



THE ALLIANCE FOR BUSINESS LEADERSHIP



ELDERS CLIMATE ACTION

Massachusetts Chapter



CLEAN WATER ACTION MASSACHUSETTS



November 5, 2021

Representative Jeffrey Roy
Chair, Joint Committee on Telecommunications, Utilities, and Energy
24 Beacon Street
Boston, MA 02133

RE: “The State of Offshore Wind in Massachusetts” Report and Recommendations

Dear Chair Roy,

On behalf of the undersigned organizations and our thousands of members and supporters across the Commonwealth, we applaud your work to keep Massachusetts at the forefront of the nation’s offshore wind endeavor. Such determined leadership made Massachusetts the home of the first utility-scale offshore wind project to both receive a positive Record of Decision from the federal government and to achieve full financing. With two contracted projects and bids under consideration for our third solicitation, the Commonwealth is well on its way to launching a robust offshore wind industry, and now is the moment to ensure we get the details right, protect wildlife and communities, and secure maximum benefits from this once-in-a-generation opportunity.

We thank you for your work on “The State of Offshore Wind in Massachusetts” and for underscoring a critical set of recommendations. In particular, we support and appreciate your recommendations to: eliminate the price cap from the Energy Diversity Act of 2016; increase funds directed to offshore wind

port infrastructure and MassCEC; adopt the legislative intent of the wildlife and environmental impact mitigation portion of H.3302; incentivize economic development; invest in educational institutions; and remove utilities from the evaluation and selection process. Together, these recommendations go a long way toward ensuring that as an offshore wind industry takes root in Massachusetts, it is guided by responsible development practices, environmental stewardship, and investment in local communities, workers, and institutions. We also appreciate your recognition of transmission as a key issue and challenge for offshore wind, and urge you to encourage regional action and coordination. A planned, regional approach could minimize costs, increase reliability, and minimize impacts to the environment and local communities, while ensuring that the industry can reach the scale needed to combat climate change.

In addition to the laudable goals you put forward, we respectfully urge you to consider incorporating the following:

- **Eliminate remuneration:** Recognizing that remuneration in this case is intended to compensate utilities for taking on the risk associated with offshore wind projects, this stands as an unnecessary and outdated burden on ratepayers. The resilience and scale of the offshore wind industry today make remuneration, even at a reduced percentage, indefensible.
- **Set labor standards:** As in Section 6 of H.3302, we recommend including a provision that promotes local jobs and labor standards, including but not limited to prevailing wage requirements. Example language can be found in Section 9 (12,13, 14) and Section 18 (4,8,9,15-18) of the Gaming Law. Example language can also be found in HB 1955/SB1198. As we embark on a new chapter of energy generation, it is essential that we facilitate a transition that provides high-quality, family-sustaining jobs for underserved and disproportionately impacted communities and workers.
- **Promote economic inclusion:** Massachusetts' most recent offshore wind solicitation included language geared toward creating more equitable access to the economic opportunities the offshore wind industry will bring. We urge you to both strengthen and codify requirements for developers to include comprehensive workforce, supplier, and investor diversity and inclusion plans in their bids. Specifically, we support the legislative intent of Section 8 of H.3302.
- **Encourage domestic supply chain procurements:** There are more than 500 U.S. manufacturing facilities specializing in wind components such as blades, towers, and generators, as well as turbine assembly. We recommend domestic content requirements are improved and extended to ensure the application to iron, steel, and manufactured goods across the clean technologies supply chain and the associated infrastructure for offshore wind, like ports and transmission.
- **Encourage municipal and private procurements:** As in Section 7 of H.3302, we recommend giving preference to offshore wind projects that include procurements by municipal aggregations and municipal load, government entities, businesses, or large non-profit organizations. Currently, only utility companies have access to the affordable, clean power of offshore wind; adopting the intent of Section 7 would enable access to other entities that have a key role to play in decarbonization efforts in New England.

In combination with the recommendations your report put forward, we believe that the actions we've listed above will position Massachusetts to harness the full potential of responsibly developed offshore wind power and the significant benefits it has to offer.

We appreciate your leadership and your attention to offshore wind power to date, and we look forward to working with you in the months and years ahead to ensure we maintain momentum toward the clean and just energy future within reach.

Sincerely,

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National Wildlife Federation

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BlueGreen Alliance

Susannah Hatch
Environmental League of Massachusetts

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