October 28 2022

New England States Transmission Initiative
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To Whom It May Concern,

Mainstream Renewable Power (Mainstream) is pleased to provide the following comments regarding the New England Energy Vision's Transmission Initiative. We commend the Participating States' respective renewable energy and decarbonization commitments, and the collective, stakeholder-focused initiative of identifying and pursuing the most cost-effective transmission solutions to achieve these goals. As a developer of offshore wind projects, Mainstream very much welcomes the opportunity to provide comments for consideration in these early stages and looks forward to engaging further with the Participating States.

Mainstream Renewable Power is a global renewable energy company with over 17.1 gigawatts (GW) in wind and solar assets. Our unique vision to electrify the world with renewable energy has driven our growth across five continents. The company is firmly on track to becoming a global pure-play renewable energy major and is focused on expanding its current development portfolio of 27GW with plans to bring 5.5GW to financial close by 2023.

Mainstream is a leading developer of offshore wind at scale globally and since 2008 has developed over 3GW of projects in Europe, including Hornsea One and Hornsea Two in England and Neart na Gaoithe in Scotland. These projects represent 20% of the UK's offshore wind capacity either in operation or under construction. In the most recent ScotWind leasing round Mainstream, as part of a 50:50 partnership with Ocean Winds, was appointed preferred bidder by Crown Estate Scotland, which will result in the development of one of the largest floating offshore wind projects in the world at 1.8GW. Mainstream's Centre of Excellence for Offshore Wind is focused on de-risking the best development sites, identifying the best partners for growth, and innovating to deliver best value. In the US, we are currently focused on drawing on our experience in Europe and Asia to support the country's goals to implement 30GW of new offshore capacity by 2030.

<u>Comments on the Regional Transmission Initiative:</u>

This effort on behalf of the member states of the ISO New England's member states is an opportunity to identify a more cost effective and collaborative strategy for delivering on the region's broader decarbonization and energy security goals. A 2019 study by the Brattle Group concluded that at least 100 GW of new renewable energy capacity would be needed to supply the New England states' existing greenhouse gas reduction goals[1]. Economy-wide decarbonization of 80% by 2050 will require electrification across multiple sectors and drive load growth that must be met with renewable sources of electricity. Given the geographic characteristics of New England and distribution of its load centers,

[1] "Achieving 80% GHG Reduction in New England by 2050," Brattle Group. September 2019.

substantial new transmission investments will be required to meet these goals. Mainstream encourages New England states to think far beyond immediate interconnection pipelines and interim targets and look to the 2050 vision when planning its transmission approach.

Strengthening interregional connections that facilitate imports from other regions will be essential to the delivery of 100+ GW of new renewables to the New England electricity grid. These interregional connections can serve to balance generation and demand across an even larger footprint, mitigate supply constraints, and reduce costs for ratepayers. A holistic, coordinated, and long-range planning process for integration of new renewables into the grid should reduce duplicative investments while minimizing stakeholder impacts and boosting investment certainty for project developers in the region.

Comments on Changes and Upgrades to the Regional Electric Transmission System Needed to Integrate Renewable Energy Resources:

4. **Comment on whether certain projects should be prioritized and why. For example, should a HVDC offshore project that eliminates the need for major land based upgrades be prioritized over another HVDC offshore project that does not eliminate such upgrades;**

   As seen with the ongoing challenges to the New England Clean Energy Connect (NECEC) transmission line project, the development of new land-based transmission lines carries substantial stakeholder and multi-jurisdictional risk. Prioritizing offshore transmission that minimizes the need for substantial land-based upgrades would also minimize stakeholder impact and streamline jurisdictional authorities, reducing overall project risk.

7. **Comment on the region's ability to use offshore HVDC transmission lines to facilitate interregional transmission in the future;**

   New England's transmission and land-use constraints limit the amount of utility-scale renewable energy that can be reasonably developed to meet the region's decarbonization goals. According to a 2019 study conducted by Brattle, it is estimated that New England will require at least 100 GW of new utility-scale renewables to come online by 2050 to meet the region's existing goals[2]. Offshore HVDC transmission lines that deliver renewable energy produced in other regions into New England will likely be required for the region to meet its goals. Shifting this transmission to the offshore environment reduces stakeholder impacts and streamlines jurisdictional authorities. New England ISO should engage in a robust dialogue with neighboring ISOs and RTOs on the East Coast, such as NYISO and PJM, as well as Canadian regulators in the Maritime provinces where offshore wind development is being actively contemplated.

8. **Comment on how to develop transmission solutions that maximize the reliability and economic benefits of regional clean energy resources.**

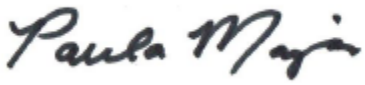
   Transmission solutions that help deliver energy produced in other regions to the New England grid can offer immediate local economic development benefits during transmission system

[2] Brattle, September 2019.

construction and long-term benefits from reduced energy prices by diversifying the supply of energy that is available in the regional market. These imports would also help reduce potential supply disruption due to localized weather conditions and carry an associated economic benefit from avoided productivity losses and market price volatility.

Mainstream Renewable Power thanks the Participating States for the consideration of these comments. We are eager to participate in continued engagement on the opportunity for offshore wind development in the region, and the efficient, cost-effective transmission solutions that will best enable deployment.

Sincerely,



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