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President

**NATIONAL  
OCEAN  
INDUSTRIES  
ASSOCIATION**

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Subject: Docket No. BOEM-2023-0005 - Comments of the National Ocean Industries Association in response to Notice of Proposed Rulemaking, Renewable Energy Modernization Rule, Bureau of Ocean Energy Management (BOEM)

The National Ocean Industries Association (NOIA) submits these comments in response to BOEM's notice of proposed rulemaking for the Renewable Energy Modernization Rule. For the past 50 years, NOIA has represented the interests of all segments of the offshore energy industry, including offshore oil and gas, offshore wind, offshore minerals, and offshore carbon sequestration. Our membership includes energy project leaseholders and developers and the entire supply chain of companies that make up an innovative ecosystem contributing to the deployment of low and zero carbon energy solutions, including offshore wind. NOIA and its members have a direct interest in the finalization of this proposed rule. NOIA has joined the comments of American Clean Power Association (ACP) in response to this proposal, and we submit this letter to supplement the record. The comments here focus solely on issues related to the *Inflation Reduction Act* provisions that tie the issuance of offshore wind leases to the holding of offshore oil and gas lease sales.

On August 16, 2022, the *Inflation Reduction Act* (IRA) was signed into law, setting in motion a host of programs that promote research, development, deployment, and investment in a wide portfolio of energy sources, many of which will help drive decarbonization efforts. NOIA actively supported the IRA provisions that encourage offshore wind, offshore oil and gas, and offshore carbon capture and sequestration projects.

NOIA strongly supports public policy actions to promote investment in offshore wind resource development in federal waters, and in a host of emerging zero and low carbon energy technologies such as carbon capture and storage and wind. Offshore wind projects are vital to the economic growth of this country and will play a critical role in achieving America's climate goals for the 21st century and beyond. According to a recent report co-sponsored by NOIA, offshore wind constitutes a \$120 billion market for the country, and the Gulf of Mexico will continue to play an important part of the development of this remarkable energy opportunity.

Offshore wind is truly a generational economic and energy opportunity, and one the Biden administration is seizing. Providing new offshore wind opportunities, modernizing the

regulatory framework, establishing permitting milestones, and boosting critical investments into the supply chain, ports, and workers will provide a foundation for exceptional offshore wind growth and to secure the long-term success of this critical domestic energy resource.

NOIA supports BOEM's proposal to add a new section to the regulations, entitled "The Renewable Energy Leasing Schedule," which will add certainty for investors through the regulatory establishment of a leasing schedule for OCS wind leasing. As the maxim goes, uncertainty is the enemy of investment. As it relates to offshore wind, investments of the magnitude required for large scale offshore wind development are predicated on predictability and stability. The industry supports greater transparency provided by this approach, as it will provide investors with advance notice of proposed lease sales. Interior previously announced a schedule of lease sales on October 13, 2021, that included a timeline for 7 new offshore lease sales by 2025. A formalized leasing schedule, combined with certainty in permitting and regulations, could help put the nation on the pathway toward the Administration's stated objective to deliver 30 GW of offshore wind capacity by 2030.

The IRA, however, specifically conditions the Administration's ability to issue future wind leases on the agency holding oil and gas lease sales. The IRA includes a requirement for Interior to hold oil and gas lease sales for 60,000,000 acres in the year prior to issuing an offshore wind lease. BOEM should factor in IRA requirements and schedule the wind lease sales at appropriate intervals to ensure that the new mandates are satisfied.

Thank you for your consideration of these comments. NOIA stands ready to serve as a resource to BOEM on these and other issues related to offshore energy development of all forms.

Very respectfully,



Erik Milito  
President  
National Ocean Industries Association