From: Timothy Vautour
To: SMART, DOER (ENE)
Subject: Straw Proposal Comments
Date: Thursday, September 12, 2019 4:26:35 PM
Attachments: image003.png

Good Afternoon,

I have the following comments on the straw proposal:

1. The new proposed land use requirements should not impact or apply to any projects that have Land Control (ie. Lease Option) prior to the filing date of the regulation. Imagine a developer paying $1.5 million for a parcel where the zoning allows for solar and then paying for engineering/permitting and interconnection study fees to then have a Greenfield Subtractor x5 make their project financially infeasible. This would be outrageous and crippling to a developer.
2. The new proposed requirements should not apply to blocks 1-8 as many developers have spent millions of dollars developing projects in Eversource East and Eversource East is much slower at performing Impact Studies. Also, its worth noting that Eversource East reviews interconnection applications much differently than National Grid, which is a major reason why Eversource East is progressing more slowly than National Grid and Eversource West. The standard process for a developer is:
    a. Perform Preliminary Screening of Land
    b. Gain Land Control
    c. Perform Additional Civil and Electrical Screening
    d. Submit Interconnection Application
    e. Town Permitting – After Results of Impact Study are received
    f. Submit to SMART

    Eversource East puts interconnection applications on hold if projects on the same feeder are ahead in the queue, which leads to projects being 4th-5th in the queue. Developers could wait two or more years for an impact study. National Grid reviews all applications at once and performs impact studies simultaneously even if projects are on the same feeder. This is a major reason why National Grid is significantly outpacing Eversource East – developers are not receiving ISA from Eversource East timely. Eversource East should be required to start impact studies on all projects once the application is deemed complete, just like National Grid.
3. The new proposed land use requirements should not include moving solar specific zoning from Category 1 to Category 2. If a town has voted and supports solar in specific zones through a special permit process, why would the state discourage the development of solar in that zone or penalize the developer for purchasing/leasing land in that zone because the land is undisturbed. If trees are not cut down to install solar panels, than they will be cut down for either agricultural, residential, commercial, or industrial uses. While trees breath in carbon dioxide, solar panels offset the carbon emitted by fossil fuel electricity. Developers already need to conform to National and State wildlife and wetland regulations that protect large areas of undisturbed forests and the eco-system. It seems like solar is the most eco-friendly form of development for buildable land.
4. The Greenfield Subcontractor should only apply to projects that need to apply for a Variance during the Town Permitting process.
5. Another major reason why Eversource West and National Grid territories are progressing

unevenly compared to Eversource East is that large acreages of land in Eversource East is more valuable, more expensive to purchase, and town permitting is more restrictive. The state should require that a Special Permit Process for Ground Mounted Solar should be required in all zones (including Residential and Agricultural) in every town. Industrial and Commercial in Eversource East towns is too valuable and/or too expensive for a land owner to lease for ground mounted solar or a developer to purchase for ground mounted solar.

6. The interconnection upgrade costs being charge by the Utilities are high by 4x, when compared to estimates for the same scope provided by independent high voltage contractors. The scope of the upgrades being required (i.e. size of feeders, equipment, etc…) is gold plated and not the scope required by the impact of the Solar Project. Utilities are using Solar Developers for profit and upgrading their systems. The DOER should allow the developer to obtain a 3rd party quote for the interconnection work and require the Utilities to honor that price.
7. The 25% ISA Payment should be due 120 days after the SMART SOQ is issued to the developer and the 100% Payment should be due 240 days after the SMART SOQ is issued to the developer. The Interconnection payments are a huge burden on the developers and can be crippling if we don't have an SOQ.

Thanks,
Tim

Timothy Vautour, *Developer*

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