October 15, 2024
Comments In Response to NJBPU Docket O2300719
In The Matter of the Opening of a Solicitation for a Transmission Infrastructure Project To Support New Jersey's Offshore Wind Public Policy

"Of all the forces of nature, I should think the *wind* contains the largest amount of motive power – that is power to move things. Take any given space of the earth's surface – for instance, Illinois; and all the power exerted by all the men, and beasts, and running-water, and steam, over and upon it, shall not equal one hundredth part of what is exerted by the blowing of the wind over and upon the same space. And yet it has not, so far in the world's history, become proportionally valuable as a motive power. It is applied extensively, and advantageously, to sail-vessels in navigation. Add to this a few windmills and pumps, and you have about all…As yet, the wind is an *untamed* and *unharnessed* force; and quite possible one of the greatest discoveries hereafter to be made, will be the taming, and harnessing of it," – ***Abraham Lincoln, 1860, Lecture, "Discoveries and Inventions"***

On behalf of Environment New Jersey, we thank you for the opportunity to submit these comments to inform the New Jersey Bord of Public Utilities Docket O2300719 in the Matter of the Opening of a Solicitation for a Transmission Infrastructure Project To Support New Jersey's Offshore Wind Public Policy.

Environment New Jersey is a state-wide citizen-based environmental advocacy organization representing more than 80,000 citizen member and activists across the state. Our mission is focused on a greener, cleaner New Jersey to protect our land, air and water and to champion solutions for the climate crisis.

PBI: The Pre-Build Infrastructure (PBI) project is a critical piece of underground transmission infrastructure that will connect power generated by offshore wind to the Larrabee Collector Station. The scope of the Prebuild includes all Cable Vaults, Duct Banks, and related facilities for four separate Qualified Offshore Wind Projects. This coordinated onshore clean energy transmission corridor will provide savings for consumers and significantly reduce the development risk and environmental impact. The PBI allows the state to have one point of cable landing instead of multiple points of interconnection for offshore wind projects across the shore.

It is imperative that New Jersey not only embraces offshore wind but also facilitates the infrastructure necessary to fully realize its benefits. The installation of onshore cables to connect offshore wind farms to the grid is a proven, safe, and effective method used globally to integrate renewable energy into local and regional energy systems. The concerns about onshore cables can be addressed responsibly. Similar infrastructure projects for underground cables and utility systems have been executed for decades without significant disruption to communities. By following best practices in environmental science and

engineering, such as proper siting, minimal disruption during construction, and adherence to all state and federal regulations, this infrastructure can be safely integrated into our communities.

The PBI project would build necessary infrastructure to support New Jersey's goal of delivering local offshore wind power to land. The installation of underground onshore cables to connect offshore wind farms to the electric grid is a proven, safe, and effective method used both globally and in New Jersey today to integrate renewable energy into local and regional energy systems.

The project selected will allow for flexibility and modularity to facilitate reliable, cost-effective delivery of offshore wind energy to New Jersey consumers. The project will provide the most cost-effective opportunity to install multiple offshore wind projects into a single point of interconnection. It maximizes capacity transfer and significantly minimizes disruption to the environment and Shore communities hosting the underground infrastructure. It would have one landing point in Sea Girt National Guard Training Center instead of multiple points of interconnections across the Shore, avoiding the dreaded spaghetti transmission interconnection line scenario with vastly higher consumer and environmental impacts. The PBI helps New Jersey achieve energy reliability and resiliency through offshore wind power. It is imperative that New Jersey not only embrace offshore wind but also deploys critical infrastructure necessary to fully realize this economic and clean energy opportunity.

Offshore Wind Benefits: The Murphy Administration's offshore wind goals has been clear and ambitious to reach 11,000 megawatts (MW) of offshore wind power by 2040, first outlined in Executive Order 307 in September 2022. In an impressively short period of time, the offshore wind industry has started to become a reality with the beginnings of a local supply chain, revitalized ports and the rapid construction of the New Jersey Wind Port.

Recognizing that climate change is the greatest existing threat we face, it is imperative that we link today and tomorrow's public health environmental challenges with the promise of offshore wind. Last summer, NJDEP issued air quality alerts for the entire state and five North Jersey counties (Bergen, Essex, Hudson, Passaic and Union) were deemed unhealthy because of dangerous levels of fine particulate matter (PM 2.5). The impacts of climate change have never been so visible – and we shouldn't wait for wildfire smoke to re-emerge to act. Climate change won't be solved overnight and there is no single solution, but the passage of NJ Clean Energy Act in 2018 set out a clear mandate that New Jersey needed to achieve 50% renewable energy for our power sector by 2030 – and the clearest way to do that is to expand offshore wind.

