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Audubon Society of Rhode Island

March 2, 2021

Representative Joseph Solomon
Chair, House Corporations Committee
Rhode Island State House
Providence, RI 02908

Re: Audubon Society of Rhode Island Opposes H5327, Net Metering, and requests amendments

Dear Chairman Solomon and members of the House Corporations Committee,

The Audubon Society of Rhode Island and our 17,000 members thank Representatives Potter, Baginski, Felix, Batista, Ruggiero, Speakman, Knight, Kislak, Shallcross Smith, and Fogarty for sponsoring this legislation. While we support the expansion of solar programs in the state, we ask that all efforts to expand solar also direct solar away from forested greenfield sites and to sites that are already developed or disturbed. Because this bill allows 2/3 of the expansion of community net metering to be sited on greenfield locations, we respectfully oppose this bill and ask that the committee consider amending it before passing it out of committee.

Rhode Island's renewable energy laws are working well and we have seen solar development expanding in communities throughout the state. However, many of the large, commercial scale projects are preferentially located on forested, greenfield sites. Developers are attracted to these sites because they are less expensive to complete. While the Net Metering Law caps projects at 10 MW, developers are building projects on contiguous parcels creating projects as large as 20 or 30 MW.

According to a story in *ecoRI*¹, a recent solar development in North Smithfield will be 38.4 MW. Development of this site has meant that 180 acres of trees were cut for 160 acres of solar panels. While the town limits solar to 6 acres, the project received an exemption in May 2018. The Town created a special zoning district that allowed the developer to by-pass the zoning board review. The land is privately owned, and a portion of the parcel had been designated by the RI Department of Environmental Management as a wildlife corridor and natural heritage area.

In August of 2020, Synapse Energy Economics², Inc. completed an analysis of solar siting opportunities for Rhode Island. The work was commissioned by the Office of Energy Resources. The study looked at rooftops, landfills, gravel pits, brownfields, commercial and industrial developed and undeveloped lots and parking lot/carport solar. The study examined total potential (an estimate of the solar potential for

¹ <https://www.ecori.org/renewable-energy/2020/6/22/north-smithfield-approves-ris-largest-solar-farm>

² <http://www.energy.ri.gov/documents/renewable/Solar%20Siting%20Opportunities%20for%20Rhode%20Island.pdf>

the entire area under consideration, no exceptions), technical potential (an estimate of the potential area excluding areas not suitable for solar development) and economic potential (an estimate of the solar potential that is likely to be installed, given the current cost of technology).

The study found that for all these sites together, there is 3,390 – 7,340 MW of technical potential (an estimate of the potential area excluding areas not suitable for solar development). This should be compared to the fact that as of spring 2020, over 250 MW of solar have been interconnected and that this bill is asking for an expansion of 60 MW. There is ample space for this expansion in preferred locations.

We ask you to consider amending the bill to increase the proportion of new development on already disturbed sites. We would be willing to consider grandfathering in projects that are already well along in their development.

We commend the sponsors for specifying that projects are prohibited from co-locating on one or more contiguous parcels (page 2, lines 17 – 19) and for allocating 20 % of the energy to low- or moderate-income households (page 2, line 11 – 12).

Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Meg Kerr".

Meg Kerr
Senior Director of Policy