Email: fpullaro@renew-ne.org
Web: renew-ne.org

June 13, 2025

By email to Chris.Connolly2@mass.gov and marfp83C@gmail.com

Chris Connolly
Clean Energy Coordinator
Department of Energy Resources
Commonwealth of Massachusetts
100 Cambridge St.
Boston, MA 02114

Subject: Massachusetts Section 83C Round 5 Offshore Wind Solicitation

Mr. Connolly:

RENEW Northeast, Inc. ("RENEW")[1] submits these comments in response to the Department of Energy Resources' ("DOER" or "Department") request for comment on the Section 83C Round 5 Offshore Wind Solicitation ("Round 5 RFP"). RENEW thanks DOER for its work preparing questions about the RFP and for giving the public an opportunity to comment. Many of RENEW's responses today build on the positions RENEW submitted in its March 17, 2025, and May 13, 2025, comments on the Department on its Massachusetts Solicitation and Procurement Effectiveness Report ("Report").

While Section 83C requires the next RFP be issued by August 30, 2025, RENEW supports extending the deadline for release of the Round 5 RFP to a later date that would allow for resolution of federal policy questions and for the completion of the Round 4 RFP. This would promote success in the solicitation. RENEW recommends in the fourth quarter of 2025 that DOER issue an RFI to survey bidders for information on the latest developments with federal policy and supply chain and enable additional comments that can assist the Department on the schedule and design of the Round 5 RFP that will ensure a successful process. The RFI should be paired with a draft RFP to provide opportunity for feedback on DOER's proposal for addressing the industry's concerns.

Questions 1 – 3. Bid Interest, Contract Provisions, Bidder Meeting(s)

RENEW refers DOER to the individual comments of its offshore wind developer members on these topics.

[1] The comments expressed herein represent the views of RENEW and not necessarily those of any particular member of RENEW.

Question 4. Federal Permitting

DOER seeks feedback on how the Round 5 RFP can be designed to mitigate against risks pertaining to federal permitting and approval as a result of the January 20, 2025, Executive Order and Secretary of the Interior review of existing wind energy leasing and permitting.[2]

The presidential memorandum, *Temporary Withdrawal of All Areas on the Outer Continental Shelf from Offshore Wind Leasing and Review of the Federal Government's Leasing and Permitting Practices for Wind Projects* (the "PM"), withdraws all unleased outer continental shelf ("OCS") lands from offshore wind leasing. While the PM uses the word "temporary," the Outer Continental Shelf Lands Act does not authorize the president to reinstate only withdraw.[3] During the first Trump administration, areas were withdrawn from leasing with a delayed start date and specific time frame for that withdrawal (10 years), however, no such provision was articulated in the PM. The PM also requires the Department of the Interior ("DOI"), in consultation with the U.S. Attorney General ("AG") to conduct a comprehensive review of the ecological, economic, and environmental necessity of terminating or amending any existing wind energy leases (identifying any legal bases for such removal) and submit a report with recommendations to the President. This is written broadly enough where it could potentially apply to existing leases and even those with approved construction and operation plans ("COPs").

The second section of the PM directs federal agencies to not issue new or renewed approvals, rights of way, permits, leases, or loans for onshore or offshore wind projects pending completion of a comprehensive assessment and review of Federal wind leasing and permitting practices. The assessment is to consider the environmental impact of onshore and offshore wind projects upon wildlife, including to birds and marine mammals, and the economic costs associated with "the intermittent generation of electricity and the effect of subsidies on the viability of the wind industry."[4]

The risks presented by the PM include lack of certainty that wind projects across the US will be permitted during the Trump Administration. The "temporary cessation" appears to be indefinite as there is no timeline on the required assessment, which is to be led by the Secretary of the Interior, nor any explanation of what circumstances would allow permitting to re-start.

