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June 12, 2024

Sherri L. Golden
Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue,
1st Floor Post Office Box 350
Trenton, NJ 08625-0350

Via email to: Board.Secretary@bpu.nj.gov

Re: In the Matter of the 2024 New Jersey Energy Master Plan Docket No. QO24020126

Dear Secretary Golden,

Rise Light & Power, LLC, on behalf of its wholly owned subsidiary Outerbridge New Jersey, LLC (collectively, Rise) appreciates the opportunity to provide the New Jersey Board of Public Utilities (BPU) with comments for consideration in connection with the 2024 update to the State's Energy Master Plan.

In New Jersey, Rise owns the site of the former Werner Generating Station – a 24-acre brownfield on the Raritan Bay in South Amboy – which it is redeveloping to serve as both an interconnection point for offshore wind, and as an operations and maintenance base for offshore wind. Separately, Rise is an owner in the Attentive Energy One project, which was provisionally awarded an OREC in New York's third offshore wind solicitation last year.

Rise has been, and continues to be, supportive of the Board of Public Utilities ("BPU") and the State's achievements since the 2019 Energy Master Plan was issued. The progress has been, in part, because of the holistic approach taken toward meeting New Jersey's goal of reaching 100% clean electricity by 2035. Our comments will address specific strategies listed in the docket that will continue to progress the State towards achieving its goals.

Strategy 2: Accelerating Deployment of Renewable Energy and Distributed Energy Resources

The State has emerged as a national leader with its commitment to using 11 GW of offshore wind by 2040. Indeed, New Jersey already touts 5 gigawatts of awarded offshore wind capacity in the pipeline. Continuing to invest in offshore wind means investing in a cleaner, more equitable future – one that provides reliable energy and economic development, while contributing to the State's clean energy goals.



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New Jersey has provided a clear offshore wind procurement schedule. Transparency around procurements provides more predictability to developers, those along the supply chain and those investing in workforce development. It also clearly demonstrates that New Jersey is committed to the industry.

Rise encourages the State to continue to lead by adhering to its forward-looking procurement schedule and actively communicating changes to the schedule, as it invests in offshore wind.

Strategy 5: Decarbonizing and Modernizing New Jersey's Energy System

New Jersey has long understood the benefits of a proactive, forward-looking approach to grid modernization. New Jersey was the first state to utilize PJM's State Agreement Approach ("SAA"), which leverages PJM's competitive planning process, to seek transmission proposals that support the injection of offshore wind into the State's bulk power grid. This proactive approach to transmission proved beneficial to ratepayers and served as a critical support for a growing industry. We look forward to SAA 2.0, which will provide the State with cost-effective solutions to interconnect additional offshore wind capacity in order to meet the 11 GW goal.

With the most recent FERC Order No. 1920, New Jersey once again can help advance transmission planning in a manner that supports not only New Jersey's clean energy goals, but the whole region. Among other elements, the new FERC order requires long-term regional planning, a consideration of cost allocations and extensive stakeholder engagement. We encourage the State to continue working with PJM to refine its approach for SAA 2.0.

As New Jersey continues to iterate on its model, Rise recommends that the State prioritize de-risked points of interconnection ("POI"). Using existing industrial sites to bring offshore wind energy onshore will keep cables away from the beaches that are so important to New Jersey's tourism economy and cultural fabric, while also providing much-needed investment in industrial areas and brownfield sites – some of which are located in or near overburdened communities ("OBC"). Rise also recommends that the State consider geographically diversifying POIs to enhance grid reliability.

Strategy 7. Expanding the Clean Energy Innovation Economy

New Jersey's commitment to training the workforce for a future green economy is commendable, particularly through its various grant programs and Wind Institute partnerships. While these programs serve as an important tool to many adults in the workforce, Rise believes there is an opportunity to start preparing a future workforce even sooner. The New Jersey Economic Development Authority's Green Workforce



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Training Grant Challenge took a step in this direction by including technical high schools as potential awardees.

In conversations with community leaders, Rise has learned that there is a desire to begin preparing high school students for work in the trades and industries that will be critical to the clean energy transition. New Jersey's county vocational-technical schools ("CVTS") provide training and career exploration programs directly related to the clean energy transition, and necessary engineering, design and trade opportunities early, and at a lower cost than through a traditional four-year university education. This would be particularly helpful for students in low-to-moderate income communities because these will be skills that are in demand and pay premium salaries. In addition, there are several high-school magnet programs throughout the State that are focused on developing job-ready skills to enable the clean energy transition. We encourage the State to consider further promoting and facilitating access to the green economy through programs such as CVTS by carving out specific funding requirements in future clean energy solicitations.

Finally, Rise encourages the State to consider how members of OBCs can more easily take advantage of the many great workforce opportunities in place or being developed. Successful programs should facilitate access to affordable childcare, reliable transportation and bridge programs that address essential skills gaps.

Thank you for the opportunity to comment.

Respectfully,

Richmond Young
Director of Development
Rise Light & Power