

March 1, 2021

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

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 – 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 2nd. 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 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. 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,

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



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

