



April 29, 2022

Board of Public Utilities
44 South Clinton Avenue, 1st Floor
Post Office Box 350
Trenton, NJ 08625-0350

RE: Docket No. QO20100630: IN THE MATTER OF OFFSHORE WIND TRANSMISSION

Dear Board Secretary,

Please accept the below comments of Community Offshore Wind (“COSW”) in the New Jersey Board of Public Utilities’ (“NJBPU”) evaluation of offshore wind transmission proposals submitted to the PJM Interconnection (“PJM”) pursuant to the PJM State Agreement Approach (“SAA”). As part of this effort, the NJBPU held a series of Stakeholder Meetings to solicit input and COSW participated in Meeting #2 that focused on Integration with Offshore Wind Generation Projects on March 30, 2022. COSW applauds the NJBPU’s continued nation leading policy development and concrete actions towards deploying offshore wind in New Jersey with the anticipated release of its third solicitation in January of 2023.

Following the success of their joint bid in the New York Bight offshore lease auction last month, RWE Renewables, one of the globally leading companies in offshore wind, and National Grid, one of the largest energy companies pivotal to the energy systems in the north-eastern United States and the United Kingdom, announced the official name of their joint venture, COSW, to reflect the benefits it will bring to local communities, with the tagline, “Local clean energy for all.” COSW is committed to delivering sustainable energy safely, reliably and efficiently to the communities we serve. RWE and National Grid share a common goal of enabling the clean energy future and offshore wind will be critical for the U.S., particularly in the Northeast, to reduce carbon emissions and meet climate goals, such as New Jersey’s target of bringing 7.5 gigawatts (“GW”) of offshore wind online by 2035. Importantly, New Jersey’s clean energy goals will also deliver significant new jobs and private investment to support the growth of the region’s economy.

COSW supports the NJBPU’s industry leading efforts to build transmission in support of offshore wind development. It is COSW’s position that the SAA can reduce project risk in three key areas: less uncertainty on transmission upgrades, reduction in curtailment risk, and the opportunity to coordinate and consolidate landfall, thereby mitigating stakeholder fatigue. COSW recommends that the NJBPU continue to ensure coordination in the following areas between the SAA process and Offshore Wind developers to ensure that project milestones are not put at risk:



- **SAA and PJM Interconnection Process Alignment:** Offshore Wind developers need to know which SAA solutions have been awarded before the NJPBU issues the third solicitation in order to know which Points of Interconnection (“POI”) to target. This is particularly important in cases where SAA solutions create new POIs that will require Offshore Wind developers to submit entirely new interconnection requests to match SAA POIs.
- **PJM Queue Reform:** PJM Queue Reform could result in significant delays for Offshore Wind developers with recently awarded BOEM lease areas. PJM’s existing and recently proposed requirements for site control prevent new entrants from entering the queue. Delayed entry into the queue places further risk that offshore wind projects will not meet the anticipated 2030 Commercial Operation Date (“COD”).
- **SAA Construction Delays:** Offshore Wind projects will need SAA solutions to be operational at least one year prior to COD of the facility because the turbines require grid power for commissioning. Therefore, any SAA proposal with CODs proposed later than 2029 put COD at-risk.

Sincerely,

Kate McKeever
Vice President, Government Affairs Offshore U.S.
RWE Renewables Americas, LLC
Acting on behalf of Community Offshore Wind
A joint venture of RWE and National Grid Ventures
M +1-325-267-0842
Kate.mckeever@rwe.com