



October 7, 2022

Secretary of the Board
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RE: In the Matter of the Opening of New Jersey’s Third Solicitation for Offshore Wind Renewable Energy Certificates (OREC), Docket No. QO22080481

Secretary of the Board,

Please accept the below comments from Community Offshore Wind (“COSW”) in regards to the Request for Information associated with the opening of New Jersey’s third solicitation for offshore wind renewable energy certificates, which was issued by the New Jersey Board of Public Utilities (“NJBP”) on September 16, 2022. COSW recognizes that distilling and incorporating feedback and comments from a diverse set of stakeholders was not an easy task, and we applaud your efforts to date. COSW applauds the NJBP’s continued nation-leading work to develop offshore wind in New Jersey and looks forward to working together to deliver clean energy and good jobs, at a value, to New Jersey and its residents.

Following the success of their joint bid in the New York Bight offshore lease auction in February 2022, RWE Renewables (“RWE”), one of the globally leading companies in offshore wind, and National Grid, one of the largest energy companies pivotal to the energy systems in the north-eastern United States and the United Kingdom, announced the official name of their joint venture, COSW, to reflect the benefits it will bring to the local communities, with the tagline, “Local clean energy for all.” COSW is committed to delivering sustainable energy safely, reliably and efficiently to the communities we serve. RWE and National Grid share a common goal of enabling the clean energy future. Offshore wind will be critical for the U.S., particularly in the Northeast, to reduce carbon emissions and meet climate goals, such as New Jersey’s target of bringing 11 megawatts of offshore wind online by 2040. Importantly, New Jersey’s clean energy goals will also deliver significant new, good paying jobs and private investment to support the growth of the region’s economy.

A. Project Design

1. What are the benefits and challenges of the Board requiring submittal of minimum and/or maximum project capacity bid sizes?



A maximum project capacity enables a more diverse portfolio reducing delivery risk and boosting a more diverse [and equitable] supply chain. A minimum cap by incentivizing the development of sizable projects may help scale up more rapidly the offshore wind generating portfolio and potentially set easier conditions for the development of an offshore transmission system. Challenges of the minimum cap include a potential strain on the system because of the size of the grid connection. Challenges of the cap include potentially restrained efficiency from economies of scale.

Overall, while there may be benefits to the Board suggesting preferred project sizes, overly prescriptive requirements may result in restrained cost efficiency and technical capacity optimization.

2. Board Staff is considering project design nameplate submissions approximately equal to 1,200 MW, while preserving the need for flexibility in its evaluation of project nameplates that significantly diverge from the target nameplate of 1,200 MW. Is there an optimal project capacity size such that multiples of this installed capacity foster efficient OREC pricing, and if so, how is that optimal project capacity size determined?

Generally speaking, larger project sizes allow for greater economies of scale. At 1,200MW most of the benefits of scale will be able to be captured. With SAA, the single largest contingency is 1,500MW, so preserving flexibility to allow those with large leases to bid at that increment could provide additional value.

What decision the NJBPU makes regarding SAA may have great impact on the optimal size of an OSW project. Should the NJBPU award an SAA that includes offshore transmission, OSW projects should be sized to best utilize the SAA infrastructure. In setting bid parameters the NJBPU should be clear with respect to its expectation for the incorporation and use of SAA funded projects.

3. What considerations should guide the determination of minimum and/or maximum project bid sizes?

Setting minimum bid sizes may limit the ability of lease holders with prior awards from participating in the NJ solicitation. For example, if a lease area has potential for 1600MW and has been previously awarded 1200MW, the remaining 400MW of lease area potential could be offered to NJ.

It should not be a forgone conclusion that smaller bids are less efficient. Lease holders with excess capacity may have amortized the bulk of development expenses over prior awards.



4. What technical, economic, or environmental considerations affect proposed project sizes?

Project size is determined through an optimization of number and orientation of WTGs, capacity of WTG, and the capability of export cable. Developers may determine that optimal development of their lease parcel may require that generation capacity and transmission capacity are not exactly matched. For instance, if total project lease capacity is not cleanly divisible by standard transmission sizes, a developer may decide to either install more generation capacity than transmission capacity (“overplant”) or oversize transmission export capacity relative to the generation capacity, which could provide headroom for future projects to utilize.

