



Equinor Wind US LLC

**Massachusetts 83C Round 4 Offshore Wind Solicitation: Request for Public Comment  
Equinor Wind US LLC Comments**

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Equinor ASA is an international energy company headquartered in Norway, with operations in over 30 countries. Equinor has approximately 22,000 employees worldwide and is listed on the New York and Oslo stock exchanges (NYSE: EQNR, OSE: EQNR). Equinor Wind US LLC (“Equinor”) and its strategic partner, bp, are currently developing the Empire Wind and Beacon Wind projects, representing more than 4 GW of generation, off the east coast of the United States. The Beacon Wind project is located off the south coast of Massachusetts. Equinor has several offices in the United States, including Boston.<sup>1</sup>

Equinor applauds Massachusetts leadership in developing offshore wind and appreciates RFP Drafting Parties providing an opportunity to submit comments and feedback ahead of the 83C Round 4. As further detailed in the responses below, developers and ratepayers benefit from as much certainty as possible when it comes to the solicitation process and any awarded contracts. For developers, this certainty provides the economic and project development foundation needed to develop and propose creative, efficient, and competitive proposals. In turn, ratepayers benefit from robust competition among developers and rate stability. In developing the RFP, Equinor encourages the RFP Drafting Parties to be as specific and concrete as possible so as to provide this certainty.

**1. Procurement Size: What should be the maximum procurement target, in megawatts (MW), for the 83C Round 4 solicitation?**

[Redacted]

[Redacted]

[Redacted]



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**2. Procurement Schedule: The 83C Round 4 RFP must be issued within 24 months of the prior solicitation pursuant to Section 83C.**

- a. What should the RFP drafting parties consider when designing the schedule for the 83C Round 4 solicitation, including deadlines for bid submission and selection of projects for negotiation?**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] If released in early May, the deadline for submissions should be between mid-September and mid-October 2023, with award notifications in the first half of Q4 2023.

- b. How could the 83C Round 4 schedule be designed to best align with other offshore wind procurements being conducted or planned in neighboring Northeastern states?**

Given that many projects also participated in New York’s recent ORECRFP22-1 solicitation and the ongoing Rhode Island RFP, Equinor believes that a bid between mid-September and mid-October 2023 is appropriate. Such a timeline would allow New York and Rhode Island to complete their evaluations and make award announcements before the 83C Round 4 deadline. This deadline – and award announcements in Q4 2023 – have the added benefit of concluding the 83C Round 4 solicitation ahead of the solicitations expected by other New England states in 2024.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**3. Commercial Operation Date: What should be the latest allowable commercial operation date for projects bidding into 83C Round 4, and why?**

Equinor recommends that the RFP Drafting Parties allow developers to present, and justify, an appropriate COD as part of their proposals. [REDACTED]

[REDACTED]

**4. Transmission:**

- a. How should the 83C Round 4 requirements regarding transmission and interconnection of proposed projects be designed to maximize efficient use of the onshore transmission system?**

[REDACTED]

[REDACTED]

[REDACTED]



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[Redacted text block]

[Redacted text block]

- b. Please comment on potential ways to integrate 83C Round 4 with ongoing regional transmission initiatives, including the Joint State Innovation Partnership for Offshore Wind.**

[Redacted text block]

[Redacted text block]

[Redacted text block]



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- c. Please comment on the advantages and challenges of the “Meshed Ready” transmission requirement in the 2022 NYSERDA offshore wind RFP (ORECRFP22-1) and what factors would need to be considered for such an approach to be applicable in a Section 83C solicitation.

[Redacted]

[Redacted]

**5. Inflation, Supply Chain, and Macroeconomic Factors:**

- a. How could 83C Round 4 be designed to best account for current and future rates of inflation and other supply chain and economic pressures on the offshore wind industry to both ensure project viability and protect Massachusetts ratepayers?

[Redacted]

- b. Please comment on when costs for offshore wind project components and labor should be expected to stabilize, including any comments on how that expected timing would impact bid development for 83C Round 4.

