

April 29, 2022

VIA ELECTRONIC DELIVERY

Ms. Carmen Diaz
Acting Secretary of the Board
44 South Clinton Avenue, 1st Floor
Post Office Box 350
Trenton, NJ 08625-0350
Phone: 609-292-1599
Email: board.secretary@bpu.nj.gov

RE: Docket No. QO20100630 – In the Matter of Declaring Transmission to Support Offshore Wind a Public Policy of the State Of New Jersey

**CON EDISON TRANSMISSION COMMENTS ON NEW JERSEY
STAKEHOLDER MEETINGS AND ADDITIONAL INFORMATION
IN THE MATTER OF OFFSHORE WIND TRANSMISSION**

Dear Acting Secretary Diaz:

In response to the New Jersey Board of Public Utilities' *Stakeholder Meetings and Additional Information in the Matter of Offshore Wind Transmission* public notice published in the March 7, 2022, enclosed please find the comments of Con Edison Transmission, Inc. on behalf of Clean Link New Jersey.

Respectfully submitted,

/s/ Timothy Frost

Timothy Frost
Vice President

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

In the Matter of Declaring Transmission to)
Support Offshore Wind a Public Policy of) BPU Docket No. QO20100630
The State of New Jersey)

**CON EDISON TRANSMISSION COMMENTS ON NEW JERSEY
STAKEHOLDER MEETINGS AND ADDITIONAL INFORMATION
IN THE MATTER OF OFFSHORE WIND TRANSMISSION**

Con Edison Transmission Inc. (“CET”), on the behalf of its subsidiary Clean Link New Jersey, LLC, the developer of the Clean Link New Jersey Project, appreciates the opportunity to provide comments on the recent series of stakeholder meetings held between March 22 and April 12, 2022. Collaboration among the New Jersey Board of Public Utilities (“the Board”), PJM Interconnection (“PJM”), and various stakeholder groups is critical for the successful implementation and delivery of the necessary offshore wind transmission projects to achieve New Jersey’s clean energy future. We applaud the Board’s focus on proactive stakeholder engagement.

In September 2021, CET submitted its bid for the Clean Link New Jersey Project to the Board and PJM under its 2021 State Agreement Approach (“SAA”) Proposal Window to Support NJ Offshore Wind. Clean Link New Jersey is an innovative, flexible, and modular power corridor solution that will enable the reliable and cost-effective delivery of offshore wind energy to customers, supporting New Jersey’s goal of 7,500 MW of offshore wind by 2035. Critically, Clean Link New Jersey will be built and operated with minimal disruption to host communities, the environment, and is a cost-effective solution for customers.

The four stakeholder meetings showcased many different approaches and opinions in this highly competitive process. This robust discussion speaks to the importance of striking a balance in the selection and ultimate delivery of an important transmission solution that optimizes cost, environmental and community impact, and effective delivery of offshore wind. This balance is exactly what we have endeavored to achieve through Clean Link New Jersey.

We highlight several key points that were made during the stakeholder discussion:

1. The flexibility of a solution is critical in accommodating future offshore wind growth in a cost-effective and reliable way for customers.
2. Transmission infrastructure must meet the expectations of New Jersey communities today and can be expanded and further integrated in the future.
3. The selected project must support an affordable cost and reduced risk for New Jersey consumers.

The importance of a flexible solution

In order to accommodate future offshore wind generation that will be spread among multiple offshore lease areas, the selected solution must be scalable and flexible to be at the right place at the right time. This reduces the risk that any transmission planned in advance of generation is optimal for the requirements needed and reduces the costs for customers. To meet this need, Clean Link New Jersey proposes various flexible onshore options utilizing different interconnection combinations, number of cables, and cable routes.

Offshore, Clean Link New Jersey provides flexibility of platform locations. Platforms can be added or removed depending on the outcome of future offshore wind procurements, including adjustments that can be made after the anticipated 2023 and future solicitations. Clean Link New Jersey will coordinate with generation developers as offshore wind projects are realized so that our solution optimizes delivery and cost while reducing environmental and community impacts.