The PM has also been used as the basis for a stop work order which halted construction on an offshore wind project located in the New York Bight. Although the stop work order was subsequently lifted, the delays cost the project a reported $50 million per week. Today, there are five offshore wind projects under construction, several others with full COP approval and more than a dozen projects in the federal permitting pipeline. Without certainty that the federal assessment required by the PM will be completed in a timely and science-based manner and because the PM is being used to delay project approvals, there is a large amount of uncertainty

[2] 90 Fed. Reg. 8363 (Jan. 29, 2025).
[3] 43 U.S.C. 1341(a).
[4] *Id.*

within the industry. This uncertainty raises the risk profile for investment in wind projects and will likely impact project timelines.

Currently, the PM has been challenged by the Attorneys General from 17 states and the Alliance for Clean Energy New York. The outcome of the case remains to be determined. Injunctive relief from the court could provide much-needed certainty at the federal level. If the court were to rule in favor of the federal government, the permitting pause initiated by the PM has the potential to last through the tenure of the Trump Administration and significantly slow down industry progress.

To mitigate risks associated with the wind PM, DOER should provide flexibility in the procurement and contracting process to ensure offshore wind is deployed in a reliable, responsible, and affordable way. Offshore wind development requires careful execution of hundreds of steps. Following a lease sale, there is a minimum of 5 to 6 years of federal permitting, negotiation of U.S. and global supply chain contracts, securing vessels for each stage of project installation, completing land and interconnection agreements, hiring a workforce for engineering, construction, installation, operations and maintenance. Extensive resources are deployed years in advance to ensure the logistics are in place to meet the specific sequence required to build an offshore wind project. A nascent offshore wind industry is not well-positioned to comply with stringent procurement programs that establish inflexible requirements (supply chain commitments, operational milestones, etc.) and create early industry interdependencies. This system has resulted in contract cancellations and re-bids and injects additional financial risk into the process. A federal permitting slowdown adds additional complications to an already complex process.

Flexibility should extend to project milestones. Exogenous forces may mean that variations or extensions of important project milestones must be required. Improved flexibility ensures developers can make short term project adjustments to minimize or mitigate impacts to state clean energy and climate goals.

Contracts should contain measures that diminish the risks of changes in law (e.g., delays or moratoriums on federal permitting) that otherwise would materially impair a project's ability to secure financing and proceed with development. Suggested measures could include modifying contract security requirements and termination provisions up until Financial Close – allowing for developers to address and work on supply chain, interconnection and permitting without risking significant financial commitment. Contracts should contain a clause that eliminates the termination penalty or at the least limits penalties to situations in which a developer is at fault.

Question 5. Project Viability

The Round 5 RFP should be designed to best support developers in ensuring project viability while mitigating against negative financial risks for ratepayers of the Commonwealth. The Round 5 RFP should address potential change in law risks such as elimination of, or changes to, the federal Investment Tax Credit ("ITC") for offshore wind as well as the threat of federal tariffs on imports. A significant portion of developer bids is affected by the ITC. Current and

future proposed changes to how the ITCs are allocated would therefore have large impacts on PPA prices developers can offer. Under these circumstances, this RFP should contain a provision that addresses any occurrence involving a substantial change to federal tax incentives, domestic content requirements, or import tariffs by activation of a price adjustment clause in the contract. Through this adjustment, the Commonwealth shares in the risks of changes in law that otherwise would materially impair a project's ability to secure financing and proceed with development.

The Round 5 RFP should also include an amendment to account for swings in inflation. Contracts should account for unforeseen inflationary circumstances such as through a pricing adjustment to ensure the viability of awarded contracts. RENEW and its members have submitted various proposals to DOER for indexing and pricing adjustments during the fourth Massachusetts offshore wind RFP process.[5] An appropriately dynamic mechanism or set of mechanisms accounting for macroeconomic risks that impact pricing will enable more bidder participation and project viability, as discussed in response to Question 7.

To be effective, the magnitude of the contract price adjustment must accurately reflect the magnitude of interest rate changes and consider other corresponding macroeconomic factors. Such mechanisms should be bidirectional to provide potential benefit to ratepayers.

