

April 27, 2022

44 South Clinton Ave, 1 Floor

P.O. Box 350

Trenton., NJ 08625-0350

Email: board.secretary@bpu.nj.gov

Re: Comments on Offshore Wind Transmission (Docket No. QO2100630)

Dear Secretary Camacho-Welch;

My name is David Wallace and my firm Wallace & Associates represents a number of fishing companies that harvest surfclam and ocean quahogs from the Atlantic Ocean off New Jersey. The clam fishery is one of the fisheries that will be negatively affected by ocean wind farms; including the turbines themselves in inter array cables and the export cables. The clam fishery's comments are simple and straight forward, option 1a is the best for the fishing industry and the ratepayers. The only requirements are that the cable routes of well understood, that the cables are installed deep in the bottom (plus 2 meters at the top of the cable), they are clearly marked on the NOAA charts, and they are monitored and inspected on a regular time frame.

The clam industry have been highly involved in addressing the issues that are being created by the wind farms regarding their negative impacts, with little to no success. The issues that we have address are that the wind developers are unwilling to address any concessions that will adversely affect the clam industry.

What is concerning to the clam fishery is the general attitude of the wind developers, their belief is that they can do whatever they please and without any accountability or responsibility for their actions. This is a complete disregard for the other users of the ocean, which in most cases, have participated in their business' for hundreds of years (shipping and fishing to name a few). The ocean wind developers also do not care about the consumer and their well-being. An example is the five six MW turbines at Block Island R.I. That small wind farm is a disaster but should be a wakeup call for the rest of the states that are considering off shore wind farms for electric power. The Block Island wind farm has been out of service for about a year, while they figure out how to fix the turbine blades, and the much larger problem with the cables. The wind developers laid off the operational responsibility when they sold the export cables to the grid operator after installing the cables as cheaply as possible the grid operator then had to replace all of the export cables and have them reinstalled at the ratepayer's expense. If the states are not careful, this type of a disaster could happen to them.

**1142 Hudson Road
Cambridge, MD 21613 USA**

**Phone: 410-376-3200 410-749-9226
Fax: 410-376-2135 410-749-9280**

e-mail: DHWALLACE@AOL.COM

As you know, the developers form separate companies as the owners of the wind farm. When the financial rewards run out, they sell the operation company to a bottom feeder and stick the ratepayers with the bill. The European developers are already doing this in Europe. This should be of no surprise, power-generating companies and real-estate developer's do it all of the time. However, in these cases the developers get the money and the ratepayers get the pain.

Therefore, our suggestions is that the developers own the system from the wind farm to the connection substation and are held accountable and responsible so the grid/ratepayers do not pay the price.

Below are suggestions to protect the electric system and the ratepayers so that the lights stay on and system is reliable. Have nuclear power and other renewables on line to carry the base load and use wind when available. At best, ocean wind provides power no more than 50 percent of the time.

1A is the cleanest way to have a wind farm power generation system and export distribution that provides cost control, in the ratepayers favor.

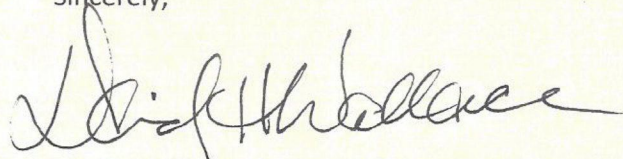
- The developers owns and control the power from offshore to substation (s) that can provide the amount of power that the station can use.
- The developer deliver the power to an upland primary or substation in the voltage that the interconnection can accept.
- The developers are responsible for the cables and other equipment at a fixed cost.
- In this way, the consumer knows what the offshore power really cost delivered to a grid substation.
- Therefore, they should know what there are getting for their money, and the developer is paid for what they deliver to the substation.
- That the developer carry the responsibility to convert the AC to DC power from the turbine and then back to AC at the grid connection point.
- The developer get paid for what they deliver to the point of connections
- As pointed out at the Block Island wind farm, the grid or state did not want to own the cable export system.
- If the grid operator owns the export system, and there is a problem transporting the power from the farm, operators want to be paid from the power that cannot be delivered. When the grid operator owns the export system then they are responsibility, not the developer.
- Cable corridors with multiple cables are acceptable as long as they are installed properly and deep enough, at least two meters above the top of the cable and below the normal ocean floor contour.
- The clam fishery does not like cables in general but if they are designed and installed properly should not case problems as long as they are buried at least two meters above the top of the cable. In areas of high-energy sand and sand waves that must be taken into consideration. Ocean cables must be inspected every five years or sooner, i if there is a large store it must be surveyed to assure that it is still two meters below the surface.
- At the end of the wind farm life cycle, all cables must be remover and disposed of in an acceptable way.

The clam industry believes that a backbone system is a bad idea.

- In most cases, backbones are owned by the grid system or the government. Any problem with a backbone is the operators fault and they have all of the accountability and reasonability, which make them the target for the developers and ratepayers.
- Ocean Backbones are very expensive and complicated. Takes the developer off the hook for being reasonable is a bad idea because then whatever the problem is, it is the fault of the owner.
- Having 5 or 6 wind farm on a single system that is in the ocean has great risk and if something happens to the backbone the entire system could be down for months.
- If the U.S. end up in a cold war with an at sea power, with an accumulation wind farms the cable hooked together could be damaged by a ship or on purpose by an adversarial source. Therefore, backbones poses a great security risk.
- In our view It is better to have 20 export power cables installed properly over a hundred miles of shore line than one hundred mile backbone with 20 cables feeding it and five or six export cables to the substation on shore. Put simply, there is safety in numbers.
- The few ocean backbones that have been built in Europe have proven to be difficult to operate and very expensive to build. They are very complicated and create all sources of problems that make them questionable as an effective system.

Thank you for considering out comments. If you have any questions, please feel free to contact us at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "David H. Wallace". The signature is fluid and cursive, with a large initial "D" and "W".

David H. Wallace