



Hon. Sherri L. Golden, Secretary
NJ Board of Public Utilities
44 South Clinton Avenue, 9th Floor
PO Box 350
Trenton, NJ 08625-0350

December 15, 2024

**RE: IN THE MATTER OF NEW JERSEY'S FOURTH SOLICITATION FOR OFFSHORE
WIND RENEWABLE ENERGY CERTIFICATES (ORECs)
Docket No. QO24020109**

Dear Madam Secretary:

We the undersigned are deeply concerned with the large subsidies and rate increases supporting offshore wind development. We have previously expressed our objections to permitting Atlantic Shores¹ to re-bid its existing contract for Offshore Renewable Energy Certificates (ORECs) as well as allowing Attentive Energy and Community Wind² to receive significant above market subsidies pursuant to the subject solicitation.

The owners of all three bidders have recently made public statements indicating an increasing reluctance to commit financial resources to US offshore wind projects:

- The CEO of Total Energies, majority owner of the Attentive Energy projects, has announced a four year pause in pursuing US offshore wind opportunities³.
- The CEO of RWE AG, part owner of Community Wind, has announced a similar two year pause in capital expenditures on US offshore wind projects⁴.
- The CEO of Shell PLC, 50% owner of the Atlantic Shores projects, has announced that it is ceasing investments in new offshore wind projects⁵.

These official statements call into question the commitment of all three bidders in this solicitation to complete proposed projects and to guarantee any related economic benefits. While we would be perfectly satisfied if no awards are made given these uncertainties, our concern is that the Board, in its eagerness to further the Governor's pledge to have 11 GW of offshore wind in operation by 2040, will agree to terms favorable to one or more of the bidders at the expense of NJ ratepayers, given the lack of robust competition among three obviously ambivalent bidders.

¹ Jersey Strong Coastal Coalition letter to BPU on Atlantic Shore South project, October 10, 2024.

² Jersey Strong Coastal Coalition letter to BPU on Attentive and Community Wind projects, October 31, 2024

³ Total Energies Pauses US Offshore Wind Due to Political Uncertainties, Maritime Executive, November 26, 2024

⁴ RWE Pauses Investments in US Offshore Wind, RTO Insider, November 13, 2024.

⁵ Shell Signals No New Offshore Wind Projects, Financial Times, December 4, 2024.

In particular, we are concerned that the Board will agree to large increases in OREC prices to entice reluctant bidders to accept awards giving them a higher return on investment than in previous awards. As we have pointed out in our previous letters regarding the Fourth Solicitation, such awards would violate the Offshore Wind Economic Development Act (OWEDA). Beyond OREC pricing, we fear the Board may agree to terms that reduce or eliminate penalties for non-compliance with economic guarantees or meeting project schedule milestones.

Following developer cancellation of awards given in the First and Second Solicitations, in its Third Solicitation orders, the Board included terms requiring the posting of financial guarantees for support of investment in the Paulsboro manufacturing facility and for project completion in accordance with mandatory milestones dates. In addition, the award orders made clear that ratepayers would not be accountable for any shortfall in the developers obtaining assumed Federal tax credits or grants, which would not be the basis for any increase in OREC pricing.

We believe that these public statements by all three bidders indicate that a vigorous competitive environment no longer exists for offshore wind procurements in US, and strongly recommend that no awards be made under the Fourth Solicitation. Should the Board persist in doing so, we caution against any awards which increase OREC prices or reduce financial guarantees or assurances that projects will be completed as proposed and scheduled. As we have indicated in our previous letters regarding the Fourth Solicitation, any awards which violate the requirements of OWEDA will be appealed to ensure that any resultant contract is challenged and overturned in accordance with applicable state law.