5. What, if any, transmission technology constraints, such as cable or converter station capacity, would directly affect project size?

HVDC systems have known power output ranges primarily depending on their operating voltage. 325kV are well known and industry-tested. 400kV systems are theoretically possible, and have been deployed on land, however there is little commercial interest from suppliers to manufacture 400kV offshore systems. 525kV are under development and will be deployed in Europe. However, the cable technology to support these systems is still in development.

Despite an HVDC converter systems design capacity, transmission export can be limited by cable constraints. If cables cannot dissipate heat, then their power carrying capacity needs to be reduced. Factors that impact a cable’s ability to dissipate heat include: thermal conductivity of soil where cable is buried, cable burial depth, radius of cable turns for HDD or other routing. For an example, a 325kV HVDC system may be technically capable of 1300 MW, but cable constraints may limit actual power transmission to 1100 MW.

6. What are the benefits and challenges of the Board allowing the inclusion of energy storage in applicants’ projects?

The benefits of adding storage to a project are to help OSW projects manage curtailment, congestion, and allow developers to shift production hours. In practice however, this is a challenge. Storage is best deployed where it can mitigate curtailment and/or congestion. Developers are looking for OSW POIs that have low expected curtailment and congestion. There is not a natural synergy between the two.

7. If energy storage is included in a proposal, should there be specific parameters in the SGD around how it should or must be interconnected, deployed, and operated to optimize grid reliability and economic benefits to New Jersey ratepayers?



We do not feel there should be any specific, onerous parameters to the inclusion of battery storage technology. We do recommend specifying any desired, or undesired, technology applications, e.g. should storage proposals only include commercially viable technologies like Lithium Ion as compared to over-the-horizon storage technologies.

All available revenue stream should be enabled to support the business case for storage. Any potential grid reliability optimization resulting from storage should be captured as a service to the grid able to generate revenue to reflect value delivered towards the system.

B. Economic Impacts and Strength of Guarantees for Economic Impacts

8. Board Staff is considering requiring deposits that are refundable if firm economic benefits guarantees are met – or a damages term if economic benefits are not met – that would be applicable to all applicants.

- a. What are the benefits or challenges of implementing such a requirement?

The main question is how this would need to be deposited. It would be beneficial if applicants were able to issue a Parent Company Guarantee (“PCG”). However, requiring that the deposit be made in cash or Letters of Credit, would necessitate additional costs. However, we do feel that requiring a deposit may increase the viability and likelihood of the economic benefits being met, while putting clear boundaries around the risk of not being able to deliver a specific benefit.

- b. How would such a requirement affect the level of proposed economic benefits and guaranteed economic benefits applicants submit?

The competitive advantage would still be there to ensure the best possible outcome for New Jersey residents but applicants would carefully assess the risk associated with it and have clear guidance to deliver the most concrete proposals possible.

- c. Under such a framework, what deposit forfeitures or damages should be imposed if there are shortfalls relative to the firm economic benefits guarantees?

Whatever the NJBPU proposes will be taken into account by the applicant and potentially increase or decrease the proposed offtake price.

By and large, most shortfalls result from unintended outcomes of well-meaning programs, plans, or commitments. Deposit forfeitures are one route to ensure New Jersey ratepayers get the full value of contract proposals but the Board might consider other measures, like requirements for equal and comparable investment or proportional damages to be committed to a state-



administered grant programs; e.g., for spurring economic development in the renewable energy industry.

- d. Under such a framework, what is the difference between a deposit forfeiture or damages term that will facilitate meeting the firm economic benefits guarantees and those that are punitive?

Please see our previous comment. A deposit will increase the overall costs, other means of guarantees, e.g., PCG are therefore preferred. Payment of potential benefits (e.g. via a PCG or potentially LC at higher costs) are therefore more favorable than forfeiting a deposit (assuming this was a cash deposit).

- e. Under the deposit forfeiture framework, how should at-risk deposit amounts be guaranteed? Should the Board require a letter of credit from a creditworthy third party, or should parental guarantees be accepted?

A PCG would be the lowest cost option, it should be issued by a party with investment grade rating. If one applicant is a joint venture and one or more PCG's are required, these should be several but not joint.

9. Proposed economic benefits require pledges or guarantees from applicants to ensure timely realization. What are the practical limitations of such pledges or guarantees?

