

From: Laura Hannah [<mailto:hannah@fresh-energy.org>]
Sent: Thursday, March 7, 2019 3:40 PM
To: Wade, Michael (CI-StPaul) (Michael.Wade@ci.stpaul.mn.us)
Subject: RE: Notice of Public Hearing – Solar and Wind Energy Text Amendments

Michael,

Please see comments attached comments from Fresh Energy on the amendments pertaining to solar and wind energy installations. My understanding is that the hearing was delayed, so I'm hopeful you will still have time to contemplate and incorporate these suggestions. Happy to provide clarification or answer questions.

-Laura

ATTACHMENT:

Comments re: [Solar and Wind Energy Text Amendments](#)
3/7/2019

Fresh Energy appreciates the opportunity to provide input on the text amendments related to solar and wind siting/permitting in the City of Saint Paul. Fair and transparent permitting requirements are an important step toward renewable market growth in the city, and we applaud the effort.

1. The interconnection review and permitting review should be allowed to happen in parallel.

It is most efficient for a developer/installer to apply for the permit and interconnection approval simultaneously. The language of Sec. 65.322 (a) would require that the interconnection application be submitted, the utility review complete, and the Interconnection Agreement executed before the permitting process could begin. This will unnecessarily lengthen the project timeline, adding cost.

Fresh Energy recommends that the language of Sec 65.925 (l) be applied to solar projects as well. Written evidence that the electric utility service provider has been informed and/or proof that the interconnection application process has begun is sufficient to assure coordination with the utility.

2. Undergrounding of power and communication lines may be prohibitively expensive.

Particularly in dense and developed places, like major cities, the requirement to bury or underground power and communication lines may add significant cost to the project and may overwhelm the economics of the project leading to less development. It would be appropriate for the developer to provide cost comparisons of overhead versus underground designs for the City reviewer to compare. Fresh Energy strongly recommends that undergrounding be stated as a preference, but not be required.

3. It may not be appropriate to apply building height and setback standards to community solar.

Applying the height and setback standards that apply to buildings in the district (Sec. 65.322 (c)) may be unnecessarily limiting to project siting. Fresh Energy recommends that height and setback variances be considered on a case by case basis to allow flexibility where appropriate.

4. Ground mounted solar is great pollinator habitat.

Fresh Energy recommends pollinator-friendly landscaping be required for ground-mounted solar projects. Specifically, we offer the following amendment to Sec. 65.322 (d):

A ground-mount (freestanding) community solar energy generation facility shall require a conditional use permit, the application for which shall include a site plan including landscaping and elevations, and a completed copy of the Pollinator-friendly Solar Scorecard published by the Minnesota Board of Soil and Water Resources.

5. The City may wish to contemplate renewable access/easement language.

Fresh Energy recommends that the City consider adding language that would provide assurance to residences and businesses investing in a solar or wind generators of access to that sunlight or wind resource over time. As an example, a residential homeowner with solar on their one-story roof may wish to be protected from a future addition to the neighbor's home that would shade their array. Renewable technology is a long-term investment, with contracts and equipment that is designed to last for 20+ years. In dense neighborhoods and cities, access rights are becoming increasingly important.

SolSmart has put together a resource for permitting jurisdictions which contains solar easement and access permit examples from around the country. The download is available here: <https://www.solsmart.org/resources/solar-easement-and-access-permit-examples/>

Thank you for your consideration.

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