



## Town of Portland, Connecticut

33 East Main Street ■ P.O. Box 71 ■ Portland, CT 06480-0071  
[www.portlandct.org](http://www.portlandct.org) ■ Phone: (860) 342-6715 ■ Fax: (860) 342-6714  
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### Office of the First Selectwoman

July 26, 2021

STEPS for Solar Development Process  
Bureau of Energy & Technology Policy  
Connecticut Department of Energy and Environmental Protection  
10 Franklin Square  
New Britain, Connecticut 06051

VIA EMAIL (sent to [Deep.Steps@ct.gov](mailto:Deep.Steps@ct.gov))

**Re: SCEF Bid Preference Written Comments**

To whom it may concern:

The Town of Portland appreciates the opportunity to provide the following comments to the Connecticut Department of Energy and Environmental Protection (DEEP) regarding bid preferences for the Year 3 Shared Clean Energy Facilities (SCEF) procurement.

**1. Discuss and provide support for any bid preferences that DEEP should consider for the Year 3 Procurement, and/or subsequent procurement years.**

Response: The Town of Portland supports the application of bid preferences in the Year 3 SCEF procurement that promote the state's goals for sustainable siting of clean energy projects. In particular, bid preferences that encourage the siting of clean energy projects on landfills, brownfields, and canopies over parking lots reduce pressure on siting and developing clean energy on greenfields, forests, and farmland. Local municipalities, like the Town of Portland, can receive tax and/or payment-in-lieu-of-taxes (PILOT) payments from the development of clean energy on these sites, and to the extent the sites are owned by the municipality, the municipality may also receive long-term lease payments for use of the municipal property. Often (though not always) landfills, brownfields, and canopies over parking lots have better access to more robust electric distribution system infrastructure (e.g., three-phase power lines, with available capacity), and are located closer to electric load, which can make these projects more economically viable and more beneficial to the electric distribution system.

However, developing clean energy on landfills, brownfields, and canopies over parking lots often requires more complicated, technical and expensive system designs due to the site conditions. For example, solar arrays on landfills require special racking to avoid penetration of the landfill cap. Clean energy installations on brownfields may require

the installation of caps and/or clean fill to contain and isolate any remaining pollution on the brownfields prior to the installation of clean energy. Solar arrays above active parking lots require large steel canopy structures. Furthermore, landfills, brownfields, and parking lots are often smaller parcels of land, resulting in smaller clean energy facilities, which cannot take advantage of the economies of scale found in larger projects. And, developing projects on landfills, brownfields, and parking lots may require more extensive state and local permitting, and environmental reviews.

All three of these elements – additional system requirements, smaller project sizes, and more difficult permitting processes – result in clean energy projects on landfills, brownfields, and parking lots costing more than large-scale clean energy projects on greenfield, farm, or forested sites. Hence, the Town of Portland supports incorporating bid preferences into the Year 3 SCEF procurement in order to help ensure that more SCEF projects are built on these landfill, brownfield, and parking lots, in furtherance of the state’s goals for sustainable siting of clean energy projects.

**2. Should a bid preference for projects located on brownfields or landfills continue to be applied for Year 3? If yes, explain why and at what weighting value. If no, explain why not.**

Response: As stated in our response to question #1, the Town of Portland supports the application of bid preferences in the Year 3 SCEF procurement for clean energy projects on landfills and brownfields, because this bid preference (1) encourages clean energy development on these underutilized lands instead of greenfields, farms, or forests; (2) promotes tax, PILOT, and/or lease payment revenue to municipalities; and (3) oftentimes places this clean energy development in areas with more robust electric distribution infrastructure, that is closer to energy demand.

We support, at a minimum, the continuation of the 20% bid preference for clean energy projects on landfills and brownfields as a way to overcome the fact that developing projects on landfills and brownfields is more expensive than developing a clean energy project on a greenfield, due to the additional system requirements, smaller project sizes, and more difficult permitting and approval process.

However, the 20% bid preference may not be enough, particularly for solar projects on landfill sites that are constrained by another SCEF program requirement, found in DEEP’s SCEF Year 2 Appendix B § B8.6. This section states in relevant part that “project sites with slopes of 15% or greater are ineligible to participate in the Shared Clean Energy Facility Program.” DEEP’s SCEF Year 2 Appendix B § B8.6. *See also* Eversource & UI SCEF Year 2 Request for Proposals § 5.2.16 (“[S]olar photovoltaic Bids are not eligible if the project site contains slopes greater than fifteen (15) percent, with the exception of the interconnection route. All [DEEP] Appendix B responses from Bidders must include documentation demonstrating that the generation site does not contain slopes greater than fifteen (15) percent.”).

For many municipal landfills, up to 30-40% of the potentially usable area for solar development may have slopes greater than 15%. This prohibition of placing solar on slopes greater than 15% reduces the overall size of potential solar arrays on landfills, which broadly impacts the financial viability of landfill solar development.