In addition to the explanations above, note that the economic benefits might be quite high and thus potentially require high guarantees.

10. Is there specific guidance to applicants that should be incorporated in the SGD to support the identification of benefits and impacts to Environmental Justice and Overburdened Communities, as identified in the 2019 New Jersey's Energy Master Plan and New Jersey's Environmental Justice Law, N.J.S.A. 13:1D-157?

We recognize the importance of environmental justice and would appreciate any guidance from the NJBPU on ways to work collaboratively.

11. How should Board Staff consider the benefits and impacts to Environmental Justice and Overburdened Communities when evaluating projects?

Community Offshore Wind is strongly focused on building strong local communities and recognizes the importance of ensuring that we devote significant time and resource to Environmental Justice and Overburdened Communities. We expect that the benefits and impacts



will be considered by Board Staff as a critical component of project evaluation and that projects that do not plan for and address impacts of Environmental Justice and overburdened communities would score lower in project review.

12. Is there specific guidance to applicants that should be incorporated in the SGD to support the dissemination of benefits to Environmental Justice and Overburdened Communities? For example, the suggestion or requirement to (1) engage with these communities on job training and supply chain opportunities, (2) define the benefits the applicant expects to provide to these communities, including potentially binding or voluntary job creation targets, and (3) explain how the applicant intends to deliver those benefits.

Guidance should be as specific as possible regarding expectations for Environmental Justice and Overburdened Communities directly impacted by development activities and operations and maintenance and those who will be able to participate in the supply chain.

13. What are the potential benefits and impacts to Environmental Justice and Overburdened Communities associated with the construction and operation of offshore wind projects and the accompanying onshore infrastructure?

No comment.

14. How should applicants be required to report on progress toward meeting their commitments to Environmental Justice and Overburdened Communities and engagement with these communities?

No comment.

15. Are there additional specific requirements, beyond those included in the Second Solicitation's SGD, that should be considered for the Economic Development Plan?

No comment.

C. Performance Guarantees

16. What mechanism could be included in a Board Order to ensure that the proposed nameplate capacity of the Project is constructed as set forth in the Order?

The projects themselves have a strong incentive to be delivered as the financial (and generally resources) commitment is substantial. If used, we suggest including a minimum delivered capacity requirements, e.g., ~80% of the proposed nameplate capacity must be met to be eligible to receive the proposed OREC price, otherwise the contract would require amendments.



17. What are the potential benefits and impacts of assessing a performance guarantee for failing to construct, or constructing less than, the proposed nameplate capacity?

As noted above, the project developer/owner is incentivized to deliver the nameplate capacity included in its bid given the embedded financial and other resource commitments at risk. In general, any form of strict performance guarantee would likely increase the cost of the investment and, as a result, the LCOE and associated contract pricing.

Further, in almost all cases, guarantees would not necessarily restore performance, e.g., ensure delivered nameplate capacity. Rather, it would likely result in some form of damages payment. Determining potential damage (e.g., what is actual damage, lower economic benefits, less green energy?) would be key in this regard.

18. If performance guarantees are to be incorporated in the Board Order governing the delivery of ORECs, how could a completion guarantee be structured to irrevocably and unconditionally guarantee performance by a certain date?

Usually, completion guarantees include sufficient buffer and long stop dates. They would also need to define the exact milestones to be met. The proposer should only be accountable for circumstances it can influence and control. Things outside of the applicants' control should not be guaranteed and instead timing extensions be granted when necessary.

19. Regarding protection of ratepayer interests:

a. How would the inclusion of a performance guarantee requiring performance by a certain date affect an applicant's OREC offer price?

Reasonable performance guarantees can offer more certainty to the rate payer and align developer and customer incentives.

b. What measures could be taken to protect New Jersey ratepayer interests?

No comment

c. Can the cost of a performance guarantee be laid off to a guarantor at good value from New Jersey ratepayers' standpoint? If not, why not?

No comment

20. N.J.A.C. 14:8-6.6(b)(4) allows ORECs in excess of the Annual OREC Allowance in a given year to be carried forward to the next year if there are unmet ORECs in that year. How should



the Board Order address a circumstance where there are persistent unmet ORECs over the OREC term?

This is a risk generally born by project developers/owners and should be mitigated through selection of experienced and credible developers during the OREC award process.

