

**Policy Position of the Advocates for Herring Bay
Regarding SB 516: Clean Energy Jobs
Statement submitted by Kathleen Gramp
March 5, 2019**

SB 516: Information and suggested amendment to conduct a study on economic incentives for siting of solar facilities on previously developed surfaces.

We commend Maryland for adopting policies that will reduce carbon dioxide (CO₂) in the atmosphere. Our state is fortunate to have numerous options for achieving CO₂ savings, ranging from technological options like renewable energy to natural solutions like forest sequestration. One promising strategy is to put solar arrays on surfaces that have little or no carbon-sequestration potential, like large commercial rooftops. Using a diverse mix of surfaces for solar could increase our supply of clean energy while maximizing the amount of carbon being sequestered by our forests, farms, and other vegetated lands.

SB 516 would provide the impetus but not the tools necessary to achieve a diversified supply of solar energy. What's missing are the economic incentives necessary to spur the use of alternative surfaces. Re-using impervious and previously developed surfaces currently is less profitable than greenfield projects, in part because Maryland's existing pricing methods overlook the ecological and carbon sequestration value of undeveloped land. Unless we rectify that pricing disparity, our in-state solar generation will fall short of the diversity needed to reach its full carbon-reduction potential.

SB 516 could lay the groundwork for achieving a diverse mix of solar generation by directing the Power Plant Research Program to study incentives for using alternative surfaces. Massachusetts, for example, is seeing early success from new siting-based incentives that provide price "adders" for installation on non-greenfield surfaces. The first solicitation of their program led to nearly 20 percent of the proposed solar capacity being sited on preferred surfaces.

Maryland's study of siting-based incentives must start immediately if we are to achieve a diverse supply of in-state solar generation by 2028. Specifically, we request that SB 516 be amended to direct the Power Plant Research Program to analyze and make recommendations by December 2020 on pricing and other measures that would provide predictable, long-term economic incentives for projects on impervious and other previously developed surfaces. An illustrative example of legislative language for an amendment is shown below.

We urge the Committee amend SB 516 to include our proposed amendment for this study. Thank you for considering our views.

Example of potential legislative language

On page 28, line 6 insert:

(G) The Program shall conduct a study of measures that would be feasible and effective in providing predictable, long-term economic incentives for locating solar installations on impervious and previously developed surfaces, including siting-based pricing differentials, contractual arrangements, and regulatory incentives. On or before December 1, 2020, the Program shall submit its findings and recommendations on any legislative or regulatory measures necessary to implement such incentives.