE: STEPS (July 19<sup>th</sup>, 2021)

July 26, 2021

I have researched the solar siting process in Connecticut over the years with nauseating detail and see major issues with the comparison of apples to oranges when talking about power output vs. goals. I am convinced before we can do any identification of lands for development we need a detailed consistent description of the power output provided from solar. Using terminology of MW needs to be clearly identified as plate or peak, AC or DC, and then the actual output as MW hours per Year AC so results can be directly compared to the desired power output goals AND traditional power sources. As currently described the output values in proposals and documents could almost be considered as deceptive, making it seem like the power gain is much more than the actual result. As I have emphasized in a prior comment, we need to clearly identify the actual power produced. To that end the capacity factors (AC) must be included in the equations to help level out this reality.

I have heard people are concerned that we should not stall the process because responding to climate change is so important. I agree climate change is real and that we as humans are completely capable of driving that change on a global scale. My bigger concern is that our response will do more harm than good, that we will cut down our trees, grade and stump the ground, fill in our farms, and only later realize so little power was produced that the final net result will have no effect on the reduction of carbon. I don't want us to be tricked into feeling good. This has to work, and right now I'm a skeptic.

Understanding the actual output for the resources replaced has become an obsession of mine. An incredible challenge given how convoluted the documentation is for these projects. To that end, below are statistics I have gleaned from a detailed GIS analysis.

Number of solar sites built, approved, or pending as identified through the Siting Council process: **57**  
Total number of acres already cleared and to be cleared if all are approved: **2706 Acres**  
Of that total: **1130 acres forest; 1200 acres agriculture; 376 acres other** (quarry, landfill, etc.)  
Within that total: **2195 acres fenced (6 to 7 ft chain link); 86 miles fenced; 1704 acres panels.**

Total output: **533 MW Peak(plate) AC** (from proposal descriptions)  
Effective power after taking into account Capacity Factors for each site: **100 MWh/hr AC**  
\*Annual output **876,000 MWh/hr per year.**

This number sounds big, but it's nothing compared to what we actually use. And I am not of the school that every MW counts, not when so much forest and farmland is destroyed in the process.

All of my GIS analysis is available online through the following ArcGIS mapping service.  
<https://arcg.is/TuD14>

If the link changes go to [ArcGIS.com](https://www.arcgis.com) and search for “CT Solar Sites”. I update the data as often as I can, but this is a personal voluntary project. Time is where I can find it and I only have access to public online sources.

Thank you –

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