



May 13, 2020

Mr. Andrew Johnston
Executive Secretary
Maryland Public Service Commission
6 St. Paul Street, 16th floor
Baltimore, Maryland 21202

RE: RM 56 to COMAR 20.62 – Community Solar Energy Generation Systems
Request to consider changing the application review process from first-come, first served in three categories, to a ranking system based on optimal siting considerations similar to the New Jersey community solar pilot program

Dear Secretary Johnston:

Like the Valleys Planning Council (VPC), the Advocates for Herring Bay¹ urge the Public Service Commission to consider changing the criteria used to rank community solar projects (see VPC comments # 143, April 27, 2020). Specifically, we recommend that the Commission implement a pilot program of siting and economic incentives for community solar projects located on impervious and previously developed surfaces. A pilot program could readily capitalize on the availability of impaired surfaces across the state, enabling Maryland to diversify and expand its in-state solar generation. That potential is clear in Anne Arundel County, where the amount of land covered with impervious surfaces is almost twice the acreage used for farming (see Attachments 1 and 2).

Other states are showing it can be done. New Jersey recently approved 77 MW_{dc} of community solar on parking canopies, brownfields, and rooftops after adopting a ranking system based on the state's siting and other policy preferences. When Massachusetts added land-use factors into its ranking system, over 20 percent of the new solar capacity was from non-greenfield projects. It's time for Maryland to catch up with its peers.

Diversifying our in-state solar generation would promote Maryland's dual goals of decarbonizing the grid while reducing the loss of forests and other lands that sequester carbon. We urge the Commission to act now so Maryland can achieve its full potential for reducing carbon dioxide emissions by the 2028 deadline in current law.

Thank you for considering our views.

Kathleen Gramp
President

Cc: Mr. Philip VanderHeyden, Assistant Executive Director, Maryland PSC

Attachments

¹ The Advocates for Herring Bay is a community-based environmental group in Anne Arundel County that has actively supported the development of solar energy in an environmentally sound manner.

**Attachment 1:
Current land cover in Anne Arundel County**

DISTRIBUTION OF ANNE ARUNDEL ACREAGE BY LAND COVER
EXCLUDING CITY OF ANNAPOLIS, AIRPORTS, AND TRANSPORTATION
SOURCE: NPDES REPORT, 2017, TABLE 2



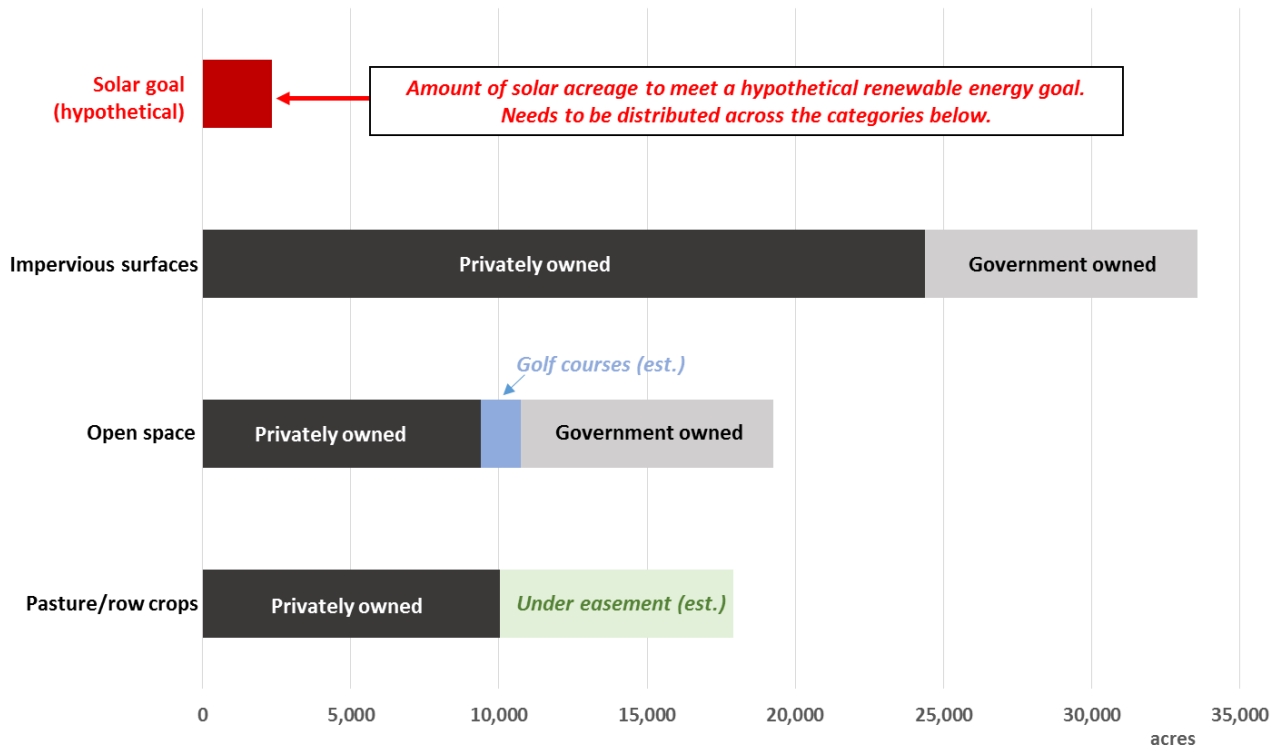
Source: AHB, using data from Anne Arundel County Department of Public Works, *National Pollutant Discharge Elimination Systems, Fiscal Year 2017 Annual Report*, Table 2, page IV-16.

Note: These data reflect the current characteristics of the land use, not zoning categories.

Attachment 2:

Major sources of acreage for solar development in AA County, by ownership

ACREAGE OF POTENTIAL SURFACES FOR NEW SOLAR CAPACITY
(ESTIMATED)



Source: AHB, using land use estimates derived from data in Anne Arundel County’s 2017 NPDES report. The estimate of acreage needed to provide “in-county” solar capacity was based on information available in 2019 and was calculated for a goal of 14.5 percent.