

August 8, 2023

Katie Dykes, Commissioner
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

Re: Offshore Wind Draft RFP Comments

Dear Commissioner Dykes,

Acadia Center commends the Department of Energy and Environmental Protection for issuing the draft Request for Proposals (“RFP”) on Offshore Wind Facilities. Connecticut has the opportunity to play a significant role in developing regional offshore wind collaboration while achieving its own clean energy and emissions reduction goals. Thoughtful and efficient offshore grid coordination will ensure efficient siting and infrastructure development. Acadia Center, both individually and as part of the New England for Offshore Wind (NE4OSW) coalition, has called for collaborative, long-term transmission planning and cost allocation reforms, and multi-state coordination on major transmission projects, including transmission for offshore wind. As part of the NE4OSW coalition, Acadia Center has helped develop [Transmission Principles](#), which we would like to see utilized in the RFP to protect our communities while providing maximum benefit with minimal impact.

These Transmission Principles help advance new transmission investments critically needed for offshore wind and establish a shared direction for transmission planning and development to bring offshore wind to communities. The shared goals of the Transmission Principles include building the transmission we need without delay, encouraging coordination between state and regional decision-makers, and ensuring holistic and transparent planning processes that further important goals, including environmental justice, environmental protection, and labor standards.

The six core Transmission Principles that should become the “B.A.S.I.C.S.” for transmission planning and development are:

- **Benefit impacted communities** – Target benefits to affected communities to help offset impacts, such as setting aside protected green space, cleaning up brownfields and investing in the local workforce and economy, in accordance with community input (see further below).
- **Avoid, minimize and mitigate environmental impacts** – Minimize the overall amount of new infrastructure needed through optimized, well-planned systems while avoiding or minimizing impacts on ecosystem services, considering cumulative environmental impacts and mitigating unavoidable impacts.
- **Secure environmental justice** – Avoid and minimize new impacts on already overburdened and historically disadvantaged communities whenever possible, while strengthening equity in planning processes and weighing the cumulative environmental, economic and health impacts of any new infrastructure proposed in or near environmental justice communities.

- **Inclusive and early stakeholder engagement** – Consult stakeholders, including communities in potentially impacted areas, in the early stages of planning when alternatives are still being considered and new alternatives can still be identified.
- **Coordinate on transmission investments** – Serve as many needs across the region as possible with each transmission investment in order to increase consensus and reduce overall impacts and costs.
- **Supply local jobs and economic development** – Lift up workers and communities by providing high-quality, local union jobs and training via registered apprenticeships and project labor agreements, while driving workforce and supplier diversity and encouraging a domestic supply chain for the expansion and maintenance of our region's electric grid.

New electric power infrastructure is essential for decarbonization and must be considered with urgency. DEEP should pursue regional collaboration utilizing the B.A.S.I.C.S. Transmission Principles in the final RFP. Multi-state collaboration in evaluating and rapidly advancing opportunities for a networked offshore grid to deliver offshore wind will improve resilience and reliability, and enable seizing opportunities for federal funding.

Acadia Center also suggests establishing coordinated plans for early outreach within all communities that may be affected by infrastructure development, including environmental justice communities. Should proposals be selected, outreach plans should span the planning, development, and implementation stages and continue through a project's lifecycle. Strategies for outreach and engagement should include hosting public forums as sessions for education, expressing concern, and surveying. Proposals should incorporate pathways to address and remedy community concerns in their engagement plans.

Thank you for the opportunity to provide these comments. If you have any questions or concerns, please do not hesitate to reach out.

Sincerely,

Jayson Velazquez
 Climate and Energy Justice Policy Associate
jvelazquez@acadiacenter.org
 860.246.7121 ext.203