



# NEW ENGLAND FOR OFFSHORE WIND

## Partners:

350 Cape Cod  
The Alliance for Business Leadership  
Association to Preserve Cape Cod  
BlueGreen Alliance  
Bristol Community College  
Ceres  
Clean Energy NH  
Clean Water Action  
CT League of Conservation Voters  
Environment America  
Environmental League of MA  
Green Energy Consumers Alliance  
Health Care Without Harm  
League of Conservation Voters  
Maine Conservation Voters  
Mass Audubon  
National Wildlife Federation  
Natural Resources Council of Maine  
New England Aquarium  
People's Alliance for Clean Energy  
PowerOptions  
Revision Energy  
Salem Alliance for the Environment  
Save the Sound  
Second Nature  
Tufts University  
UMass Amherst  
UMass Boston  
UMass Lowell  
VT Natural Resources Council

## Endorsers:

Amalgamated Bank  
Autonomous Marine Systems  
Ben Hillman & Company  
Cape Cod Climate Change Collab  
Cape Cod Five  
Climate Action Now, Western MA  
Climate Reality Project – MA  
Southcoast  
Coalition for Social Justice  
E. Hampton Clean Energy Task Force  
Eastern CT Green Action  
Elders Climate Action Massachusetts

March 1, 2021

**Commissioner Kate Bailey**  
**NH Public Utilities Commission**  
**21 S Fruit St. #10**  
**Concord, NH 03301**

**Director Dan Burgess**  
**Maine Governor's Energy Office**  
**62 State House Station**  
**Augusta, Maine 04333**

**Energy Undersecretary Judy Chang**  
**MA EO of Energy & Enviro. Affairs**  
**1 Ashburton Place**  
**Boston, MA 02108**

**Commissioner Katie Dykes**  
**CT DEEP**  
**79 Elm Street**  
**Hartford, CT 06106**

**Commissioner June E. Tierney**  
**VT Department of Public Service**  
**112 State Street**  
**Montpelier, VT 05602**

**Commissioner Nicholas Ucci**  
**RI Office of Energy Resources**  
**1 Capitol Hill**  
**Providence, RI 02908**

## **RE: New England States Technical Conferences – Transmission Planning**

Dear Commissioner Bailey, Director Burgess, Undersecretary Chang, Commissioner Dykes, Commissioner Tierney, and Commissioner Ucci,

New England for Offshore Wind appreciates the opportunity to submit comments on the New England States' Technical Conference on Transmission Planning, hosted on February 2<sup>nd</sup>. New England for Offshore wind is a broad-based coalition of over 75 organizations that aims to drive regional collaboration and procurements of responsibly developed offshore wind in New England.

As associations, businesses, environmental and justice organizations, institutions, and labor unions with significant operations in New England, we write to express our support for the New England States' efforts to collaborate regionally on long-range transmission planning. Regional collaboration on transmission planning is essential to our decarbonization efforts and will unlock economies of scale, lower prices, improve reliability, and enable the increased deployment of clean energy resources including offshore wind.

We support the States' Vision Statement recommendations on transmission planning, including:

- Using as a starting point decarbonization analyses and scenarios developed by various States;
- Conducting a system plan for the next three decades;
- Engaging stakeholders; and

**Endorsers (cont'd):**

Energy Efficiency Associates, LLC

Environmental Council of RI

eWind Consultants

Faith Communities Enviro. Network

Flashover LLC

GBPSR

Green Newton

Hollis Line Machine

Iron Workers Local 7

Keuka Energy

Lautec US Inc.

MA AFL-CIO

MassMEP

MCAN

Mills Public Relations

Mothers Out Front

Muggventures

Nashoba Conservation Trust

New Hampshire Audubon

NH Businesses for Social Responsibility

Philip Conkling & Associates

POWER-US | MA

Rhode Island Building Trades

Robert E Derecktor Inc.

Seacoast Anti-Pollution League

Self-Reliance

Turnstone

University of Maine

Vineyard Power Cooperative Inc.

- Right-sizing transmission and exploring non-transmission alternatives to minimize cost.

Energy infrastructure siting including transmission is of particular concern to environmental justice communities in our region. We urge the States to foster a robust stakeholder engagement process that is inclusive from the start to ensure that EJ communities are involved early and often. The transmission planning process should also include an assessment of cumulative impacts to ensure equitable siting.

Overall, the selected planning process for transmission should be a holistic approach grounded in transparency and accountability that considers emissions, environmental justice, and costs/benefits. A transparent planning process for transmission should include the evaluation of alternative options and justification of investment decisions and how they compare to the alternatives. It should also include a process for defining how to allocate costs fairly.

Careful and transparent planning is essential to ensuring the effective expansion of responsibly developed offshore wind in our region.

We support the States' vision to conduct detailed analyses that include understanding future needs for the offshore infrastructure needed to support offshore wind. Offshore wind is our region's best opportunity for new sources of energy and is likely to be the linchpin of our clean energy transition. According to several analyses, New England will need anywhere from 30<sup>1</sup>-45<sup>2</sup> GW of offshore wind to reach net zero by 2050, and that number would increase if more existing power plants (including nuclear stations) retire in the coming decades. Closing the regional fossil fuel plants and replacing them with offshore wind will also reduce pollution and lead to improved air quality and health outcomes in our most vulnerable communities. As with the former Brayton Point coal plant, it is also important to look at these retiring power plants as opportunities for collocation of transmission or points of interconnection, and to study any potential economic benefits or impacts of such a transition on nearby communities.

We urge the New England States to work together to set regional targets for offshore wind for 2030, 2040, and 2050 so that any needed offshore transmission network can be planned. Given geography and our proximity to our neighbors and their planned offshore wind development, we encourage the New England States to consider super-regional coordination with other ISO regions for offshore transmission. A planned approach such as this would minimize costs to ratepayers,

<sup>1</sup> "Massachusetts 2050 Decarbonization Roadmap," *Massachusetts Executive Office of Energy and Environmental Affairs and The Cadmus Group*, <https://www.mass.gov/doc/ma-2050-decarbonization-roadmap/download>.

<sup>2</sup> Weiss, Jürgen and Hagerty, John Michael, "Achieving 80% GHG Reduction in New England by 2050," *The Brattle Group*, slide 11, [https://brattlefiles.blob.core.windows.net/files/17233\\_achieving\\_80\\_percent\\_ghg\\_reduction\\_in\\_new\\_england\\_by\\_20150\\_september\\_2019.pdf](https://brattlefiles.blob.core.windows.net/files/17233_achieving_80_percent_ghg_reduction_in_new_england_by_20150_september_2019.pdf)



increase reliability, and minimize impacts to the environment and our local communities by reducing the amount of new transmission infrastructure needed. A planned approach for offshore transmission should also consider non-transmission alternatives that could optimize offshore wind's contributions to the grid and minimize infrastructure. Failure to plan and develop a shared offshore transmission grid in a timely manner for the next phase of offshore wind projects will result not only in increased impacts and costs, but also force major land-based transmission system upgrades, including in areas where there are sensitive, biologically diverse habitats.

Thank you for the opportunity to comment on this conference on transmission planning. We commend the New England States for collaborating regionally on working to conduct long-range planning that will ensure the integration of an expanding clean energy portfolio including offshore wind. We look forward to working with your offices to ensure the responsible build-out of offshore wind in our region.

Sincerely,

Susannah Hatch, Regional Lead  
**New England for Offshore Wind**