In circumstances where persistent unmet OREC delivery is materially below expectations due to critical unforeseen factors (e.g. market restructuring) the Board should maintain the openness and flexibility to work with project owners to find workable solutions.

D. Inflation/Deflation Adjustment

Board Staff is considering a pricing mechanism where the OREC price an applicant submits in their Application could be adjusted at a future milestone date based on inflation/deflation and/or specific commodity costs, particularly as they affect project component pricing and labor costs. The adjustment would be based on an actual measure of inflation or other commodity price index or indices on the future milestone date, relative to the measure of inflation, value of the index or indices at the time of Application submission. Board Staff seeks input on how such an adjustment mechanism can be designed to share

21. Please comment on your expectations for near-term (through 2025), medium-term (through 2030) and long-term (through 2050) inflation and the impact on OREC pricing and provide the basis for this outlook.

No comment.

22. What are the benefits and challenges of including an inflation adjustment mechanism in the Third Solicitation to account for changes in commodity pricing and labor costs?

Generally, taking out an important risk is beneficial to all parties and would allow applicants to propose a lower OREC price. With adjustments, all proposals will be more on a like to like basis and it would be ensured that the rate payer only pays (or benefits) from the actual inflation without buffers. It avoids rate payers paying too much because inflation was lower than expected but in case inflation were higher than expected ensures the economics of the project still work and construction would go still go ahead. The viability of the project increases.

Challenges include accurately accounting and adjusting for risks born by applicants and ensuring transparency during the selection process.

23. Describe how an inflation adjustment mechanism could affect OREC pricing.



An inflation adjustment mechanism could reduce the risk premium implicit in OREC bid pricing that must hedge for inflation, and therefore lower bid prices. The extent to which the premium would be reduced would depend on the quality of the hedge; that is to say, how much the to-be-determined base index truly matches the inflation developers face on their major expenditures. COSW recommends that the index should be tailored as closely as possible to the specific costs of goods and services necessary for project development and delivery.

24. If an inflation adjustment is included, what are the elements of residual inflation risk? This would depend on the inflation adjustment mechanism but if structured correctly and transparently, those risk would be low.

25. What are the advantages and disadvantages of a requirement to propose (a) a fixed OREC price without inflation adjustment and (b) an inflation adjustable OREC price, versus making one or both optional?

If NJBPU prefers to compare both prices, we suggest to ask applicants to submit pricing for both.

26. If an applicant offers both a fixed OREC price and an adjustable OREC price, and if the applicant's project is selected, what is the latest date that the pricing option could be chosen and why?

We suggest that the full terms of the contract should be agreed to at the time of execution.

27. Describe how an inflation adjustment mechanism could affect the project development timeline and/or viability of an offshore wind project.

If inflation is higher than expected, the project would still go ahead as the risk could be shared. Viability and development timeline would be more certain. Otherwise, a project carries a higher risk of delay or abandonment if inflation rises significantly above forecasts.

28. What are the benefits and challenges of (i) applying the inflation adjustment in lieu of an annual escalator on the OREC price or (ii) allowing bids with inflation adjustment to also include an escalator?

No comment.

29. Should the inflation adjustment mechanism be based on a single defined index or multiple indices?



If structured as a one-time adjustment over the development phase, we recommend using multiple indices that match the project cost stack (See answer in question #30). Otherwise, if structured as an annual adjustment until decommissioning, we suggest a single Index, e.g. CPI.

30. What publicly available index or indices are most suitable to capture applicants' exposure to inflation during the project development period? Please explain the relevance of the index or indices you suggest. If the index is not publicly available, how would you suggest the Board meet its goal of transparency and openness?

It would be most beneficial if the applicant could propose a mechanism and indexes used to ensure alignment with the applicant's view. Only in this case would the applicant be able to provide the lowest OREC proposal.

Absent this approach, COSW suggests that an offshore wind-specific composite index could be created by sorting the Producer Price Index (PPI) family for the relevant North American Industry Classification System ("NAICS") codes representing all or nearly all the goods and service components (e.g., steel, copper, fiberglass, etc.) that comprise a typical project and weighting the different categories proportionally to the major project components costs. To account for labor costs, we suggest using the Bureau of Labor Statistics ("BLS") contracting guidelines where the costs of labor are adjusted with the Employment Cost Index from BLS.¹ An example of the methodology and offshore wind specific NAICS codes used to define a similar composite index is described in the NREL paper: Wind Turbine Design Cost and Scaling Model (L. Fingersh, M. Hand, and A. Laxson. 2006. <https://www.nrel.gov/docs/fy07osti/40566.pdf>).

