



December 2, 2020
Commissioner Nicholas Ucci
Rhode Island Office of Energy Resources
One Capitol Hill
Providence, RI 02908
RE: Draft Rhode Island Offshore Wind Request for Proposals

Dear Commissioner Ucci:

On behalf of the undersigned organizations and the tens of thousands of Rhode Islanders we represent, we strongly support Rhode Island's advancement of responsible, transparent offshore wind development. Rhode Island led the nation in piloting the first offshore wind turbines in state waters at the Block Island Wind Farm. This project, grounded in a robust stakeholder process, championed environmental protections and prioritized local economic benefits at each stage of development. Rhode Island's next procurement must utilize an equally strong stakeholder-driven process to build on our success while keeping pace with states that are taking a strong leadership role in shaping the development of offshore wind power off our shores.

Permitting of these massive infrastructure projects requires widespread public and political support, which hinges on developers' plans for environmental protection and commitments to benefit local communities. A successful project builds goodwill by establishing these commitments from the very beginning. To this end, we are providing several recommendations that the Rhode Island Office of Energy Resources (OER) and National Grid should adopt as part of a standard and transparent procurement process for offshore wind energy. The provisions recommended below reflect best practices already established in procurement processes by leading states across the region. Implementation of these recommendations will maximize equitable job creation, environmental protection, and help ensure that selected projects are more likely to successfully navigate the many permitting and public approval processes ahead.

We recommend that OER:

- Conduct a transparent offshore wind selection process that includes a public comment period on the draft Request for Proposals (RFP) before the RFP is filed at the Public Utilities Commission (PUC). A public comment period before the PUC filing will help avoid errors from the earliest possible stage and allow stakeholder input without the barriers inherent in the PUC intervention process.
- Outline clear proposal evaluation criteria in the RFP, including which criteria a project will be rated on (e.g. price per megawatt-hour (Mwh), environmental mitigation, local job creation, etc.), the weight of each criteria, and how each criterion will be evaluated.
- Ensure weighting criteria emphasizes minimizing ratepayer impacts, especially minimizing the cost impact to low-income and small business ratepayers through innovative programs offered by the bidder.
- Consult with Rhode Island's Habitat and Fisheries Advisory Boards (HAB and FAB) for input on the draft RFP and throughout the selection process, and ensure ongoing dialogue with selected developers throughout the permitting process on the implementation of bid commitments

- Create an oversight committee that includes labor and community representation to monitor the bid process and, once a bidder has been selected, implementation of commitments made in the bids.

We recommend that OER require bidders to:

- Provide a comprehensive assessment of potential impacts to coastal and marine resources from the project; a plan to address those impacts, including any innovative measures to be deployed; a description and timeline of baseline and post-construction monitoring data to be collected and made publicly available; and plans to engage stakeholders and address concerns over the lifetime of the project. The information provided by developers in these critical areas will help the state determine if they have sufficient plans factored into their bid price and development timeline to address these issues critical to a project's success. New York has established a strong new model¹ for collecting this information, that Rhode Island should strongly consider adopting.
- Specify harm mitigation practices that will be required of all selected projects, such as a prohibition on pile-driving at night to protect marine mammals (as has been required by New York and Maryland²). This should consider all levels of the mitigation hierarchy.
- Contribute financial and technical support for regional research needed to assess and address potential impacts to wildlife and key fisheries, as is now required by New York and New Jersey (\$10,000 per megawatt³) and was recently included in Massachusetts' most recent contract with Mayflower Wind (\$10 million research contribution⁴).
- Provide plans for hiring from and investing in local workforces; plans may include commitments to pay prevailing wage, accept union neutrality agreements, and participate in good faith negotiations to reach community benefit agreements that include commitments to local hiring, as well as training for local workers⁵.
- Commit to developing a regional, low-carbon supply chain that goes beyond the final fabrication and assembly and includes provisions for components to be made in America.
- Provide any exceptions to hiring outside of Rhode Island, and a plan to compensate for out-of-state hiring to support our workforce development (in Massachusetts, Mayflower Wind made a 75% local employment commitment for Operation and Maintenance jobs, and will invest \$20,000 per FTE shortfall to support the training and development of the workforce to ensure the 75% minimum threshold is met⁶).
- Provide a plan to ensure equity and inclusion throughout the development of the offshore wind project. Equity plans should include measurable commitments to workforce diversity and inclusion and utilization of women- and minority-owned businesses.

¹ [Appendix E](#) of New York's 2020 solicitation

² [Appendix E](#), Section 4.3 of New York's 2020 solicitation and Maryland Public Service Commission [Order No. 88192, Case No. #9431](#) (May 11, 2017)

³ New York's [2020 Solicitation](#), Section 2.2.5 and New Jersey's [2020 Solicitation](#), Section 3.

⁴ Massachusetts Department of Public Utilities [order](#) approving offshore wind power generation contracts between Mayflower Wind and National Grid, Eversource and Unitil, page 43.

⁵ This has been done to varying degrees in New York, New Jersey, and Connecticut. See New York's [2020 Solicitation](#), Section 2.2; New Jersey's [2020 Solicitation](#), Section 3.8; and in Connecticut's [2019 Solicitation](#), Section 15.

⁶ [Mayflower Wind Bid](#), section 11.1

- Submit plans to support environmental justice communities by providing jobs, grants, training programs, and environmental benefit projects to address historical and cumulative impacts in economically disadvantaged communities along with an explanation of the nexus between the spending and the application.
- Contribute financial support for Rhode Island communities that have been most impacted by climate change, including communities otherwise vulnerable to inequity, such as the Port of Providence.

Rhode Islanders want a strong economy that runs on clean energy and offshore wind energy provides an unmatched opportunity to achieve that vision. We submit these initial recommendations with enthusiastic support for the foundation they lay in creating a thriving offshore wind industry in our state that prioritizes environmental protection and local economic benefits. A public comment period on the Draft RFP is a critical next step, and we look forward to the opportunity to comment further when that process is put forth by your agency.

Sincerely,

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