

January 31, 2012

Mr. David Meyer
Office of Electricity Delivery and Energy Reliability
OE-20
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: Plan for Conduct of 2012 Electric Transmission Congestion Study

Dear Mr. Meyer:

This letter contains the comments of Atlantic Grid Development, LLC (AGD), and was prepared in response to the Department of Energy's (DOE's) November 4, 2011 request for comments. AGD is the developer of the Atlantic Wind Connection (AWC) high-voltage direct current transmission project.

As DOE evaluates what data should be considered to identify and understand the significance and character of transmission congestion, AGD encourages DOE to evaluate, as it did in its previous studies, the location of offshore renewable resources as well as state, regional, and federal policies supporting offshore wind development on the outer continental shelf.

AGD urges DOE to continue analyzing how the states in the Eastern Interconnection, particularly those within the Mid-Atlantic Critical Congestion Corridor, will meet their renewable portfolio standards. As the DOE's 2009 Study noted, many of these states have implemented aggressive renewable energy standards. For instance, Delaware has instituted a 20% RPS by 2019; Maryland a 20% RPS by 2022; Pennsylvania an 8% RPS by 2020; New York a 24% RPS by 2013; and New Jersey a 22.5% RPS by 2021. Of course, FERC's Order No. 1000 now requires regional transmission operators to take state and federal public policy requirements into account in transmission planning.

For many of these seaboard states with high population densities and less intense solar, wind, and geothermal resources than western states, offshore wind remains an important untapped resource. The 2009 Congestion Study identified Conditional Constraint Areas focused on areas of potential renewable generation. One such Conditional Constraint Area included offshore wind on the east coast. States are making efforts to develop these offshore resources.

New Jersey has established an offshore wind renewable energy certificate program to support at least 1,100 megawatts of offshore wind development. The Maryland legislature is considering a similar program this year.

Meanwhile, the Interior Department has defined Wind Energy Areas (WEAs) on the Atlantic outer continental shelf. The WEAs signal where concentrations of offshore wind turbine capacity could be built and suggest that areas along the coast near to the WEAs may receive substantial injections of offshore wind energy. Currently, the Interior Department is evaluating expressions of interest in the wind energy areas filed by offshore wind project developers for potential leases in Rhode Island/Massachusetts, New Jersey, Delaware, Virginia, and Maryland. Notably, the last four wind energy areas stated above largely parallel the Mid-Atlantic Critical Congestion Corridor identified in the 2009 Study.

Thank you for the opportunity to provide these comments. After the Study is released, AGD looks forward to highlighting how the Atlantic Wind Connection project can help to relieve some of the congestion issues facing the Mid-Atlantic region.

Sincerely,

A handwritten signature in blue ink, reading "Markian Melnyk", with a long horizontal flourish extending to the right.

Markian Melnyk
President
Atlantic Grid Development, LLC