



**Testimony of RENEW Northeast before the  
Environment Committee in Opposition to**

**Raised Bill 6498**

***An Act Concerning the Siting of Certain Solar Facilities on Farmlands and Core Forests***

March 19, 2021

Co-Chairs Cohen and Gresko, Ranking Members Miner and Harding, and members of the Environment Committee, my name is Francis Pullaro and I am here on behalf of RENEW Northeast (RENEW),<sup>1</sup> its Executive Director, to offer testimony in strong opposition to Raised Bill 6498, *An Act Concerning the Siting of Certain Solar Facilities on Farmlands and Core Forests*.

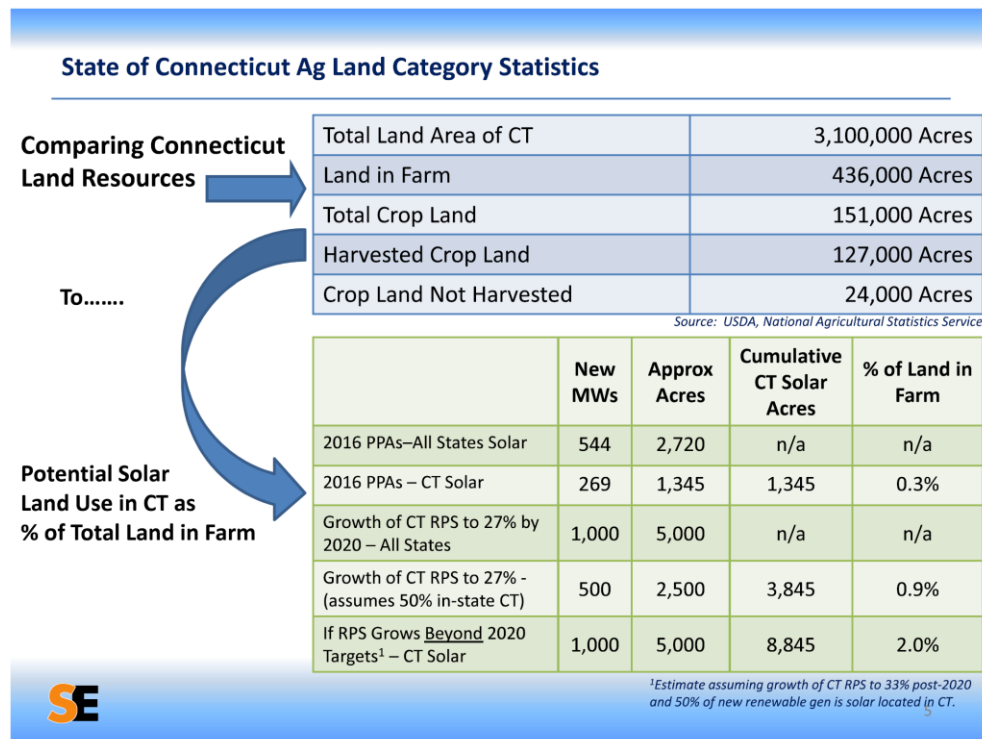
Today, due to the measures established by Public Act 17-218, solar energy projects over two megawatts in size to be located on prime farmland face different and more uncertain permitting requirements than comparably sized projects to be fueled by natural gas or oil. This bill proposes to further discriminate against solar by capturing more projects under the restrictive siting measures through lowering the threshold to one megawatt and broadening the definition from prime farmland to a vague and potentially all encompassing "farmland of statewide importance". RENEW opposes the bill for the following reasons:

- Not all renewable energy projects needed to meet Connecticut's clean energy requirements can be on brownfield sites, yet the bill penalizes developers of projects on farmland for helping Connecticut achieve its environmental and economic development goals. Ratepayers will face significant cost increases if developers must build projects of less efficient scale, pay higher charges to connect projects to the grid, and imbed the cost of brownfield risks and clean-up and/or other construction work due to a site's condition;
- Farmland is not under threat by large solar development. The analysis below developed by a RENEW member and presented at a January 2017, Department of Energy and Environmental Protection (DEEP) workshop, shows that attaining half of Connecticut's current Renewable