Question 6. Procurement Schedule

The Round 4 RFP established a yearlong schedule for the bidding process.[6] Generally, the Section 83C solicitation schedule should consist of a predictable schedule for procurements that will, according to an analysis prepared for RENEW, keep Massachusetts on a trajectory to meet greenhouse gas reduction requirements over the next decade.[7] To ensure consumers benefit from the federal tax credits and promote robust competition in the RFP, RENEW strongly recommends the Round 5 RFP schedule be based on issuance of the RFP in 2026, and ensuring that DPU approval is achieved by mid-2027. The RFP issuance and selection dates should be set to ensure that the dates for execution and approval of the PPAs can be safely achieved.

Once an RFP is issued, RENEW recommends that DOER hold a clear and an expeditious process from RFP to contract execution to reduce the chance of a bid price becoming obsolete due to intervening factors during the course of contract execution. This includes a shortened timeline between draft and final RFP, and under a year between bid material preparation and final contract signature. During this time, RENEW encourages DOER to engage in bidder meetings to support a more expeditious bidding process and allow for timely discussion and follow-up questions/clarifications.

---

[5] D.P.U. 23-42, Request for Proposals for Long-Term Contracts for Offshore Wind Energy Projects, Section 1.1. In its August 23, 2023, Order, the Department supported the inclusion of an indexed price bid option in the RFP as a valid mechanism to promote project viability and mitigate risk due to the inflationary environment. (57).
[6] 83C Round 4 RFP, Section 3.1.
[7] Power Advisory, Massachusetts Clean Energy Procurement Needs (October 21, 2024), https://drive.google.com/file/d/1HyHDOfSJhZaWIYNftdioTxZ7HP960lpQ/view

Question 7. Inflation, Supply Chain, and Macroeconomic Factors:

Similar to RENEW's response to question 4 concerning federal permitting, DOER should ensure the contracts help manage macroeconomic risks that are very dynamic. For example, it is impossible to predict what tariffs will be in place or the level of inflation when projects reach their financial investment decision milestone, which is the appropriate milestone for bidders to understand appropriate and necessary price adjustments. For these reasons, RENEW advises against DOER requiring bidders to identify the anticipated price impact of tariffs in their contract. Instead, DOER should consider adopting a more dynamic mechanism that allows the price to adjust bidirectionally based on these market factors. The design of this mechanism and contract provision should be clarified through further engagement with developers.

These mechanisms should remain bidirectional to provide potential benefit to ratepayers. RENEW further recommends DOER host additional stakeholder sessions to discuss the finer points in designing and implementing any pricing mechanism that quantifies the risks associated with tariffs, supply chain, and other macroeconomic factors. This would enable DOER to develop a mechanism that works for prospective bidders and not arbitrarily limit participation in the upcoming Round 5 RFP.

Question 8. Procurement Size

RENEW has assented to the Section 83C RFPs having a procurement size consisting of a floor of 400 megawatts and a maximum amount being the remaining statutory requirement under Section 83C of 5,600 megawatts.[8] Based on the outcomes in previous Section 83C RFPs, RENEW observes, however, that bids of 400 megawatts or of a similarly small size are unlikely to be successful or might not even be offered in the RFP.

Question 9. Project Size

RENEW has no objection to DOER implementing similar project size restrictions as those implemented in the 83C Round 4 RFP that allowed bidders to offer proposals from 200 megawatts up to 2,400 megawatts.[9] Again, past experience suggests that DOER is unlikely to see bids on the small end of the spectrum. DOER should not place constraints on the preferred bid size. ISO New England ("ISO-NE" or "ISO") has provided preliminary information that appears to indicate a possibility that the existing system could remain reliable with a New England loss of source limit as high as 1,800 megawatts without the need for transmission upgrades. Depending on the additional time for the ISO, NYISO, and PJM to come to agreement on the new limit and how it will be preserved by each region, the change to a higher single source limit may support allowing proposals that are greater than 2,400 megawatts.

