



June 21, 2022

To Whom It May Concern:

On behalf of myself and Environment New Jersey, I am proud to offer my support for the Boardwalk Power Link Projects as proposed by Anbaric Development Partners in New Jersey. At Environment New Jersey, we support the projects that will put the environment first and create a greener, healthier New Jersey.

Environment New Jersey understands that robust offshore wind generation is critical to delivering clean energy to homes and businesses and mitigating climate change across New Jersey and beyond. That's why we are supportive of the Board of Public Utilities' first-in-the-nation solicitation process to prioritize the growth of the offshore wind industry as it scales alongside the states renewable energy goals. Building the infrastructure for a reliable, scalable transmission system will ensure that clean, renewable energy is brought to the Jersey Shore in an environmentally-conscious manner, minimizing impacts to our coastline and marine life. The Boardwalk Power Link Projects offer a thoughtful approach to transmission infrastructure across a portfolio of 19 submissions. These projects are in the making and represent a multi-billion dollar investment in New Jersey's clean energy future.

We all have become acutely aware of the impact that ignoring the warnings of climate change have in terms of severe weather events, impacts to endangered species and habitat, and rising sea levels at the Shore. Incorporating responsibly developed offshore wind infrastructure is critical to our state's clean, renewable energy future. We must act quickly, and the state's environmental mandate of a 50% Renewable Portfolio Standard by 2030 and the requirements of the Global Warming Response Act and Governor Murphy's Executive Order 274 to reduce climate pollutants by 50% by 2030 (and EO 92) all point to the same conclusion – the need for a massive ramp-up of clean, renewable energy via offshore wind and to facilitate the ability of the industry to scale.

The BPU's SAA approach is designed to integrate offshore wind in the most environmentally-responsibility manner, recognizing that environmental protection and preservation is a paramount priority. If the offshore wind developer solicitations bids were strictly binary, the decision in front of the NJBPU is a kaleidoscope of options. If offshore wind turbines capture the imagination, interconnection makes offshore wind a reality.

Noting the plenary of options, we strongly encourage the Board to prioritize projects that: 1) Create the least environmental impacts by avoiding, and if needed, mitigating any anticipated environmental damage by focusing on the least number of Shore interconnections. 2) Maximize the potential for future MW and ultimately GW of offshore wind off the Jersey Shore. EO 92 laid out a vision to 7,500 MW by 2035 for New Jersey – we can only hope that future years and increased technology will allow for a further ratcheting up of this goal. 3) Focus on the least number of cables. Not every principle will 100% mesh with the other – we encourage a balanced approach by the Board.

Additional considerations that should be evaluated for projects is their ability to future proof their projects by allowing for an expansion of New Jersey's offshore wind mandates in future years to expand upon EO 92's goal of 7500 MW by 2035; the need for points of interconnect to limit environmental impacts as not every Right Of Way is created equally; rate considerations should include a full life-cycle cost analysis of offshore wind that not only look at direct costs, but also more clearly at direct and indirect benefits including environmental and economic factors (similar to the cost beneficial analysis of the 2010 OWEDA legislation) and the cost of inaction, especially now that we can quantify the increased delta of damage of storm surges from storm like Sandy directly attributable to climate change (thanks to the groundbreaking research of Rutgers University).

The Boardwalk Power Link Projects pose a myriad of benefits for New Jersey. By delivering clean energy to power hundreds of thousands of homes and businesses across the state, this portfolio will help us to meet New Jersey's clean, renewable energy mandates. New Jersey has established strong climate and renewable energy goals, including the aforementioned 7,500 MW of energy from offshore wind by 2035. Anbaric's portfolio will help New Jersey continue to develop an expansive offshore wind industry.

Mitigating the impacts of climate change will require bold and scalable transmission solutions that will accommodate future industry growth, and we encourage the BPU to proceed with this in mind. I look forward to supporting Anbaric as they work to scale the future of offshore wind in New Jersey.

Sincerely,

A handwritten signature in black ink that reads "Doug". The letter "D" is large and stylized, with a loop at the top. The name "Doug" is written in a cursive, lowercase font.

Doug O'Malley
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