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<sup>1</sup> The comments expressed herein represent the views of RENEW and not necessarily those of any particular member of RENEW. RENEW is a non-profit association uniting environmental advocates and the renewable energy industry whose mission involves coordinating the ideas and resources of its members with the goal of increasing environmentally sustainable energy generation in the Northeast from the region's abundant, indigenous renewable resources. RENEW members own and/or are developing large-scale renewable energy projects, energy storage resources and high-voltage transmission facilities across the Northeast. They are supported by members providing engineering, procurement and construction services in the development of these projects and members that supply them with multi-megawatt class wind turbines. RENEW seeks to promote policies that will increase energy diversity, promote economic development, and achieve the Commonwealth's policy goals including those found in the Renewable Portfolio Standard (RPS) and the Global Warming Solutions Act (GWSA).

Portfolio Standard requirement with solar on farmland will require the use of less than one percent of Connecticut's available farmland;



- The term "farmland of statewide importance" is vague and almost entirely subjective. It will not be defined by a neutral arbiter like the Siting Council but by the Department of Agriculture (DOA) that has a hostility toward solar development;
- Renewable energy projects are providing positive economic benefits to hosting communities, including much needed new tax revenue streams which often exceed hundreds of thousands of dollars annually. The bill could favor out-of-state projects not facing punitive siting restrictions that would therefore be lower in cost;
- Many farmers are faced with having to sell portions of their land for housing or commercial developments. This bill ignores other lawful forms of development like housing subdivisions and commercial and industry buildings and parking lots that are routinely built on farmland every year in Connecticut. By contrast, solar energy is a reversible, alternative to selling land for permanent development. This bill will likely result in less solar energy on farmland but do nothing to stem residential and commercial development on farmland; and
- DEEP should be allowed to complete its solar and farmland stakeholder engagement process that is proposed by its recently released Integrated Resources Plan before any further restrictions on solar are enacted.

The power already given to DOA in Public Act 17-218 singles out utility-scale solar development and allows DOA to impose a permitting process on utility-scale solar intended for large fossil fueled power plants. Further restrictions on solar could ultimately cause renewable energy developers to look outside of Connecticut to states not subjecting large-solar projects to these risks. According to the Solar Foundation's most recent jobs census, one out of every fifty new jobs added in the United States in 2016 was created by the solar industry.<sup>2</sup> A January 2017 report by U.S. Department of Energy found that solar makes up the largest segment of Connecticut's electric power generation workforce, with 2,927 jobs.<sup>3</sup>

With solar projects today expected to have a life expectancy of 25 to 35 years, the bill's provision that a decommissioning bond be in place would be an expensive requirement that will further decrease Connecticut's competitiveness as a host state for renewable energy projects. The Siting Council already requires a decommissioning plan for any solar facility as part of its approval. RENEW believes that is sufficient to ensure for responsible decommissioning. If the committee continues to pursue a decommissioning bond requirement, RENEW recommends this bill be amended to reduce the cost of new renewable energy development. First, the developer should have the flexibility to select the form of financial security whether performance bond, surety bond, letter of credit, parental guaranty, or any other form of financial assurance acceptable to the Siting Council. Second, the amount of the financial security should equal the cost of decommissioning the solar arrays offset by the salvage value of the solar panels and components. Third, financial security for decommissioning should not be required if the landowner exercises an option to buy-out and continue to use the original or replacement equipment to generate electricity or otherwise use the land for purposes not requiring restoration of the soil to its status prior to solar development.

While RENEW seeks to increase the amount of new, low-cost utility-scale renewable resources in the state by opposing this bill and eliminating laws like Public Act 17-218 that hold utility-scale renewable resources to a higher standard than other forms of lawful energy development, the DEEP stakeholder process is potentially a way for all parties to find common ground. For this reason, RENEW urges the Committee to reject this bill and await the outcome of the DEEP process before making any further statutory changes. Thank you for the opportunity to provide these comments.

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<sup>2</sup> The Solar Foundation, Solar Jobs Census 2016, available at <https://solarstates.org/#state/connecticut/counties/solar-jobs/2016>.

<sup>3</sup> U.S. Department of Energy, 2017 US Energy and Jobs Report, State Charts at 38, available at <https://energy.gov/sites/prod/files/2017/01/f34/2017%20US%20Energy%20and%20Jobs%20Report%20State%20Charts%202020.pdf>.