

February 24, 2021

**Partners:**

The Alliance for Business Leadership  
 Association to Preserve Cape Cod  
 BlueGreen Alliance  
 Bristol Community College  
 Ceres  
 Clean Energy NH  
 Clean Water Action  
 CT League of Conservation Voters  
 Environment America  
 Environmental League of MA  
 Green Energy Consumers Alliance  
 Health Care Without Harm  
 League of Conservation Voters  
 Maine Conservation Voters  
 Mass Audubon  
 National Wildlife Federation  
 Natural Resources Council of Maine  
 New England Aquarium  
 People's Alliance for Clean Energy  
 PowerOptions  
 Revision Energy  
 Salem Alliance for the Environment  
 Save the Sound  
 Second Nature  
 Tufts University  
 UMass Amherst  
 UMass Boston  
 UMass Lowell  
 VT Natural Resources Council  
 350 Cape Cod

Commissioner Kate Bailey  
 NH Public Utilities Commission  
 21 S Fruit St. #10  
 Concord, NH 03301

Energy Undersecretary Judy Chang  
 MA EO of Energy & Enviro. Affairs  
 1 Ashburton Place  
 Boston, MA 02108

Commissioner June E. Tierney  
 VT Department of Public Service  
 112 State Street  
 Montpelier, VT 05602

Director Dan Burgess  
 Maine Governor's Energy Office  
 62 State House Station  
 Augusta, Maine 04333

Commissioner Katie Dykes  
 CT DEEP  
 79 Elm Street  
 Hartford, CT 06106

Commissioner Nicholas Ucci  
 RI Office of Energy Resources  
 1 Capitol Hill  
 Providence, RI 02908

**RE: New England States Technical Conferences – Wholesale Market Design**

Dear Commissioner Bailey, Director Burgess, Undersecretary Chang, Commissioner Dykes, Commissioner Tierney, and Commissioner Ucci,

New England for Offshore Wind appreciates the opportunity to submit comments on the New England States' Technical Conferences on Wholesale Market Design, hosted on January 13th and 25th. New England for Offshore wind is a broad-based coalition of over 75 organizations that aims to drive regional collaboration and procurements of responsibly developed offshore wind in New England.

As associations, businesses, environmental and justice organizations, institutions, and labor unions with significant operations in New England, we write to express our support for the New England States' efforts to collaborate regionally to design a market that appropriately values clean energy resources and that aligns with states' climate mandates. Regional collaboration is a necessary precondition for attaining New England's potential as a leader in offshore wind – such collaboration will unlock economies of scale, accelerate development, and improve project outcomes across the six-state grid we share.

We also support the States' recommendation to “establish effective market mechanisms that accommodate existing and future long-term contracts for clean energy resources executed pursuant to state law.” Procurements are important tools to deliver social, economic, and

**Endorsers:**

Autonomous Marine Systems  
 Ben Hillman & Company  
 Burns & McDonnell  
 Cape Cod Climate Change Collab  
 Cape Cod Five  
 Clean Air Task Force  
 Climate Action Now, Western MA  
 Climate Reality Project – MA Southcoast  
 Coalition for Social Justice  
 CT Sustainable Business Council  
 E. Hampton Clean Energy Task Force

**Endorsers (cont'd):**

Eastern CT Green Action  
Elders Climate Action Massachusetts  
Energy Efficiency Associates, LLC  
Environmental Council of RI  
Faith Communities Enviro. Network  
Flashover LLC  
GBPSR  
Green Newton  
Hollis Line Machine  
Iron Workers Local 7  
Lautec US Inc.  
MA AFL-CIO  
MassMEP  
MCAN  
Mills Public Relations  
Mothers Out Front  
Muggventures  
Nashoba Conservation Trust  
New Hampshire Audubon  
NH Businesses for Social  
Responsibility  
Philip Conkling & Associates  
POWER-US | MA  
Rhode Island Building Trades  
Robert E Derecktor Inc.  
Seacoast Anti-Pollution League  
Self-Reliance  
Turnstone  
University of Maine  
Vineyard Power Cooperative Inc.

environmental benefits such as environmental and wildlife protection, equity, and economic development. We urge the New England states to ensure that any future clean energy market design values these benefits appropriately.

Offshore wind is our region's best opportunity for new sources of energy and is likely to be the linchpin of our clean energy transition. According to several analyses, New England will need anywhere from 30<sup>1</sup>-45<sup>2</sup> GW of offshore wind to reach net zero by 2050, and that number would increase if more existing power plants (including nuclear stations) retire in the coming decades. Closing the regional fossil fuel plants and replacing them with offshore wind will also reduce pollution and lead to improved air quality and health outcomes in our most vulnerable communities. With the scale of offshore wind needed for decarbonization and the urgency of climate change – and in recognition that creating a new regional clean energy market will be a lengthy process – moving forward on offshore wind cannot wait. As our region moves toward a new market design, we urge you to continue to push offshore wind procurements forward and collaborate regionally to the extent possible to capture economies of scale as well as regional social and economic benefits.

Thank you for the opportunity to comment on these conferences on wholesale market reform. We commend the New England States for collaborating regionally on working to design a market that fairly values clean energy resources, and we look forward to working with your offices to ensure the responsible build-out of offshore wind in our region.

Sincerely,

Susannah Hatch, Regional Lead  
***New England for Offshore Wind***

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<sup>1</sup> "Massachusetts 2050 Decarbonization Roadmap," *Massachusetts Executive Office of Energy and Environmental Affairs* and *The Cadmus Group*, <https://www.mass.gov/doc/ma-2050-decarbonization-roadmap/download>.

<sup>2</sup> Weiss, Jürgen and Hagerty, John Michael, "Achieving 80% GHG Reduction in New England by 2050," *The Brattle Group*, slide 11, [https://brattlefiles.blob.core.windows.net/files/17233\\_achieving\\_80\\_percent\\_ghg\\_reduction\\_in\\_new\\_england\\_by\\_20150\\_september\\_2019.pdf](https://brattlefiles.blob.core.windows.net/files/17233_achieving_80_percent_ghg_reduction_in_new_england_by_20150_september_2019.pdf)

