



**Engineers Labor-Employer Cooperative**  
The Labor-Management Fund of Operating Engineers Local 825  
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**March 12, 2021**

Aida Camacho-Welch  
Secretary of the Board  
NJ Board of Public Utilities  
44 South Clinton Ave, 3<sup>rd</sup> Floor  
Trenton, New Jersey 08625-0350

**Subject: Docket No. QO20100630 – OSW Transmission**

The Engineers Labor-Employer Cooperative is a labor-management trust that represents the combined interests of the nearly 8,000 members of International Union of Operating Engineers Local 825, and the signatory union contractors who employ them. As a multi-state organization, ELEC focuses on promoting economic development and advocating for investments in infrastructure -- not only to provide work opportunities but to ensure that our members, contractors and their families, have the quality of life they deserve as residents of New Jersey.

IUOE and contractors invest millions annually, host and operate two state-of-the-art training campuses and are making significant advancements and investments in STEM higher education for our members to keep up with equipment technology, software and hardware, internal computers, GPS and other advanced features, which will be required to build the energy of the future. As we plan the energy mix of the future, it is critical to keep in mind that organizations like ours have already begun putting the pieces in place to ensure our membership is up-to-date and ready to work.

New Jersey's transition to incorporating offshore wind into its energy portfolio is an incredibly complex process that requires a structured plan to ensure generation and transmission are constructed so that completion of its components coincides with the other.

No matter how offshore wind transmission is bid and procured, whether in conjunction with generation or separately, it is imperative to note the consequences and risks associated with building one part, either generation or transmission before the other. These risks include higher costs, delays in implementation and delivery and connectivity issues that could decrease reliability.

As our state continues to pursue radical changes, like NJDEP proposals outlined in NJ PACT (Protecting Against Climate Threat) and recent Environmental Justice legislation that is currently engaged in the rulemaking process, policymakers must analyze each project holistically, taking

into account how these changes to land-use may impact siting transmission and onshore generation associated with offshore wind.

In order to meet New Jersey's offshore wind energy goals and projections outlined in Governor Murphy's Energy Master Plan, the Board of Public Utilities must take careful consideration when determining transmission and generation, regardless of how the work is bid. Siting, planning, permitting and building should be coordinated to prevent mismatched construction schedules, compatibility issues, and other delays; all of which can increase costs, for both the state and rate-payers, which is especially troubling considering the true cost of this type of renewable energy is still undetermined.

Thank you for the opportunity to submit these comments.