

Via Electronic Mail

February 25, 2021

Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street
Boston, MA 02110

Re: Draft RFP for Long-Term Contracts for Offshore Wind Energy Projects

Dear Commissioner Woodcock:

The Northeast Clean Energy Council (“NECEC”) appreciates the opportunity to provide this comment letter in response to February 8, 2021 Request for Public Comment from the Department of Energy Resources (“DOER”) and the Massachusetts Electric Distribution Companies (the “EDCs”) (collectively, the “Procurement Team”) on the DRAFT Request for Proposals for Long-Term Contracts for Offshore Wind Energy Projects (the “Draft RFP”). This proposed solicitation represents a significant opportunity to advance the clean energy transition in the Commonwealth and to achieve its 2030 greenhouse gas reduction targets.

NECEC is a clean energy business, policy, and innovation organization whose mission is to create a world-class clean energy hub in the Northeast, delivering global impact with economic, energy and environmental solutions. NECEC is the only organization in the Northeast that covers all of the clean energy market segments, representing the business perspectives of investors and clean energy companies across every stage of development. NECEC members span the broad spectrum of the clean energy industry, including clean transportation, energy efficiency, wind, solar, energy storage, microgrids, fuel cells, and advanced and “smart” technologies.

At the outset, NECEC acknowledges the opportunity that Massachusetts and other Northeast states have to harness the abundant wind energy resources in our oceans. The Administration and Legislature have appropriately recognized that offshore wind represents the promise of economic and workforce development, in addition to much needed clean electricity. As such, we encourage DOER and the EDCs to structure the RFP and to review bids through the lens of maximizing a variety of benefits for all populations and communities. In addition, this process does not occur in a vacuum and it is essential that the Procurement Team be mindful of other procurement activity in the region in order to coordinate where possible and to avoid unnecessary confusion in the marketplace.

First, we encourage the Procurement Team to approach the RFP and bid selection processes with an eye to maximizing the amount of offshore wind capacity procured up to the 1,600 MW target. To achieve a 45% reduction in GHG emissions by 2030, as called for in the December 30, 2020 Determination of Statewide Emissions Limit For 2030 Pursuant to the Global Warming

Solutions Act by Secretary Theoharides, requires a dramatic increase in zero carbon energy. This RFP process is a chance to make a meaningful contribution to that target.

Second, we recommend that the RFP require explicit criteria to ensure that the economic development benefits will create meaningful opportunities for minorities and disadvantaged workers and will protect Environmental Justice populations. Such criteria must be explicit in the RFP requirements and be part of the bid evaluation process.

Third, the RFP should recognize the value that offshore wind resources can provide to the grid. As such, we recommend that the Procurement Team consider including flexibility in RFP responses to allow for strategies, including the deployment of energy storage, that will maximize the value of offshore wind to be maximized rather than risk curtailment of a valuable resource.

Fourth, we recommend that the RFP process provide as much clarity around the specific information required of bidders and the criteria upon which bids will be assessed. Providing a common understanding among all bidders will ensure a competitive process that delivers maximum benefits to the ratepayers, citizens and businesses of the Commonwealth.

NECEC appreciates the opportunity to provide these comments.

Sincerely,



Jeremy McDiarmid
Vice President, Policy & Government Affairs