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March 11, 2024

VIA ELECTRONIC MAIL

Honorable Sherri Golden, Secretary
New Jersey Board of Public Utilities
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Re: I/M/O the Opening of New Jersey's Third Solicitation for Offshore Wind
Renewable Energy Certificates
Leading Light Wind 2,400 MW Project¹
BPU Docket No. QO22080481

Dear Secretary Golden:

The undersigned represents Invenergy Wind Offshore LLC ("Invenergy") and its Qualified Offshore Wind Project ("QOWP"), Leading Light Wind 2,400 MW Project (together, the "Parties"). In lieu of a more formal filing, please accept this Letter as a follow-up to the Parties' February 8, 2024 Request to Toll the Operation of N.J.A.C. 14:1-8.6(a).

As the New Jersey Board of Public Utilities (the "Board") is well aware, the Parties have reviewed the Board's January 24, 2024 Order (the "QOWP Order"),² and have identified certain matters that require the Board to issue a corrected order. Rather than file a motion for reconsideration, the Parties requested that the operation of N.J.A.C. 14:1-8.6(a) be tolled to March 11, 2024 to permit the Parties to confer with Board Staff regarding the needed corrections, and also reserved their rights to take further actions pursuant to N.J.A.C. 14:1-8.6(a). Since then, the

¹ Please note that a docket number specific to the Leading Light Wind 2,400 MW Project has not yet been provided to the Parties. Therefore, this request has been filed with the docket number for the third solicitation for offshore wind.

² *I/M/O the Opening of New Jersey's Third Solicitation for Offshore Wind Renewable Energy Certificates (OREC)*, Order Approving Leading Light Wind 2,400 MW Project as a Qualified Offshore Wind Project, BPU Dkt. No. QO22080481 (dated January 24, 2024).

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Parties have conferred with Board Staff and the Division of Rate Counsel, but the Board has not yet taken action on the Parties' tolling request or issued the needed corrections to the QOWP Order.

On March 5, 2024, various individuals and organizations filed an appeal of the Board's QOWP Order with the Superior Court, Appellate Division.³ While this action may transfer jurisdiction over certain aspects of the matter to the Appellate Division, the Board continues to maintain jurisdiction over corrections to, and enforcement of, its QOWP Order. Therefore, the Parties respectfully renew their request for a corrected QOWP Order, and continue to reserve their rights to take any and all actions required to obtain the requested relief, including a motion for correction and/or a motion to stay or waive enforcement of the QOWP Order.

If you have any questions concerning this request, please do not hesitate to contact me. Thank you for your attention to this matter.

Respectfully submitted,



Colleen A. Foley

cc: Attached Service List (via email only)

³ See *In re the Opening of New Jersey's Third Solicitation for Offshore Wind Renewable Energy Certificates (OREC)*, Docket No. A-001973-23 (filed March 5, 2024).

IN THE MATTER OF THE OPENING OF NEW JERSEY'S THIRD SOLICITATION
FOR OFFSHORE WIND RENEWABLE ENERGY CERTIFICATES (OREC)
BPU DOCKET NO. QO22080481

LEADING LIGHT WIND 2,400 MW PROJECT
BPU DOCKET NO. _____

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