The Murphy Administration's focus on offshore wind has been matched by the Biden Administration, which has implemented initiatives to combat climate change by reducing climate polluting fossil fuels and setting the goal of deploying 30 GW of offshore wind by 2030. Additionally, the six new leased areas in the New York Bight following the record-breaking Feb. 2022 auction could provide additional offshore wind power to New Jersey.

Climate Impacts: The promise of offshore wind is that it can quickly move to become carbon negative and that it can move to displace more traditional fossil fuels sources off the electric grid (including older coal and gas fossil fuel plants) and prevent the construction of new gas-fired power plants across the PJM electric grid, including in New Jersey. The threats of climate change to New Jersey are well-documented, with the most notable research coming from Rutgers University and the NJDEP on sea-level rise and its impact on the Jersey Shore – the upper ranges of projected sea level rise reach up to 2 feet of sea level rise by 2050 and up to 6 feet by 2050. This translates into real economic and community risk for coastal communities, as New Jersey has the second most homes at risk in 2045 and 2100, according to an Union of Concerned Scientist (UCS) study. In 2045, $27 billion of residential properties are at risk and 1st in the nation for commercial properties at risk in 2045 ($2.1 billion) for chronic flooding.

In this context, it is critical to note the importance of BOEM expanding its offshore wind beneficial climate impacts analysis to include the social cost of greenhouse gas emissions. The Biden Administration issued interim guidance to guide agencies on how to account for climate impacts. This analysis has shown that offshore wind has exceptional benefits in the range of $1.734 billion to $22.069 billion in benefits from potential impacts.

Offshore wind – facilitated by offshore transmission – represents a clear win for both New Jersey's clean energy economy and our environment because the massive wind turbines can create a supply chain of good green jobs and union labor through the construction, delivery, installation, interconnection, manufacturing, and long-term maintenance of these units. As New Jersey is already feeling the impacts of climate change, we have no time to lose. We must move forward in an environmentally responsible manner that avoids, minimizes, and mitigates impacts to ocean wildlife, habitat and traditional ocean uses, meaningfully engages stakeholders from the start, and uses the best available science and data to ensure science-based decision making.

We have no time to lose in advancing clean, renewable energy solutions that rise to the environmental, economic, and public health crises our nation faces. It's time to chart another energy course and embrace the environmental and economic benefits of responsibly developed offshore wind power. We appreciate your diligent attention to the review of the PBI process.

Summary: We urge the BPU to prioritize the development of offshore wind and related transmission infrastructure as outlined in the PBI process for the following reasons:

1) **Smart power**: The PBI process is a coordinated system of transmission lines that will connect offshore wind to the state's power grid. It allows for reliable, cost-effective delivery of offshore wind energy with minimal disruption to Shore communities.
2) **Resilient & reliable infrastructure**: Similar projects for underground cables and utility systems have been implemented for decades. By following best practices in environmental science and engineering, such as proper siting, minimal disruption during construction, and strict adherence to all state and federal regulations, his infrastructure can be safely integrated into our communities.
3) **Public benefits:** The transition to offshore wind energy will also bring substantial public health benefits. By replacing fossil-fuel power generation with clen energy, we will significantly reduce harmful air pollutants and improve air quality.

Conclusion: In July 2023, Gov. Phil Murphy signed legislation S3110/A4783, which requires sellers of property and landlords to make certain notifications regarding flooding. Under the law sponsored by Senator Bob Smith and Assemblyman John McKeon, sellers of real property and landlords must disclose knowledge of a property's history of flooding, flood risk, and location in a flood zone or area. Additionally, the law requires landlords to notify tenants of the availability of insurance for renters through the National Flood Insurance program. "Every New Jersey resident deserves to know the history and risk of flooding when making the consequential decision to buy or rent a home," said NJDEP Commissioner Shawn LaTourette.

Climate change – and its impacts – are at our doorstep, and the ability of offshore wind to provide real and tangible benefits to power our electric grid will be delivered through the offshore wind *tamed and harnessed* by the PBI process.

Sincerely,

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