CADMUS

April 20, 2023

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

RE: Case 22-E-0633 - In the Matter of New York Independent System Operator, Inc. Proposed Public Policy Transmission Needs for Consideration for 2022.
M-TWG Cabling Workshop Summary

Dear Secretary Phillips:

The New York State Offshore Wind Maritime Technical Working Group (M-TWG) respectfully requests consideration by the Public Service Commission (PSC) and New York Independent System Operator (NYISO) of the enclosed summary of feedback from 46 stakeholders developed during the ***M-TWG's Offshore Wind Cabling Workshop: Advancing Cable Routing Coordination,*** held on March 2, 2023.[1] Workshop participants indicated that these are important topics for your consideration as New York State advances responsible and sustainable offshore wind projects and transmission infrastructure.

The M-TWG is an independent and non-decisional advisory entity made up of representatives from the maritime transportation sector, navigation community, and offshore wind developers who provide guidance and advice on how to responsibly advance New York State's offshore wind energy development. The regional focus of this group is the New York/New Jersey Harbor and its approaches, including the New York Bight and Long Island Sound. Since its inception in 2018, M-TWG members have consistently identified offshore wind transmission cable infrastructure as a priority topic requiring coordination and thoughtful planning due to the potential conflicts that could arise within the busy and space-constrained waters of the Harbor and its approaches.

The workshop was convened in response to stakeholder-identified needs given the State's dual interests in continuing to grow responsible offshore wind development and maintaining a safe and resilient Marine Transportation System. As the East Coast's largest port complex, the New York/New Jersey Harbor is an economic driver for the region containing an extensive network of public and private marine terminals, creating thousands of jobs and generating approximately $1.2 billion in GDP for the State.[2] Likewise, New York City and points on Long Island have been identified as critical to efficiently

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[1] Cadmus is contracted by NYSERDA to serve as the facilitation contractor for the Maritime Technical Working Group (M-TWG). Further information about the M-TWG is available on the website: https://www.nymtwg.com/

[2] NOAA Economics: National Ocean Watch (ENOW). New York State – Marine Transportation, 2019. Accessed March 27, 2023. https://coast.noaa.gov/enowexplorer/#/gdp/livingresources/2016/36000.

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interconnecting the State's mandated 9 gigawatts of offshore wind into the grid, necessitating a greater number of subsea cables to be installed within a limited number of feasible routes. While the Workshop Summary is not a consensus document, M-TWG members recommend that the PSC and NYISO carefully consider stakeholder input in this Case and the NYISO's Public Policy Planning Process.

The M-TWG would like to emphasize several points that could be advanced through New York State transmission planning processes and which are further detailed in the enclosed Workshop Summary:

- Coordinate offshore wind cable routes and, if possible, designate regional cable corridors to reduce total subsea cable footprints required to meet the New York State Climate Leadership and Community Protection Act mandates
- "Future-proof" cable routes through proper planning to minimize incremental and cumulative impacts to maritime industries, achieve sufficient burial depths, and be adaptable to a growing and resilient Harbor
- Establish policies so that subsea cables minimize constraints identified in the NYSERDA Offshore Wind Cable Corridor Constraints Assessment and carefully consider navigation and safety risks, outreach and coordination, burial depth requirements, and cable monitoring and maintenance [3]
- Commit to early coordination with U.S. Coast Guard, the Harbor Safety, Navigation, and Operations Committee,[4] and similar maritime organizations

The M-TWG will continue to evaluate feedback generated during the Workshop and explore opportunities to build consensus and specific recommendations to reduce or avoid navigational impacts that could result from installing and operating subsea offshore wind cables. Further information is available on the M-TWG website (www.nymtwg.com) and will be updated as discussions continue.

We appreciate this opportunity to provide input. The M-TWG members would be happy to provide more detail on this information upon request.

Sincerely,

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ecc: Mike Snyder and Laura McLean, NYSDOS and M-TWG co-chairs
M-TWG members

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[3] NYSERDA. January 2023. "Offshore Wind Cable Corridor Constraint Assessment." https://www.nyserda.ny.gov/-/media/Project/Nyserda/Files/Programs/Offshore-Wind/2306-Offshore-Wind-Cable-Corridor-Constraints-Assessment--completeacc.pdf

[4] For more information about The Maritime Association of the Port of New York-New Jersey, see the website: https://nymaritime.org/harbor-safety-navigation-and-operations/