



October 15, 2024

New Jersey Board of Public Utilities
Secretary of the Board
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MAREC Action comments re: NJBPU Docket Number Q023100719

MAREC Action (informally, “Mid-Atlantic Renewable Energy Coalition”) is a coalition of over 50 utility-scale solar, wind, and energy storage developers and manufacturers dedicated to the growth and development of renewable energy across the PJM grid region. The following comments concern the New Jersey Board of Public Utilities (NJBPU) opening of a solicitation for a transmission infrastructure project to support New Jersey’s offshore wind public policy.

MAREC Action strongly supports the NJBPU’s efforts to enhance the state’s transmission infrastructure through the Prebuild Solicitation, and the state should move forward with a final award to one of the bidders so that work may begin on this vital project. New Jersey’s application of the State Agreement Approach to resolve offshore wind interconnection challenges is a prudent measure that will ultimately save consumers money and reduce the number of cable landings required to serve New Jersey customers with clean and reliable electricity.

Meeting electricity demand

For many years, electricity demand has been relatively static throughout the PJM electricity grid, which is comprised of New Jersey and 12 other states. This status quo has been shattered with the most recent PJM load forecast, which estimates the PJM Eastern Mid-Atlantic Region (E-MAAC) will see peak demand in the winter growing by almost 10,000 MW.¹ Near-term urgency to build new energy resources is magnified by impending retirements of old, inefficient power plants in PJM.

¹ <https://www.pjm.com/-/media/library/reports-notices/load-forecast/2024-load-report.ashx>



Because of the pre-planning by the Murphy Administration and NJBPU to establish offshore wind procurements and the Prebuild Infrastructure (PBI), offshore wind is a large-scale clean energy resource that can be meaningfully deployed in time to meet demand. Any large-scale resource entering the PJM queue today would take at least 5 to 7 years to come online from planning to commercial operations. New nuclear power facilities would likely take even longer.

Consumer savings

The NJBPU's foresight around the around the PBI will also save consumers money. The BPU estimated that proactively planned & coordinated SAA transmission projects will save New Jersey ratepayers \$900 million² compared to the cost of transmission without utilizing this coordinated approach. Indeed, PJM itself notes³ that significant cost savings are expected from proactively planning for New Jersey's offshore wind target, rather than incrementally building on a project-by-project basis.

All large-scale investments in infrastructure—roads, bridges, water, the list goes on—are expensive, there's no getting around that. However, these are *investments*, which will pay off for consumers when compared with the alternative. Further delays and alternative plans for New Jersey's future energy supply would cost both time and money.

Reduced cable landings

As noted, the alternative to the PBI—building transmission lines to each wind farm individually—would be costly. Imagine the PBI as a single power strip, designed to accommodate many of New Jersey's future wind farms. Taking a piecemeal approach would result in four uncoordinated cable landings across the state of New Jersey. The electricity grid, first designed over 100 years ago, was not planned with any thought that large amounts of electricity would one day be delivered from offshore. As a result, the grid tends to get smaller and less robust closer to the seashore. All cable landings would require substantial upgrades to the

² <https://www.nj.gov/bpu/newsroom/2022/approved/20221026.html>

³ <https://www.pjm.com/-/media/about-pjm/newsroom/fact-sheets/the-state-agreement-approach.ashx>



grid and there is no reason to cause four temporary disruptions when one could suffice.

In closing, we urge the BPU to move ahead with a PBI award

New Jersey stands to benefit from a timely award of the Prebuild Solicitation, and the offshore wind potential unlocked—we urge the BPU to finalize your selection as soon as is prudent. These investments are key to meeting New Jersey’s clean energy goals, to fuel economic growth, and to keep the lights on. Changing course now, after years of careful analysis and preparation, would send New Jersey back to the drawing board on energy planning at a time when the state’s economy needs energy more than ever.

Best regards,

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