

## COMMENTS ON THE DRAFT NOTICE OF REQUEST FOR PROPOSALS FROM PRIVATE DEVELOPERS FOR CLEAN ENERGY

The undersigned organizations thank the Connecticut Department of Energy and Environmental Protection (“DEEP”) for the opportunity to submit written comments on the Draft Notice of Request for Proposals from Private Developers of Clean Energy (“Draft RFP”) in response to the Notice of Opportunity for Public Comment issued December 15, 2017. The undersigned represent a diverse group of interests, including clean energy advocates, environmental organizations, labor unions, and faith groups, all of whom support the development of offshore wind resources. We commend DEEP’s release of the Draft RFP, and we are encouraged that DEEP has embraced offshore wind as a clean energy resource that can help meet the state’s electricity needs while creating in-state jobs and economic activity.

Offshore wind is a key component for the Northeast and Connecticut to achieve their greenhouse gas emissions reduction goals. With good wind speeds, shallow water, and close proximity to population centers, the region has vast potential for harvesting this zero-carbon resource that remains largely untapped. Unlike other generation fuels, including natural gas, which must be imported from outside the region, the Northeast’s wind resources place it at the head of the offshore wind “pipeline,” and Connecticut should aggressively pursue offshore wind procurement to reap the local economic and climate benefits.

Therefore, the undersigned are pleased that DEEP will accept proposals for offshore wind generation up to the maximum capacity allowed under law—up to 3% of load. We are also pleased that DEEP has encouraged bidders to consider coordinating their submissions with the Massachusetts offshore wind development process to maximize potential economies of scale that could bring down project costs. The requirement in Appendix B Section 12.3 that bidders describe how the project will contribute to meeting the state’s climate goals under the Global Warming Solutions Act will also provide an important metric for comparing proposals.

The undersigned applaud the proposed scoring system for evaluating the proposals, allowing 75 points for quantitative cost factors and 25 points for qualitative factors, including economic benefits and environmental concerns. This approach puts an important emphasis on in-state development of the offshore wind industry, including workforce development, port investments, and establishment of supply chain industries. Prioritizing these in-state impacts is critical to ensuring the economic benefits from this RFP accrue to Connecticut. Acting now to secure these in-state investments will help position Connecticut as a supply point for future offshore wind installations along the Atlantic coast.

Within the 25 points allotted for evaluation on economic and environmental concerns, we appreciate that DEEP has highlighted in-state job creation, including jobs in distressed communities, among the criteria to be considered. The undersigned would like to see this aspect of the RFP expanded and strengthened by including language from Maryland<sup>1</sup> in the following ways:

- (1) Insert the phrase “Use of skilled labor and registered apprenticeship programs” in the list of “economic development benefits” in Section 2.3.2.1, subsection (4).

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<sup>1</sup> Public Utilities Article, §7-704.1, Annotated Code of Maryland, available here: [http://www.marylandoffshorewind.com/Documents/PUA\\_7-704.1.pdf](http://www.marylandoffshorewind.com/Documents/PUA_7-704.1.pdf)

(2) Insert the following paragraphs in Appendix B, Section 13:

“13.X Describe the applicant’s plan for the use of skilled labor, especially for the construction and manufacturing components of the project, including outreach, hiring, or referral systems, or all of these, that are affiliated with registered apprenticeship programs in Connecticut.”

“13.X Describe the applicant’s plan for using an agreement designed to ensure the use of skilled labor and to promote the prompt, efficient, and safe completion of the project, particularly with regard to the construction, manufacturing, and maintenance of the proposed offshore wind project.”

The undersigned thank DEEP again for the opportunity to provide input on this important process and look forward to engaging further as the request for proposals is finalized.

**Endorsing Organizations:**

Acadia Center  
Connecticut Roundtable on Climate and Jobs  
Citizens Campaign for the Environment  
Clean Water Action, Connecticut  
Connecticut AFL-CIO  
Connecticut Citizen Action Group  
Connecticut Fund for the Environment  
Connecticut Laborers’ District Council  
Connecticut State Council of Machinists  
Connecticut State Employees Association,  
SEIU Local 2001  
Conservation Law Foundation  
Cornwall Energy Task Force  
Eastern Connecticut Green Action  
Efficiency for All  
Greater Hartford/New Britain Building and  
Construction Trades Council  
Interreligious Eco-Justice Network

International Brotherhood of Electrical  
Workers, Local 90  
International Union of Operating Engineers,  
Local 478  
Ironworkers, Local 15 and Local 424  
Middletown Clean Energy Task Force  
Naugatuck Valley Project  
New England Regional Council of Carpenters  
New Haven Energy Task Force  
New London/Norwich Building and  
Construction Trades Council  
People’s Action for Clean Energy  
SEIU Connecticut State Council  
Sierra Club  
Solar Energy Association of Connecticut  
Unitarian Society of Hartford, Green  
Sanctuary Committee  
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