

## Vermont Public Utility Commission Rule 5.100

House Committee on Energy and Technology

Thursday, April 25, 2019

Thank you Chairman Briglin and members of the Committee.

My name is Jason Rasmussen, Director of Planning, from the Southern Windsor County Regional Planning Commission (SWCRPC). Thank you for the opportunity to testify about PUC Rule 5.100, specifically in reference to preferred siting and local input.

Over the past three years, we have worked with 9 towns to develop enhanced energy plans. Enhanced energy plans are encouraged, not required, to designate preferred sites for particular types and/or scales of renewable generation. None of these 9 plans, in their current form, have identified specific preferred sites. Our towns have been reluctant to do so because they feel it is not possible to identify all suitable sites, there are some mapping data limitations at the parcel level, or for private property-related concerns. The ability to determine preferred sites on a case by case basis through a joint letter, signed by the selectboard, planning commission and regional planning commission, presently allowed for in PUC Rule 5.100, has been a valuable tool.

Since 2017, the SWCRPC has been asked to sign a preferred site letter for ten projects. Our process to consider signing such a letter has worked best when we scheduled a joint public meeting with the three boards and notify abutters. A site visit is held before the meeting and the developer and/or landowner presents the project during the meeting.

The SWCRPC has found that preferred site letters:

1. Are an effective way to get input from neighbors, towns and regions early in the project development process.
2. Lead to much more local and regional influence into how renewable energy projects are sited and designed.
3. Allow towns and regions the ability to have a dialog with the developer about how a proposed project meets a community's vision and policies.
4. Encourage early coordination that ultimately results in better projects.

The term "letter of support" used in the Rules presently results in confusion. The SWCRPC has generally approached the preferred site letter as a designation process which does not confer blanket support for the project. Typically, only limited information is available at the time of making this preferred site designation. It is not until later on in the Section 248 process that information, such as the aesthetic assessment and natural resource assessment reports, are available for review.

The SWCRPC believes that it would be helpful to clarify the Rules, such as by deleting "of support" in Section 5.103 Definitions for "Preferred Site" (7): *"A specific location designated in a duly adopted municipal plan under 24 V.S.A. chapter 117 for the siting of a renewable energy plant or specific type or size of renewable energy plant, provided that the plant meets the siting criteria recommended in the plan for the location; or a specific location that is identified in a joint letter ~~of support~~ from the municipal legislative body and municipal and regional planning commissions in the community where the net-metering system will be located."*