Keith W. Moore
kmoore@jerseystrong.org



Mike Dean
mdean@jerseystrong.org

Coalition Signatories:

Atlantic County

Commissioners	Clark	Kenilworth	Millville	Seaside Park
Barnegat Twp	Defend Our Beaches NJ	Keyport	North Arlington	Ship Bottom
Barnegat Light	Elk Twp	Lavalette	North Hanover	Stafford Twp
Bay Head	Florence	LBT10 Taxpayers	Pemberton	Stop High Risk Cables
Beach Haven	Florham Park	Little Egg Harbor	Plumsted	Totowa
Beachwood	Hainesport	Long Beach Twp	Protect Our Coast-LINY	Ventnor
Berkeley Twp	Harvey Cedars	Mahwah	Point Pleasant Boro	Wallington
Brick Twp	Hawthorne	Manasquan	Raritan Twp	Wall Twp
Brielle	Howell	Mantoloking	Save the East Coast	Washington Twp
Brigantine	Jackson	Margate	Sea Girt	Wildwood Crest
			Seaside Heights	Wyckoff

Signatures:



Walter G. LaCicero, Mayor
Borough of Lavallette





John A. Peterson, Jr, Mayor
Seaside Park NJ





John Coiro
Mayor
Borough of Totowa
mayorcoiro@totowanj.org





Kevin P. Orender, Mayor
Township of Wall
korender@wallnj.gov





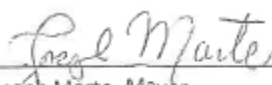
W H Malone, Jr., President
LBT10 Taxpayers Association





Michael Dean, Founding Member
Save the East Coast, Inc.
info@savetheeastcoast.org





Joseph Marte, Mayor
Township of Barnegat
jmarte@barnegat.net





Catherine Snyder, Council President
Beach Haven, Ocean County
ksnyder@beachhaven-nj.gov





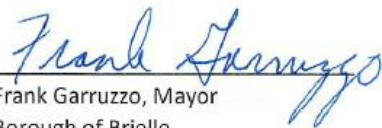
Carolyn D King-Sammons, Mayor
Elk Township, Gloucester County
Email: CSammons@elktownshipnj.gov





John A. Bacchione
Mayor
Berkeley Township, Ocean County, NJ
jbacchione@berkeleystownship.org






Frank Garruzzo, Mayor
Borough of Brielle
Email: fgarruzzo@briellenj.gov






Leila Gilmore
Township of Hainesport
lgilmore@hainesporttownship.com




Joseph H. Mancini, Mayor
Long Beach Township





William Huelsenbeck, Mayor
Borough of Ship Bottom
whuelsenbeck@shipbottom.org
kdeboer@shipbottom.org




Ship Bottom


Robert Henken, Mayor
Township of Stafford
rhenken@staffordnj.gov




Ronald DeBaecke, Mayor
North Hanover Township





Hon. Donald E. Fetzer, Mayor
Borough of Sea Girt

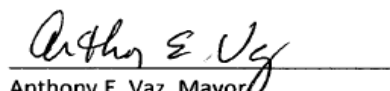



Scott Sipos, Mayor
Raritan Township
Scott.sipos@raritantwpnj.gov




Michael W. Mangan, Mayor
Borough of Manasquan

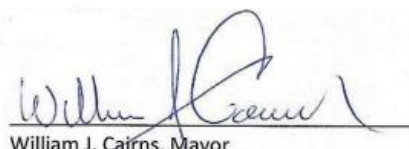



Anthony E. Vaz, Mayor
Borough of Seaside Heights
mayor@seaside-heightsnj.org





James F. Ulrich
Business Administrator
Township of Clark

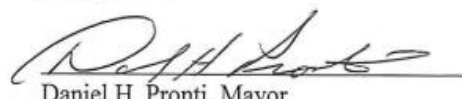



William J. Cairns, Mayor
Borough of Beachwood
mayorcairns@beachwoodusa.com




Mark Taylor, Mayor
Borough of Florham Park
mtaylor@fpboro.net




Daniel H. Pronti, Mayor
Borough of North Arlington
DPronti@NorthArlington.org



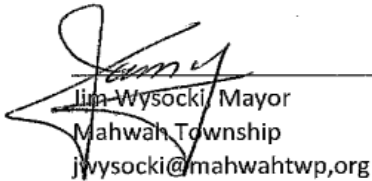


Kimberly Paterson
StopTheHighRiskPowerCables.org
KimberlyPaterson53@gmail.com

**STOP THE HIGH-RISK
POWER CABLES**



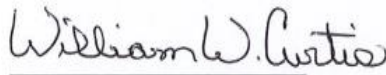
Peter J. Melchionne, Mayor
Township of Wyckoff, County of Bergen
pmelchionne@wyckoffnj.gov



