



Atlantic Shores Offshore Wind
1 Dock 72 Way, Floor 7
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October 15th 2024

New Jersey Board of Public Utilities (BPU)

Submitted electronically to:

board.secretary@bpu.nj.gov

Re: PBI Comment, Docket Number QO23100719

Atlantic Shores Offshore Wind, LLC ("Atlantic Shores"), a 50/50 joint venture of EDF-RE Offshore Development, LLC (a subsidiary of EDF Renewables, Inc.) and Shell New Energies US LLC, has one of the largest portfolios of U.S. offshore wind ("OSW") lease areas, totaling 262,604 acres capable to support over 5 GW of OSW generation. Atlantic Shores' Portfolio comprises Lease OCS-A 0499 and Lease OCS-A 0549, totaling 183,253 acres and hosting Project 1, a 1,510 MW project awarded an OREC from the BPU in June 2021; and Lease OCS-A 0541, which totals 79,351 acres and was awarded to Atlantic Shores by BOEM pursuant to the ATLW 8 Bight Auction.

Atlantic Shores appreciates this opportunity to provide information to support an effective and efficient Prebuild Infrastructure (PBI) solution. The PBI is one piece, a critical piece, of a larger effort to responsibly develop offshore wind in New Jersey.

We look forward to the awards for the PBI solicitation and remain at your disposal to meet with you and provide any clarification, further details or responses to additional questions, including on nascent topics on which you continue to evolve your solicitations and their specific application in the OSW space.

For any further engagement, please note our primary point of contact:

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Comments:

Coordinated transmission—that is, the pre-planning of necessary infrastructure to better facilitate and synchronize offshore wind development in New Jersey—is a good thing. In 2022, the BPU found that in its inaugural offshore wind coordinated transmission effort (the State Agreement Approach), New Jersey would receive over \$900 million in savings. In soliciting proposals for the PBI, the BPU again seeks to find the most efficient, economical and responsible approach to developing offshore wind.

We would like to highlight three beneficial aspects of the PBI design:

1. **The PBI design concept places the community at the forefront.**
 - a. Its purpose is to minimize community disruptions and environmental impacts from temporary construction by providing a single effort to support up to 4 projects, thus avoiding subsequent construction efforts.
 - b. It will also help to reduce the number of communities impacted with a single corridor of interconnection, rather than the potential to have four separate, varying routes from Sea Girt to the LCS.
 - c. The PBI will enhance community engagement, limit confusion and avoid permitting fatigue from the municipalities. Without the PBI, up to four developers would engage the relevant municipalities separately, all for similar infrastructure. This duplicative engagement does not efficiently utilize local resources and has the potential to hinder local cooperation and support.
 - d. The PBI provides additional oversight to safeguard responsible project development. The Solicitation Guidance Document (SGD) requires adherence to all applicable Federal and State statutes and regulations and municipal code requirements. The SGD also mandates that any awarded project will be required to provide proof of such compliance to Board Staff on an ongoing basis.
2. **The PBI facilitates reliable, cost-effective delivery of offshore wind energy to New Jersey consumers, helping the state achieve energy reliability and resiliency through offshore wind power.** With rising energy demand across the region and grid operators forecasting electric load growth of nearly 40% over the next 15 years, the PBI serves not only to help the State achieve its renewable energy goals, but to diversify the electricity supply, increase electricity reliability, and reduce greenhouse gas (GHG) emissions at the order of magnitude required to meet this moment.
3. **The PBI is safe.** As an experienced developer of large infrastructure projects, we are keenly aware of the safety and known hazards related to underground transmission infrastructure. The installation of underground onshore cables to connect power generators to the local electric grid is a proven, safe, and effective method used both globally and across New Jersey. There is no evidence that these underground transmission cables present an unsafe hazard for the hosting community.
 - a. The EPA provides that, “waves from power lines and electrical devices have a much lower



frequency than other types of EMR, such as microwaves, radio waves or gamma rays.”¹

- b. The National Institute of Environmental Health Sciences states that, “[n]on-ionizing: low-level radiation...is generally perceived as harmless to humans” and that the studies show “no evidence of a link between EMF exposure and adult cancers, such as leukemia, brain cancer, and breast cancer.”²
- c. The National Cancer Institute provides that, “[n]umerous epidemiologic studies and comprehensive reviews of the scientific literature have evaluated possible associations between exposure to non-ionizing EMFs and risk of cancer in children (13–15)...[n]o consistent evidence for an association between any source of non-ionizing EMF and cancer has been found.”³

Additionally, Atlantic Shores provides the following comments for the BPU’s consideration regarding the evaluation and possible award of the PBI proposals.

- 4. **Timing and deliverability of the PBI is critical.** Atlantic Shores urges the BPU to give ample weight to project viability in its evaluation. Proposals that include firm commitments on the proposed COD should be strongly favored. We also respectfully request that the BPU require ample transparency and coordination between the PBI developer and future PBI users. Such requirements may include active notification should the PBI developer experience delays, regular and transparent reporting on the development status, and availability to meet with PBI users. The BPU should include this as a consideration in their evaluation of the bids as well as a requirement in any resulting Board order(s). Lastly, we respectfully note that remaining on the current solicitation schedule with a PBI award in Q4 2024 is critical to ensure maximum benefits are achieved.
- 5. **Proper risk allocation will protect rate payers.** Atlantic Shores greatly appreciates the BPU’s efforts to ensure the PBI is constructed on time, however, we urge the BPU to consider including a requirement that some of the forfeited securities be used to compensate Qualified Projects scheduled to utilize the PBI that will be uniquely harmed and incur cost and schedule overruns due to the PBI delay or abandonment.

Responsible transmission planning and development will enable the abundant economic and environmental benefits of offshore wind to be delivered to host communities and ratepayers across the State. The PBI upholds these benefits and Atlantic Shores proudly supports the BPU’s efforts.

¹ <https://www.epa.gov/radtown/electric-and-magnetic-fields-power-lines>

² <https://www.niehs.nih.gov/health/topics/agents/emf>

³ <https://www.cancer.gov/about-cancer/causes-prevention/risk/radiation/electromagnetic-fields-fact-sheet#what-have-studies-shown-about-possible-associations-between-non-ionizing-emfs-and-cancer-in-children>