



NEW JERSEY OFFSHORE WIND ALLIANCE

June 12, 2024

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Sherri L. Golden
Secretary of the Board
44 South Clinton Avenue, 1st Floor
Post Office Box 350
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RE: In the Matter of the 2024 Energy Master Plan, Docket No. QO24020126

Dear President Guhl-Sadovy, Secretary Golden, and NJ BPU Staff,

The New Jersey Offshore Wind Alliance (NJOWA) is an advocacy organization created to be the trusted voice of the offshore wind industry in the state. It is a membership organization representing seven developers with lease-holding interests in the New York Bight and regional renewable energy organizations. It advocates for the growth and sustainability of the offshore wind industry in New Jersey and is organized through MAREC Action which is a non-profit coalition of developers and manufacturers dedicated to the growth and development of renewable energy across the PJM grid region.

NJOWA submits these comments to champion offshore wind energy as a cornerstone of the state's sustainable future. As New Jersey's moves forward with its transformative shift towards a cleaner energy grid, offshore wind development is the best option for scalable domestically produced energy generation with zero emissions. NJOWA has four high level asks and other substantive comments spelled out below:

1. It is critical that the Board of Public Utilities (BPU) continues to support this technology and moves forward with future solicitations on a predictable schedule. Those solicitations should remain competitive, with simple

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requirements that offer flexibility to deliver viable and affordable projects that support ratepayers and meet benchmarks set forth in the EMP.

2. Robust state investment in the offshore wind supply chain which includes continued support for the Port of Paulsboro, New Jersey Wind Port in Salem, and other manufacturers and businesses in the state. This could also include investments in strategically positioned operation and maintenance hubs that may be used to leverage efficiencies.
3. Codification into state law the Governor's Executive Order #307 which establishes the target of 11,000 MW by 2040. This positions New Jersey as a leader in offshore wind and provides long-term certainty necessary to establish and grow the industry.
4. We advocate for increased administrative capacity and resources at the BPU to ensure adequate implementation of offshore wind solicitations along with many other projects and programs to meet our states ambitious climate goals.

Strategy 2

Regarding the OREC, we would like to see simplified and streamlined solicitations. While NJOWA supports the fast-tracked process, having at least 16 weeks to prepare and submit bids would result in submissions that deliver greater customer value. More time would enable fuller consideration of the opportunities, risks, and risk mitigations associated with these complex megaprojects and their nascent US supply chains. Some thought should also be given to the OREC contract period as the current 20-year period was established in 2009. A 25-year contract would provide beneficial security and dependability as volatility in the market, supply chain issues, vessel availability, and inflation unpredictability all factor into challenges developers face, as well as support a more competitive pricing for New Jersey ratepayers.

Strategy 5

Since 2018, New Jersey has made important strategic decisions to position itself as an offshore wind industry leader on the east coast. We applaud the BPU for its forward-thinking approach to transmission planning and the nation leading State Agreement Approach. We encourage the timely award for transmission infrastructure investments needed to deliver upcoming offshore wind procurement and continued regional collaboration in ongoing infrastructure planning. We also seek as much clarity and certainty as can be provided around planning, schedule and path forward with respect to key uncertainties in coordinated infrastructure investments. Additionally, we support any and all efforts of grid modernization, battery storage development, and the leveraging of federal funds for state investments.





Strategy 6

A booming offshore wind supply chain and work force begins with meaningful engagement with many different stakeholders including developers, government, academia, unions, and NGOs, among others. The 2024 New Jersey Disparity Study done by the Department of Treasury exemplified that there is more work to be done to provide meaningful opportunities for Minority and Women-Owned (MWBE) businesses. Continued pre-apprenticeship and work force development programs along with technical assistance and education for businesses interested in participating in the supply chain will help ensure that the benefits of offshore wind accrue statewide. We support the ongoing work of the Wind Institute, the Department of Labor, and the Governor's Council on the Green Economy to diversify the offshore wind supply chain and suggest more engagement with the Department of Education to involve more public schools. We encourage the Wind Institute to continue to work with and partner with developers and recommend identification of quantifiable goals and metrics to assist with measuring success on a year-to-year basis.

Strategy 7

We applaud the New Jersey Economic Development Authority for making crucial investments in the New Jersey Wind Port and the EEW monopile foundation manufacturing plant in Paulsboro. Both resources along with in-state talent, workforce, and geographic location make New Jersey attractive for offshore wind business. We encourage the state to continue these long-term investments continue and the support for development of a robust in-state supply chain remains. Already, the success of the industry can be exemplified by the NJ EDA offshore wind supply chain registry obtaining 900 registrants. That is 900 companies willing and ready to do business with the offshore wind sector. Add to that an estimated 20,000 new high quality paying jobs that are family sustaining and overwhelmingly union. Offshore wind is a transformational opportunity for the whole of New Jersey but particularly the South Jersey region that has lagged in economic recovery when compared to its Northern counterpart. Lastly, we welcome the discussions between neighboring states for a regionalized approach to a supply chain which may help with project efficiencies and overall costs.

Support for offshore wind is a commitment to create thousands of high-quality good paying jobs, invigorating communities, and local economies, and positioning the state as a leader in the clean energy sector. Furthermore, the reduction in greenhouse gas emissions and improvement in air quality align with New Jersey's commitment to

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combat climate change and safeguard public health. New Jersey has already been disproportionately affected by climate change and sea level rise, at a rate that is more than 2X the global average. Over the last 50 years, storms that resulted in extreme rain increased by 71% in New Jersey, which is a faster rate of increase than anywhere else in the U.S. Sea level in New Jersey could rise from 2000 levels by over one foot by 2030 and over six feet by 2100. These impacts pose a threat to New Jersey's natural resources, communities, infrastructure, and economy. It is imperative that we make the right investments and continue the path to reach 100% renewable energy by 2035. We appreciate the opportunity to comment and are happy to serve as a resource to the BPU for offshore wind matters.

Thank you for your consideration of the above comments,

Paulina O'Connor
Executive Director
New Jersey Offshore Wind Alliance

