



February 24, 2021

Partners:

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
350 Cape Cod

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

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

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

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

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

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

RE: New England States Technical Conferences – Wholesale Market Design

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 Conferences on Wholesale Market Design, hosted on January 13th and 25th. 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 to design a market that appropriately values clean energy resources and that aligns with states' climate mandates. Regional collaboration is a necessary precondition for attaining New England's potential as a leader in offshore wind – such collaboration will unlock economies of scale, accelerate development, and improve project outcomes across the six-state grid we share.

We also support the States' recommendation to “establish effective market mechanisms that accommodate existing and future long-term contracts for clean energy resources executed pursuant to state law.” Procurements are important tools to deliver social, economic, and

Endorsers:

Autonomous Marine Systems
Ben Hillman & Company
Burns & McDonnell
Cape Cod Climate Change Collab
Cape Cod Five
Clean Air Task Force
Climate Action Now, Western MA
Climate Reality Project – MA Southcoast
Coalition for Social Justice
CT Sustainable Business Council
E. Hampton Clean Energy Task Force

Endorsers (cont'd):

Eastern CT Green Action
Elders Climate Action Massachusetts
Energy Efficiency Associates, LLC
Environmental Council of RI
Faith Communities Enviro. Network
Flashover LLC
GBPSR
Green Newton
Hollis Line Machine
Iron Workers Local 7
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.

environmental benefits such as environmental and wildlife protection, equity, and economic development. We urge the New England states to ensure that any future clean energy market design values these benefits appropriately.

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 30¹-45² 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. With the scale of offshore wind needed for decarbonization and the urgency of climate change – and in recognition that creating a new regional clean energy market will be a lengthy process – moving forward on offshore wind cannot wait. As our region moves toward a new market design, we urge you to continue to push offshore wind procurements forward and collaborate regionally to the extent possible to capture economies of scale as well as regional social and economic benefits.

Thank you for the opportunity to comment on these conferences on wholesale market reform. We commend the New England States for collaborating regionally on working to design a market that fairly values clean energy resources, and 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

¹ "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>.

² 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

