MID-ATLANTIC
OFFSHORE DEVELOPMENT

April 29, 2022

Carmen D. Diaz
Acting Secretary of the Board
New Jersey Board of Public Utilities
BPU Docket No. QO20100630
Submitted electronically to: Board.Secretary@bpu.nj.gov

Dear Acting Secretary Diaz,

Mid-Atlantic Offshore Development, LLC (MAOD), a 50/50 joint venture between EDF Renewables North America (EDFR) and Shell New Energies US, LLC (Shell New Energies), appreciates the opportunity to submit comments concerning NJ BPU Docket No. QO20100630. These comments are submitted as a follow up to MAOD's presentations throughout the Stakeholder Meetings.[1]

MAOD strongly supports New Jersey's use of its State Agreement Approach (SAA) to safely, responsibly, and competitively facilitate grid integration of future offshore wind generation via cost effective transmission. The MAOD organization fully supports Governor Murphy's Energy Master Plan targeting 7,500 MW of offshore wind generation by 2035 and believes competitively soliciting transmission bids through the SAA process is the most practical approach to jump start requisite infrastructure development and construction.

MAOD further believes that its proposal's specific technical and environmental tenets best advance these economic and social objectives to the broad benefit of local labor, grid and utility operators, and New Jersey ratepayers. MAOD would like to highlight such specifics as they pertain to the NJ BPU and PJM's long-term SAA objectives.

## Flexible Technical Solution

MAOD has proposed modular technical solutions across its submissions to facilitate efficient, integrated, and appropriately sequenced development to meet State objectives. MAOD's system and approach relies on HVDC circuits between at least two, and up to four, offshore HVDC platforms to support HVDC transmission - facilitating maximum generation uptime even in the case of planned or unplanned downtime along one of the export cables or onshore converters.

Additionally, MAOD's SAA proposals facilitate reduced transmission interconnection costs for future offshore wind generators. While recent offshore wind proposals have generally been offered in specific increments (ex: 400MW) to accommodate AC cable delivery capability, MAOD's

[1]March 22, 2022 – General Description of SAA Goals and Evaluation Process, and Review of Applications Received; March 30, 2022 – Integration with Offshore Wind Generation Projects; April 4, 2022 – Environmental and Permitting issues.

infrastructure presents an opportunity for developers to cost-effectively interconnect in smaller or larger increments, facilitating development flexibility likely associated with eventual corporate PPA or merchant projects.

## Modularity

MAOD's solutions (Proposals 1, 2 and 3) offer a modular approach with each successive proposal adding additional HVDC capacity in 1,200 MW increments up to 4,800 MW total. Scale economies and general efficiency may be realized as each HVDC circuit utilizes the same offshore cable routes, beach landfall, onshore rights-of-way (ROW), and onshore substations. Illustratively, the BPU could initially select Proposal 1 (2,400 MW total) and subsequently expand its desired solution to encompass Proposals 2 and 3 to offer sufficient capacity for further offshore wind generation solicitations. MAOD's solution also offers the ability to change the circuit building sequence to accommodate the BPU's preferred actions.

## Location and Timing Flexibility

In addition to capacity expansion adhering to New Jersey's 2035 generation targets, MAOD's approach provides flexibility to change platform location. The systems outlined in each proposal may be relocated to best suit future offshore wind developers and successfully solicited projects. MAOD is also able to alter the Point of Interconnection sequence and could explore utilizing higher capacity ratings should the BPU hope to exceed the initial 7,500 MW target. MAOD's proposals also satisfy the BPU's preferred solicitation and award timing such that locations may be selected without risk to MAOD's project schedule, provided that offshore substation location is made in due time.

## Environmental

MAOD's solutions are principled in approach and aim to responsibly manage the development's potential environmental impacts. To date, project components have been sited to avoid sensitive offshore and onshore environmental and fisheries resources by leveraging site-specific technical studies shared by Atlantic Shores Offshore Wind (ASOW). The 3-year work maturity of ASOW's onshore and offshore ROWs minimizes both disturbances and permitting uncertainty to provide greater surety that the project is completed on time.

MAOD will complete the most intrusive phase of construction in one cycle such that its substation, trenches, conduits, and vaults are in place and can be accessed for future project expansion with minimal ground disturbance. This approach contrasts with the environmental impact of an alternative generator lead-line approach serving multiple future offshore developments.

## Conclusion

MAOD fully supports the BPU's SAA approach and believes this process will best facilitate offshore transmission infrastructure development and the ultimate 2035 State targets. Further, MAOD believes that its specific technical proposals are flexible enough to accommodate Solicitation 2 awards *and* any potential future awards.

MAOD both appreciates the opportunity to comment and participate in the Solicitation and believes its technical solution uniquely furthers the Board's near and long-term objectives.

Sincerely,

Matthew Virant
Development Director
Mid-Atlantic Offshore Development, LLC