



August 13, 2020

New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Trenton, New Jersey 08625

RE: Comments on the Offshore Wind Strategic Plan Draft

To Whom it May Concern:

Anbaric Development Partners (ADP) welcomes this opportunity to offer comments on the draft of the Offshore Wind Strategic Plan released for public comment on July 13, 2020. The New Jersey Board of Utilities, along with all of the departments, agencies, and stakeholders involved in the creation of this document deserve to be commended for vision and expertise in this plan that will keep New Jersey on its path to be the national leader in the offshore wind industry.

These comments presented focus on the topic of transmission as laid out in the draft strategic plan, which is a key threshold issue for New Jersey to meet its goals in a way that is most cost effective, least environmentally impactful, most reliable for the power system, and ready to position itself to meet carbon-free goals. It is clear that New Jersey recognizes the tremendous opportunities that offshore wind presents, but also the challenges that achieving utility scale transmission presents. Key among those challenges is planning for the transmission infrastructure that can efficiently and reliably deliver the power to shore. This document presents a clear overview of the decisions that need to be made, specifically how transmission will be procured and what configuration that transmission should take. It is now known via the release of the draft solicitation language, that New Jersey's second solicitation will follow the same path as the first solicitation. That is, transmission and generation will be procured in a bundled fashion. However this seems to continue the state down a path contrary to the direction the Energy Master Plan suggested. As was stated in the 2020 Energy Master Plan:

"Further, planned transmission to accommodate the state's offshore wind goals provides the opportunity to decrease ratepayer costs and optimize the delivery of offshore wind generation into the state's transmission system. This planning may include strengthening the onshore portions of the transmission system and extending the existing grid into the ocean. Although the transmission component of the Ocean Wind 1,100 MW project, which was bundled with the generation component, has its benefits, this model would likely not lead to efficient growth of the offshore wind industry into the future. Transmission planning is important in order to reach the state's long-term offshore wind goals. Coordinating transmission from multiple projects may lead to considerable ratepayer savings, better environmental outcomes, better grid stability, and may significantly reduce permitting risk."

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ADP is hopeful that through this strategic plan and the information gathering process at the NJBPU that subsequent transmission for offshore wind will be procured via a planned process that looks at the totality of the state's offshore wind goal, and allows for future growth. As stated in the Strategic Plan draft, transmission infrastructure scenarios must be evaluated to consider the impact that cables will have on the marine environment, sensitive habitats and historic areas, as well as the impact on the fishing industry. In addition, considerations regarding the future of offshore wind development must continue to evaluate the impact on the ratepayer.

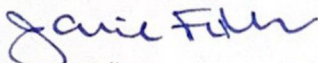
As you know, in New Jersey we have been advocating for planned, open-access transmission as one of the key steps that will ensure New Jersey reaches its 7,500 MW goal while protecting the ratepayer, the environment, the fishing industry, all the while spurring competition and with it the robust growth of the offshore wind sector.

ADP offers the following benefits of planned transmission for consideration:

- Planning to maximize the utilization of each onshore point of interconnection or POI. These POIs are scarce and those that can absorb thousands of megawatts should use the full amount of headroom without leaving any unused capacity.
- Planning can minimize the number of cables necessary to deliver power to shore, therefore reducing disruption to ocean and terrestrial ecosystems and impacts to communities and commercial and recreational fishing.
- Planning can create the infrastructure which enables long-term, predictable procurements for the offshore wind industry, which New Jersey is working so hard to anchor in the state, to eliminate concerns regarding project completion risk, as well as establish a financing structure for the procurement of OSW transmission.
- Finally, planning can increase and focus competition on the both the generation and transmission components which can lead to reduced costs for ratepayers.

ADP thanks the NJBPU for the opportunity to submit these comments on the Offshore Wind Strategic Plan, and we look forward to the continued leadership of Governor Murphy and the NJBPU in the development of the offshore wind industry in New Jersey.

Sincerely,



Janice Fuller
President, New Jersey
Anbaric Development Partners