31. If multiple indices are used, please provide any suggestions on how they should be weighted for purposes of tracking key component costs, including calculation examples. Please identify suggested sources, either proprietary or public, that represent the best information source.

Please see our answer to question #30.

32. What are the benefits and challenges of applying the adjustment to all versus only a specific percentage of the OREC price?

An approach that pinpoints a specific percentage of capex for adjustment may add complexity and risk false precision while not achieving any meaningful benefit.

33. What is an appropriate way to set the baseline value of the inflation index or indices at the time of bid submission, for example an annual average or discrete monthly value?



We recommend three-, six-, or twelve-month averages. Further, we suggest that, instead Application submission date as start of inflation, consider using a yearly start date, e.g, January 1st of 2023.

34. Regarding the milestone for determining the price adjustment date:

- a. What is the best milestone for determining the price adjustment date?

We recommend FID as the best milestone.

- b. What are the benefits and challenges of the milestone being a fixed calendar date versus the date of a defined event?

Given the long development timelines and range of uncertainty around a broad set of project determinants, defined project milestones (FID suggested) are much more reasonable than defined dates.

- c. Please explain your choice of milestone date and how it could be unambiguously defined.

FID is a key project milestone and the date at which project capex costs are fully known and secured.

- d. If there is ambiguity, please explain why it should be considered.

No comment.

35. Regarding the potential inclusion of a “deadband” (i.e., the amount that the OREC price is adjusted when the adjustment resulting from applying the change in index (up or down) exceeds a certain percentage of the OREC price):

- a. What are the benefits and challenges of including a deadband in the inflation adjustment?

Would enable more clarity into price evaluation. Provides insight into level of risk state is willing to share in.

- b. What are the benefits and challenges of a symmetric vs an asymmetric deadband?
Would enable more clarity into price evaluation. Provides insight into level of risk state is willing to share in.

- c. What is a reasonable deadband percentage to apply and why?



- d. It's up to the state to determine the amount of risk it is willing to share.
- e. What would be the impact on OREC pricing if there is a deadband on the adjustment and why?

It is hard to say without modeling, however, we think the wider the band, the more risk is shared so the lower bid prices would be.

36. What specific content in regard to the inflation adjustment factor in a Board Order awarding a project would strengthen an applicant's ability to execute binding agreements on a timely basis with primary original equipment manufacturers ("OEMs")?

No Comment.

E. Environmental and Fisheries Mitigation Plan

37. Are there additional specific requirements, beyond those included in the Second Solicitation's SGD, that should be considered for the Environmental Protection Plan?

None identified at this time.

38. Are there additional specific requirements, beyond those included in the Second Solicitation's SGD, that should be considered for the Fisheries Protection Plan?

None identified at this time.

39. Please discuss opportunities for sharing environmental data collected prior to and during preconstruction surveys and baseline monitoring regarding the spatial and temporal presence of marine mammals, fish, aquatic invertebrates, sea turtles and avian species and bats, as well as benthic habitats, with the environmental community, including, but not limited to, the New Jersey Department of Environmental Protection ("NJDEP") and other state agencies and regional entities.

Leaseholders should coordinate with the NJDEP, state agencies, and regional entities during survey and monitoring methodology and planning to determine where there are data gaps and what information would be beneficial to collect. Methodologies and data formats/software should be compatible across developers to allow for merging of datasets, and uploaded to a regional or centralized publicly-accessible portal [or perhaps one w/appropriate permissions for use by agencies, academics, regional research entities]. We note that during development of the



COP, some of the benthic geophysical and geotechnical information would be considered proprietary during that process.

40. What is the scope of environmental data that can or should be required to be shared, for example, pre-construction data that is included in the Construction and Operations Plan submitted to BOEM, all pre-bid data, or a sub-set thereof?

Geological and Geophysical data should remain proprietary up until COP submission. Biological and other environmental data should be shared to the maximum extent practicable to allow for coordination and regional management efforts.

