Lessons Learned:

The Case Against a Scattershot Approach to Siting Solar

Last year, the Secretary of the Interior approved the first ever utility-scale solar power plants on public lands in the West. Despite increasing success in the utility-scale solar industry, federal land managers continue to evaluate the many pending applications in a reactive manner: solar companies submit applications to construct power plants and federal land managers react to those applications. This reactive process is incapable of providing the certainty necessary to build a successful solar industry.

The status quo leaves solar companies with little guidance on where to find lands with high solar resources and low environmental conflicts. Even though solar development on our public lands is still in its infancy, the high costs of this project-by-project approach are already apparent.

Southwest Region Has Huge Potential

According to the U.S. Department of Energy, the solar resources contained in six western states—California, Nevada, Utah, Arizona, New Mexico and Colorado—are more than enough to satisfy the country's entire electricity demand.

These significant resources have spawned a 21st century gold rush—as of late 2010, more than 100 applications were pending in the region for utility-scale solar energy projects and the Interior Department continues to accept additional applications. However, this current approach lacks certainty and predictability for developers, utilities, and conservation groups alike, imposing high costs on stakeholders who want to meet renewable energy goals.

Scattershot Approach Undermines Responsible Development

The project-by-project approach lacks key attributes that will help projects succeed. It is inefficient, unpredictable, expensive, time-consuming, and risky. The current project-by-project approach:

- Increases costs and risk to investors. Pursuing applications that are located in high conflict areas or
 areas with irresolvable conflicts is more expensive and time-consuming throughout the permitting
 process than applications in suitable areas.
- Rewards speculative applications. Speculative applications are obstacles to development by legitimate companies and take available and necessarily limited agency resources away from non-speculative applications. Such applications remain on the books even in California, the only state which has made a major effort to date to weed them out.
- <u>Encourages duplicative applications</u>. Numerous areas are subject to multiple applications, including speculative applications. While the "booking" of applications—regardless of the likelihood of their development—provides certain advantages to solar companies, maintaining these applications can be expensive and perpetuates uncertainty.
- <u>Diverts limited agency resources.</u> According to criteria adopted by the Interior Department in February 2011, numerous pending applications appear to be located in areas with high resource conflicts. Processing such applications takes time and resources away from lower conflict projects that are likely to be built with a minimum of time and controversy.





