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April 29, 2022

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

RE: In The Matter of Offshore Wind Transmission, Docket No. QO20100630, Comments Following The Series of Virtual Public Stakeholder Meetings

Dear New Jersey Board of Public Utilities,

Attentive Energy LLC (“Attentive Energy”) appreciates the opportunity to provide comments to the New Jersey Board of Public Utilities (“NJBPU”) regarding the State Agreement Approach (“SAA”) Proposal Window to Support New Jersey Offshore Wind.

Attentive Energy is a wholly owned subsidiary of TotalEnergies Renewables USA, LLC (“TotalEnergies”), a global multi-energy company that produces and markets energies – with a 10GW offshore wind development portfolio globally and major interest in expanding within the U.S. market. TotalEnergies has an ambition to install 100GW of global renewable power generation by 2030 and reach carbon neutrality in global business operations by 2050.

In February 2022, Attentive Energy was named a provisional winner of lease area OCS-A 0538 in the Bureau of Ocean Energy Management’s federal New York Bight lease auction, thus establishing its long-term presence in the region and commitment to deliver a community-first approach following years-long stakeholder engagement.

Attentive Energy is focused on delivering offshore wind opportunities to empower communities today and tomorrow. Our team is guided by deep experience in the offshore sector and a forward-thinking commitment to put people first. Attentive Energy appreciates the opportunity to engage in recent public SAA stakeholder sessions, learn about local stakeholder needs, and understand how to best strengthen our communities while achieving New Jersey’s offshore wind goals. Attentive Energy applauds the NJBPU for taking a proactive approach to transmission buildout that will facilitate the interconnection of clean energy to the State. We are eager to continue to listen and engage with the State and relevant stakeholders as New Jersey advances the “first-of-its-kind” offshore wind transmission program.

As a new entrant to the market, Attentive Energy would like to reinforce the following items for consideration as NJBPU continues to evaluate SAA proposals and their integration to the upcoming New Jersey Phase 3 Offshore Wind Renewable Energy Certificate (“OREC”) solicitation.

Attentive Energy supports New Jersey's ambitious offshore wind goal of 7500MW by 2035. To ensure successful realization of this goal, we encourage NJBPU to transparently update the market on the many ongoing regulatory developments, including SAA advancements, PJM queue reform, and timing of the pending Phase 3 OREC solicitation. Schedule certainty will ensure project viability by allowing for thorough planning and assessment of the large capital investment required for transmission and offshore wind projects. Furthermore, increased certainty will help ensure the availability of the most efficient and cost-effective financing possible; this will benefit all projects, and ultimately the ratepayers of New Jersey.

Additionally, Attentive Energy is actively developing a project design envelope informed by our solutions-focused technical and permitting strategies while concurrently preparing for the Phase 3 OREC solicitation. The uncertainty of the required technical solutions for interconnection into New Jersey requires alternative analyses and larger design envelopes than may otherwise be required. This complicates both the respective federal permitting strategy and the impending early development of robust interconnection concepts. Timely and prescriptive guidance as to how the generation, transmission, and interconnection scopes will be integrated with an SAA award is critical for market participants to advance solutions that will benefit New Jersey ratepayers. We appreciate the complexities of the SAA; however, we implore NJBPU Staff to work expeditiously to meet the currently proposed evaluation schedule.

We look forward to continued dialogue with NJBPU, local stakeholders, and other industry participants as we forge a new industry and build an inclusive clean energy economy.

Sincerely,

Christen Wittman
Project Director
Attentive Energy LLC