

ERE-1 Resolution on Offshore Wind Transmission

Whereas the Federal Energy Regulatory Commission (“FERC”) is conducting a technical conference regarding offshore wind (“OSW”) integration in regional transmission organizations (“RTOs”) and independent system operators (“ISOs”) in Docket No. AD20-18-000;

Whereas FERC is examining whether the Commission’s existing transmission, interconnection, and merchant transmission frameworks in RTOs/ISOs are capable of the anticipated growth of OSW;

Whereas at least six States have established OSW targets over 28 gigawatts (“GWs”) by 2035 according to the American Wind Energy Association;¹

Whereas these States have already awarded, through resource solicitations, 6.3 GWs of OSW projects;²

Whereas FERC is examining its open access transmission principles and possible changes or improvements to the current frameworks to accommodate anticipated OSW growth;

Whereas a planned and coordinated approach to OSW transmission may reduce the miles of marine cabling thereby reducing impacts on marine environments and fisheries;³

Whereas some studies suggest that a planned offshore network could cost less in capital outlays and reduce power losses, and could produce other grid savings;⁴

Whereas existing grid capacity is finite and once hosting capacity is used up at specific interconnection points then extensive upgrades may be required;⁵ and

Whereas networked OSW transmission could enhance grid reliability by facilitating the rerouting of power when helpful; *now, therefore be it*

Resolved that the Board of Directors of the National Association of Regulatory Utility Commissioners convened at its 2020 Annual Meeting and Education Conference, urges FERC to consider as it reviews its open access transmission principles that a well-planned OSW grid may result in enhanced transmission efficiency and reliability compared to unplanned OSW tie-line interconnections; *and be it further*

Resolved that NARUC respectfully recommends that FERC consider that a well-planned networked offshore transmission grid may reduce the impacts of OSW development on the marine environment and fishery; *and be it further*

Resolved that NARUC recommends a clear path for both traditional utility and non-traditional competitive

¹ <https://www.awea.org/Awea/media/Resources/Fact%20Sheets/Offshore-Fact-Sheet.pdf>

² <https://www.awea.org/Awea/media/Resources/Fact%20Sheets/Offshore-Fact-Sheet.pdf>

³ https://brattlefiles.blob.core.windows.net/files/18939_offshore_transmission_in_new_england_the_benefits_of_a_better-planned_grid_brattle.pdf

⁴ https://brattlefiles.blob.core.windows.net/files/18939_offshore_transmission_in_new_england_the_benefits_of_a_better-planned_grid_brattle.pdf; <https://www.offshorewindus.org/wp-content/uploads/2020/10/Business-Network-OSW-Transmission-White-Paper-Final.pdf>

⁵ <https://www.offshorewindus.org/wp-content/uploads/2020/10/Business-Network-OSW-Transmission-White-Paper-Final.pdf>

merchant transmission development, including stand-alone OSW transmission proposals, be established in the relevant RTOs/ISOs by action of the RTOs/ISOs and FERC as necessary to achieve an optimal balance of low-cost transmission and OSW development and avoidance of environmental and fishery impacts through appropriate planning and processes to coordinate state OSW goals with RTOs/ISOs processes.

Passed by the Committee on Energy Resources and the Environment November 10, 2020

Adopted by the Board of Directors, November 11, 2020