



Massachusetts Lobstermen's Association, Inc.

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February 25, 2019

Department of Energy Resources
100 Cambridge St Suite 1020
Boston, MA 02114

Via email: eric.steltzer@mass.gov

Respondent Information

1. Please provide the name of your organization and your contact information.

Massachusetts Lobstermen's Association (MLA)
8 Otis Place
Scituate, MA 02066

2. Please briefly describe your organization and your interest in the Commonwealth's OSW procurements.

The Massachusetts Lobstermen's Association was established in 1963 by the fishermen, for the fishermen, and is presently one of the leading commercial fishing industry associations in New England. On behalf of the 1,800 members, the MLA works to maintain both the industry and the resource. The MLA strives to be proactive on issues affecting the lobster industry and is active in the management process at both the state and federal levels. The MLA communicates with its members through a monthly newspaper, weekly email, Facebook, Twitter and attendance at meetings. For the past 56 years, the MLA has become a trustworthy voice for the industry on important issues, and is looked to by both the fishing industry and the management community.

MISSION STATEMENT: *The Massachusetts Lobstermen's Association is a member-driven organization that accepts and supports the interdependence of species conservation and the members' collective economic interests.*

The MLA is committed to the Commonwealth's OSW procurement process as the installation of wind turbines offshore will have a direct and indirect impact on the historic commercial fishing fleet along with the shore side business they support. The MLA has been actively engaged in the offshore wind development process over the last two decades and will continue to be at the table so the fishing industry can keep fishing. The MLA members are stewards of the Sustainability of the ocean and constantly strive to coexist with all facets of the ecosystem.

Furthermore, the unknown impacts to the ecosystem and the multitude of species that are currently harvested from the coastal waters sustainable will not be realized until it is too late to undo any harm the introduction of turbines, cable and substations will have on them.

Necessity

3. Are additional OSW procurements for long-term Power Purchase Agreements that are above and beyond those authorized by Section 83C necessary to support the development of OSW?

Before any further Power Purchase Agreements (PPA) are approved the MLA strongly recommends that the Commonwealth abstain from issuing any until the impacts of the Vineyard Wind project can be assessed and that the all the involved parties in Southern New England are able to review, comment, and advocate better practices and how well the first project was done and that any negative impacts to the ecosystem and commercial fishing industry collectively is vetted so not to be repeated.

a. What are the advantages and disadvantages of longer and shorter term (i.e. 10 years, 25 years) periods for Power Purchase Agreements to developers, ratepayers, or others?

As the rates are negotiated before the PPA is given – a concern is that a developer make bid so low that once the project is completed they can not deliver on that rate and then the rate payers will be on the hook. With consumer education and products becoming more and more energy efficient, the Commonwealth's power need should be reassessed ever ten years before any PPA is signed. Put a moratorium on building individual house greater than 5,000 sq. When houses are continually being built larger and larger 10,000s ft or larger, this is a strain on the power supply and unnecessary.

b. Are there advantages or disadvantages in soliciting OSW in a stand-alone procurement – or could it compete in a broader renewable or clean energy procurement?

The disadvantages of develop offshore wind far out way the advantages with the negative impacts to the oceans and commercial fishing industry along with the staggering cost. There are currently, new and more efficient power plants being built in the Commonwealth, why not let the residents of the Commonwealth reduce their consumption and give them an incentive of a tax credit for reducing their overall consumption by X.

There are always ways to get more people to do more to reduce their consumption. The 1.6 billion dollar tax credit given to a developer could go a lot further to the residents and then we could truly be part of the solution instead of having our historic and iconic commercial fishing industry pay the ultimate price.

4. Are the opportunities to participate and earn revenue in the wholesale markets (e.g. Energy, Capacity, and Ancillary Services) and renewable energy certificate payments sufficient to support the development of new OSW projects?

