

Comments for 3rd Solicitation for NJ Offshore Wind Renewable Energy  
Certificates (OREC)

BPU Docket No QO22080481

3.2 Project Description -

These power generation and distribution facilities should be considered  
"essential facilities"  
for purposes of meeting the Building codes.

3.4 Financial Analysis -

p. 18 The feasibility study used to determine decommissioning costs should also  
be  
provided, as is specified for the construction costs.

3.10 Environmental Protection Plan -

p. 27 In comparing the environmental impacts to other Class I renewable energy  
projects,  
on - shore wind projects should be included.

p. 28 Should require a commitment from the applicant to obtain from the DEP a  
Coastal  
Zone Management Consistency certificate.

p. 29 "Pre-construction" and "development" should specifically include ocean  
survey  
activities.

The waterborne and airborne noise levels related to development  
(including ocean  
surveys), construction, operations and decommissioning should be  
provided as part  
of the impact assessment on marine life and onshore communities.  
Negative impacts on on fisheries (commercial and recreational) and on  
shore  
communities ( tourism, property values, local tax revenues) from noise,  
visual, and  
other degradation of the environment should be quantified both as  
respects economic

dollar impact and the loss of jobs, and included in the cost benefit analysis.

Per the state law, calculations of the cost/benefit of avoided emissions should only include the benefits to NJ - not worldwide.

### 3.11 Fisheries Protection Plan

Negative impacts on commercial and recreational fisheries should be quantified as respects economic impact and the impact on jobs.

### 3.16 Decommissioning Plan

Include a requirement to show when and where the applicant's plan has been successfully completed elsewhere.

Require a detailed plan for the decommissioning/removal of a large turbine - including the disposal/or recycling of major components.

### 3.17 Cost-Benefit Analysis

The estimates of environmental and economic costs and benefits should be spelled out individually before they are combined or netted, so that each cost and each benefit component may be assessed and evaluated individually.

Just as is done for economic benefits in dollars and jobs, the costs of the negative impacts should include direct, indirect, and induced costs in dollars and jobs.

The benefit calculated from avoided emissions should only include the benefits to NJ (per the NJ state law), not the worldwide benefits.

The benefit calculated from avoided emissions should be broken down into its

component parts; such as from rise in sea level, health effects, and economic effects.

The analysis should include the cost impact in dollars and jobs on the NJ economy from

the increased costs of electricity from these projects compared with cheaper alternatives.

The analysis should consider the projects on their own merits but also in the broader

context of the full offshore plan and the total expected impact on the ratepayer and the

NJ economy from the increased rates due to the projects approved thus far (OW1, OW2,

AS1 and the transmission system upgrade), plus those in this solicitation, plus those

planned in the future solicitation in order to meet the Governor's goal.

Individual project

costs to the ratepayer are included, but nowhere is the total shown. And nowhere is the

total impact on the NJ economy assessed for one or all of these rate increases.