

Date: 26 October 2022

To: Regional Transmission Initiative (5 New England Participating States)
transmission@newenglandenergyvision.com

From: Falmouth Heights - Maravista Neighborhood Association, Inc (FHMNA)
info@fhmna.org

Re: Regional Transmission Initiative / Request for Information

We write with respect to the Request for Information (RFI) issued on 1 September 2022, seeking comments on the *Modular Offshore Wind Integration Plan / Conceptual Framework for New England*.

Falmouth Heights - Maravista Neighborhood Association (FHMNA) is an organization representing approximately 400 households / nearly 500 individuals in Falmouth, MA who will potentially be “directly impacted stakeholders” by Mayflower Wind Energy’s provisional intentions to utilize Falmouth Heights as a “Points of Interconnection” (POI’s) for both their preferred and alternate routes for onboarding 1200mw/300,000v transmission cables. It should be noted that Mayflower’s application to the MA/EFSB is currently “temporarily suspended” pending their refiling, while maintaining their intentions for Falmouth.

As an organization we have been closely following the development of the MA wind generated clean energy initiative off the MA / New England coast for over 2 years, and we are supportive of same. We do, however, oppose Mayflower’s intention to place their transmission cables under the public beach, park, playground, and roads of our densely populated residential community.

We have reviewed nearly all filings by Mayflower, have attended informational zoom presentations, as well as attended a Town of Falmouth hosted public forum with Mayflower. We have followed closely the MA/BOEM, and MA/EFSB filings related to Mayflower. We are familiar with *the MA / Decarbonization Roadmap*, *ISO/NE studies*, have reviewed the *Modular Offshore Wind Integration Plan (MOWIP)*, and attended the *Regional Transmission Initiative / Technical Zoom Meeting* on 7 October 2022.

Our comment on this matter is our concern with the number of offshore leases and the resulting routing of transmission cables emanating from each. Until present, the individual offshore wind farms have individually and randomly selected and negotiated to onboard their transmission cables at various coastal locations. From a review of these locations, it appears that the lessees are selecting locations based on the closest point of approach to land based landing sites as opposed to where the generated power is ultimately required (the NE grid), thereby resulting in the construction of extensive and costly land based, infrastructure upgrades. While it is clear however from various studies that the NE grid must be substantially upgraded to accommodate the next phase of wind generated power, why not coordinate this effort to bring the power directly to the point of need?

At the RTI / Technical Zoom Meeting on 7Oct2022, the representative from the ANABARIC Group made a presentation citing findings of the BRATTLE Group 2020 study, promoting the idea of a Better Planned Approach for offshore transmission and onshore upgrades to minimize costs and risks. Ideas such as the grouping of offshore cables, reduced offshore trenching, and perhaps even offshore collection stations would reduce environmental impact and would be cost effective. We are in agreement with ANBARIC

and BRATTLE, and believe that a thoughtful, well planned, coordinated, consolidated REGIONAL approach is necessary. Such an approach would be cost saving for both transmission as well as shore-based infrastructure upgrading, with better utilization of landing sites and thereby hopefully alleviating the need to utilize densely populated residential communities such as ours.

Respectfully submitted,

David Buzanoski, President
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