

Written Comments to the Senate and House Natural Resources and Energy Committees  
Joint public hearing on renewable energy siting, primarily solar  
March 24, 2015

In the absence of being able to attend the March 24 hearing on the siting of renewable energy — primarily solar — in Vermont, we respectfully submit the following comments from the Norwich Energy Committee and thank you in advance for your consideration.

Our committee has organized campaigns to encourage town residents to “go solar” for each of the past three years. By our count, 128 Norwich homes are using solar power, either on-site or via off-site solar parks. This is about 10% of the total residences in town. We want to (and must) do more as our contribution to Vermont's goal of 90% renewable energy by 2050.

We would like to make three points regarding the siting process for solar energy.

*1) The current process supports the state's energy goals for renewable energy and reduction in carbon emissions, and already incorporates strong and appropriate reviews.*

The concept of a statewide evaluation of “public good” is the key to the Section 248 process for energy generation projects. The principle of governing energy generation and transmission at the state, rather than local, level made sense when it was enacted and it makes even more sense now in the shadow of global warming. Our electric grid is complex and interconnected, and the evaluation and review of energy generation projects is complicated. This review should be conducted in the appropriate context – which is statewide, not piecemeal.

It is important to recognize that the Section 248 process uses the **same criteria used under Act 250** to review other kinds of development, **in the context of the statewide public good.**

*2) Permitting, inspection, and interconnection (PII) costs are a significant obstacle to solar installations in other parts of the country, but not in Vermont. Don't undo this.*

Vermont's net-metering law of 2011 was praised as “a pioneering permitting process for small solar systems (less than 5 kilowatts) that is a model for reducing the 'soft costs' of residential solar.” As another commenter observed, “What's unique and **significant about Vermont's program is the uniformity.** They took state-level action, which demonstrates to other states that local permitting reform with the same standards across all jurisdictions is possible.” (GreenTechMedia.com, May 29, 2011)

This makes a difference to the local Upper Valley installers we work with, who confirm that it's much more time-consuming and costly to deal with varying requirements in New Hampshire towns.

*3) The goals in Vermont's Comprehensive Energy Plan are there for a good reason: to stave off the worst impacts of global warming and to take responsibility for our energy needs. We need solar to meet these goals.*

Global warming is affecting and will affect every aspect of life in Vermont: where we live, how we farm, our health, our safety. According to the Union of Concerned Scientists, “Summer in Vermont could feel like the typical summer in Tennessee by the end of the century unless we take action to reduce heat-trapping emissions today.” ([http://www.ucsusa.org/global\\_warming/science\\_and\\_impacts/impacts/effects-global-warming-](http://www.ucsusa.org/global_warming/science_and_impacts/impacts/effects-global-warming-)

vermont.html)

The state energy goals are well thought-out, and there is no way to reach them without solar installations both large and small. “Fostering small-scale and distributed renewable energy by increasing regulatory support is an objective of the CEP.” (Comprehensive Energy Plan, Vol. 2, p. 71) Our policies should make the installation and integration of clean energy simple and easy, within the current, comprehensive regulatory structure.

*Our conclusion*

With the increased deployment of solar in Vermont, people are finally beginning to see where the energy they use everyday is coming from. That causes some public concern. It seems that most of the concerns being raised on siting solar arise from the fact that people don’t want to look at it. Unfortunately, with our energy needs and societal energy appetite, we can no longer rely on coal-fired power plants in someone else’s backyard to power our lives.

With cold-climate heat pumps and electric vehicles, solar energy can provide for home heating and transportation. Why should there be restrictions for homeowners when they choose this “fuel” and not when they choose to use fossil fuels?

Solar and other renewable energy will be – and must be – a part of our landscape. It is our hope that the Legislature recognizes the value of solar and supports its strong, ongoing deployment. We can deploy these solutions in a way that respects natural resources and communities. But we can do that without further regulatory action.

Our recommendation is to NOT make any legislative changes to the siting and permitting process for solar energy.

Norwich Energy Committee  
Linda Gray, Chair