



July 19, 2019

**NATIONAL  
OCEAN  
INDUSTRIES  
ASSOCIATION**

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RE: Notice and Request for Comments in BOEM Docket No. BOEM–2018–0067

To Whom It May Concern:

The National Ocean Industries Association (NOIA) submits the following comments in response to the notice issued by the Bureau of Ocean Energy Management (BOEM) on the “current and future need for a regional transmission system in the proposed area” and related considerations.

NOIA is the only national trade association representing all segments of the offshore industry with an interest in the exploration and production of both traditional and renewable energy resources on the U.S. Outer Continental Shelf (OCS). The NOIA membership comprises more than 250 companies engaged in a variety of business activities, including production, drilling, engineering, and marine and air transport, offshore construction, equipment manufacturing and supply, telecommunications, finance and insurance and renewable energy.

The coming expansion off offshore wind leasing in the Atlantic provides a tremendous opportunity for American energy development and national energy security. A planned, regional transmission system, such as Anbaric’s proposed NY/NJ OceanGrid sited on a non-exclusive Right of Way (ROW), will enable multiple uses in the future while providing significant advantages for the emerging U.S. offshore wind industry. Allowing more transmission options to be considered fosters greater competition. A planned transmission system benefits the offshore wind industry, states, taxpayers, local communities, the environment, local businesses and other stakeholders.

To maximize the benefits and the opportunities for scaling an expansive and competitive offshore wind industry while actively protecting the environment, BOEM should also facilitate more open and planned transmissions available as an option by processing offshore transmission rights of way in a timely fashion consistent with the established regulatory process. This would provide the U.S. offshore wind industry with a mix of predictability and flexibility as companies work to bring new projects online in a manner that enables them to provide affordable electricity to consumers.

Considering the limited shoreline connection options available on the East Coast, BOEM should make as many connection points available as possible. These limited, high-capacity connection cables can reduce costs, including costs associated with upgrading facilities at the interconnection point with the grid, and enhance system reliability. In addition, maximizing the limited connection points can mean fewer trenches on the seafloor. Fewer potential transmission lines have less conflicting uses with the activities and uses identified in the notice.

A scalable, planned transmission system can also enhance competition for both state offshore wind contracts and future BOEM auctions. A planned transmission network can help make current and future BOEM areas equally attractive to bidders, while allowing states along the Atlantic coast to benefit from that competition and deliver value to ratepayers.

More competition, and thus lower pricing, will help bolster the emerging offshore wind industry in the U.S., which is projected to result in at least \$70 billion in supply chain investment by 2030. BOEM should focus on supporting this growing industry and fostering competition by allowing all options to be considered when building a new US energy and manufacturing industry. Therefore, BOEM should allow for the normal course of action and process ROW grant applications with expediency, and because these ROW are non-exclusive, BOEM should find there is no competitive interest in the grant area.

Respectfully submitted,

A handwritten signature in black ink, reading "Tim Charters". The signature is written in a cursive, flowing style with a large initial "T" and "C".

Tim Charters  
Vice-President, Govt. and Political Affairs