

December 19, 2024

Via Electronic Filing & Electronic Mail

Honorable Sherri Golden, Secretary
New Jersey Board of Public Utilities
44 South Clinton Ave., Ste. 314
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Re: **In re the Opening of New Jersey's Third Solicitation for Offshore Wind
Renewable Energy Certifications (OREC)
Board Docket No.: QO22080481**

Dear Secretary Golden:

This Firm represents Invenergy Wind Offshore LLC (“Invenergy” or the “Company”), the developer of the 2,400 MW Leading Light Wind Project (“LLW Project” or the “Project”). On behalf of the Company, please accept this letter Motion to Extend the Stay (“Motion”) previously granted by the Board of Public Utilities (the “Board”) on September 25, 2024.

Background & Requested Relief

On January 24, 2024, following a lengthy and detailed application review process, the Board approved the LLW Project as a Qualified Offshore Wind Project (“QOWP”).¹ At that time, the Board found the Project was in the public interest in that it would provide significant renewable

¹ See *I/M/O the Opening of New Jersey's Third Solicitation for Offshore Wind Renewable Energy Certifications (OREC)*, BPU Docket No. QO22080481, Order Approving Leading Light Wind 2400 MW Project as a Qualified Offshore Wind Project (dated January 24, 2024) [the “January Order”].

energy supplies, establish a diverse and robust offshore wind supply chain in New Jersey, and create good-paying jobs.²

On July 22, 2024, Invenergy filed a Motion for a Stay of the Board’s January Order.³ In support of its Motion, the Company described in detail the challenges it faced in the procurement of critical project equipment due to volatility in the equipment market, as well as the potential impact of that issue on the LLW Project economics.⁴ Given the evolving nature of the situation, Invenergy requested a Stay of the Board’s January Order of approximately five months.

On September 25, 2024, the Board issued an Order granting the Company’s Motion to Stay.⁵ In reaching its decision, the Board noted the important public interest served by the continued development of the LLW Project in terms of meeting the State’s clean energy goals and providing significant environmental and economic benefits to New Jersey.⁶ The Board concluded that staying the January Order to maintain the status quo would “uphold the public interest,” and directed that the January Order was stayed until December 20, 2024.⁷ With the stay set to expire shortly, the Company files this Motion to request an extension of the current stay to May 20, 2025.

² *Id. passim.*

³ *See I/M/O the Opening of New Jersey’s Third Solicitation for Offshore Wind Renewable Energy Certifications (OREC)*, BPU Docket No. QO22080481, Invenergy Wind Offshore LLC’s Motion for a Stay of Order, dated July 22, 2024 [“Motion”].

⁴ *See* Motion and supporting Certification of James Shield.

⁵ *See I/M/O the Opening of New Jersey’s Third Solicitation for Offshore Wind Renewable Energy Certifications (OREC)*, BPU Docket No. QO22080481, and *I/M/O the Board of Public Utilities Offshore Wind Solicitation 3 for 1,200 to 4,000 MW - Invenergy Wind Offshore LLC*, BPU Docket No. QO24010060, Order Granting Motion for Stay (dated September 25, 2024) [“Stay Order”].

⁶ *See* Stay Order, at 6.

⁷ *Id.* at 6-7.

The offshore wind equipment market continues to experience significant price volatility and the Company has not yet identified a solution to that volatility. While Invenergy has not resolved this problem, the Company continues to believe that the LLW Project has the potential to provide significant environmental and economic benefits to New Jersey and its residents. Invenergy has already invested millions of dollars in the LLW Project and continues to invest time and resources in its development. Invenergy remains committed to the LLW Project. The Company simply needs additional time to work through the present challenges.

For the reasons set forth herein, and as detailed in the Company's original Motion and Supporting Brief and Certification, Invenergy hereby respectfully requests an Extension of the Stay to May 20, 2025.

Respectfully submitted,



Colleen A. Foley

cc: Service List

SERVICE LIST

In the Matter of the Opening of New Jersey's
Third Solicitation for Offshore Wind Renewable Energy Certificates (OREC)
BPU Docket No. QO22080481

In the Matter of the Board of Public Utilities
Offshore Wind Solicitation 3 for 1,200 to 4,000 MW – Invenergy Wind Offshore LLC
BPU Docket No. QO24010060

NJ Board of Public Utilities

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