October 15th, 2024

The New Jersey Board of Public Utilities
Submitted electronically to NJBPU
Docket No. QO23100719-

Oceantic Network Support of the New Jersey Board of Public Utilities' Solicitation for a Transmission Infrastructure Project to Support Offshore Wind

To The New Jersey Board of Public Utilites,

I am writing on behalf of the Oceantic Network (the Network) to express our strong support of the New Jersey Board of Public Utilities (NJBPU) in their solicitation for a pre-build transmission infrastructure project to support offshore wind development in the state. The Network has been working in the United States for over a decade to advance the offshore wind industry, including in the state of New Jersey, and fully supports the NJBPU building out transmission infrastructure as an essential development to meet state renewable energy goals and to help build a robust offshore wind supply chain. The pre-build infrastructure project is essential to the state finalizing its innovative State Agreement Approach (SAA) process that should result in $900 million[1] in ratepayer savings, while giving greater certainty to New Jersey's offshore wind projects. This action is necessary to continue supporting the offshore wind market, adding investments into the state, and to meet the transmission needs for large scale electricity demand and production.

The Network is a 501(c)(3) non-profit dedicated to advancing the offshore wind industry and its supply chain through policy, research, resources, and educational trainings. Since 2013, the Network has brought together business and government, both domestically and internationally, to educate and prepare companies and small businesses to enter the offshore wind market. The Network uses the voice of its members to strengthen federal, state, and local policies to advance the development of the U.S. offshore wind industry. We empower our members with the education, tools, and connections necessary to participate in this booming industry. Our membership includes the entirety of the U.S. offshore wind supply chain, from international developers and state agencies to community colleges and local marine service providers, including many New Jersey businesses.

From this collective perspective, we commend the NJBPU for its urgency in power solicitations and transmission development for the state's active offshore wind projects. Advancing transmission infrastructure will aid the state in meeting its goals of 100% clean electricity by 2035, 11 gigawatts (GW) of offshore wind by 2024, and a 50% reduction in greenhouse gas emissions by 2030[2], established under the Murphy administration.

[1] New Jersey Board of Public Utilities, Press Release, 2022
[2] New Jersey Department of Environmental Protection, 2022

New Jersey's bold actions on procurement, port infrastructure, and now planned transmission development has made the state an attractive market to investors and has resulted in significant economic opportunities for local businesses. According to the Network's Market Dashboard, over $3 billion has been invested in the state supply chain (encompassing port infrastructure, transmission projects, supply chain investments, research, education, and workforce developments) despite the setbacks experienced by the national (and global) offshore wind industry over the past few years. The Network also closely tracks supplier contracts and found 191 going to 58 identified New Jersey firms. Many of these investments and contracts are predicated on the state's projects advancing on their expected deployment timelines, of which the prebuilt transmission infrastructure is an essential part.

Unfortunately, the industry has been plagued by misinformation campaigns by offshore wind opponents seeking to delay industry progress, but only succeed in harming the state's ability to attract investment, including new disinformation campaigns about electromagnetic fields (EMFs) associated with subsea cables. The Network urges deferring to the best available science when weighing these concerns. Specifically, subsea cables, which have been used for 150 years, emit low-frequency waves, which can occur naturally and are not shown to be harmful. According to the National Wildlife Federation (NWF)[3], best practices for cable laying are already being incorporated in offshore wind to ensure negligible impacts including cable siting, design with protective measures, wrapping cables in conductive material, grounding, and burying them 3-7 feet below the seafloor, sometimes covering them in concrete. According to the best available science, EMF radiation is non-concerning and should not hinder the state's efforts to develop offshore wind power generation, reduce carbon emissions, and save ratepayers.

Most importantly, by perusing the SAA and the pre-build infrastructure, the state of New Jersey is creating enormous environmental benefits by avoiding multiple beach crossings, new transmission lines, and/or reducing the amount of cable length needed. Bringing 11 GW of offshore wind power generation onto the grid requires upgrades, and a planned transmission buildout (with pre-build infrastructure) will maximize new transmission infrastructure and reduce inefficient upgrades. That means less community disruption and less environmental impact from installing cables or transmission lines.

The Oceantic Network supports the New Jersey Board of Public Utilities in their pursuance of transmission infrastructure for the state's offshore wind projects and recognizes its necessity as a critical step in meeting New Jersey's offshore wind goals, efforts to bolster the local and regional supply chain, create jobs, and foster economic growth.

Thank you,
Sam Salustro ,The Oceantic Network
Vice President of Policy and External Affairs

[3] National Wildlife Federation, EMF Factsheet, 2024