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New York, NY 10017

March 27, 2024

PUBLIC COPY

New Jersey Board of Public Utilities
44 South Clinton Ave
Trenton, New Jersey 08625
via: publicaccess.bpu.state.nj.us

RE: Attentive Energy Comments on NJ4 Draft SGD

Dear BPU Offshore Wind Team,

Attentive Energy LLC (“Attentive Energy”) submits these comments to the New Jersey Board of Public Utilities (“BPU”) regarding the Draft Solicitation Guidance Document (“SGD”) for New Jersey’s fourth offshore wind solicitation (“NJ4”). The Attentive Energy Two Project was awarded in the BPU’s third offshore wind solicitation (“NJ3”) and will supply the State of New Jersey with 1,342 megawatts (“MW”) of clean and renewable offshore wind energy. The Project will be located in Lease Area OCS-A 0538, located over 40 miles east of Seaside Heights, and it is expected to power more than 650,000 homes annually. Attentive Energy appreciates the opportunity to provide comments on the NJ4 Draft SGD, released on March 6, 2024.¹

Inflation Adjustment

[Redacted]

[Redacted]

[Redacted]

¹ Portions of this response contain confidential, proprietary, and/or commercially-sensitive information. Attentive Energy has submitted a Confidential Copy of this response that should be treated as a non-public record that is exempt from disclosure to the extent permitted under applicable laws and/or as expressly set forth in the Draft SGD. Attentive Energy has also submitted a redacted version of this response that should only be released to the public to the extent permitted under applicable laws and/or as expressly set forth in the Draft SGD. All notices or other communications regarding the confidential nature of this letter should be directed to Attentive Energy’s General Counsel Murray Greene, murray.greene@totalenergies.com.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Re-Bid Projects

Attentive Energy underscores the importance of developing this solicitation in a manner that balances the objectives of advancing New Jersey’s offshore wind portfolio while maintaining a fair, robust, and highly competitive solicitation to produce prices that are in the interest of ratepayers. As one of the most recent Qualified Offshore Wind Projects (“QOWPs”), newly representing New Jersey’s offshore wind industry to stakeholders and the greater public, we offer the following considerations with an aim to maintain public confidence in the offshore wind industry and in New Jersey’s priorities for affordability and protection of the environment.

[Redacted]

- [Redacted]

- [Redacted]

[Redacted]

- [Redacted]

[Redacted]

[REDACTED]

Transmission & interconnection

PBI and Smithburg

As BPU is aware, AE2 was awarded in NJ3 and assigned the LCS-Smithburg circuit. Acknowledging that the fourth Prebuild Infrastructure (“PBI”) circuit may be awarded in NJ4 and assigned remaining SAA Capability at Smithburg, Attentive Energy requests the following clarifications to ensure proper coordination across all PBI users and minimize impacts to NJ3 projects that have already been awarded use of the PBI.

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Offshore Transmission Network

AE2 is engaged in continued dialogue with the BPU as an NJ3 QOWP about the offshore transmission network (“OTN”) concept and has raised the importance of sharing details and

standardizing information across projects that are contemplated to utilize an OTN. We offer the following comments in alignment with our comments provided for NJ3, as it is important that NJ4 OTN requirements are compatible with NJ3 OTN requirements.

HVDC projects will be required to include design components to allow for potential future development of and connection to an OTN; those Applicants then have the option to also submit a corresponding HVDC non-OTN project option. AC projects are not required to include OTN design components. We request that BPU provides the following clarifications.

[REDACTED]

- BPU should confirm that use of design components is only referring to platform space as indicated in Attachment 10.
- BPU should elaborate on its logic to limit OTN to HVDC as suggested in the SGD. We note that Attachment 10 references an offshore transmission system via individual radially-connected HVDC *or* AC systems. Understanding the BPU's desired OTN scheme will help developers better understand BPU's long-term planning priorities and potential operational schemes.

[REDACTED]

[REDACTED]

[REDACTED]

Transmission System Upgrade Costs

We understand from the SGD Section 4.1 that the BPU will evaluate Transmission System Upgrade Costs ("TSUC") only as it relates to the OREC price. [REDACTED]

[REDACTED]

The SGD states that Applicants are required to provide P50 and P90 estimates of the required TSUC for their project capacity beyond that accommodated by the SAA (if applicable). [REDACTED]

[REDACTED]

[REDACTED]

Other transmission & interconnection requirements

Per Section 3.13, Applicants must provide a “detailed description of how the Project will address and mitigate load constraints in the electrical distribution and PJM transmission system for each point of interconnection” and “demonstrate to the greatest extent possible how the Project will address current or potential future load pocket or constraint problems with the electric distribution system and the PJM transmission system.” [REDACTED]

[REDACTED]

Additionally, Section 3.13 asks that Applicants who are proposing Capacity Interconnection Rights (“CIRs”) at the LCS beyond those accommodated by SAA Capability explain various additional information. [REDACTED]

[REDACTED]

Supply chain investments

[REDACTED]

Tier 1 cost-sharing

We note the addition to Section 3.8 of the NJ4 SGD that Applicants proposing cost-sharing with other developers for Tier 1 facilities should clearly describe the associated mechanisms and impact on OREC price. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Other economic impacts

Section 3.8 of the SGD states that “Land purchase and lease costs (including at ports and for right-of-way concessions) shall be excluded from economic model input values for the purpose of determining indirect and induced economic impacts, but should be reported separately in the Application Narrative and included in guaranteed in-state spending where applicable.” BPU should clarify why the phrasing “where applicable” is included. The underlined text is the opposite approach of what we’d expected (that lease costs may not be guaranteed spend, but could contribute to indirect and induced impacts), and appears to conflict with guidance in the NJ3 Q&A #185.

[REDACTED]

Other administrative points

[REDACTED]

Q&A Process: As a developer, we appreciated the opportunity to ask questions to the BPU during NJ3’s formal solicitation Q&A process. We would like to emphasize that there is significant value added to the solicitation process when the BPU provides more detailed responses to technical questions raised by developers. When technical questions are submitted through the Q&A, it is supporting a project’s design basis and ultimately its CAPEX

considerations; therefore, the more detail that the BPU can provide in their responses, the more beneficial the responses are to developers and ratepayers in designing and estimating a project.

[REDACTED]

We again thank the BPU's Offshore Wind Team for the opportunity to provide feedback on the NJ4 Draft SGD. We look forward to supporting New Jersey and its communities as a long-term partner. If you have any additional questions or seek clarification to any of our responses, please do not hesitate to contact me at christen.wittman@totalenergies.com or (508) 272-6987.

Sincerely,



Christen Wittman
Vice President Project Development