



COUNCIL ON ENVIRONMENTAL QUALITY

July 22, 2026

Timothy J. Bishop
Acting Chair

To: DEEP.EnergyBureau@ct.gov

Linda Bowers

Re: Shared Clean Energy Facility (SCEF) Year 8 Comments

Christopher Donnelly

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 Statewide SCEF Program.

Cinzia Lettieri

The Council's responses to the questions identified in the Notice of Public Meeting and Request for Written Comments, dated June 24, 2026, are as follows:

Aimee Petras

1. What should the Program Price Cap be for Year 8 of the SCEF program? Please explain your response.
 - a. Are there any current "changed circumstances" that suggest a higher Program Price Cap is necessary? Please explain any industry-wide concerns in detail and provide as much evidence as possible.
 - b. What future potential "changed circumstances" do you anticipate occurring in advance of the Year 8 procurement in 2027?

Denise Rodosevich

The Council has no comment regarding the Program Price Cap or project cost information for Year 8.

William Warzecha

2. What bid preference percentage should be given to projects on brownfields and landfills? Please explain your response.

The Council supports a bid preference for projects on landfills and brownfields. As noted in the request for written comments, in years 1-7 there was a 20 percent bid preference for projects sited on landfills and brownfields. However, a review of the data for the SCEF program administered by Eversource indicates that out of the 55 projects selected for development, only three received a bid preference for development on landfills and only three received a bid preference for development on brownfield sites. Likewise, a review of the data for the SCEF program administered by United Illuminating (UI) indicates that out of the 13 projects selected for development, only two projects received a bid preference for development on landfills through Year 6. With regards to brownfield sites, UI selected five projects (38 percent) for development through Year 6. Given the relatively small number of selected projects that have received a bid preference, the Council suggests that DEEP recommend increasing the bid preference for development of projects on landfills and brownfield sites.

- a. Please provide evidence demonstrating how building on a brownfield or landfill impacts project cost compared to those on "greenfield" sites, if at all.

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

Paul Aresta
Executive Director

The Council strongly supports a bid preference for solar canopy projects since such projects are usually constructed on developed sites, such as parking areas, which would be less likely to adversely impact environmental resources, such as farmland, vegetation/core forests, and important habitat. The Council suggests that DEEP recommend increasing the bid preference for solar canopy projects.

- a. Please provide evidence demonstrating how building a solar canopy impacts project costs compared to a ground mounted system, if at all.
4. What bid preference percentage, if any, should be given to projects that provide additional distribution system benefits? Please explain your response and provide quantifiable information or measures that can be used to assess distribution system benefits.

The Council supports a bid preference for projects that could provide additional distribution benefits provided such locations 1) do not adversely impact environmental resources, such as forests, important farmland, and critical habitat, and 2) could be “stacked” or combined with the bid preference for development of projects on landfills, brownfield sites and as solar canopies. For example, if a project is proposed on a landfill or brownfield site, which could potentially receive a minimum 20 percent bid preference, AND could also provide additional distribution benefits, then the overall combined bid preference might exceed 20 percent.

- a. Please provide evidence demonstrating how building a project with additional distribution system benefits impacts project costs compared to any other SCEF project, if at all.
5. What other bid preferences should DEEP consider for Year 8? 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 is appropriate.

The Council suggests a bid preference for the development of solar electric generating facilities on appropriate developed sites, such as parking areas, other impervious surfaces, and rooftops since such development would be less likely to adversely impact farmland, vegetation/ forests, and important habitat. Moreover, buildings/structures with large rooftops are typically located in or near load centers 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. A bid preference is necessary to encourage the development of renewable energy sources on previously developed sites since the costs associated with such development, especially land costs, might be higher than developing such projects on undeveloped land and important farmland¹ in the state.

6. 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 comment.

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

Sincerely,



Paul Aresta, Executive Director

¹ United States Department of Agriculture - National Agricultural Statistics Service 2025 Farm Real Estate Value by State;
https://www.nass.usda.gov/Charts_and_Maps/graphics/farm_value_map.pdf