

October 1, 2024

New Jersey Board of Public Utilities
44 S Clinton Ave
Trenton, NJ 08625

Re: [Docket #QO23100719] IN THE MATTER OF THE OPENING OF A SOLICITATION FOR A TRANSMISSION INFRASTRUCTURE PROJECT TO SUPPORT NEW JERSEY'S OFFSHORE WIND PUBLIC POLICY

Dear New Jersey Board of Public Utilities:

Thank you for the opportunity to comment in support of the Prebuild Infrastructure (PBI) to facilitate offshore wind in New Jersey.

New Jersey has already been disproportionately affected by climate change and sea level rise, at a rate that is more than [two times the global average](#). These impacts pose a threat to New Jersey's natural resources, communities, infrastructure, and economy. From 2017-2021 alone, climate-related disasters cost New Jersey nearly [\\$12 billion](#). Offshore wind is a once-in-a-generation opportunity to invest in our communities, promote energy independence, protect everyday Americans against unpredictable utility bills, and generate immense workforce and economic benefits, all while meeting the urgency of the climate crisis.

Leading Light Wind is an American-led offshore wind project that can deliver 2,400 MW of clean energy to New Jersey – enough to power more than one million homes. Located over 40 miles off the coast, Leading Light Wind is positioned to spur \$3.7 billion in economic development benefits, create thousands of local union jobs, reduce dependence on foreign energy sources, advance public health, and empower local communities across the state. The project is developed by Invenergy and co-developer energyRe – partners with a proven track record of responsible development.

Recent progress on our project development activities includes the completion of our offshore geophysical and geotechnical surveys for 2024 to understand and map the existing conditions of our lease and export cable corridor and inform the Construction and Operations Plan (COP). The COP is the first step of the Bureau of Ocean and Energy Management's multi-year environmental review process for Leading Light Wind.

To deliver clean power to New Jersey homes and businesses, Leading Light Wind will utilize New Jersey's State Agreement Approach (SAA), a coordinated solicitation that addresses multiple long-term reliability needs for both PJM and New Jersey and is an effective way to integrate offshore wind power into the grid. It is anticipated that the shared transmission approach will eliminate redundancies between multiple offshore wind projects trying to connect to the same point, limiting the onshore environmental and community impacts, and will save New Jersey ratepayers \$900 million.¹

Crucial to the success of Leading Light Wind and its associated benefits is the PBI, which consists of underground cable vaults and duct banks that will start at Sea Girt National Guard Training Center and end at the Larrabee Collector Station in Howell. The PBI developer will be responsible for identifying the exact route(s) from Sea Girt to Howell and building the underground cable vaults and duct banks that offshore wind projects will use for their cables. Once this infrastructure is installed, offshore wind project developers will pull their cables through the underground duct banks to connect to the PJM grid. Leading Light Wind will be responsible for developing and constructing the offshore wind farm, installing onshore transmission cables, and constructing converter stations at the property provided by the Mid-Atlantic Offshore Development (MAOD) in Howell by the Larrabee Collector Station. This is the point at which the clean energy generated by the project will be delivered to the grid.

The PBI can help ensure safe, reliable, and cost-efficient transmission. Any concerns about temporary disruption during construction can be effectively managed through careful planning and implementation. For decades, installation of underground or submarine transmission lines has become commonplace around the world, with underground routes often passing beneath residential and urban areas using existing right of ways.

Regarding electromagnetic fields (EMF), this refers to the electric and magnetic fields created by electric currents. The direct current (DC) transmission lines, such as those proposed as part of the PBI, create a static electromagnetic field that is comparable to the natural magnetic field produced by Earth itself. Once installed, directly above the PBI's underground transmission infrastructure, the upper range of the DC magnetic field is expected to be less than 1/2 of one percent of the International Commission on Non-Ionizing Radiation Protection (ICNIRP)'s recommended safe limit. In fact, ICNIRP's recommended

¹ *New Jersey Board of Public Utilities Selects Offshore Wind Transmission Project Proposed by Mid-Atlantic Offshore Development and Jersey Central Power & Light Company in First in Nation State Agreement Approach Solicitation.* New Jersey Board of Public Utilities, October 26, 2022.
<https://www.nj.gov/bpu/newsroom/2022/approved/20221026.html>

safe limit of magnetic field exposure is much higher than what would be produced by any transmission lines installed within the PBI. Magnetic field levels decrease rapidly with distance and at nearby residences would be lower. Additional resources on EMF and other frequently asked questions on the PBI are available [from the BPU](#).²

In response to a multi-year, robust, and science-based permitting processes established by state and federal agencies, offshore wind developers spend years collecting data and engaging with stakeholders and subject matter experts to inform environmentally sound project decisions throughout the project lifetime. Leading Light Wind will work directly with the PBI developer selected by the BPU to communicate and engage with municipalities and community groups throughout project design and permitting, from planning to completion.

Leading Light Wind is committed to facilitating open lines of communication with communities and recognizes our team's responsibility to be a trusted partner. To sign up for project updates, visit [leadinglightwind.com](https://www.leadinglightwind.com).

² *Prebuild Infrastructure Frequently Asked Questions*. New Jersey Board of Public Utilities, September 2024. <https://njcefiles.s3.amazonaws.com/PBI+FAQ+25+Sept+2024.pdf>