Mr. Wright Frank  
Bureau of Ocean Energy Management  
Office of Renewable Energy Programs  
381 Elden Street, HM 1328  
Herndon, Virginia 20170  


Dear Mr. Frank:  

The Virginia Offshore Wind Development Authority (VOWDA) is hereby responding to the subject Notice of Proposed Grant Area and Request for Competitive Interest (RFCI), as detailed in the announcement posted in the Federal Register, Vol. 76, No. 245 on December 21, 2011.  

As requested by the subject Notice, this letter provides information about site conditions and multiple uses within the area identified by the Notice that are relevant to the proposed project or its impacts.  

The subject RFCI also invited the submission of indications of competitive interest for any right-of-way (ROW) grant that may partially or fully overlap the area requested by Atlantic Grid Holdings, LLC (AGH), or that may otherwise interfere with development of AGH’s proposed offshore transmission facilities, which are collectively named the Atlantic Wind Connection (AWC).  

VOWDA’s comments hereunder support the following objectives: (i) reduce the cost of delivering power to Virginia residents from wind farms off the coast of Virginia, (ii) remove barriers and promote actions and policies that shorten the time to permit, design, and construct wind farms offshore of Virginia. Specifically, with respect to the granting of any ROW, VOWDA seeks a solution that will hasten the on-line date for Virginia offshore wind, and at the same time will reduce cost of power from these wind farms to Virginia residents.  

AGH has requested lease blocks for three possible cable routes from its proposed Virginia offshore hubs to the Virginia coast. VOWDA understands that at a minimum Dominion Virginia Power (DVP) is evaluating the construction of transmission solutions to connect projects
in the Virginia offshore Wind Energy Area (WEA) to the onshore transmission grid. VOWDA notes that there is a high potential for geographic overlap between the three AWC alternative routes and other potential transmission options to be constructed to connect projects to the onshore grid. At this time, VOWDA does not support one option over the other as it remains to be determined which of the proposed options (or any other options) best support VOWDA’s stated objectives.

VOWDA’s primary area of concern is the granting of ROW between the Virginia WEA and the Virginia coast. VOWDA’s objective is for any ROW between the Virginia WEA and the Virginia coast to be granted to the party that can accelerate the development of low cost offshore wind to Virginia residents.

VOWDA is concerned that the current proposed schedule for placing the Virginia phases of the AWC into service is not until 2019, while offshore wind projects in the Virginia WEA could be operational as early as 2017 and that by awarding AGH a ROW grant between the Virginia WEA and the Virginia coast at this time, BOEM could prevent or delay development of a lower cost near term transmission solution by any other party, or in the alternative, force projects to wait until AWC Phase D is constructed for the first 1,000 MW of installed capacity in the Virginia WEA and wait again until AWC Phase E is constructed for the second 1,000 MW of installed capacity in the Virginia WEA. Neither of these alternatives is in Virginia’s best interest, nor are they in the national policy interest of realizing commercial deployment of cost-effective offshore wind generation as quickly as possible.

The AWC Phase D and Phase E circuits are not now planned to be operational until AFTER the first Virginia offshore wind projects would need to interconnect. Therefore, VOWDA makes the following requests:

1. That BOEM not award any exclusive ROW grants in such a way that could prevent or delay any other party from pursuing an interconnection route of their choice between the Virginia WEA and the onshore grid, where that interconnection cable may be at a lower cost and/or may accelerate the construction of wind farms offshore Virginia. Specifically, we urge BOEM not to award exclusive legal rights in its ROW grants that would allow a ROW lessee to require compensation for crossing their ROW or withhold permission or delay a crossing of its ROW.

2. That BOEM reserve ROW lease blocks off Virginia to be granted to an applicant or applicants who can demonstrate the ability and intent to install a submarine power cable in time to interconnect the first offshore wind project(s) in the Virginia WEA that would provide for the lowest transmission costs between the Virginia WEA and Virginia residents.

VOWDA commends the work that BOEM is doing to promote the development of shared offshore transmission infrastructure for wind projects in the Mid-Atlantic region, and we appreciate the opportunity to submit these comments for your consideration. We hope that they illustrate the risks in awarding any exclusive ROWs for AWC Phases D and E off Virginia at this time. We urge BOEM to encourage AGH and other parties wanting to implement any offshore shared interconnection for the Virginia WEA to inform the VOWDA Board of their plans and
demonstrate how such plans will meet the interconnection needs of Virginia WEA projects in a timely and cost-effective manner.

Sincerely yours,

Arthur W. Moye  
Chairman

c: Cathie J. France, Department of Mines, Minerals and Energy