



SMART GROWTH AND REGIONAL COLLABORATION

February 25, 2021

Charlie Baker, Governor  
Massachusetts State House, 24 Beacon St.  
Office of the Governor, Room 280  
Boston, MA 02133

**RE: MAPC Comments on Draft 83C Round 3 RFP**

Dear Governor Baker, Secretary Theoharides, Undersecretary Chang, and Commissioner Woodcock,

Thank you for the opportunity to provide input on the Draft 83C Round 3 RFP. The Metropolitan Area Planning Council (MAPC) serves as the regional planning agency (RPA) for the people who live and work in the 101 cities and towns in Metropolitan Boston, which includes roughly half the state's population and two-thirds of the state's jobs. Our mission is to promote smart growth and regional collaboration. Every day, we work with municipalities that are eager to play an active local role in mitigating climate change. MAPC is currently updating our regional long-range plan, MetroFuture, to memorialize our priorities to move the region to net zero greenhouse gas emissions with renewable energy as the region's primary energy source by 2050, while also working to equitably distribute the benefits and impacts of new energy infrastructure and ensure that the Green Economy supports local workforce development and economic opportunity. Our comments on the RFP pertain to these priorities.

**Municipal Participation in Offshore Wind**

Over thirty municipalities in the MAPC region have implemented municipal aggregation programs that include five percentage points or more Class I Renewable Energy Certificates (RECs) than the Renewable Portfolio Standard (RPS) requires to provide a greener electricity supply for their community members than the Energy Distribution Company's (EDC) basic service provides. Not only have these programs been the most impactful climate mitigation strategy of any that cities and towns have deployed, but they also have served as significant contributors to the demand for more renewable energy on the grid. Residents in MAPC communities are increasingly prioritizing energy that comes from local renewable energy sources. Collectively, these energy purchases help to drive greenhouse gas emissions reductions, more renewables in New England, local economic development, and clean energy job opportunities.

MAPC strongly encourages the drafting team to revise the RFP to offer options for both municipal aggregation programs and Municipal Light Plants (MLPs) to serve as offtakers of the electricity and associated RECs generated by these new offshore wind developments. Section 2.2.1.3 outlines how an eligible bidder can sell the electricity and RECs generated by their project. MAPC requests that municipal aggregation programs and MLPs be provided a designated carve-out as offtakers of the electricity and RECs to ensure that all Massachusetts residents can benefit from clean offshore wind energy generation. This exciting and important opportunity to connect more of our local resources to our local communities should not be missed.

## **Minority-owned Business Participation in Offshore Wind**

MAPC commends DOER for encouraging bidders to be inclusive of employment and other opportunities for historically marginalized communities in Section 2.3.2. However, we strongly encourage setting a more robust threshold for reviewing this aspect of offshore wind developers' bids to ensure that populations underrepresented in the clean energy economy can truly participate in and benefit from offshore wind. Specifically, DOER should provide significant weighting criteria to this portion of the RFP to ensure that it is impactful and thoroughly addressed by bidders.

DOER's evaluation should consider how the bidder's proposal would advance inclusive training and workforce development and the rigor of their plan for soliciting business and investment from minority and disadvantaged contractors and investors. Respondents should also describe how they will cooperate with the state Supplier Diversity Office and other state agencies focused on minority and disadvantaged business creation and development. Centering racial equity in the evaluation criteria for offshore wind project proposals is a paramount opportunity. MAPC also recommends including strong reporting and evaluation requirements for successful bidders and meaningful financial penalties for non-compliance to ensure follow-through on commitments made.

## **Low-income Ratepayer Benefit**

MAPC is pleased to see the RFP note that it will consider the demonstration of benefits to low-income ratepayers as a qualitative evaluation criteria in Section 2.3.2. MAPC recommends that the RFP define or offer examples of what is meant by a benefit in this section to help encourage strong responses. Complementarily, the RFP could also request that respondents provide creative strategies for how they will reduce the energy burden of low-income and environmental justice communities, and include this within the evaluation criteria accordingly. In both cases, the bids should be required to clearly demonstrate how benefits will be realized and measured.

MAPC is thankful for the opportunity to review this RFP and for the progress made in this revised draft. We are encouraged by the accelerating role of offshore wind generation in the Commonwealth and hope to see this transition continue in a way that is directly accessible to Commonwealth cities and towns and inclusive to all Massachusetts residents. For any questions related to our comments, please contact Julie Curti, Clean Energy and Climate Strategy Manager and Senior Planner, at [jcurti@mapc.org](mailto:jcurti@mapc.org).

Sincerely,



Cammy Peterson  
Director of Clean Energy

Cc' Secretary Theoharides, Undersecretary Chang, Commissioner Woodcock