

Fred Behringer
11-1 Stonewood Dr
Old Lyme, CT 06371
June 25, 2021

CT Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

RE: Objectives, scope, topics and engagement for STEPs for Solar Development meetings

I greatly appreciate DEEP's outreach to gather input and ideas from CT organizations and citizens. Addressing climate change is complicated. Figuring out the optimal path forward is a huge challenge.

I attended the public comment meeting on 6/16. Comments raised indicate the scope and topics listed in the meeting announcement are relevant and important. I would like to respond more directly to the request for feedback on the objectives, scope, topics and engagement for STEP meetings and submit to following for consideration:

Objectives – add the following or something related:

- Consider alternative clean energy sources for supplying a portion the 2,200 – 3,500 MW that the 2020 IRP draft has proposed be obtained from solar.

Rationale: there is a real conflict/conundrum with ground mounted solar and environmental protection. Solar in NE is inefficient. Significant area is needed to provide impactful amounts of energy. Natural and working lands are precious for many reasons and are at risk of loss from other activities as well. Siting options that are relatively benign may not meet the capacity goals, so alternative generation options should be explored. 2,200 – 3,500 from solar should not be regarded as a "given" at this time.

Scope – begin with: "Review solar photovoltaic capacity anticipated to help meet CT's clean energy goals and", then continue as written "focus stakeholder engagement..."

Rationale: Need to understand required PV capacity as best we can to plan accordingly

Potential Topics:

7. Review performance of ground mounted solar installations in CT to date. Data to be supplied by DEEP to include energy produced by solar facilities and their capacity factors.
Rationale: Solar is a great technology, but its performance varies with geography. Understanding the real-world performance of solar in CT is needed to determine the area needed to achieve energy requirements. Performance metrics will assist future planning.
8. Alternatives for reducing the 2,200 -3,500 MW from solar sited in the 2020 IRP draft.
Rationale: The 2020 IRP is a draft report and has provided valuable modeling for various scenarios. It provides a sound basis for discussion but is still a guide with many variables to consider. Options that may reduce the need for ground mounted solar include further conservation/efficiency, additional OSW, hydro from Canada, Millstone, and advanced nuclear.

Stakeholder engagement: I appreciate this being acknowledged. From what I have seen from the GC3 process and other interactions with DEEP there is a strong culture of being inclusive and listening to a wide range of views. Please continue this tradition.

Thank you for providing an opportunity to help direct the discussion of this critical topic.

Fred Behringer
fbehinger@yahoo.com