August 10, 2018

RFI OSW-2018 Comments – Large Scale Renewables Team New York State Energy Research and Development Authority 17 Columbia Circle Albany, NY 12203-6399

To whom it may concern:

Arch Street Communications (ASC) appreciates the opportunity to contribute this feedback on the Offshore Wind Renewable Energy Credits Request for Information OSW-2018 that was the subject of a technical conference we had the pleasure to attend July 23.

As a New York-based woman-owned small business enterprise delivering strategic communications and public engagement to the energy and transportation sectors, and as New Yorkers, we are enthusiastic about the Public Service Commission (PSC) order related to offshore wind procurement in our State and are excited to participate in this historic and transformative moment.

To clarify our subject matter expertise in this area, ASC has completed more than 70 public engagement projects across New York State over 25 years and is currently guiding communications strategy supporting Cypress Creek Renewables Article 10 application related to the Bear Ridge 100 MW utility-scale solar farm in Niagara County and are supporting Deepwater Wind in the development of its Public Involvement Plan for the Article VII process related to interconnection of electricity from the proposed South Fork Wind Farm. Our clients include NYSERDA, as well as the New York Power Authority, for whom we provide strategic communications support to advance energy efficiency, renewables, and clean technologies to meet the Governor's ambitious energy goals in New York.

Given the scope of the upcoming RFP, it will be important to require proposers incorporate opportunities for small business and to require a robust, inclusive public engagement process to continue the strong outreach effort conducted by NYSERDA in development of the Offshore Wind Master Plan. In our experience, regardless of the scale of the project, the boldness of the initiative, or the size of the developer, all energy is ultimately local and a sophisticated ground game that engages New Yorkers in the process will be vital to navigating a path to completion.

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We applaud the RFI's call for recommendations for efficient and effective ways to:

- 1. Ensure that the maximum potential high-quality employment opportunities are available to New Yorkers;
- 2. Ensure that a properly trained, highly-skilled and qualified workforce is available to fill the various labor needs throughout the duration of the project; and
- 3. Ensure opportunities for the participation of New York small businesses.

Small business can bring value, provide innovation, creativity, and years of experience advancing important infrastructure projects in New York. We are encouraged by our Governor's commitment to provide more opportunities for businesses that are at least 51 percent owned by women, minorities, veterans or the disabled, and to leverage this opportunity to launch an industry centered in New York.

We appreciate the PSC's recognition that "the development of offshore wind creates the potential for high-quality employment opportunities and therefore presents a significant potential benefit to New York State," and strongly encourage the inclusion of a local content provision in the evaluation criteria (Order, p. 52), possibly in the form of the Economic Benefits Plan suggested in the RFI.

We suggest, however, that the new supply chain begin, not with construction, but with the team that advances the proposal and moves projects to construction. Specific approaches that could be integrated into the RFP might include:

- Inclusion of a utilization goal for businesses that are at least 51 percent owned by women, minorities, veterans or the disabled among the evaluation criteria for project award.
- Host a disadvantaged small business enterprise informational summit on this project. Such an event
  could introduce the opportunity to New York's disadvantaged small business market, provide
  informational seminars on the process ahead, offer job training information for trades that will be
  required before, during, and after construction, and coordinate matchmaking and networking
  sessions between developers and the certified small business market.
- Create a certified small business website as a resource for respondents to this RFP, with a
  disadvantaged small business opt-in based on completion of a questionnaire to help respondents
  pre-screen potential small business subcontractors.

We appreciate this opportunity to provide input and look forward to the issuance of the RFP.

Sincerely,



