



August 7, 2023

Re: Draft Request for Proposals from Private Developers for Zero Carbon Energy

Thank you for the opportunity to provide comments on the July 25, 2023 draft of the Request for Proposals from Private Developers for Zero Carbon Energy. The following are comments of Rivers Alliance of Connecticut.

Thank you for including a strong focus on community engagement and public participation throughout the process. We also applaud the attention given to decommissioning plans and financial assurances for decommissioning of projects.

Give Land Re-Use and Natural Resources Some Weight

The emphasis in the draft RFP on preferred siting on brownfields and disturbed land is appreciated. Unfortunately, as the current process is still weighted so heavily on bids that are economically competitive, consideration of impacts on environmental quality and natural resources or projects sited on brownfields or disturbed areas may never even make it past the first step of the second phase of evaluation.

Utilizing clean energy and keeping energy costs low is important. Loss of ecosystem services that our natural resources provide also come at a cost. We recently witnessed devastating flooding in parts of Vermont, Connecticut, and New York. Costs due to flooding in Vermont could exceed \$5.2 billion. Climate change brought the extreme rainfall. Poor land-use decisions and lack of protection of resources in their natural state exacerbated the destruction.

The second phase of evaluation as proposed continues to put a significant emphasis on cost. Quantitative factors count for 75/100 points and all benefits considered are cost-related. "The first step will be a screening process wherein the Evaluation Team will compare bids directly and determine whether one or more bids are not economically competitive when compared to other bids. If the consensus view of the Evaluation Team and the Department Consultant is that one or more bids are not economically competitive enough to be selected irrespective of qualitative evaluation results or indirect benefits, then such bids will not proceed to the next step of the quantitative evaluation."

So, at this point in the process, a project sited on a brownfield or disturbed land but is not economically competitive compared to other projects that may be sited on swaths of forest would never be considered because these projects have no weighted value as a benefit in Quantitative Analysis.

Meaningful weight must be given to non-price factors in the way of incentives for use of previously developed land and disincentives for impacts to prime farmland soils, forest, water resources and other natural resources within the Quantitative Analysis.

Identify Projects Sited on Source Waters Early in the Process

At BOTH the project selection and siting council application stages, the applicant should be required to indicate if the project is located on drinking water watershed source protection or aquifer protection land. The applicant should be required to and made aware that they must contact DPH and water utility if the project is to move forward.

The following changes are recommended to ensure that projects on source water lands are identified.

- Add a definition for source water.
- In the last paragraph on page 19, impacts on source water should be added to Prime Farmland and agricultural lands.
- For large-scale solar projects located on source water land, the applicant must agree to contact DPH as well as the water utility to which the watershed or APA correspond.
- Thank you for updating Appendix B to include drinking water supplies. Applicants should be referred to the source water protection mapping that has been done by CT Department of Public Health as a resource.

Hydropower Specific Requirements

We enthusiastically support the technology specific requirement that hydroelectric projects provide safe, effective and timely up and downstream passage. This is an essential requirement that should be included in the final RFP. An economic and efficiency analysis should also be required.

The cost of decommissioning, operation and maintenance, and inspection reports should be specifically requested for hydropower projects. These should all be taken into consideration during the net present value analysis.

Thank you, again for the opportunity to comment on the draft RFP.