

Sent via email to MARFP83C@gmail.com

February 22, 2021

Re: DRAFT Request for Proposals for Long-Term Contracts for Offshore Wind Energy Projects

To Whom It May Concern:

On behalf of the over 3,500 cross-industry leading business members of the Associated Industries of Massachusetts (AIM), I would like to offer our comments relative to the February 8, 2021 *Draft Request for Proposals for Long-Term Contracts for Offshore Wind Energy Projects*.

This planned solicitation would be the third offshore wind energy solicitation and is part of a procurement schedule developed by the Distribution Companies and DOER in accordance with Section 21(a) of Chapter 227 of the Acts of 2018. The Distribution Companies must enter into cost-effective contracts for offshore wind energy generation equal to an additional approximately 1600 MW of aggregate nameplate capacity not later than December 31, 2035. All proposals in this RFP must provide for a scheduled commercial operation date before January 1, 2030.

Comments are due by February 23, 2021.

As you know, AIM supports the clean energy goals of the commonwealth. The ability to procure and build large amount of offshore wind is one of the most important components needed to meet that goal. This solicitation is particularly important because it will likely be the final project to come online before 2030, a milestone year for meeting our 2050 greenhouse gas reduction goals.

Through all the previous solicitations we have been impressed by the aggressive timelines and commend you for the aggressive timelines in this RFP. We have also been encouraged by the transparent process and robust review of previous solicitations.

Pricing of course, remains one of the success stories of the offshore wind solicitation process. AIM supported the original requirement that all solicitations not only be cost-effective but competitively bid. This requirement alone has resulted in savings to ratepayers of hundreds of millions of dollars and proved that competition can work.

In fact, that requirement (and the one that requires the levelized price of each new solicitation be lower than the previous one) has been so successful that this solicitation requires a levelized pricing of less than \$77.76/MWh (the levelized price from the contracts executed by the Distribution Companies with Mayflower Wind Energy, LLC in the 2019 83C procurement), an unheard-of price that is only possible due to the robust competition that comes from having the proper laws in place.

And things could be even better, as the price to beat requirement does not include the likelihood of lower prices due to changes to the federal Offshore Wind Energy Investment Tax Credit.

Finally, AIM is particularly encouraged by the new additions in Section 2.3.2.

This section, updated in this RFP, now includes a requirement for the bidder to provide their strategy to enable access to employment and opportunities for historically marginalized communities (including but not limited to Black, Indigenous and people of color, LGBTQ communities, veterans, immigrants, women, and gender minorities), including their strategy to ensure vendors utilized are committed to enabling the same.

Also, they must include their investment in workforce development, including partnerships with vocational and technical schools, community colleges, labor groups, and community-based organizations to create paid training, internship, and apprenticeship programs.

Both additions are important components to making sure that the offshore wind projects not only reduce greenhouse gases but also spreads the economic gain through a large portion of previously excluded segments of our population.

This challenge is also an important component of AIM's Diversity, Equity, and Inclusion (DEI) campaign. While we know that DOER and others have always tried to be inclusive, we are happy to see such language included in writing for the very first time. AIM would be a willing partner in any outreach needed to help the projects meet these targets.

Thank you for the opportunity to comment on this proposal. Should you have any questions please do not hesitate to contact me at 617-488-8308.

Sincerely yours,



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Government Affairs