Additionally, Section 2.2.1.2 of the Round 4 RFP precludes bidders from submitting proposals with positive contingent bids. RENEW supports allowing bidders to submit limited positive contingent bids based on the interaction between Massachusetts' RFP and that of at least

[8] *See e.g.,* 83C Round 4 RFP, Sections 1.1, 2.2.1.2.
[9] *Id.*

one other state having a concurrent RFP (e.g., bid A into the Massachusetts Section 83C RFP cannot be accepted unless bid B into another's states RFP is also accepted). Limited positive contingent bids could enable bidders to increase scale economies and correspondingly offer lower prices into the Round 4 RFP.

Question 10. Commercial Operation Date

Commercial operation date ("COD") requirements must recognize the length of time for a project to pass the interconnection queue and state and local permitting process. Requirements must respect that both estimated cost and time to construct interconnection facilities and network upgrades identified by ISO-NE during the interconnection study process have grown substantially in recent years, with little to no explanation. Further, given the potential for challenges in federal permitting, RENEW recommends the RFP not contain a firm COD deadline.

Question 11. Transmission and Interconnection

A. Onshore Transmission System

DOER seeks feedback on how the Round 5 RFP can be designed to maximize efficient use of the onshore transmission system and how it might be integrated with the reformed ISO-NE interconnection process. RENEW stands for offshore wind transmission development policies that: (1) are most likely to enable responsible development of offshore wind at the lowest cost and risk to ratepayers; (2) give the leaseholders and independent transmission developers discretion on interconnection points for them to select the most cost-effective, environmentally friendly, and reliable interconnection for their projects; (3) maintain existing contractual arrangements; (4) recognize the situation of generation projects in advanced permitting and interconnection queue processing; and (5) achieve near term state offshore wind goals while enabling full development of the Northeast's offshore wind resource.

RENEW recommends DOER work with developers, other states, and stakeholders on a transmission planning process to meet effectively and efficiently the Commonwealth's energy and climate goals. Optimizing interconnection of new resources – particularly offshore wind – is one of the most important contributions that the ISO-NE 2050 Transmission Study has made to planning transmission solutions for the region. The Department can use the findings of the 2050 study as a guide and an independent reference when reviewing proposals, however it cannot use it as a sole source as the study was limited and only provided "potential" interconnection points and did not evaluate the stability of the system. Individual developers would not be able to anticipate the interaction of their interconnection with that of a competing project's interconnection on the New England onshore transmission system, but the 2050 study results allow the Department to consider possible interactions when reviewing proposals to minimize unanticipated consequences of selecting projects that would cumulatively require further onshore upgrades than what has been identified in their individual proposals.

For subsequent offshore wind RFPs, the Department should identify preferred points of interconnection for offshore wind that will encourage regionalization of transmission, e.g.,

through Longer-Term Transmission Planning ("LTTP") procurement, and minimize costs and delays while improving environmental outcomes. The Commonwealth can leverage its ability to work within regional processes to plan transmission to serve the offshore wind build-out. This proactive transmission planning has regional benefits and can reduce developer exposure- in turn reducing the risk premium developers would have to account for with interconnection and transmission upgrades.

B. Interconnection Requirements

Under the new Order 2023 process, the identification of transmission system upgrades needed to meet the Capacity Credibility Interconnection Standard ("CCIS requirement"), or to interconnect at a CCIS-equivalent, are identified through the cluster interconnection study process. Obtaining CCIS or a CCIS-equivalent interconnection may or may not require additional upgrades to be built beyond what would be required for Network Resource Interconnection Service ("NRIS") (energy interconnection service), but there is no longer any way to obtain CCIS outside of the interconnection process. The offshore wind project would need to go through the interconnection cluster study process for both NRIS and Capacity Network Resource Interconnection Service ("CNRIS") (capacity interconnection service) under the new process; they become equivalent to each other in terms of the process to get them.

In addition to the recently approved changes to the interconnection process resulting from Order 2023, the ISO is also in the process of redesigning the capacity market. As discussed in detail at the June 9, 2025, NEPOOL Markets Committee meeting, ISO plans to require any generator with CNRIS to offer their capacity into the capacity auction. As a result, if the Department were to require bidders to interconnect and achieve CNRC, it would also be requiring bidders to offer their capacity into future capacity auctions, which may not be appropriate.

