

**Environment New Jersey • New Jersey Audubon • New Jersey Work Environment Council • National Wildlife Federation • Natural Resources Defense Council • Offshore Power LLC • Regional Plan Association**

March 12, 2021

Ms. Aida Camacho-Welch, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
Post Office Box 350  
Trenton, NJ 08625

**Re: Docket No. QO20100630, In the Matter of Offshore Wind Transmission**  
*Delivered via email to: [Board.Secretary@bpu.nj.gov](mailto:Board.Secretary@bpu.nj.gov)*

Dear Ms. Camacho-Welch:

On behalf of the undersigned organizations and our thousands of members, we strongly support Governor Murphy's continued leadership to accelerate the responsible development of offshore wind power for New Jersey. Offshore wind power is essential for providing the clean, renewable energy we need to reach the state's 50% Renewable Portfolio Standard by 2030 mandate in the 2018 Clean Energy Act. The state's recently finalized Offshore Wind Strategic Plan provides an important roadmap for reaching Governor Murphy's goal of producing 7,500 MW of offshore wind power by 2035, including strategies for navigating transmission challenges and other complex issues involved in bringing this new clean, renewable energy source online and to scale.

We applaud NJ BPU's recent action to request that the New Jersey's offshore wind goals be formally incorporated into the PJM transmission planning process, and encourage continued state leadership to ensure responsibly developed offshore wind power can be integrated into the electric grid cost-effectively and without delay. We appreciate this public comment opportunity as a follow up the NJ BPU *Offshore Wind Transmission Risk Technical Conference* on February 26, 2021.

Our organizations support equitable transmission approaches that are most likely to enable responsible development of offshore wind infrastructure, including: cable routes and landings that maximize environmental protections; construction by companies with strong safety records and union friendly contractors, including project labor agreements (PLAs); and reasonable cost and risk to ratepayers. Ensuring sufficient, cost-effective and responsibly developed transmission infrastructure to connect New Jersey's offshore wind projects will require substantial public and private collaboration, as well as comprehensive and ongoing stakeholder and expert outreach, to ensure the latest science and public input are considered early in the planning process. This is important both offshore and on land, as development of new substations and lines are needed to maximize integration of offshore wind power into the grid.

We fully appreciate the complexity of this issue and support the state's efforts to further analyze the potential advantages of both radial and shared transmission approaches. We also strongly support regional collaboration that could help maximize efficiencies and cost-effective interconnections across states. A transparent and robust public engagement process is essential for building trust between residents and the offshore wind industry as these major infrastructure developments are planned and constructed. The DEP Environmental Resources Working Group is one important forum for outreach and engagement with environmental and fisheries stakeholders, and additional targeted outreach will be needed to assess more localized impacts from specific transmission development scenarios.

Specifically, in evaluating on and offshore transmission projects and approaches, we encourage NJ BPU, in partnership with NJ DEP, to ensure potential impacts to natural resources and communities are carefully considered. All transmission projects should first aim to avoid any potential impacts to the most sensitive wildlife habitats. When projects cannot avoid impacts to our natural resources, there must be an effective plan to minimize and mitigate for those impacts. Our groups strongly believe that offshore wind energy, and associated transmission development, can coexist with our state's bountiful natural resources, but careful planning and execution informed by the best available science and comprehensive stakeholder input is necessary to make that scenario a reality. In particular, potential interconnections on public lands - including preserved state, county and local parklands – must be closely reviewed and approved only if impacts can be avoided or sufficiently minimized.

In addition, offshore wind transmission projects should include labor provisions such as PLAs. PLAs can provide the best value to ratepayers and keep good paying construction jobs in the state while: providing contractors with a reliable and uninterrupted supply of qualified workers; ensuring projects are completed on time; and requiring safety training provisions that protect workers. In addition, priority must be given to responsible companies and contractors. Specific factors to evaluate include exploitative business practices such as tax avoidance and history of fines for environmental or labor and health and safety violations.

In conclusion, we appreciate New Jersey's leadership in seeking solutions to this complex challenge facing the offshore wind industry and look forward to working with NJ BPU and NJ DEP to ensure that our state continues to be a national leader in ensuring our natural resources and communities are protected as we advance these and other infrastructure projects necessary to launch this critically needed climate solution.

Sincerely,

Catherine Bowes  
National Wildlife Federation

Doug O'Malley  
Environment New Jersey

Drew Tompkins  
New Jersey Audubon

Debra Coyle McFadden  
NJ Work Environment Council

Berenice Tompkins  
Jersey Renews

Eric Miller  
Natural Resources Defense Counsel

Rob Freudenberg  
Regional Plan Association

Bill O'Hearn  
Offshore Power LLC