



July 1, 2022

[Via Email \(scopingplan@nyserda.ny.gov\)](mailto:scopingplan@nyserda.ny.gov)

Draft Scoping Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

Re: Comments on Climate Action Council Draft Scoping Plan

OW Ocean Winds East, LLC (OW East) commends New York State and the Climate Action Council (the Council), the Advisory Panels, Just Transition Working Group, and Climate Justice Working Group (CJWG) on the Draft Scoping Plan and the important consensus recommendations on the strategies to achieve critical emissions limits and the goals of the Climate Leadership and Community Protection Act (CLCPA). We applaud The Council's efforts to engage stakeholders on the Draft Scoping Plan as the framework for how the State will reduce greenhouse gas emissions and achieve net-zero emissions, increase renewable energy usage, and ensure climate justice. Amid the many bold initiatives outlined in the Draft Scoping Plan, New York's commitment to advance offshore wind as a core strategy to reduce greenhouse gases and transition to 100% zero-emission electricity by 2040 stands out as a national model.

OW East supports the consensus recommendations of the Draft Scoping Plan and comments submitted by the New York Offshore Wind Alliance (NYOWA) and Alliance for Clean Energy (ACE) and urges the Council to finalize the Scoping Plan by the statutory deadline of December 31, 2022. **Further, we urge the Council to prioritize certain aspects of the plan related to offshore wind, and to clarify and strengthen some elements to ensure targets are met and the benefits of offshore wind, including the significant its potential for job creation, are fully realized.**

About OW Ocean Winds East. LLC

OW East is a partnership between OW North America LLC (OW NA), a subsidiary of OW Offshore S.L. (Ocean Winds), and Seaway Energy (an affiliate of Global Infrastructure Partners), established to develop offshore wind projects in the United States. OW NA is the North American business unit of Ocean Winds (OW), a global joint venture between EDP Renewables ("EDPR") and ENGIE, two major clean energy companies. Global Infrastructure Partners is an \$80bn infrastructure asset manager and a top 10 renewables player with approximately 15GW in operation globally.

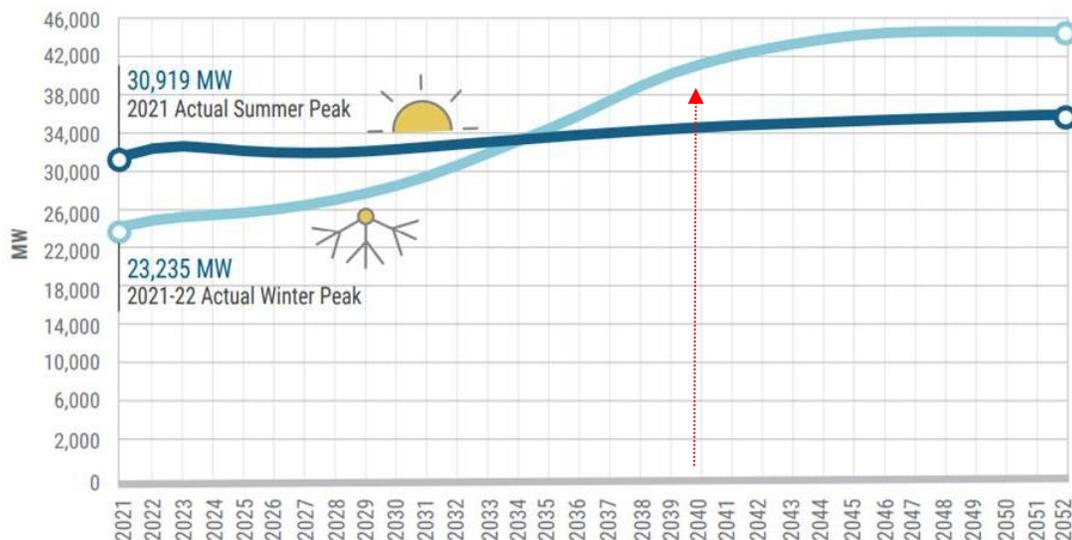


OW East recently acquired lease OCS-A 0537, which includes 72,522 acres located in the New York Bight. The lease has the potential to deliver 1.7 gigawatts (GW) of installed capacity and contribute to meeting New York’s near-term greenhouse gas reduction goals and Just Transition goals for social equity – **but only if paths to market are expedited and strengthened.**

1. Offshore Wind must be a strategic priority to attain 2040 goals

OW East strongly agrees with the Alliance for Clean Energy (ACE) who notes *the construction of renewable electricity generation facilities is the most critical near-term area of focus for implementation of New York’s climate plan.* This is particularly true of offshore wind. Without the continued growth and expansion of offshore wind it will be challenging for New York State to meet new electricity demand from electric vehicles, buildings and other sources. Buildings and Transportation sectors together represent 60% of current (2019) greenhouse gas emissions¹ and are expected to transition to a net zero electricity grid in order to reduce emissions. This transition will nearly double the winter peak demand for electricity by 2040 so it is critical for offshore wind to continue to grow and expand to help meet this demand.

Electric Summer and Winter Peak Demand - Actual and Forecast: 2021-2052



Source: NYISO Power Trends Report 2022, The Path to a Reliable, Greener Grid for New York.