Jim Wysocki, Mayor
Mahwah Township
jwysocki@mahwahwp.org



Kristan Marter
Mayor



William W. Curtis, Mayor
Borough of Bay Head
bcurtis@bayheadnj.us



Robert A. Sabosik, Mayor
Borough of Point Pleasant
Mayorsabosik@ptboro.com



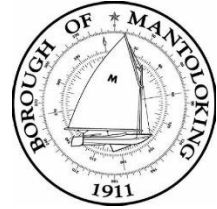
Dominick Cuzzo, Mayor
Plumsted Township
dcuzzo@plumsted.org




Keith W. Moore
Defend Our Beaches NJ



E. Laurence White, Mayor
Borough of Mantoloking



Theresa Berger, Mayor



Michael Collins, Mayor
Margate City
Mcollins@margate-nj.com



Kirk O. Larson
Borough of Barnegat Light
mayor@barnegatlight.org



BOROUGH OF
**BARNEGAT
LIGHT**

Lisa Crate, Mayor
Township of Brick



Township of
BRICK

John M. Imperiale, Mayor
Borough of Harvey Cedars
jimperial@harveycedars.org



Don Cabrera, Mayor
Borough of Wildwood Crest
dcabrera@wildwoodcrest.org



Michael Reina
Mayor, Jackson Township
mikereina@jacksontwpnj.net



Vincent Sera, Mayor
City of Brigantine Beach
vsera@brigantinebeachnj.com



Blaise Scibetta, Mayor
Little Egg Harbor Township
Email: bscibetta@leht.com



James A. Bertino
Commissioner District 5



Richard R. Dase
Commissioner District 4



John W. Risley
Commissioner-at-Large



June Byrnes
Commissioner-at-Large



Andrew W. Parker
Commissioner District 3



H. Timothy Kriebel, Mayor
Ventnor City
tkriebel@ventnorchity.org



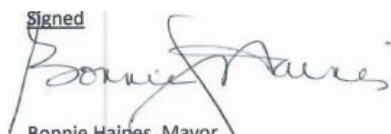
Melissa Dabal, Mayor
Wallington
wallington.org




Rose Araneo
Mayor, Borough of Keyport
mayoraraneo@keyportonline.com




Signed


Bonnie Haines, Mayor
Borough of Pemberton
bhaines@pemberton.comcastbiz.net




John V. Lane, Mayor
Borough of Hawthorne
jlane@hawthornenj.org




Benjamin J. Romanik, Mayor
City Of Millville
benjamin.romanik@millvillenj.gov

CITY OF MILLVILLE



'A MAIN STREET NEW JERSEY COMMUNITY'


Name. Linda Karlovitch
Borough of Kenilworth
l.karlovitch@kenilworthnj.org




Mayor Robert Klingel
On behalf of the Washington Township Committee




Christina Kramer
President, Protect Our Coast LINY



CC List: Benjamin.Witherell@bpu.nj.gov
blipman@rpa.nj.gov
board.secretary@bpu.nj.gov
Christine.guhl-sadovy@bpu.nj.gov
kira.lawrence@bpu.nj.gov
Marian.abdou@bpu.nj.gov
Michael.bange@bpu.nj.gov
rll@levitan.com
robert.brabston@bpu.nj.gov
taryn.boland@bpu.nj.gov
veronique.oomen@bpu.nj.gov
caroline.tkachuk@totalenergies.com
christen.wittman@totalenergies.com
Joris.Veldhoven@AtlanticShoresWind.com
Douglas.Perkins@communityoffshorewind.com