

Hi Peter, Paul, Kristin, Linda and Joey,

I hope you are all well. I think there is some low hanging fruit that the Governor's commission could move forward that will continue to help us all lower the cost of solar energy. These are not transformational policies but rather good small steps to keep us moving in the right direction.

Context: In 2017 PUC passed new rules that encouraged projects to be located on roofs and parking canopies. Some additional changes to the rule and to state law should be made to support this direction and continue to lower the cost of solar in Vermont, especially on these preferred sites.

1. There are statewide solar setback rules in statute. These were drafted with ground mounted solar arrays in mind, not solar parking lot canopies. Parking lots are often located near property boundaries. They are in built environments and where we prefer solar from an aesthetic and grid support standpoint. But they are more expensive.

Action: Differentiate parking canopies from ground mounts in the setback rules, exempting them from the setbacks or setting a smaller setback of 5 or 10 ft.

Examples: SunCommon is looking at parking canopies for 2 schools, one non-profit and one business. All of them are having issues with the setback rules.

2. Parking canopies were deemed a preferred location, but are being treated like greenfield ground mounts in the permit process. They, by their nature are located at parking lots where ag soil is not a consideration, where it will look appropriate to have a parking canopy in the built environment, where there will be no change/ impact re: storm water... And yet the permit process adds 4-6 months to a project and tens of thousands of dollars.

Action: direct the PUC through legislation to treat parking canopies like rooftop arrays in the permitting process, so long as they are indeed located at a parking lot. This concept has received ANR support in the past, but it was too late in the process to make it into the rules.

3. Eliminate ANR fee on rooftop and parking canopy locations. The ANR fee was justified to cover the costs ANR had related to ground mount solar projects, primarily due to wetlands and endangered species. These are not factors on roof and canopy projects and this fee artificially inflates project costs.

Example: on a school rooftop installation that SunCommon did in St.Albans we paid \$2000 in ANR fees.

I would be more than happy to discuss any of these in more detail with you, just let me know. Of the three policies above #2 would by far be the most impactful in the market. Parking canopies are hard to line up, can only be installed in certain seasons (summer at a school), require significant \$ upfront in design, engineering, survey and geotechnical work. Then the racking is custom for that site and takes months to get into the fabrication schedule. All of this is complicated and made riskier by a long, expensive and more uncertain permit process.

Cheers,  
James

--

James Moore, President