

**STATE OF NEW JERSEY
BOARD OF UTILITIES**

IMO Offshore Wind Transmission

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Docket No. QO20100630

AFFIDAVIT OF MATTHEW J. VIRANT

I, Matthew J. Virant, being first duly sworn according to law, hereby depose and say that:

1. I am Development Director of Mid-Atlantic Offshore Development, LLC (“MAOD”). I am involved with transmission development activities for MAOD, including bid management and implementation of MAOD's proposed project in New Jersey.

2. By this affidavit, I support MAOD’s request that the Board protect from public disclosure the “Confidential Copy” (unredacted version) of MAOD’s supplemental material related to its application to PJM and other related material being filed herewith.

3. The Confidential Copy contains information that is critical, commercially sensitive and competitively significant to MAOD’s proposed project. This information could possibly be used by competitors and potential competitors against MAOD in connection with this proceeding.

4. To the best of my knowledge, the information that has been redacted from the redacted or Preliminary Public Copy of the documents has not been made available to the public or contained in materials which are routinely available to the general public, including without limitation, initial and final orders in contested case adjudications, regulatory filings, press releases, copies of speeches, pamphlets and educational materials.

5. To the best of my knowledge, neither the Board nor any other state or Federal agency or court of competent jurisdiction has previously made a confidentiality determination relevant to the pending confidentiality claim.

6. Disclosure of such information would be extremely detrimental and could be used in an anti-competitive fashion by MAOD's competitors. Moreover, competitors at any level possessing such information would find it of great economic value in determining their own business plans and, in many cases, could use such information to structure their plans in such a way as to undercut MAOD's competitive positions, or could otherwise materially affect MAOD's ability to compete effectively.

7. Due to the sensitive nature of this information, it is appropriate for the Board to limit access to such information. The confidential information being provided is for the use of the Board in exercising its governmental functions. There is no legitimate purpose to be served in disclosing this proprietary material to MAOD's competitors or, indeed, to any person other than the appropriate staff of the Board.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the above statements are willfully false, I am subject to punishment.

Dated this 20th day of May, 2022 in Dallas, Texas.



Matthew J. Virant
Development Director
Mid-Atlantic Offshore Development, LLC