



April 28, 2023

The Honorable Elizabeth Klein
Director
Bureau of Ocean Energy Management
United States Department of the Interior
1849 C Street, NW
Washington, DC 20240

88 FR 5968

Docket ID: BOEM-2023-0005
RIN 1010-AE04

Re: The Pew Charitable Trusts' Comments on the Bureau of Ocean Energy Management's Notice of Proposed Rulemaking on the Renewable Energy Modernization Rule

Director Klein:

The Pew Charitable Trusts (Pew) is pleased to offer comments on the Bureau of Ocean Energy Management's (Bureau) Notice of Proposed Rulemaking (Notice) on the Renewable Energy Modernization Rule. We are an independent, nonpartisan research and public policy organization dedicated to serving the American public. Pew's energy modernization project works with state and federal policymakers and other stakeholders to build a clean, reliable electric grid; advance the nation's transition to electric vehicles; and expand renewable energy solutions, such as offshore wind.

We commend the Bureau for this initiative to update and improve the existing rules which enable the productive and safe deployment of the renewable energy resources available in multiple locations in the waters of the U.S. Outer Continental Shelf. We appreciate that these rules, while aimed at fostering important new sources of clean energy via offshore wind, must also align with the federal laws that protect valuable marine life and ecosystems and carefully consider the impacts and concerns of coastal communities. Overall, Pew believes that the proposed changes included in the Notice will be helpful in enabling responsible and important offshore wind projects to proceed to completion.

In particular, Pew supports the proposal to release to the public a renewable energy leasing schedule and update that schedule on a frequent basis. We believe this new level of communication will help potential offshore wind project developers gain the certainty needed to make appropriate plans for financing and

investment; inform the work of Regional Transmission Organizations, utilities, and others charged with planning for grid transmission improvements; and allow for early and constructive dialogue with relevant stakeholders.

Pew also strongly supports the use of multi-factor, non-monetary bid credits, and we urge the Agency to make a solid commitment to continuing to incorporate this type of bidding into its auctions. The Notice identifies several important factors that the Bureau may incorporate into bidding evaluation, including power purchase agreements, renewable energy credits, and development agreements for shared transmission solutions and grid interconnection. We agree that developer commitment to such factors as well as assistance with workforce training and development, community engagement and investment, and proactive conservation measures deserve strong considerations in selection of winning bids.

Pew acknowledges that several other organizations have recommended the use of a Programmatic Environmental Impact Statement (PEIS) at the Wind Energy Area (WEA) identification stage, arguing that such an approach could aid in selecting those areas that best avoid, minimize, and mitigate environmental impacts while allowing the Bureau to consider preferable options for regional transmission planning. We agree that a PEIS for a regional area initiated early on could be helpful on many fronts, and we recommend that the Bureau confer with other offices within the Department to consider lessons that may be applicable from previous PEISs conducted on federal lands, such as the Bureau of Land Management's Solar PEIS.

On the topic of transmission, we underscore the comments from others who strongly support early action to begin planning for alternatives to the project-by-project radial transmission approach. We concur that shared transmission solutions have the potential not only to be cost effective, but also to limit the levels of disturbances to the environment and to coastal communities.¹ Again, we encourage the Bureau to utilize its bidding authorities to incentivize shared transmission facilities and to alter other aspects of the rules, such as timing for general activities plan submissions and requirements for Right-of-Way grants and Right-of-Use and Easement grants to drive the creation of effective, shared transmission solutions.

¹ See, for example, Connecticut Department of Energy and Environmental Protection, Maine Governor's Energy Office, Massachusetts Department of Energy Resources, Rhode Island Office of Energy Resources, "Joint State Innovation Partnership for Offshore Wind," concept paper submitted to Department of Energy, January 13, 2023, <https://newenglandenergyvision.files.wordpress.com/2023/01/joint-state-innovation-partnership-for-offshore-wind-concept-paper.pdf>; National Grid ESO, "Holistic Approach to Offshore Transmission Planning in Great Britain," September 14, 2020, <https://www.nationalgrideso.com/document/177221/download>; The Brattle Group, Inc., "The Benefit and Urgency of Planned Offshore Transmission: Reducing the Costs of and Barriers to Achieving U.S. Clean Energy Goals," January 24, 2023, <https://www.brattle.com/wp-content/uploads/2023/01/Brattle-OSW-Transmission-Report-Jan-24-2023.pdf>; U.S. Department of Energy, "Advancing Offshore Wind Energy in the United States: U.S. Department of Energy Strategic Contributions Toward 30 Gigawatts and Beyond," March 2023, DOE/GO-102023-5888, <https://www.energy.gov/sites/default/files/2023-03/advancing-offshore-wind-energy-full-report.pdf>; Matathia, Alexander and George Xydis, "Offshore wind transmission in the United States. A collectivist culture versus Europe's individualistic approach?" International Journal of Emerging Electric Power Systems, <https://doi.org/10.1515/ijeeps-2022-0018>; Pfeifenberger, Johannes P., John Tsoukalis, and Samuel A. Newell for New York State Energy Research and Development Authority, "The Benefit and Cost of Preserving the Option to Create a Meshed Offshore Grid for New York," November 9, 2021 <https://www.brattle.com/wp-content/uploads/2021/12/The-Benefit-and-Cost-of-Preserving-the-Option-to-Create-a-Meshed-Offshore-Grid-for-New-York.pdf>

Again, we commend the Bureau for initiating this important rulemaking and we look forward to engaging in the future as this rulemaking advances. Please do not hesitate to reach out to us should you have questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Laura Lightbody". The signature is fluid and cursive, with the first name "Laura" and last name "Lightbody" clearly distinguishable.

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