



10 W Lafayette Street  
Trenton, NJ 08608-  
2002

609-393-7707  
www.njbia.org

**Michele N. Siekerka,**  
**Esq.**  
President and CEO

**Christine Buteas**  
Chief Government  
Affairs Officer

**Raymond Cantor**  
Vice President

**Christopher Emigholz**  
Vice President

**Alexis Bailey**  
Director of  
Government Affairs

**Kyle Sullender**  
Director of Economic  
Policy Research

May 2, 2022

Board Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue  
Trenton, NJ 08625

**Re: In the Matter of Offshore Wind Transmission, BPU Docket No. QO20100630**

Dear Secretary Camacho-Welch:

I am pleased to submit comments regarding Offshore Wind Transmission as part of the Board of Public Utilities' process under the State Agreement Approach (SAA). NJBIA is the state's largest business association. As such, NJBIA has an interest in ensuring that New Jersey's economy is robust and competitive. This holds true for our energy sector. Our members are the consumers of energy, from the largest manufacturers to Main Street businesses. Our members are also impacted by the capital and other physical costs associated with a change in energy policy, from building retrofits to the purchase of electric or zero-emission vehicles, to implementing new ways of doing business.

But our members also include those companies who supply energy. We represent solar developers, wind and transmission companies, electric and gas public utilities, inventors and developers of new technologies, as well as many of the trade unions who support these industries. We try to take a broad view on energy public policy, understanding the policy objectives of climate change and carbon reduction, but also keenly aware of the cost and economic impacts of those policies. It is with that lens that we offer these comments.

In addition to the informative Stakeholder meetings that the BPU held, the New Jersey Business and Industry Association hosted many of the companies who submitted proposals for a roundtable discussion on March 25, 2022. This discussion allowed for each company to explain the primary benefits of their proposals and the policies the Board should pursue in making its determination.

We support New Jersey's goal of reaching 7,500 MW of offshore wind power by 2035. New Jerseyans understand the importance and urgency of addressing climate change. The development of offshore wind power is a significant part of the decarbonization solution and is also an opportunity for economic development and business growth in New Jersey.

We believe that the overall goal in choosing an offshore wind transmission solution for New Jersey is to bring on shore the most power with the least community impact and disruptions and in the most affordable way for ratepayers.

Factors that we believe are important in this decision are Reliability, Flexibility, Accountability, and Affordability.

The best transmission solution for New Jersey should include redundant systems to ensure electricity can be reliably delivered even during necessary maintenance or under emergency conditions. Reliability also means choosing a company with significant expertise in building and operating successful transmission systems as well as the financial strength to complete the project. Getting the job done on schedule and on-budget is key to meeting New Jersey's goals, but so is doing so in a manner that is at an affordable cost. Toward that end we would also like the Board to explore the feasibility of linking this project to existing approved wind facilities and to other projects along the eastern seaboard if it would lower the overall costs to ratepayers and enhance transmission and overall grid reliability.

Consideration should also be given to plans that are easily expandable in the future without having to cause significantly more disruption to our communities onshore. While we recognize the inherent benefits of offshore wind as well as the relative minimal impacts of onshore transmission connections, we are also cognizant of the impacts these facilities can have on tourism communities as well as the unwanted impacts to overburdened communities. Therefore, any approved project should seek to minimize onshore connections and impacts, utilize existing infrastructure and facilities, and, if possible, gain community backing. For the wind industry to grow in New Jersey it must have community support.

The best transmission solution for New Jersey will also have comprehensive cost containment and protection for ratepayers from excessive costs, as well as cost overruns. But construction costs are only part of the project costs, company revenues should also be analyzed. The only way to ensure ratepayers are protected is to evaluate proposals on the total cost customers will have to pay. The Board should evaluate what costs are contained and what exclusions apply to any particular company's proposal in order to get the best project for ratepayers. BPU should also ensure a company that has the financial strength to back up those promises, so New Jersey ratepayers won't be put in economic jeopardy.

The bottom line is what ratepayers actually pay is the most important measure of affordability and cost containment.

To meet its full potential, offshore wind power must be brought onshore in the most responsible way. We support the Board of Public Utilities' process under the State Agreement Approach to choose the transmission solution that best meets New Jersey's needs. The BPU's SAA approach is designed to integrate offshore wind in the most affordable and resilient manner possible while keeping environmental responsibility a paramount priority and creating new jobs and economic investment.

Thank you for this opportunity to submit our comments and thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Cantor", with a long horizontal flourish extending to the right.

Ray Cantor, Vice President of Government Affairs  
New Jersey Business & Industry Association