

Commissioner Recchia:

I provide the following in response to your request that Solar Siting Task Force members suggest high priority issues and appropriate action responses.

My suggestions are based on what I have learned so far from the invited testimony and public comments presented to the Task Force as well as my continuing effort to understand what is and is not working well. I have learned a lot from the information and opinions presented to the Task Force so far and anticipate that my views will continue to evolve as I hear more from others and discuss issues and potential action responses with Task Force colleagues.

When one compares the different ways to generate electricity, the environmental impact solar technology compare very well with other generation options. When sited on roof-tops or on brown-field sites, solar generation can provide the smallest environmental impacts of any available electricity generation option; unfortunately the capacity potential of such clearly desirable sites is limited. Because solar electric generation requires a comparatively large area to capture the abundant but diffuse energy from the sun, the land impacts of solar generation can be significant, especially when they conflict with other important environmental or community development goals. Accordingly the land impacts of solar electric generation, especially the aesthetic impact and potential conflicts with other high value land use options, require careful planning to ensure that these impacts are understood, limited by designing solar facilities well and siting them where the land use and visual impacts are managed well.

I suggest an overarching objective for our work:

To provide a process for developing, designing, and siting new solar electric generation that reconciles Vermont Energy Plan goals with the long established Vermont commitment to protecting the physical environment and sustaining vibrant, attractive communities.

I suggest three priority areas of focus:

1. Enabling municipalities and individual Vermont citizens to contribute to the siting of solar electric generation in their communities.

2. Ensuring that the funding and siting of solar electric generators provides financial and regulatory incentives that reward the project outcomes we seek.
3. Encouraging solar siting practices that reduce conflicts between project developers and community hosts and encourage outcomes that protect the physical environment and sustain vibrant, attractive communities.

For each major issue I suggest that the Task Force consider action responses that can be carried out without new legislation as well as those requiring action by the legislature, indicating in both cases which actions require priority attention.

Addressing both legislative and non-legislative actions will provide a balanced picture of the available pathways for addressing the solar siting issues, setting in perspective how any proposals for legislative action relate to overall efforts to strengthen solar siting.

Following are action pathways I suggest we consider to address each of these three issues.

1. Enabling municipalities and individual Vermont citizens to contribute to the siting of solar electric generation in their communities.
 - a. Strengthen the process by which the Public Service Board decides applications for a Certificate of Public Good (CPG) for stand-alone solar electric generators to ensure that solar projects will meet setback and aesthetic standards the community generally applies to other developments in their community. Consider whether this may be accomplished by requiring that each CPG application identify and describe compliance with the local standards embodied in building or zoning regulations, as well as municipal plans, that address setbacks and aesthetics.
 - b. Changes CPG decision criteria to enable the Public Service Board to consider the cumulative impact of multiple solar projects within a single municipality or other appropriate proximate geographic area.
 - c. Identify a combination of application and pre-application notice requirements that may strengthen the ability to communities and individual citizens to participate in the CPG decision making process.

- d. Using case studies of effective municipal action, strengthen model municipal plans and land use regulations to clarify the steps required to effectively integrate solar generation into Vermont community landscape. Take steps necessary to ensure that CPG decision making process utilizes the resulting guidance effectively.
 - e. Sustain the ongoing regional planning pilots that are addressing steps to integrate State Energy Plan objectives into regional and municipal planning.
 - f. Commit state resources to strengthen ongoing efforts to build a publicly available information that may inform local planning of solar by both community hosts and project developers.
2. Ensure that the funding and siting of solar electric generators provides financial and regulatory incentives that reward the project outcomes we seek.
- a. Offer incentives in net metering tariffs for siting solar in preferred locations
 - b. Align the financial benefits from REC sales to support high value solar siting objectives.
 - c. Offer premium prices for solar located on target sites (engage regional and local government organizations in developing target sites).
 - i. Examples of target sites may include rooftops, parking canopies, gravel pits, quarries, landfills, and brown-fields, economic development zones
 - ii. Integrate in target zones criteria that address electric system planning needs
3. Encourage solar siting practices that reduce conflicts between project developers and community hosts and encourage outcomes that protect the physical environment and sustain vibrant, attractive communities.
- a. Offer incentives in the CPG process that reward effective developer consultations with host communities with simpler, less costly CPG hearing pathways.
 - b. Develop means to facilitate pre-application mediation between the community and neighbors over solar project siting or design disputes.