



January 13, 2023

Ms. Carmen D. Diaz
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Phone: 609-913-6241
Email: board.secretary@bpu.nj.gov

Docket No. QO22080481

Dear Ms. Diaz,

Leading Light Wind appreciates the opportunity to submit comments to the New Jersey Board of Public Utilities (BPU) related to the New Jersey Offshore Wind Solicitation #3 Draft Guidance Document.

Leading Light Wind is an offshore wind project in the New York Bight, located in BOEM lease OCS-A 0542. The project sponsors are Invenergy and energyRe, with financial backing several key project partners including Blackstone, CDPQ, PSP/FirstLight and Ullico.

Invenergy's name is synonymous with innovation in an industry undergoing transformation. As the world's largest privately held developer and operator of renewable power, Invenergy works with leading utilities, global brands and public sector partners to take energy infrastructure projects from drawing board to reality. Invenergy has successfully developed over 30 gigawatts of power projects across the Americas, Europe and Asia to enable a more sustainable, flexible, and resilient grid.

For more information regarding Leading Light Wind and Invenergy please visit <https://leadinglightwind.invenergy.com/> and <https://invenergy.com/>.

Sincerely,

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Rob Stupar
Senior Manager, Reg. Affairs
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Inflation Adjustment

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Transmission & Interconnection Prebuild Infrastructure and Cable Corridor

Leading Light Wind would appreciate additional clarity around several issues related to the prebuild infrastructure and cable corridor. These are:

- 1) The status of discussions with the National Guard and associated approvals for the cable landfall, transition vaults, and other infrastructure associated with the prebuild infrastructure and cable corridor proposed for the National Guard Training Center (NGTC).
- 2) Whether the BPU will facilitate discussions with NGTC and the applicants, as information on existing underground infrastructure and current and planned uses of the NGTC's grounds and the adjacent ocean area will affect the location of the proposed Pre-build infrastructure.
- 3) Whether the NGTC will provide an access agreement for applicants to access the constructed facilities for maintenance and repair at any time during the project's life.
- 4) Whether data on the specific locations and depth of the operating and abandoned submarine cables that originate from the NGTC will be made available. It is likely that the submarine cables that are not in service will need to be removed for the landfall of the future transmission cables to happen, while operating submarine cables will need to be avoided.

Environmental Protection Plan and Environmental Mitigation Requirements

Leading Light Wind would appreciate additional guidance on the requirements outlined in the Environmental Protection Plan to provide analyses of anticipated environmental benefits and environmental impacts of the Project. Of particular concern are requirements that:

- Applicants provide an assessment of environmental impacts from the project compared to other similar Class I renewable energy projects.
- Environmental impacts (direct and comparative) must be quantified to the extent they are significant and it is possible to quantify them.

We note that these requirements pertaining to assessing environmental impacts of the Project would be difficult for early-stage projects to meet for a variety of issues and resources. At best, Leading Light Wind anticipates that lessees could provide a sense of potential impacts at a high-level which may not prove useful for comparison against other projects that have undergone more rigorous impact assessments later in the process. Impact analysis is conducted at a high-level during the Construction and Operations (COP) stage of the federal permitting process and then in more detail during the National Environmental Policy Act (NEPA) process. Accordingly, Leading Light Wind would benefit from additional detail on the level of assessment to conduct.

Lastly, the second bullet above uses the term significant. Please define what the term significant means and how it applies to various resources and issues. Given that level of significance can be subjective, identification of that identification of significant issues could be challenging for early-stage projects that have not yet conducted rigorous studies.

Energy Storage

Leading Light Wind requests additional guidance on acceptable locations and configurations for energy storage resources that may be bid into the solicitation. In particular, we would appreciate clarity on whether energy storage resources must be paired with the associated offshore wind resource. We note that Leading Light Wind does not believe that energy storage resources must be paired to provide system and/or ratepayer value.

In addition, Leading Light Wind requests additional clarity around revenue treatment for energy storage resources. Similar to the offshore wind project, will the applicant be required to return market revenues (energy payments, capacity payments, ancillary services payments, etc.) from the energy storage system to ratepayers? If so, will the BPU allow applicants to include costs related to the energy storage system into their OREC price?

General HVDC System Design

Leading Light Wind requests that additional guidance is provided on the following items:

- For developers pursuing an HVDC system larger than 1,400 MW, there will be concern about the project size exceeding PJM reserves which would require the developer to build additional reserves. If the BPU takes ownership of additional reserves, or alleviates this concern through other means, this creates a runway for developers to pursue a 1,600 MW, ± 400 kV monopole. Otherwise, larger projects will be either dual monopoles or a ± 525 kV bipole.
- For larger projects that use a bipole or dual symmetrical monopole, developers may request each pole is considered as a separate circuit for reliability reasons. As written, it appears that each project may only receive one of four duct banks depending on the configuration of other projects selected. Additional guidance is requested to correctly model plant availability. One possible way to add guidance is to include language similar to this in the [Route Details – Larabee Collector Station](#) section, “Each duct bank is expected to protect a circuit whose capacity exceeds

1,000MW. Multiple duct banks may be used by a single project if each circuit exceeds this amount.”

OTN Preparation Requirements

The OTN Preparation Requirements section is written to take advantage of future technology advancements – no equipment is installed, only space is reserved for future equipment. While we see the benefit, Leading Light Wind recommends committing to 230kV OTN system with pre-installed OTN components when project is initially installed. This recommendation is based on conversations with cable and HVDC converter suppliers, and specifically the three following factors:

- 1) The cost of installing this equipment at a later date is likely to outweigh upfront installation cost when offshore installation labor, logistics, and plant downtime is considered.
- 2) The market for higher AC voltage cables like 345kV is unlikely to advance because of diminishing capacity returns as voltage increases due to increased cable capacitance.
- 3) The technology for a DC network is unlikely to advance because of the strain on the HVDC engineering market.