



VIA ELECTRONIC FILING

Honorable Michelle L. Phillips
Secretary
New York State Public Service Commission
Three Empire State Plaza, 19th Floor
Albany, New York 12223-1350

RE: Case 19-E-0530 – Proceeding on Motion of the Commission to Consider Resource Adequacy Matters

Equinor Wind US LLC Comments

Dear Secretary Phillips,

Equinor Wind US LLC (“Equinor Wind”) appreciates the opportunity to submit comments in response to the July 10, 2020 Technical Conference concerning The Brattle Group’s (“Brattle”) analysis of potential resource adequacy (“RA”) structures for New York. As discussed further below, Equinor Wind strongly supports the Commission’s continued effort to ensure that the RA framework within New York does not stand as an obstacle to achieving New York’s renewable energy and emission reduction goals.

Equinor Wind is a subsidiary of Equinor ASA, a global energy company with over four decades of experience developing, owning, and operating large-scale offshore energy projects. Equinor Wind currently is developing the Empire Wind Project, an 816 MW offshore wind project that is under development in federal waters off the coast of New York and was one of two projects selected through New York’s first offshore wind solicitation. Equinor Wind appreciates the opportunity to support New York State in achieving its goal of fostering the development of 9,000 MW of offshore wind by 2035 and facilitating the just transition outlined in New York’s Climate Leadership and Community Protection Act.

Although Equinor Wind currently does not have a position regarding the alternatives outlined in the Brattle Group's analysis, Equinor Wind encourages the Commission to continue to explore ways that the RA framework can be modified to better align with the State's renewable energy and emission reduction goals. In so doing, Equinor Wind also encourages the Commission to keep in mind the manner in which changes adopted through this proceeding could impact renewable and energy storage resources that have already entered into agreements pursuant to state programs. Because contracts that have been awarded through the state's renewable solicitation programs generally have been premised on the existing market design, it will be important to ensure that any changes to the RA framework adopted through this proceeding are implemented in a manner that does not upset the settled expectations of parties and create unnecessary uncertainty. As the Commission continues to move forward with this important initiative, Equinor Wind encourages the Commission to consider what steps can be taken to preserve the benefits of existing contracts while accomplishing the Commission's objective of ensuring that the New York markets evolve in a manner that is compatible with the state's public policy objectives.

Equinor Wind appreciates the opportunity to provide its views to the Commission on this important issue.

Respectfully Submitted,

/s/ Matthew Brotmann

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