

February 20, 2024

Esteemed Chairs Maroney and D'Agostino,
Members of the Planning and Development Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Raised Bill 5151, *An Act Concerning Solar Licensing Exemptions*.

WestCOG has devoted substantial resources to assist local governments with the transition to renewable energy, including its recent report [Decarbonizing Land Development Practices: Strategies for Connecticut Planning and Zoning Commissions](#).

Expanding the deployment of on-premises solar energy is key to the state achieving its goals in reducing greenhouse gas emissions and achieving resilience in the face of a climate that is marked by more and more extreme weather events.

Building tradespeople are in short supply in Connecticut; this shortage may substantially worsen with expected retirements (tradespeople in Connecticut are among the oldest in the nation) and with the growing demand for renewable energy projects stimulated by federal incentives under the Inflation Reduction Act.

For Connecticut to meet this demand and to achieve its energy and sustainability goals, the state will need to expand the pool of people who legally may work on solar projects. This includes not only training and licensing more people to become solar installers but also removing barriers to other tradespeople from working on non-electrical aspects of solar installations.

To this end, WestCOG suggests that your Committee consider:

- Expanding the language proposed in the bill while not striking “placement and anchoring.” This would preserve the provision for roofing professionals to attach solar arrays to roofs, rather than pushing that responsibility onto electricians or plumbers (for solar thermal) – who are in short supply and who may not have been trained in roof construction.
- Including “site preparation” to enable landscapers and earthwork contractors to grade sites for ground-mounted systems and to dig trenches for electricians to lay conduit in.
- Including “ballasted systems.” Ballasted systems, which sit on the surface of the ground, rather than penetrate it (as concrete foundations and ground screws do), reduce the time and cost associated with installing ground-mounted solar arrays, as well as facilitate reuse of the property in the future should the array be removed. (The ballast, which is typically concrete blocks, crushed stone, gravel, can placed – and removed – without excavation.)

Images of types of ballasted systems that are commercially available are depicted on the next page:



From left to right: Terrasmart (pre-cast concrete); APA ReadyRack Geoballast (gabions or rock baskets); Powerfield Energy PowerRack (polyethylene containers that can be filled with any ballast material)

Thank you for your consideration.

A handwritten signature in black ink that reads "Francis R. Pickering". The signature is stylized and cursive.

Francis R. Pickering
Executive Director