[Redacted]



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- c. Please comment on the Inflation Adjustment provision of the 2022 NYSERDA offshore wind RFP (ORECRFP22-1) and what factors would need to be considered for such an approach to be applicable in a Section 83C solicitation.

[Redacted]

- d. Please comment on recommended timing applicable for an inflation adjustment price provision, if warranted, including any comments on the price adjustment timing in the 2022 NYSERDA RFP, which allows for an adjustment from bid submission to BOEM COP approval. Please also comment on how such a provision should be considered in the evaluation process when comparing fixed price bids to inflation-adjusted bids.

[Redacted]

[Redacted]

[Redacted]

**6. Federal Funding:**

- a. How could 83C Round 4 be designed to ensure Massachusetts ratepayers receive the maximum benefits of the new federal funding opportunities, tax credits, and/or other programs available to offshore wind developers under the Bipartisan Infrastructure Law (BIL) and Inflation Reduction Act (IRA)?



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States and industry eagerly await formal guidance from the relevant federal agencies concerning the interpretation and implementation of the funding opportunities, tax credits, and other programs available under the BIL and IRA. [REDACTED]

[REDACTED]

[REDACTED]

- b. Please comment on when the Internal Revenue Service should be expected to issue regulations related to relevant tax credits under the Inflation Reduction Act.

[REDACTED]

- c. Please comment on the provisions of the Rhode Island RFP requesting bidders to describe how they would consider EDC customers in the event of the availability of any tax credit or other government grant or subsidy not contemplated in their proposals.

[REDACTED]

- 7. Economic Development, Workforce, and Diversity, Equity & Inclusion (DEI): How could 83C Round 4 be designed to best encourage investments and commitments that maximize economic benefits to the Commonwealth, support workforce harmony, and advance goals for DEI? Specifically, please refer to Section 2.3.2.i of the 83C Round 3 and to the relevant provisions in Section 61 of An Act Driving Clean Energy and Offshore Wind.

- a. Memorializing Commitments: In 83C Round 3, DOER executed Memoranda of Understanding (MOUs) with the selected projects to memorialize and track their commitments to economic development and DEI. Please provide any comments on these prior MOUs or other mechanisms to memorialize and track these commitments with selected projects.

Equinor acknowledges the importance of defining and verifying economic benefits commitments. [REDACTED]

[REDACTED]



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[REDACTED]

**8. Environmental Justice: How could 83C Round 4 be designed to best encourage project design and investments that avoid negative impacts on, and direct positive benefits of the project to, Environmental Justice (EJ) communities? Please refer in particular to Appendix J of 83C Round 3 and to the relevant provisions in Section 61 of *An Act Driving Clean Energy and Offshore Wind*.**

As demonstrated through the initiatives developed and community commitments made in connection with Equinor’s previously awarded projects, it has taken an intentional approach to stakeholder engagement that aligns with the state’s environmental justice initiatives. Equinor views itself as a partner in the communities in which it operates and works to develop solutions and programs that address that specific community’s needs and desires rather than taking a “one-size-fits-all” approach. This process necessarily includes engagement with local leaders and community representatives to ensure meaningful and responsive engagement. Equinor fully intends to apply this same approach in Massachusetts and support the state in achieving its environmental justice objectives.



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9. **Environmental and Fisheries Impacts: How could 83C Round 4 be designed to best encourage project designs that avoid, minimize, and mitigate negative impacts on the environment and fishing industry? Please refer in particular to Appendix J of 83C Round 3 and to the relevant provisions in Section 61 of *An Act Driving Clean Energy and Offshore Wind*.**

[Redacted]

[Redacted]

10. **Please provide any additional comments regarding implementation of the new provisions in Section 61 of *An Act Driving Clean Energy and Offshore Wind* in 83C Round 4.**

[Redacted]

[Redacted]

Equinor welcomes an opportunity to provide more detail on these comments should DOER find that beneficial.