



July 23, 2020

ELECTRONIC FILING

The Honorable Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza, Agency Building 3
Albany, New York 12223-1350

**Re: Case 15-E-0302 - Proceeding on Motion of the Commission to Implement
a Large-Scale Renewable Program and a Clean Energy Standard**

Dear Secretary Phillips:

RWE Renewables Americas, LLC (“RWE”) appreciates the opportunity to provide comments in response to the New York State Energy Research and Development Authority’s (“NYSERDA”) and Staff of the New York State Department of Public Service’s (“DPS”) White Paper issued in the above-captioned docket on June 18, 2020, proposing a regulatory structure to implement the Climate Leadership and Community Protection Act (“CLCPA”). We support the Alliance for Clean Energy New York’s comments, and we offer some specific comments on offshore wind below.

RWE, founded in 1898, is one of the largest players in the renewable business worldwide and the third largest producer of renewable energy in Europe. RWE's strategy for renewables is geared to growth and we plan to invest an annual amount of \$1.5 billion to expand our wind, solar energy and storage technologies portfolio. Since 2007 we have built nearly 4,000 megawatts (“MW”) of wind, solar and energy storage projects in the United States. In New York, RWE is a leader in utility scale clean energy investment, currently developing just over 250 MW between the Cassadaga Wind and Baron Wind projects and operate 34.5 MW at the Munnsville Wind project. In addition to investing more than \$6 billion in

producing clean, affordable homegrown energy, RWE has also established an ambitious CO2 reduction target and has committed to be carbon-neutral by 2040. As the second largest offshore wind developer in Europe, RWE owns 2.5 gigawatts (“GW”) of Offshore Wind and operates an additional 800 MW for our partners.

Requested Authorization to Procure up to 9 GW

RWE supports the White Paper’s recommendation that the New York State Public Service Commission (“PSC”) adopt the CLCPA’s goal of 9 GW of offshore wind-powered generation capacity by 2035 and grant NYSERDA the authority to procure the remaining amount of Offshore Wind Renewable Energy Credits (“ORECs”) needed to achieve the 9 GW goal. While we appreciate New York’s measured, piecemeal approach to offshore wind procurements in its initial stages, NYSERDA now has the experience to successfully solicit clean energy attributes including ORECs without the need to obtain PSC authorization for each solicitation, therefore alleviating the administrative burden associated with preparing for and participating in a regulatory proceeding.

The White Paper recommends annual solicitations between 750 MW and 1,000 MW through 2027. The White Paper also proposes that NYSERDA have flexibility in conducting procurements in order to be able to respond to market conditions. RWE supports the White Paper concept of publishing a long-term solicitation schedule to provide insight and certainty to efficiently incentivize future investment decisions, and this position is reflected in our comments submitted on April 20, 2020, in response to NYSERDA’s Petition Regarding Offshore Wind Procurement Authorization for 2020 Procurement. In determining the size and frequency of future procurements, NYSERDA should consider factors including the following:

- As suggested in RWE’s comments on April 20, 2020, a staggered solicitation schedule beginning in 2021 between New York and other Northeast states (e.g. New Jersey’s proposed even-numbered year solicitation schedule) will help smooth the supply curve and prevent issues that may arise with multiple, concurrent project submittals.
- The status of designation of wind energy areas and the Bureau of Ocean Energy Management lease auction timelines. The availability of more

lease areas will promote greater competition yielding more creative bids and greater economic benefits.

- The availability of federal tax incentives.

If the PSC grants NYSERDA the requested flexibility to unilaterally adjust the timing and size of the procurements, then NYSERDA should have to show “good cause” for any subsequent change(s).

Transmission

RWE agrees with the White Paper’s conclusion that it would be difficult to design coordinated transmission systems without knowing the locations of the final wind energy areas in New York Bight. We, therefore, support the White Paper’s recommendation for continued study of alternative transmission networks and onshore transmission upgrades that will be necessary for New York to attain its 9 GW goal. RWE strongly encourages New York to closely coordinate with other northeast states to develop interregional offshore wind transmission policies.

Great Lakes Wind

RWE supports the White Paper’s recommendation to develop a feasibility study to gather information and to assess the potential of offshore wind development in Lake Erie and Lake Ontario.

Tier 4

RWE agrees with the White Paper’s conclusion that downstate needs more clean energy delivered into Zone J in order to displace the fossil fuel generation that currently provides most of the electricity to New York City. We also agree with the White Paper’s acknowledgment that offshore wind has the greatest potential to increase the penetration of renewable energy in New York City. RWE requests that the PSC clarify that offshore wind is an eligible technology for a newly created Tier 4 of the New York Clean Energy Standard and to ensure that any future Tier 4 solicitations will be competitive among all eligible resources and provide additionality by adding *new or expanded* renewable energy generation.

Disadvantaged Communities

RWE supports the CLCPA requirement to incorporate environmental and health benefits to disadvantaged communities that will result from New York State achieving its 2030 and 2040 targets.

Sincerely,
Kate McKeever

Kate McKeever

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