

March 1, 2023

Ms. Marian Swain
Deputy Director of Policy and Planning
Massachusetts Department of Energy Resources
100 Cambridge St., 9th Floor
Boston, MA 02114

Re: Massachusetts 83C 4 Offshore Wind Solicitation: Request for Public Comment

Dear Ms. Swain:

We are a consortium of the six public colleges and universities in Southeastern Massachusetts and Cape Cod and in collaboration with the New Bedford Ocean Cluster, we write to comment on the 83C Round 3 Massachusetts RFP offshore wind solicitation.

Leaders from our region have worked diligently for well over a decade to cultivate the industry's interest in our region and we are proud of the advances that have been made. We are excited that the country's first industrial scale offshore wind project will be marshalled from the Port of New Bedford and that the port is poised to launch and maintain many more projects. We are also pleased that Prysmian Group has committed to building a new cable manufacturing facility at Brayton Point in Somerset, a long-term economic development investment that will create good paying jobs for our community.

We support this offshore wind solicitation in the critical need to address climate change and reduce the region's carbon usage. The solicitation, once fully operationalized, will generate enough renewable, affordable power to materially reduce emissions while providing renewable energy to power more of New England. In our collective roles in higher education, the continued development of the offshore wind industry is a key driver of economic development.

The arrival of offshore wind presents a generational opportunity for our region to attract significant capital and job growth, and by virtue of our competitive advantages, could thrive here for a long time. With our full-service industrial port in New Bedford, multiple offshore cable landings and integration with the grid at several points on Cape Cod and the South Coast, proximity to wind energy areas, maritime labor, and solid network of academic and workforce training institutions, our region is naturally suited to become a leading wind industry cluster.

We feel strongly that the following comments are important considerations in evaluating bids submitted by offshore wind developers and will better position the Commonwealth to compete for the prodigious investments the wind industry is about to make in the United States.

1. The 83C 4 RFP should establish “Economic Benefits” as a separate scoring category.

Many of us have long advocated to state policy makers that the Request for Proposals for wind energy contracts should establish a clear and meaningful weight for investment commitments in the scoring process. The provisions included in Chapter 179 of the Acts of 2022 “*An Act Driving Clean Energy and Offshore Wind*” now provide the roadmap for the 2023 RFP to require specific, binding, economic development commitments and more specifically, “commitments for new capital investments in manufacturing, fabrication, and assembly of offshore wind domestic supply chain components within Massachusetts.” To that end, we believe that to compete more effectively for industry investment the “economic benefits” section of Qualitative Analysis should be separated into an independent step in the scoring process, and that it should represent 15 points of the total score. The assigned weight of each scoring step would be as follows: Quantitative Analysis: 70 points; Qualitative Analysis: 15 points, and Economic Benefits: 15 points.

Further, a focus on environmental and fisheries impacts within this category should include an outline of long-term planning strategies for the major maintenance, decommissioning, and replacement of the offshore wind infrastructure. Given the evolution of new technologies and resources, and the time horizon before this occurs, a proactive approach to removing turbines, turbine blades, concrete, cables, and other accoutrements of the industry and determining how this material is repurposed, recycled, or disposed of, will require collaboration among other industry partners, educational institutions, the community, and policymakers as we continue to support the Blue Economy and reduce our planet’s carbon footprint. The solicitation should include this aspect in consideration of the appropriate proposals.

2. Offshore wind growth enables the creation of a leading industrial base centered within Southeastern Massachusetts, distributing economic opportunity more broadly across the Commonwealth.

To the extent that developers are required to demonstrate how their investments will deliver long-term “economic benefits” in the upcoming solicitation, we write to make clear our collective view that all proposals should be evaluated against the legislature’s primary economic development objective of Chapter 188 of the Acts of 2016 “*An Act to Promote Energy Diversity*,” which was to create a leading industry cluster centered in Southeastern Massachusetts that benefited the entire state.

It has been troubling for us to witness the establishment of headquarters and regional offices of major wind companies in Boston. A recent report¹ on the economic outcomes to-date of the Vineyard Wind 1 project showed that just 24% of the project's full-time employees reside in Bristol and Plymouth counties. Encouraging commitments to specific long-term investments that lead to the industry setting down roots in this region is essential and should be treated as basic requirements for all bids.

3. The 83C 4 RFP should continue to place high value in the Qualitative Analysis on bidder investments to develop a skilled, diverse, and equitable workforce to support the offshore wind industry.

In 2022, CONNECT institutions (Bridgewater State University, Bristol Community College, Cape Cod Community College, Massachusetts Maritime Academy, Massasoit Community College and UMass Dartmouth), on average, reported 39% of the student population as being first-generation, while nearly 50% of CONNECT's students are non-white. According to Massachusetts 2020 Census data², the diversity index in Massachusetts is 61%, and in CONNECT's catchment area, the diversity index, on average is 18%. In comparison to data collected in 2010, Massachusetts' diversity index has increased by 7%, and it is estimated that this trend will continue.

The offshore wind industry is about to expand quickly and if the Commonwealth does not have a ready workforce, the jobs will go elsewhere. We are fortunate that Southeastern Massachusetts and Cape Cod (via CONNECT partner institutions) have initiatives well underway to service the industry, such as Massachusetts Maritime Academy's successful GWO Basic Safety Training, UMass Dartmouth's over 15 degrees connected to blue economy sectors and School for Marine Science & Technology's (SMAST) decades of experience in ocean research, Cape Cod Community College's Sustainable Energy and Blue Economy Associate Degrees, and Bristol Community College's National Offshore Wind Institute, which will open the doors of a new workforce development facility in New Bedford later this year. To further bolster education and training in critical positions in the offshore wind industry, Bridgewater State University offers a Supply Chain Management concentration, and Massasoit Community College offers Distribution and Logistics Management. Collectively, these initiatives will need ongoing financial support to maintain and build that pipeline of skilled and prepared workers.

We appreciate that the 83C 3 RFP requires bidders to demonstrate a commitment to create and foster short- and long-term employment opportunities in the Commonwealth that prioritize diversity, equity, and inclusion. (Section 2.3.2.i) We encourage the state to continue to place high value on developing a skilled, diverse, and equitable workforce in the next bidding process, and recommend that bidders commit to sustained investments in this area as part of the economic development benefits.

¹ *Vineyard Wind 1, Impact on Jobs and Economic Output, Annual Report #1, November 2022*

² <https://www.census.gov/library/stories/state-by-state/massachusetts-population-change-between-census-decade.html>

In conclusion, we are confident that if these recommendations are adopted, the Commonwealth will be able to lead this next great American industry. Thank you for your consideration.

Sincerely,

Dr. Laura L. Douglas
President, Bristol Community College &
CONNECT Board Chair

Dr. Stacey A. Kaminski
Executive Director
CONNECT

John Bullard
President, Board of Directors
New Bedford Ocean Cluster

Jennifer Downing
Executive Director
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