Why or why not? Are there recommended changes to the wholesale market structure or renewable energy portfolio standard that would impact your answer? [No comment](#)

5. Are there other forms of financing mechanisms, such as Offshore Renewable Energy Certificates (ORECS), that could support OSW? [No Comment](#)

6. What are the costs and benefits of an additional OSW procurement(s) on potential pricing and other impacts on wholesale markets (e.g. Energy, Capacity, and Ancillary Services)? Please be as specific as possible as to which markets you are referring too.

a. What, if any, would be the effect on the wholesale markets caused by an additional OSW procurement(s)? [No Comment](#)

b. If there would be any negative effect, are there recommended solutions to mitigate the effect? [No Comment](#)

7. Would additional OSW procurement(s) incremental to procurements under Section 83C have any specific wholesale market impacts on other low/no emission resources? [No Comment](#)

8. What are the potential pricing and compliance impacts of additional OSW procurement(s) on Renewable Energy Certificate and Clean Energy Certificate markets? [No Comment](#)

9. Will additional OSW procurement(s) have specific seasonal market impacts? [No Comment](#)

10. Is an additional 1600MW of solicitation(s) the appropriate target? Why or why not?

[No, the MLA strongly recommends that the Commonwealth abstain from issuing any additional solicitations until the impacts of the Vineyard Wind project can be assessed. All the involved parties in Southern New England must be able to review, comment, and advocate better practices and how well the first project was done and that any negative impacts to the ecosystem and commercial fishing industry collectively is vetted so not to be repeated. There is no undoing the negative impacts to the commercial fishing industry and environment.](#)

Transmission

11. What are the advantages and disadvantages of requiring a coordinated OSW transmission network? [No Comment](#)

a. If there are advantages, what would be required to accomplish this? [No Comment](#)

b. Are there changes to the solicitation process that could accomplish this? [No Comment](#)

c. Could state or regional support for a transmission system to support further offshore wind development be sufficient to finance further offshore wind development? [No Comment](#)

Other Factors that Impact Cost and Price

12. What, if any, impact will the expiration of the federal Investment Tax Credit have on future pricing for additional OSW procurement(s)? [Rate payers should be made aware of what their rates are projected to be and have a cap not to exceed X.](#)

13. What is the potential for advancement of technological improvements in offshore wind sector to affect pricing for any additional OSW procurement(s)? [No Comment](#)

14. What restrictions on price shall there be on any additional OSW procurements, if any? [Rate payers should be made aware of what their rates are projected to be and have a cap not to exceed X.](#)

Should each successional procurement be required to reflect a price decrease? [Yes, that would be the right thing to do and the rate payers should be the first to see any reduction in cost.](#)

d. 15. With pending retirements in New England should there be a particular focus on specific development areas and/or transmission interconnection points to relieve future reliability constraints? [No Comment](#)

Economic Development and Supply Chain

e. 16. Will requiring the Distribution Companies to undertake an additional OSW solicitation of up to 1600 MW impact the development of offshore wind supply chain services in the Commonwealth? [No Comment](#)

If so, what potential economic benefits to the Commonwealth may result if OSW supply chain services are located in MA?

f. 17. Are there certain services or products in the OSW supply chain that are more likely to locate in the Commonwealth than others? [No Comment](#)

18. Are there actions, outside of additional OSW procurement(s), that the Commonwealth should consider to secure OSW supply chain services are located in MA? Please explain.

[The Port of New Bedford is one of several southern locations that could take on a role as a hub for OSW. Our concern is that as this newly emerging OSW industry is developed it be done with input from the commercial fishing industry with a well represented, area specific, actively commercial fishing advisory board as they are the ones currently out on the water and working within the harbors in the Commonwealth. There is a fleet of vessels in SE Massachusetts that could be utilized to transport workers to turbines instead of introducing a new fleet of vessels to the area as an example.](#)

Regional Coordination

19. Should Massachusetts coordinate with other states in any future solicitations of OSW? [No Comment](#)

20. What are the advantages or disadvantages to coordinating? [No Comment](#)

Other

21. Please provide any other comments pertain to the necessity, benefits and cost of additional OSW procurement(s).

Kind regards,

Beth Casoni

Executive Director