41. Please explain the types of environmental data obtained prior to and during pre-construction surveys, during construction and during operation that applicants would consider to be proprietary and explain why.

Geological and Geophysical data should remain proprietary up until COP submission. Biological and other environmental data should be shared to the maximum extent practicable to allow for coordination and regional management efforts.

42. What delays may exist in making proprietary data available and why?

Proprietary data should become available as soon as practicable once commercial sensitivities such as COP submission have passed.

43. Please describe potential plans for collecting environmental, wildlife and/or fisheries data (through either pre-construction or operations-phase research and monitoring) that could be used to inform mitigation actions and/or decisions.

The New York Bight is one of the most studied areas and has a very robust baseline data set. BOEM is currently developing a PEIS, which will utilize this existing data and encourage adoption from leaseholders. Also, coordination across leaseholders regarding compatible data collection and monitoring methodologies can/could facilitate management and mitigation decisions. Such coordination could potentially (with respect to monitoring) result in economies of scale (e.g., total numbers of samples required to determine impacts of OSW at regional scales), lower biological impacts, reduced impacts on fisheries, and efficiencies for state agencies regarding resources needed to review and support OSW development. COSW is committed to pursuing opportunities to coordinate with other developers in the NYB to develop coordinated and consistent monitoring plans.

44. What requirements for stakeholder review of mitigation and monitoring plans are reasonable and appropriate for the awarded project?



Review from regional groups (RWSC, NYSERDA TWGs, ROSA, NJ OSW WG), federal and state agencies. Timely input from these groups and stakeholders should occur early in the development of mitigation strategies and monitoring approaches to ensure constructive feedback can be incorporated throughout the process. Developers should also vet their ideas and approaches with fishing industry participants and representatives.

45. NJDEP is interested in opportunities to collaborate with other Atlantic seaboard states to integrate data regarding the spatial and temporal presence of marine mammals, fish, aquatic invertebrates, sea turtles, avian species and bats, as well as benthic habitats. Discuss opportunities and potential barriers that may exist.

Regional groups are currently coordinating around these efforts and there remain opportunities for further leaseholder coordination. Potential barriers include different stages of project development, different construction periods. Other barriers include different monitoring program designs and differences in data collection methods and data storage that preclude merging of datasets to inform regional conclusions re: impacts of OSW.

46. What information is available about embodied carbon in applicants' proposed supply chains? What types of embodied carbon data can applicants report?

There is a range of embodied carbon data related to applicant's supply chain. The most robust and granular data is available from Tier 1 suppliers who themselves have invested time and resources into effective emissions data management and reporting. Data availability and resolution typically decreases at deeper levels of the supply chain.

It is to be expected that most developers are committed to the accounting and management of embodied carbon, to the extent that is possible and commercially reasonable. In considering SGD language, we recommend the Board focus on the most carbon-intensive aspects of the supply chain, seek out ways to incentivize applicants to find innovative pathways to reducing embodied carbon through innovative technology or methods, and rely on established Greenhouse Gas Protocol (GHGP) standards for carbon accounting methodology and calculations.

47. The Second Solicitation required a fee of \$10,000/MW to support regional research and monitoring. Is a similar fee to support regional research and monitoring reasonable and appropriate for the Third Solicitation? Why or why not?

The fee is appropriate and leads to further research and coordination.

F. Evaluation



48. Are there any criteria relevant to the evaluation of the Environmental and Fisheries Protection and Permitting Plans, as presented in Section 4.2 of the Evaluation Report for the Second Solicitation that should be added or any criteria that are not relevant and should be removed?

The NYB is one of the most studied regions and use of existing data, to the extent it is compatible, to develop/determine baseline conditions should not be discounted. By minimizing the amount of data that needs to be collected pre-construction, the developers can focus on further research/data collection at later stages of the project.

49. Are there any criteria relevant to the evaluation of the “Likelihood of Successful Commercial Operation,” as presented in Section 5 of the Evaluation Report for the Second Solicitation that should be added or any criteria that are not relevant and should be removed?

The Project Design criteria should allow for technical advances by accounting for innovation in the evaluation.

COSW appreciates and recognizes the incredible work the Board has done to prepare for releasing the next RFP and looks forward to working together to bring clean energy to New Jersey at an affordable price.

Sincerely,

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