



STATE OF CONNECTICUT
COUNCIL ON ENVIRONMENTAL QUALITY

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Paul Aresta
Executive Director

July 23, 2025

To: DEEP.EnergyBureau@ct.gov

Re: Shared Clean Energy Facility Program Year 7 Comments

The Council on Environmental Quality (Council) provides the following comments in response to the Department of Energy and Environmental Protection's (DEEP) request for comments regarding the Shared Clean Energy Facility Program.

Shared Clean Energy Facility (SCEF)

1. *What should the price cap be for Year 7 of the SCEF program?*

The Council has no comment regarding the price cap for Year 7 of the SCEF program.

2. *What bid preference percentage should be given to projects on brownfields and landfills?*

The Council supports DEEP's recommendation for maintaining a minimum 20 percent bid preference for projects on brownfields and closed landfills.

3. *What bid preference percentage should be given to solar canopy projects?*

The Council supports DEEP's recommendation for maintaining the bid preference for solar canopies on previously developed land, such as parking or driving areas, pedestrian walkways, courtyards, etc.

4. *What bid preference, if any, should be given to projects sited on sand and gravel pits?*

The Council notes that locations with sand deposits formerly used for sand and gravel extraction might be appropriate for the development of some SCEF facilities since such locations might be previously disturbed, potentially unsuitable for farming, and might lack mature forested vegetation. However, such locations might also provide critical habitat for certain state-listed species and Species of Greatest Conservation Need. Indeed, the draft 2025 Connecticut Wildlife Action Plan notes that "Glades, Barrens, and Savanna habitats in the Northeast support the fifth highest number of Regional Species of Greatest Conservation Need (RSGCN) and Watchlist species of any habitat type, totaling 164 species." Sand Barrens are a critical habitat that includes "dry sandy deposits with woody or grassy vegetation maintained by fire. Subtypes include sparsely vegetated sand, sandplain grassland, pitch pine scrub, riverine dredge spoils, and other/unique." Consequently, the Council suggests that DEEP's Energy Bureau confer with DEEP's Wildlife Division to 1) assess the suitability of using such habitat for energy development, and if suitable, 2) identify any specific areas or other requirements that should be addressed on such sites prior to offering a bid incentive.

5. What bid preference, if any, should be given to projects sited in Distressed Municipalities?

As stated in the Notice of Public Meeting and Request for Written Comments for the Statewide SCEF Program, revised July 2, 2025, “Distressed Municipalities have historically been burdened with energy infrastructure in their neighborhoods without receiving any economic benefits and with adverse health consequences for residents.” The Council continues to support a bid preference for the development of clean energy facilities on closed landfills and brownfield sites at the levels recommended by DEEP.

6. What other bid preferences should DEEP consider for Year 7? Provide both the category and the suggested percentage, and please explain how the bid preference furthers the state’s policy goals, why a bid preference is necessary, and why the suggested percentage.

The Council supports a bid preference for the development of Class I energy sources on appropriate developed sites, such as rooftops, parking areas, closed landfills, brownfields, etc. that would not result in significant adverse impacts on environmental resources. As suggested in the Council’s comments last year, DEEP could consider a bid preference for previously developed sites that are designated by the host municipality as industrial/commercial, which would encourage solar development on land that is not zoned as residential and/or agricultural. The intent of providing an incentive to use previously developed commercial and industrial land and land that has been designated as commercial or industrial rather than agricultural or residential land is to further the goals of the state to preserve forests and open space, maintain and potentially expand agricultural land, and protect and enhance important habitat. This is consistent with the intent of providing bid preferences, which “are used to incentivize project types/characteristics that help achieve state policy goals, even if they make the project more expensive.”¹

The Council would also support a bid preference for solar facilities developed on rooftops since such development would not impact farmland, vegetation/core forests, and important habitat. Moreover, buildings/structures with large rooftops are typically located in industrial and commercially zoned areas, which should reduce conflict(s) that sometimes arise when siting an electric generating facility on agricultural land, forest land, or proximate to residential dwellings.

7. If any of the recommendations in this Notice present a barrier to participation in the SCEF program, please explain why and discuss possible modifications to the recommendation.

The Council has no additional comments regarding any of the proposed recommendations that could present a barrier to participation in the SCEF program.

Thank you for your consideration of the Council’s comments.

Sincerely



Paul Aresta
Executive Director

¹ Notice of Public Meeting and Request for Written Comments, Statewide Shared Clean Energy Facility Program, Revised July 2, 2025