



May 26, 2022

The Honorable Jeffrey N. Roy
House Chair, Joint Committee on
Telecommunications, Utilities, and Energy
State House Room 42

The Honorable Tackey Chan
House Chair, Joint Committee on Consumer
Protection and Professional Licensure
State House Room 43

The Honorable Bradley H. Jones, Jr.
House Minority Leader
State House Room 124

The Honorable Michael J. Barrett
Senate Chair, Joint Committee on
Telecommunications, Utilities, and Energy
State House Room 109D

The Honorable Cynthia S. Creem
Senate Majority Leader
State House Room 312A

The Honorable Bruce E. Tarr
Senate Minority Leader
State House Room 308

Dear Honorable Members of the Conference Committee,

On behalf of the undersigned organizations and our members and supporters across the Commonwealth, we appreciate the opportunity to offer comments on **H.4524/S.2842, An Act advancing offshore wind and clean energy**. As members and allies of the New England for Offshore Wind coalition, we applaud your commitment to passing clean energy legislation that will move the needle on achieving our climate targets and position the Commonwealth as a national leader in offshore wind, and we urge you to work quickly to produce comprehensive final legislation for approval.

The landmark Net Zero Roadmap law passed early this session set the course for the Commonwealth to reach net zero by 2050 by mandating sector-specific targets on emissions reductions every five years. In order to meet those goals, the Legislature must pass comprehensive climate legislation to drive the implementation of those targets by increasing the supply of clean energy to our grid. Currently, the Commonwealth is not on track to meet its statutory goal of 50% emissions reductions by 2030. As the linchpin of our decarbonization strategy, increasing our deployment of offshore wind and supporting clean energy infrastructure can make meaningful strides toward closing that gap.

As we tackle the climate crisis, it is also crucial that we do not exacerbate racial and income inequality in the Commonwealth. It is imperative that final legislation drives equitable outcomes by ensuring economic inclusion and justice as we transition to a green economy. A strong, well-crafted climate bill

will help address these issues and position Massachusetts as a national leader in clean energy, including offshore wind.

Therefore, we urge inclusion of the following language in any final legislative package approved by the conference committee:

Responsible Development and Expansion of Offshore Wind

Final legislation should include language that drives the continued growth of offshore wind generation and ensures its development is strategic and responsible. In order to reach net zero by 2050, the 2050 Decarbonization Roadmap shows that Massachusetts will need up to 20,000 megawatts (MW) of offshore wind to serve as the backbone of a decarbonized grid. Establishing a bold but attainable offshore wind target of 10,000 MW by 2035 (section 68 of S.2842) will be crucial as we look ahead to the next frontier of offshore wind in the Gulf of Maine and will set the Commonwealth on the path to achieving its climate goals. We encourage a firm mandate for the Department of Energy Resources to meet this target, rather than the current text requiring only that they “strive to achieve the goal.” Recognizing the value of municipal aggregation and large private off-takers (such as business and non-profit institutions) enabling and incentivizing additional contracts for offshore wind by these entities will also contribute to decarbonization of our economy (sections 9A and 22 of H.4524).

As we drive the expansion of offshore wind, it is essential that the Commonwealth ensure its responsible development. Doing so requires including strong provisions for wildlife monitoring and mitigation and environmental protection through all stages of offshore wind development (sections 1 and 20 of H.4524 and section 50(d) of S.2842 with minor technical corrections for clarity and consistency). We also strongly encourage inclusion of provisions for environmental justice, economic inclusion, and labor standards in the industry’s workforce development and supply chain (sections 1, 11, 20 and 22 of H.4524; sections 8 and 50 of S.2842).

Infrastructure and Investment in Clean Energy Development

Ensuring adequate funding and investment in supporting infrastructure, workforce development, and innovation is essential to the Commonwealth’s ability to bring offshore wind to the scale needed to mitigate the worst impacts of climate change. Increasing the share of clean energy on our grid will only be possible with investments in transmission (section 15 and 23 of H.4524) and significant grid modernization (sections 18 and 23 of H.4524). We appreciate the inclusion of regional collaboration on a transmission procurement in H.4524; planning and partnering with other states and stakeholders is a critical component of transmission planning for our shared electricity grid.

The Massachusetts Clean Energy Center (MassCEC) will also have a pivotal role to play in developing the Commonwealth’s clean energy economy including offshore wind. To ensure their success in driving workforce development, economic inclusion, and coordination across the state and the region, final legislation should drive significant and sustainable funding to MassCEC to facilitate the growth of our clean energy economy (section 8 and 3 of H.4524 and section 9 of S.2842).

Reform of Offshore Wind Procurement

Finally, we agree with the proposals made in H.4524 and S.2842 to reform the role of the utilities in the procurement process for offshore wind (section 20 of H.4524 and section 50 of S.2842). We believe that the authority for designing the solicitations and for issuing the final determination of the winning bid(s) should rest with the Department of Energy Resources (DOER), with the distribution companies in a technical advisory role. This delegation of roles will help streamline the offshore wind procurement process and improve its integrity. We also support lowering remunerations for the distribution companies to the greatest extent possible (section 50 of S.2842). Finally, we appreciate the careful

attention to the matter of the offshore wind “price cap” and support removing that provision or having as much flexibility as possible (section 20 of H.4524) to ensure the Commonwealth attracts sufficient economic development; incentivizes the best solutions for interconnection, transmission, and storage; and allows for the potential adoption of new technology such as floating offshore wind in the coming decade.

Thank you for your consideration of these important provisions. We look forward to supporting a comprehensive final bill that moves us forward on the path to net zero and sets the Commonwealth up as a national leader in the responsible development of offshore wind.

Sincerely,

Susannah Hatch
Environmental League of Massachusetts

Amber Hewett
National Wildlife Federation

Kai Salem
Green Energy Consumers Alliance

Michael Sales
Elders Climate Action, Massachusetts Chapter

Susan Helms Daley
Mothers Out Front, Massachusetts Chapter

Carrie Katan
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Wendy Burge
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Paula García
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Joe O'Brien
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Melissa Birchard
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Elizabeth Foster-Nolan
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David Zeek
Sierra Club Massachusetts Chapter