We recognize that in the context of a greenfield, farm, or forested site, the prohibition against siting solar arrays on slopes greater than 15% makes sense due to construction stormwater runoff concerns.<sup>1</sup> In the context of a landfill, however, solar developers do not disturb or disrupt the surface of the landfill, in order to maintain the integrity of the landfill cap that was designed to contain the waste materials below. Solar arrays on landfills are attached to concrete ballasts that “float” on the surface of the landfill, so as to not penetrate and disturb the landfill cap. These ballasts for solar arrays on landfills have been designed to work on slopes up to 30%. *See, e.g.,* <https://www.rbisolar.com/solutions/landfill-solar/>.

Because the 15% slope restriction in the DEEP’s SCEF Year 2 Appendix B § B8.6 hinders solar development on landfills, we respectfully request that DEEP modify this portion of the Appendix B to exempt landfills from the 15% slope prohibition for SCEF Year 3 (and beyond).<sup>2</sup>

Finally, we also note that in the SCEF Year 1 procurement, where the 20% bid preference for landfills and brownfields was first applied, no landfills or brownfields were selected. We do not yet know the results of the SCEF Year 2 procurement. But if again no landfills or brownfields are selected in the SCEF Year 2 procurement, this may suggest that the landfill and brownfield bid preference should be increased to 25% or 30%.

**3. How should DEEP acquire cost information for project development while maintaining the competitiveness of the procurement? For example, what is the price premium on land, development and other project costs for developing on a brownfield and/or landfill? Similarly, what is the price premium for other recommended qualitative preferences?**

Response: The Town of Portland respectfully submits that in advance of the SCEF Year 3 program, it may be difficult to obtain detailed and precise information on project development costs in an open and public process, because developers would likely consider this information proprietary. Moreover, actual project development costs are very site and

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<sup>1</sup> On greenfield, farm, and forested sites, solar developers, as part of their site preparation, typically clear the land of trees and vegetation, and move (or remove) soil while grading the site, which can cause significant ecological damage from stormwater releases.

<sup>2</sup> To be clear, although exempt from the 15% slope prohibition, these solar on landfill projects would still have to follow all of the construction stormwater requirements in the DEEP construction stormwater general permit. And, these projects would also address construction stormwater concerns through the Connecticut Siting Council review and approval process.

project specific, and thus may be hard to quantify in the abstract or in a generally applicable manner.

However, as part of the SCEF Year 3 bidding process, DEEP could clarify and standardize the materials currently requested in DEEP's SCEF Year 2 Appendix B § B2.2. Instead of the general request for estimated costs currently in that section, DEEP could require bidders to submit a breakdown of the relevant costs of their project on a \$/Watt-DC basis, in as granular a level of detail as DEEP wanted. For example, DEEP could request the following information from all SCEF Year 3 bidders:

Cost Breakdown (\$/Wdc)	
Modules:	
Inverters:	
Racking:	
Balance of System:	
Engineering:	
Permitting:	
Interconnection:	
Installation:	
Site Work:	
Land acquisition:	
Overhead & Profit:	
<b>Total (\$/Wdc)</b>	

In so doing, DEEP would be able to compare the relative costs of the various bids into the SCEF program, and would be able to compare elements of the different bids – e.g., the racking costs of a solar on landfill bid, compared to the racking costs of a solar canopy over a parking lot, compared to the racking costs of solar on a greenfield site. Of course, collecting and analyzing this detailed cost information in the Year 3 SCEF program would only be helpful for tailoring the bid preferences in the Year 4 SCEF program.

4. For each bid preference identified in response to Question 1 and/or 2, what clear standards, terms, parameters, or metrics should be used to evaluate whether a project qualifies for the bid preference?

Response: For bid preferences related to SCEF projects sited on landfills and brownfields, the Town of Portland generally supports the current standards and definitions for landfills and brownfields found in DEEP's SCEF Year 2 Appendix B at page B2.

For bid preferences related to SCEF projects sited on solar canopies over parking lots, the Town of Portland suggests that a bidder could demonstrate that their SCEF project is on a parking lot through a simple site plan with an aerial photo. Like the requirements for landfills and brownfields in DEEP's SCEF Year 2 Appendix B at page B2, DEEP could require that solar canopies on parking lots must be either (1) wholly located on the parking lot to qualify for the bid preference; or (2) if the parking lot cannot accommodate the entire project footprint, the project can still be eligible to receive the bid preference, provided at least 75% of the total project footprint is within the parking lot, and the entire parking lot that is legally and technically available for development is utilized.

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The Town of Portland appreciates this opportunity to provide comment to DEEP on the bid preferences for the Year 3 SCEF program.

Sincerely,



Susan Bransfield  
First Selectwoman

Town of Portland

Email: [sbransfield@portlandct.org](mailto:sbransfield@portlandct.org)