Interconnecting to the CCIS is not a guarantee of the deliverability of an offshore wind project's energy production profile. The CCIS ensures that the qualified capacity of the new resource, which might be just half of the maximum output of an offshore wind project, can be delivered to the resource's capacity zone at the same time as all existing capacity to offer and sell the resource's capacity into the ISO-NE capacity market. It provides no guarantee that the full energy production profile of the offshore wind project is deliverable. Further, it may require extensive and costly transmission system upgrades that do nothing to improve the deliverability of the offshore wind's production profile.

Given the changes to the process for determining the transmission system upgrades required to obtain CCIS, the expected future change that would impose a capacity must-offer requirement on any resource that obtains CNRC in the interconnection process, the inability of the CCIS study to identify those upgrades required for full delivery of an offshore wind's production profile, and the very real possibility that the CCIS study would result in requirements to pay for and build onshore transmission upgrades that do not improve the project's ability to deliver its energy production profile, RENEW recommends that the Department not require interconnection according to the CCIS.

Instead, RENEW recommends that the Department adopt the requirement from the Round 4 RFP for bidders to demonstrate that their proposed point of interconnection and planned upgrades are sufficient for the full delivery of their proposed energy production profile, and that bidders reduce their proposed energy production profile for any constraints or curtailments that would be expected. This will better achieve what we understand to be the Department's goals than requiring interconnection equivalent to the CCIS. Further, as discussed in the responses below, interconnections utilizing Surplus Interconnection Service ("SIS") could offer significant benefits to ratepayers, but given the limitations of the SIS process, it may not be possible to obtain CCIS for the full qualified capacity that an offshore wind project would otherwise be capable of attaining. Eliminating the requirement to interconnect according to the CCIS would enable bidders to utilize SIS.

Under the new Order 2023 interconnection process, Interconnection Requests are accepted only during specified Cluster Request Windows for those projects that are ready to go through the associated Cluster Study. The first such window for submitting new interconnection requests is expected to occur in late 2026. Given this new process, it is no longer appropriate for an RFP to require a bidder to have a valid queue position at the time of bid submittal. Rather, the bidder should be required to make a commitment to interconnect their project according to the applicable ISO procedures if selected.

If the procurement were to specify preferred points of interconnection, and if ISO were to determine that the projects being solicited in this RFP would be unable to interconnect without common significant new transmission lines, then ISO could pull these points of interconnection out of the regular cluster cycle and do a Cluster Enabling Transmission Upgrade Regional Planning Study ("CRPS") study before the Planning Advisory Committee to figure out the major common upgrades needed for their interconnection. The state-procured resources would then be able to enter into the next cluster study cycle with priority to interconnect at those locations, and would already have an understanding of their major upgrade requirements. The interaction of this procurement and the ISO's new CRPS/Cluster Study process should be discussed with ISO-NE to ensure the most beneficial process can be followed to meet the Department's goals.

C. CCIS Mechanism

As discussed above, RENEW recommends that the Department require bidders to demonstrate how their proposed production profile would be deliverable, without relying on the CCIS which is a flawed proxy for this information.

D. Surplus Interconnection Service

The Round 5 RFP should allow projects to utilize SIS to obtain either NRIS or NRIS and CNRIS. The ISO-NE SIS process allows an existing generator, or one that has an executed interconnection agreement, to share its interconnection service with another generator that is co-located behind the same point of interconnection.

The energy interconnection service can be shared between the original and surplus generator, so long as the combined energy output of both generators never exceeds the original generator's energy interconnection rights. There are many existing generators in New England that operate for only a small number of hours per year, and in all other hours their full energy injection rights can be made available for a surplus generator to utilize. The few hours per year when the original generator is expected to operate would need to be reflected in the bidder's proposed production profile.

