



N A R U C
National Association of Regulatory Utility Commissioners

February 11, 2021

The Honorable Richard Glick, Chairman
The Honorable Neil Chatterjee
The Honorable James Danly
The Honorable Alison Clements
The Honorable Mark Christie
Federal Energy Regulatory Commission
888 1st Street, NE
Washington, DC 20426

Re: NARUC Resolution on Offshore Wind Transmission (Docket No. AD20-18-000)

Dear Chairman and Commissioners:

On behalf of the National Association of Regulatory Utility Commissioners (“NARUC”), I am writing to share with you a resolution that our association passed at our Annual Meeting in November; please see attached. The Board of Directors adopted the resolution, titled *Resolution on Offshore Wind Transmission*, after the Federal Energy Regulatory Commission (“FERC”) had conducted a technical conference regarding offshore wind (“OSW”) integration in regional transmission organizations/independent system operators (“RTOs/ISOs”) in Docket No. AD20-18-000.

The resolution urges FERC to consider as it reviews its open access transmission principles that a well-planned offshore wind (“OSW”) grid may result in enhanced transmission efficiency and reliability compared to unplanned OSW tie-line interconnections. In the resolution, NARUC 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. Furthermore, we recommend a clear path for both traditional utility and non-traditional competitive 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.

Please let us know if you have any questions or wish to discuss these issues further. You can reach our Director of Energy Policy and Senior Counsel, Jennifer Murphy, at jmurphy@naruc.org or 202-898-1350.

Thank you for your attention to these matters and for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Paul Kjellander". The signature is written in a cursive style with a large initial "P".

Paul Kjellander
of Idaho
NARUC President

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*

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>

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 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