

January 14, 2019

Ms. Judith Judson, Commissioner  
Massachusetts Department of Energy Resources  
100 Cambridge Street  
Suite 1020  
Boston, MA 02114

Re: DOER Request for Stakeholder Comment – Offshore Wind Procurement  
Schedule

Dear Commissioner Judson,

Please accept these comments on behalf of Siemens Gamesa Renewable Energy, Inc. (SGRE). Siemens Gamesa is the world's leading manufacturer of utility-scale offshore wind turbines. With a total capacity of approximately 11 gigawatts installed offshore and six times that amount of installed onshore capacity, in over 90 countries across 5 continents, SGRE has the longest track record of all wind turbine suppliers in the offshore industry. The Commonwealth of Massachusetts represents an important market to our future business operations and the Baker Administration has demonstrated substantial leadership in helping to bring the offshore wind energy industry to American shores.

SGRE applauds the efforts of the MA DOER in undertaking a considered approach to establishing a successful offshore wind energy industry in the Commonwealth.

Given SGRE's substantial experience with the development of new offshore wind markets, please consider the following suggestions to produce the most successful outcome for the development of a sustainable, long term market opportunity for the Commonwealth of Massachusetts:

### **Stakeholder Questions**

*2a) What are the advantages or disadvantages to issuing the subsequent solicitation prior to June 29, 2019 ("Subsequent Solicitation")?*

The establishment of a sustainable and robust supply chain requires two things: large initial volumes in the early years required to make the investment decision to establish facilities, and a steady and predictable pace of subsequent procurements to sustain the facilities. The offshore wind industry is currently in the initial stage of establishing the volume required for supply chain localization. It is more likely that significant supply chain investments will be made in the Commonwealth of Massachusetts if the Subsequent Solicitation is issued as soon as possible because of the potential to aggregate volumes for suppliers.

*2g) Should the timing of offshore wind energy procurements in other states have any impact on the procurement timeline of the Subsequent Solicitation?*

There is a concern among the offshore wind industry that overlapping construction deadlines based on state procurement rules could pose challenges due to constrained supply of manpower, vessels, or other logistics bottlenecks. The Commonwealth of Massachusetts must of course attend to its best interests, however SGRE recommends that sufficient flexibility be granted to allow bidders to manage this complexity rather than states seeking to mitigate such concerns via staggered solicitations. Bidders will take different approaches to

managing supply chain logistics and have better visibility to the various factors and potential solutions that will allow them to deliver successful projects.

Offshore wind is poised to become a major economic driver for US, thanks in large part to rapidly declining costs, advantageous wind speeds and construction conditions, and significant localized demand for clean electricity.

Accordingly, we respectfully request that the MA DOER consider our comments above in order to support the continued growth of this industry.

Respectfully submitted,

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