Even if the existing generator rarely operates, it may still be receiving its full qualified capacity under the current capacity market rules, in which case it would have no ability to transfer its CNRIS to the surplus generator. If the existing generator has a small amount of unused capability (the difference between the existing generator's CNRC and its most recent qualified capacity), then this small quantity of CNRC could be transferred to the surplus generator. However, this amount of CNRC is unlikely to be sufficient to match the full amount of qualified capacity an offshore wind project would otherwise be eligible to attain.

The potential benefits of interconnecting under the SIS process are significant and could result in more cost-effective proposals, despite a possible small decrease in the energy profile for the hours when the original generator operates, and that are able to interconnect sooner than a proposal that has to go through the new cluster study process. The Department should allow bidders to submit proposals that rely on SIS and select the projects that are best for ratepayers, rather than excluding SIS projects from the process.

The Department should note that SIS only allows sharing of existing interconnection service. This means, for example, that even if a 500-megawatt existing generator participated, it would only enable 500 megawatts of offshore wind injection under a SIS. This arrangement might be more beneficial for a bid on the lower end of the size spectrum (e.g., 400 megawatts) than one interconnecting 1,200 megawatts of offshore wind.

Question 12. Economic Development, Workforce, and Diversity, Equity & Inclusion

Given the macroeconomic and political pressures facing developers of offshore wind, the Round 5 RFP should recognize offshore wind's qualitative benefits. RENEW has supported placing additional weight on public benefits as they are likely to have relatively modest cost compared to the scale of the projects expected to bid. The economies of scale from larger sized proposals should provide sufficient project savings to overcome the costs from a higher level of public benefits that might otherwise place bids above the price cap. RENEW supports previous RFPs having assigned the weighting of qualitative factors at 30 points. RENEW recommends the level of non-price benefits not be increased any further for the Round 5 RFP.

The Round 4 RFP provided information on non-price criteria, enabling developers to better understand which criteria were deemed more important, and allowed for tailoring their proposals to meet policy objectives. DOER should replicate this practice of publicly releasing the criteria weighting.

RENEW supports developers being committed to racial equity and advancing minority economic participation and a requirement that bidders include Diversity, Equity and Inclusion Plans with their submissions. RENEW supports the use of Memoranda of Understanding with the selected projects to memorialize and track their commitments to policy goals.

Question 13. Environmental Justice

Offshore wind projects will help reduce emissions from traditional fossil-fueled power plants located in environmental justice communities and help stabilize electricity rates now subject to the volatile of natural gas prices. To maximize environmental justice benefits, DOER should evaluate whether the cost-effective integration of offshore wind could enable more rapid closure of existing fossil fueled power plants (or reduced usage, in the case of peaker plants). This can help to reduce local emissions impacts, which are often concentrated in historically affected communities.

Question 14. Environmental and Fisheries Impacts

In recognition of the primarily federal role in siting and permitting offshore transmission, the Round 5 RFP must avoid adopting requirements for any environmental or fisheries measures that conflict with federal requirements, or that risk delaying necessary federal regulatory approvals.[10] In the Round 4 RFP, Appendix J included additional criteria to be considered in the Non-Price Evaluation pertaining to impacts on the environment, wildlife, commercial and recreational fishing, and environmental justice populations. RENEW recognizes that offshore wind projects must be developed with strong, and reasonable, protections in place to protect our coastal and marine environment and wildlife. RENEW supported the requirement that each bidder submit a preliminary plan describing the best management practices the bidders commit to employing, informed by the best available science, that will avoid, minimize, and mitigate environmental impacts to marine wildlife and habitat, including but not limited to threatened or endangered species such as North Atlantic right whales; coastal and marine habitats and ecosystems; natural resources; benthic resources and essential fish habitat; and birds. However, it is important to note that many of the requirements in Appendix J are subject to the outcomes of environmental reviews and consultations that are held at both the Federal and state levels. Developers responding to this RFP may be in various stages of the permitting process and given the added uncertainty with the Federal permitting process for offshore wind, requirements and plans may not yet be developed or may be subject to change. Therefore, it is premature for many projects to provide detailed mitigation and monitoring plans at the bid stage. The state should instead require developers to commit to following relevant state and federal agency guidelines, identify and commit to utilizing certain best management practices, make commitments to stakeholder engagement at appropriate times (preferably early in the process), and develop mitigation and monitoring plans at the appropriate time in the process as required by relevant

[10] Information about how BOEM promotes environmental protection through responsible, science-based management of offshore wind development is available at American Clean Power, BOEM Renewable Energy Fact Sheet (February 26, 2020), https://www.boem.gov/sites/default/files/documents/renewable energy/BOEM_FactSheet-Renewable-2-26-2020.pdf.

terms and conditions of project approval. However, the details of these should not be required to be submitted with the bid.

