

Barriers to solar in S.323 will drive up rates for everyone

**Testimony to the Senate Committee
on Agriculture**

**Ben Edgerly Walsh, VPIRG
Feb 24, 2026**



Unnecessary barriers = Energy unaffordability

Sec. 10 will make larger distributed solar almost impossible to build

- **Renewable Energy Standard limit = 5 MW**
- **5 MW solar = 25 acres**
- **Sec. 10 limit of 5 acres = 1 MW**

In MA, arrays 0.5-1 MW are 35% more expensive than arrays at or near 5 MW.

In NY, that number is 29%.

REV estimates in VT it would be 18%.

Source: Spring 2025 Solar Industry Update, NREL, May 14, 2025

If the concern is farmland conversion, restricting solar gets you nowhere

American Farmland Trust projections

- **Total VT agricultural land conversion through 2040: 41,200 acres**
- **Total conversion to solar: 1200 acres**
(note: will be higher due to RES update)
- **Solar – 3–6% of all farmland conversion**
- **Other development – 94–97%**

Sources: AFT testimony to House Agriculture, Jan 28, 2026;
Potential Placement of Utility Scale Solar Installations on Agricultural Lands in the US to 2040, AFT, Nov 2022

S.323 solar restrictions would fragment development

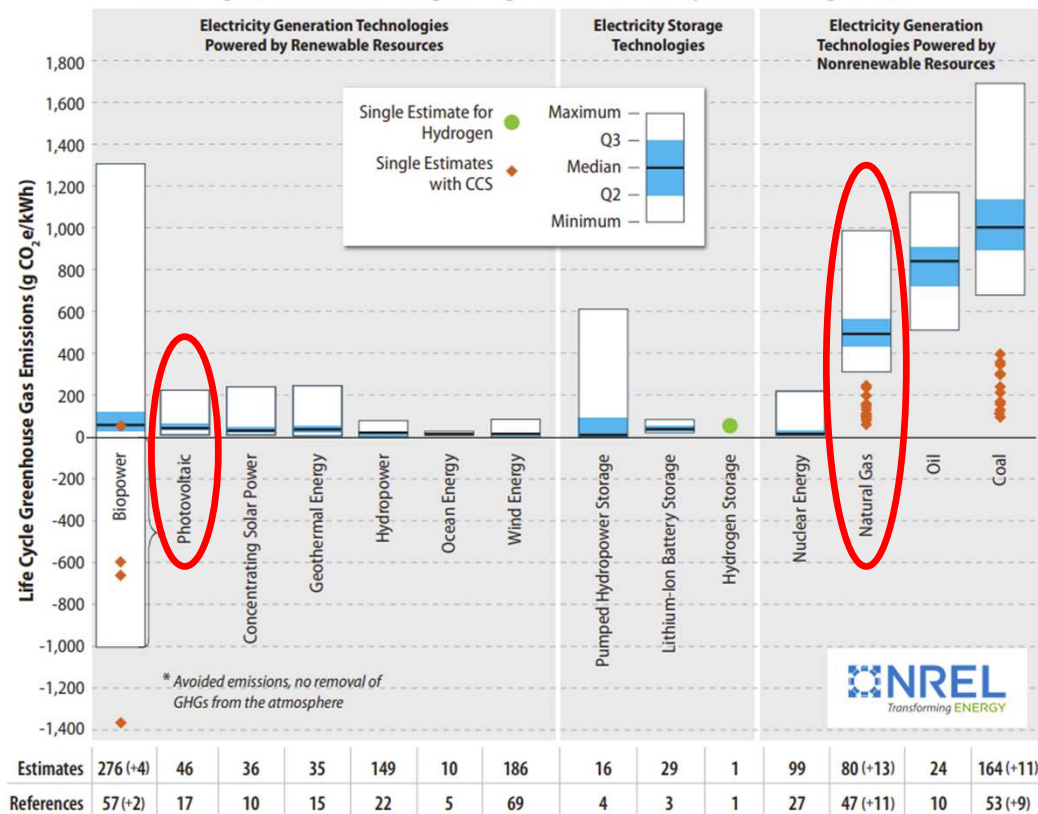
Department of Public Service projections:

- **42-50 MW solar / yr, 2025-2034**
- **Assuming 10-15 MW/yr net metering, 5 MW/yr of other solar, ~30 MW/yr from larger solar**
- **30 MW = 6 solar arrays 5 MW in size**
- **30 MW = 30 solar arrays at 1 MW each**
- **Over a decade that's 300 sites vs 60**