Clean Link New Jersey will also provide a flexible framework to provide links between the Clean Link New Jersey offshore platforms as well as neighboring wind farm platforms to create a level of reliability that New Jerseyans expect.

Creating the right infrastructure for New Jersey

Clean Link New Jersey is designed to meet the needs of New Jersey for both today and in the future. Avoiding or reducing community and environmental impacts is clearly a priority for the Board and many stakeholders in New Jersey. After examining numerous routing options, the Clean Link New Jersey Project identified an underground power corridor design utilizing mostly existing and public rights of way (“ROWS”) to minimize these impacts and create a solution that is best for local communities.

Clean Link New Jersey’s power corridor design uses high voltage direct current (“HVDC”) technology which minimizes impacts on communities, maximizes power capability and control, and uses fewer cables than other options. By comparison, alternating current (“AC”) lines are more intrusive to the environment and have the highest impact to the communities due to the considerable number of cables required.

Landing cables on shore remains a major concern for local communities. Anticipating this, Clean Link New Jersey uses a landfall location that is non-public and has been used for landing communication cables in the past. We are building on our experience utilizing existing ROW from other projects. It is an advantageous approach for the environment, the surrounding communities, and mitigates risks in the permitting process.

Using the underground power corridor design also increases resiliency by minimizing disruptions from severe weather, a growing concern in the face of climate change. As an affiliate of Con Edison Company of New York, the most reliable utility in North America,

we are a leader on the critical importance of reliability and resiliency. We plan to continue that legacy with Clean Link New Jersey.

On an ongoing basis, Clean Link New Jersey's offshore transmission infrastructure will not create local visual impacts for the shore communities. Our proposed offshore network creates a level of reliability that New Jerseyans deserve and expect as we transition to clean energy. We believe that this element of our proposal initiates a meshed offshore network that will only grow and expand into the future, further improving flexibility, reliability, and dispatchability. This meshed network proposal will allow New Jersey to, once again, lead the way developing transmission infrastructure for the future of offshore wind.

Supporting affordable cost and reduced risk for New Jersey consumers

A large part of the stakeholder discussions focused on cost containment, a key feature of this competitive process. CET agrees with many of the other stakeholders that cost containment is very important, and we have accordingly adopted a framework that provides for customer protections and improved risk allocation between developers and customers, thereby reducing the cost risk to customers.

For cost containment to be effective, framework, scope, and credibility must be considered. We emphasize that it is important to consider the project scope and technology as these elements are a major driver for reducing costs to customers. Clean Link New Jersey's selection of HVDC and cost-effective corridors and interconnection locations achieves this, resulting in one of, if not the, most cost-effective proposals offered.

Another important consideration is the confidence that the developer will deliver the project if selected, including fair implementation of its cost containment. Credibility cannot be understated. Financial strength, track record and reputation should all be considered alongside the various cost containment proposals. CET, as an affiliate of Con Edison, Inc, is exceptional on these parameters and further has the knowledge and experience to deliver and operate underground, underwater and overhead transmission infrastructure.

Finally, Clean Link New Jersey welcomes the opportunity to work with the Department of Energy to explore potential funding opportunities to reduce the cost to customers, including low-cost financing, and will work with the State to pursue these opportunities.

Conclusions

Clean Link New Jersey encourages the Board to consider the comments above in its evaluation. Clean Link New Jersey welcomes the opportunity to continue the stakeholder dialogue, and is ready to help the Board, PJM, and all stakeholders in delivering this critical infrastructure to achieve the clean energy future. We are available to answer questions and provide additional information to help the Board and PJM in its evaluation.

Dated: April 29, 2022

Respectfully submitted,

CON EDISON TRANSMISSION, INC.

By: /s/ Timothy Frost

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