¹ DRAFT Scoping Document, Chapter 4 Current Emissions (Page 24) [Draft-Scoping-Plan \(1\).pdf](#)



2. NEW Offshore Wind Capacity (MW) Targets should be set for 2035 and 2040 in order to reach a minimum of 20% of Winter Peak Demand

NYSERDA has already procured 4,300 MW of offshore wind capacity, or nearly 50% of its 9000MW target by 2035. The full 9000 MW target may be procured as early as 2023 depending on the results of NYSERDA's upcoming solicitation scheduled in 2022. However, New York will likely need to double this capacity target in order to both keep pace with NEW demand and deliver on its target of 100% zero-emissions electricity by 2040. Put simply, we struggle to see a clear path to New York achieving its climate goals without a significant acceleration in the deployment of offshore wind. Other countries such as United Kingdom, Netherlands or Germany have acknowledged the importance of offshore wind in powering a zero-emissions energy grid thanks to its more stable output in comparison to more intermittent renewable energy sources. In New York, offshore wind would be even more crucial, as few other renewable opportunities exist to bridge the gap between New York's progress to date and the considerable work still to be done.

The Draft Scoping Plan calls out the need to *Accelerate Growth of Large Scale Renewable Energy Generation*² and calls for the expansion of offshore wind procurement, however we urge New York to take quick action to set offshore wind specific targets relative to the growth in demand. OW East supports the NYOWA and ACE recommendation for a minimum percentage of winter peak demand to come from offshore wind **and believe that the State should aim for meeting 20% of projected 2040 winter demand with Offshore Wind power (to meet 2040 decarbonization targets).**

A target of 20% of 2040 winter peak demand would require approximately 20-25 GW of installed offshore wind capacity. In order to achieve this objective, the current 2035 target should be reviewed and increased to 15 GW (up from 9 GW) to ensure an appropriate pathway to achieving the final goal. Additional efforts will be needed for a 85%-100% reduction in GHG emissions by 2050 and an ambitious offshore target of 40 GW will contribute decisively towards this goal. In summary, the following targets are recommended to achieve the needed growth and expansion for New York's decarbonization objectives.

- 15 GW by 2035 (up 6 GW from current 9 GW)
- 20-25 GW by 2040
- 40 GW by 2050

² NYSERDA's current procurement programs including Tier 1, Offshore Wind, and Tier 4, will expand and continue to procure the renewable energy needed to reach these requirements, and a zero-emissions grid. The State also recently created a dedicated ORES to streamline and expedite the siting of major renewable energy projects. The State also participates in existing planning processes related to transmission projects and recently identified the need for several competitive project solicitations through the NYISO Public Policy Transmission Planning Process. (pg. 159)



This type of predictable visibility into demand will offer clear signals to the global supply chain which will translate into jobs, workforce development and the type of economic opportunities called for by the Climate Justice Working Group.

3. Decisions on transmission planning and grid upgrades for Long Island and New York City are critical to the success of future offshore wind procurements and long term integration of offshore wind.

OW East agrees with the Draft Scoping Plan and believes that New York should pursue system upgrades on Long Island and in New York City to facilitate 9,000 MW of offshore wind as well as any future capacity targets. The lack of clarity on new transmission and grid upgrades adds substantial risk to offshore wind projects. New York has taken a critical look at the public policy transmission needs (PPTN Study) to support offshore wind, and clarity on the outcome of that process is needed for the industry to plan for future projects to serve the State. Similarly, additional clarity on mesh-ready and other future transmission solutions would be helpful to offshore wind developers as we advance project design.

As part of any future transmission work, OW East encourages New York to have meaningful engagement with Mid-Atlantic and Northeast states on inter-regional planning concepts between NYISO (both the entity and the stakeholders) and PJM and ISO-NE that could both address the needs of the OSW industry while considering important topics like cost allocation.

OW East agrees with NYOWA recommendations to convene a technical working group as soon as possible to consider the technical, regulatory, financial and contractual barriers to implementation of a Meshed Grid. New York's Public Service Commission (PSC) will likely need to engage the support and involvement of NYSERDA, NYISO, Transmission Operators (TOs) and other interested stakeholders - to convene the technical working group.

4. Coordination on workforce development is essential to meeting the needs of disadvantaged communities.

OW East is strongly committed to the community benefit goals of the State to ensure disadvantaged communities share in the economic benefits of offshore wind. Workforce development is the number one priority to enable access and ensure job readiness. We applaud efforts being undertaken by the state, private developers, academia, and the unions to put together workforce development programs to ensure that New York has a ready supply of trained and certified workers to meet the coming demand. We further encourage the state, through NYSERDA and the Department of Labor, to ensure the coordinated delivery and funding of workforce development programs and that the training be designed and delivered to address any specific barriers encountered in environmental justice communities.



5. Continued leadership and collaboration among all stakeholders on wildlife research and environmental protection is needed.

New York should continue its leadership position on national and regional wildlife research efforts such as the Regional Wildlife Science Collaborative for Offshore Wind. Such organizations are critical to developing a deeper understanding of offshore wind development and the ocean environment and will require a long-term collaboration and commitment. OW East shares in the commitment to science-based solutions and believes that collaboration is the best way to expand our knowledge and develop effective conservation programs.

OW East appreciates The Council's efforts to engage stakeholders on the Draft Scoping Plan and we look forward to working with the State agencies and stakeholders to ensure your success.

Sincerely,

John Dempsey
Chief Executive Officer, OW East
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