Source: 2026 Annual Energy Report, Vermont Department of Public Service

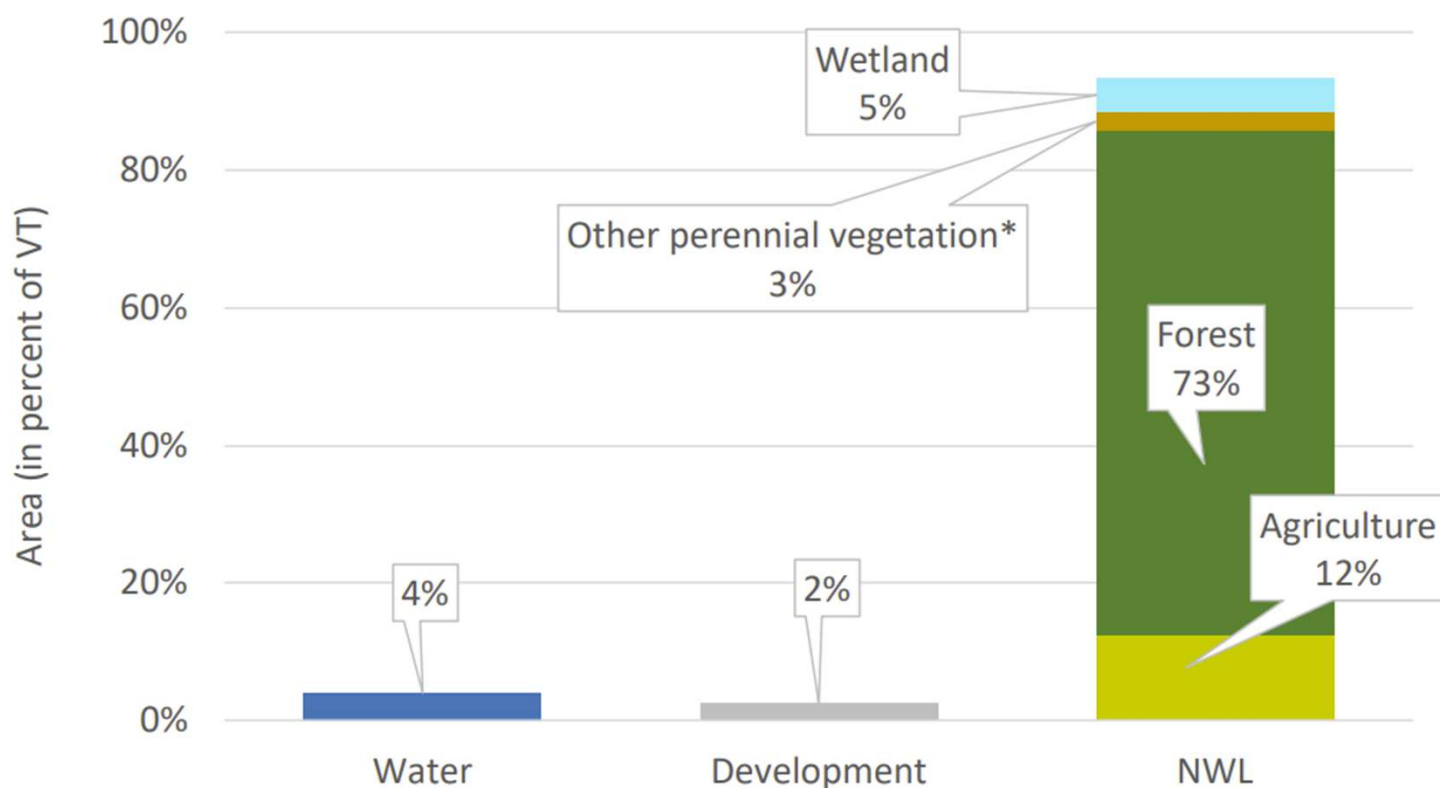
Lifecycle assessment singles out solar, increases costs for no benefit

Figure 2. Life cycle greenhouse gas emission estimates for selected electricity generation and storage technologies, and some technologies integrated with carbon capture and storage (CCS).



Source: Life Cycle Greenhouse Gas Emissions from Electricity Generation: Update, NREL, 2021

Natural & Working Lands (NWL) cover 94% of Vermont



Source: Agency of Agriculture Presentation to House Committee on Environment & Energy, May 9, 2024

Sec 10 of S.323 would result in:

- Higher costs for all solar (including residential, business, municipal)
- Higher costs overall by eliminating the cheapest distributed solar
- Fragmented solar development
- No reduction in overall solar deployment or farmland conversion
- Hundreds of millions of dollars in additional costs for Vermont ratepayers

Solar Development: Potential Paths Forward

- **Balance solar of various sizes**
 - **Current policy drives solar towards small, net metered systems and 5 MW systems, with little in between**
- **Incentivize “dual-use” / “agrivoltaics”**
- **Incentivize solar on previously developed areas (parking lots, brownfields, etc.)**
- **Remove the ban on wind**



Ben Edgerly Walsh
ben@vpig.org