In addition, many extremely important efforts to mitigate impacts are currently under development and requirements within the RFP process could undermine those efforts. This includes the establishment of a regional fisheries compensatory mitigation fund that is currently under development by a regional fund administrator with the assistance of a design oversight committee made up of representatives from the states, fishing industry, and the offshore wind industry.[11] In addition, the National Oceanic and Atmospheric Administration's National Marine Fisheries Service ("NOAA Fisheries"), the Bureau of Ocean Energy Management ("BOEM"), and the offshore wind industry have been working together to develop a regional approach to mitigating Federal surveys that may be impacted by offshore wind development.[12]

In response to the question on how "to best encourage project designs that avoid, minimize, and mitigate negative impacts on the environment and fishing industry?", the Round 5 RFP should not play a role in dictating project design. Elements of project design for offshore wind projects on the outer continental shelf are solely within the jurisdiction of BOEM and other federal agencies. In addition, all developers within the Massachusetts and Rhode Island Wind Energy Areas ("MA and RI/MA WEAs") have already agreed to design their projects in a consistent grid with one nautical mile by one nautical mile spacing in an east-west and north-south direction. In addition, the United States Coast Guard, which serves as the premier experts and authority on navigation safety, released project design recommendations that calls for wind turbines and other towers within a wind farm to be paced in a uniform grid pattern with at least two lines of orientation.[13] Therefore, the basic layout for all wind energy facilities on the outer continental shelf is guided by those principles and facilities within the MA and RI/MA WEAs have further agreed upon design criteria. Any further project design elements to avoid, minimize, and mitigation impacts on the environment and fishing industry should be determined through the federal permitting process which includes in-depth environmental reviews and consultations.

[11] Special Initiative on Offshore Wind, Fisheries Mitigation Project, https://offshorewindpower.org/fisheries-mitigation-project; and Fisheries Compensation Program, https://www.rfainfo.com/

[12] NOAA Fisheries, Efforts to Mitigate Impacts of Offshore Wind Energy Development on NOAA Fisheries' Surveys, https://www.fisheries.noaa.gov/feature-story/efforts-mitigate-impacts-offshore-wind-energy-development-noaa-fisheries-surveys

[13] Navigation And Vessel Inspection Circular No. 03-23, *Guidance on Navigational Safety In and Around Offshore Renewable Energy Installations* (November 16, 2023), https://www.dco.uscg.mil/Portals/9/DCO%20Documents/5p/5ps/NVIC/2020/2023/NVIC%2003-23_MarinerGuidance_OREI_FINAL_10_20_2023_V2_CG-5P%20SIGNED.pdf?ver=Kh282w3cBQTyYJZkIJ-GJQ%3D%3D

Question 15. Further Comments

To best discuss the technical details of the procurement schedule, RENEW encourages DOER to host a Bidders Conference for prospective bidders and interested persons approximately two weeks after the final RFP documents are posted online. The Bidders Conference should be used as an opportunity to clarify any aspects of the final RFP. Bidders Conferences provide a critical opportunity for prospective bidders to submit questions about the RFP and describe how bidders may seek consultation with approved resources to develop potential aspects of a successful bid.

Question 16. Simultaneous Round 6 Procurement

For the reasons explained above, RENEW supports delaying the issuance of the Round 5 RFP until next year. We support the issuance of draft Round 5 and 6 RFPs for simultaneous review and approval by the DPU with the objective of providing clarity to bidders around the terms of the next two RFPs.

Sincerely,

Francis Pullaro
President