

Subject: Comments on the REGIONAL TRANSMISSION INITIATIVE September 21, 2022

These comments are those of a National Grid customer living in the Newburyport MA area North of Boston.

HVDC links are an appropriate transmission facility for interconnecting offshore wind with the onshore grid by bundling capacity into fewer HVDC cable vs multiple AC cables. A DC link can prove in at less than 50 miles for submarine cables which typically have high AC reactance from capacitive loading . However, the cost of the proposed ~150 mile cable to Mystic could be well in excess of \$300 million. We should be investing in close-to-shore wind energy North of the Cape that can reach points of interconnection at Mystic Boston, Salen Harbor (Footprint), and the West Amesbury substation on the Merrimack River that currently connects with Seabrook Nuclear at Hampton Harbor.

I believe a proposal for a HVDC link from the Vineyard Haven offshore wind farm to Mystic Boston is premature at best. I see no plan and no activity for offshore wind in the Gulf of Maine¹. An important requirement for locating a generating resource, particularly renewable energy, is that it should be close to the load center that it serves. Transmission costs are almost half the electric bill. We will need wind farms off the Massachusetts shore North of the cape to replace the retirement of Seabrook, Salem harbor Footprint, Boston Mystic and many other fossil fuel plants. In fact the RFI states in paragraph 2:

“The Participating States agree that New England and the Northeast region have important renewable energy resource potential, including offshore wind resource areas, in near proximity to load centers and that these resources will be an important element in meeting state goals”.

The BOEM² has partitioned over 13 million acres of the Gulf of Maine into leasable blocks for wind farms.

According to an ISO-NE study existing points of interconnection at Brayton Point and landing points South of Cape Cod have sufficient available transmission capacity to handle 5800 MW from offshore wind. In the meantime we shouldn't be investing in a 150 mile Mystic link for backup or curtailment avoidance of South of the Cape wind farms.

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1 Except for a small research project by the University of Maine for a deepwater floating wind turbine

2 Bureau of Energy Management

