



BY ELECTRONIC DELIVERY TO: board.secretary@bpu.nj.gov

March 2, 2023

Carmen D. Diaz, Acting Secretary of the Board
44 South Clinton Ave., 1st Floor PO Box 350
Trenton, NJ 08625-0350

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

Dear Acting Secretary Diaz,

In response to the Request for Information notice issued by the New Jersey Board of Public Utilities (BPU) on February 24, 2023, Vineyard Offshore LLC (Vineyard Offshore) is pleased to provide the enclosed comments and requests for clarification.

Vineyard Offshore was founded in 2022 by the same team behind Vineyard Wind 1 (Lease Area OCS-A 0501), the nation's first commercial-scale offshore wind project. Vineyard Wind 1 is currently in the construction phase and is on track to achieve commercial operation in 2024. Beyond Vineyard Wind 1, Vineyard Offshore currently has the largest portfolio of undeveloped lease acreage in the United States and is leading the development of more than 6 gigawatts (GW) of cost-effective clean energy on both the East and West Coast. This includes Lease Area OCS-A 0522 (known as Vineyard Northeast), Lease Area OCS-A 0544 (known as Vineyard Mid-Atlantic) as well as a provisional lease in California (Lease Area OCS-P 0562).

We applaud the BPU and the Murphy Administration's offshore wind energy ambitions as demonstrated in Executive Order (EO) No. 8, EO No. 92, and, most recently, EO No. 307, and their proactive efforts to issue a draft Solicitation Guidance Document (SGD) in advance of New Jersey's third offshore wind solicitation.

The comments that follow focus on the performance guarantees introduced in the proposed language in Attachment 1 (herein the "Proposed Language"). We agree with the need to ensure the delivery of Projects, Tier 1 investments, and Prebuild Infrastructure in a timely manner, and have provided suggestions on how to better ensure the realization of those commitments.

Respectfully submitted,

DocuSigned by:
A handwritten signature in black ink, appearing to read "Lars Thaaning Pedersen".
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Lars Thaaning Pedersen
Chief Executive Officer



New Jersey has the most ambitious offshore wind target of any state in the nation: a goal to deploy 11 GW of offshore wind energy by 2040. On top of that, the state has taken a proactive approach to facilitate local offshore wind supply chain development - with strategic investments in critical infrastructure like the New Jersey Wind Port - and manage transmission and interconnection challenges through the nation's first interconnection cost sharing mechanism - the State Agreement Approach. We fully support New Jersey's offshore wind ambitions, and we appreciate the importance of identifying ways to ensure that commitments made by developers to deliver offshore wind projects, the associated transmission and interconnection infrastructure, and commitments to invest in and localize the supply chain are realized. However, we believe the Proposed Language introduces several new challenges and risks that could have the opposite effect of inhibiting new Tier 1 investments and increasing costs to ratepayers. Vineyard Offshore proposes alternative approaches for consideration that could still enable the BPU to realize firm commitments while addressing some of the challenges of the Proposed language.

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