

Rodvien, Emma (PUC)

From: David Ciochetto <dciochetto@crmc.ri.gov>
Sent: Thursday, June 29, 2023 5:00 PM
To: Rodvien, Emma (PUC)
Subject: RI Energy Facility Siting Board in Docket No. SB-2022-02 (SouthCoast Wind Energy, LLC Application for a License to Construct Major Energy Facilities in Portsmouth, RI)

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Hi Emma,

(This is not written as a public comment, I need to share the conversation that i intended to have. Apologies, it grew. I can make time to discuss. I have great respect for your work.)

I was trying not to send anything written but I just haven't been able to connect with you and I feel it's important to transfer the information. As I'm sure you know the developers don't provide you with the truth and delay information and try to control the narrative and try to isolate the various agencies in the state. As a prelude we had a monthly meeting the week after the show cause hearing and Christine Capezio sat there straight faced and told us that there were absolutely no problems with the EFSV process that it was just posturing and they had A full guarantee that they were able to move forward with the project. I don't know what your internal discussions are I don't expect they are having them with you like we are not, but I needed to let you know this.

When I reviewed the pre-filed testimony the night before the hearing there were three blaring misleading statements if not outright lies regarding CRMC. At the time of the filing of the testimony, South Coast wind had filed for a state ascent for state waters portions of their project. The application was the determined to be incomplete, we spoke with them multiple times to try to get them to make it complete however they were unable to bring the application to a point where we can accept it. so as to this date there is no application being reviewed by the CRMC for the state Waters portion.

The second outright lie was that they have been meeting with the fab for CRMC. They have not met with the fab and they have not retained the fabs subject matter experts to assist the fab as we have requested since almost a year ago. We have been asking them to set up these relationships and get the process rolling so we're not pushed to the last minute and they just drag their feet and don't find Rhode Island important enough to follow through. However this also occurs for every data request or communication we have with them. They either don't interpret the communication properly or simply just do not address or Communications's. So they have not met with the fab nor have they engage the fabs subject matter experts. We have many steps in our process and they are not following our advice to get through this.

I do not exactly know what the third lie is but I have a few points that I did want to share. Number one is they have no guarantee that the Sakonnet route will be allowed for the cable to be installed. If the program the project the developers tell you otherwise that is more lies the Sakonnet is under high risk review to as to the unique card species and other user disruptions. We have expressed to them since the beginning that we would like them to land the cable at the coast and then go up Rhode Island state roads were to go up in Massachusetts. They treat us like they don't even hear this request. We requested an analysis of overhead transmission which from an engineering and construction standpoint is a factor of 10 cheaper. Their experts spent 2 1/2 months coming up with a reply to that and they sat us down and they said look how big those towers are that's ridiculous we don't want to do that. This is the only justification that they were willing to try and defend in front of us. The cable is a battle that is going to happen and happen and happen and there is very little chance the aggressive installation schedule that they have shown shared with you will be met.

Between their incompetency and unwillingness to work with us and also with the large number of projects under review this is at the very bottom of the barrel. There are no deadlines or timelines for Rhode Island to issue a state ascent for the cable in state waters any number that they give you as to when they will receive this permit is most likely 1/2 of the time it's going to take. We have asked them repeatedly to sit down with their Engineering and go over the ground model. They have not we have asked them repeatedly to give us the impact to the card in the river all they say is that the bottom is soft no cod will be there. Data is in severe disagreement with their statements.

Time and time again we are met with incompetence in lies from this developer. We will do our due diligence and we will thoroughly review this project looking for impacts and looking for mitigations and looking for compensation to the impacted stakeholders.

They stated in your hearing that the project is not financially viable unless they completely billed out the lease area. However before day one of discussions, we told them that they should not only build out their entire lease area but due to the strategic location of the Sakonnet River and connection to the grid, that they should look to build a much larger transmission trunk with offshore station capabilities to plug-in offshore to voluntarily work towards being a grid operator to minimize the impacts to Rhode Island and maximize the benefits from the energy. Time and time again they look at us and they say no we can't afford that. Even though they have admitted that they want to have a second cable come up the Sakonnet River next to the first cable. This has not been thought out well by their engineering because there are industry standard safety corridors which we are unable to get them to tell us how they are going to install the second cable within inches of the first cable without threatening it. Many facts presented by them themselves indicate that to mitigate any Financial threats to the project they need a full build out. They are not planning or considering a full build out.

Again I did not intend any of this to be public comment but just for the EFSBNPC staff. But from my sideline perspective on listening to this hearing what I heard them say was that we are still profitable with the existing power purchase agreement, However we are not profitable enough. Our target return is 15% and as your chairman pointed out why are we putting the risk in the fluctuations onto the repairs who are just gonna end up putting profit into the pockets of the investors?. Out of my league but I have listen to NPR and there are many funds that say you may get a lower investment return however you can choose to invest in what is important to you what your values are. The only thing I heard at the show cause hearing was money money money. I'm not sure if I told you but the day after the show cause hearing show came out and announced that they were divesting from offshore renewable energy and putting their resources back into natural gas and oil exploration and harvesting. This is an effort for them to become more competitive with the American companies who did not say that they were going to invest in renewable energy and then have to fight with inflation.

What are my final points I would make is why do they get special treatment when inflation is a global in phenomena. I don't think they should be allowed to treat us in the track pairs like energy Terrorists. I have no better word for it because that's the way it feels they are treating us. I'll use that term particularly so I can say that the United States does not deal with terrorists.

I am fully in favor of building out offshore wind if it is done responsibly and at the proper pace. We do not need to put further political strife onto the ratepayers. If the politicians want to fight over if they like offshore wind or not the rest of the country needs to step back work nationally globally regionally and locally to protect our existing users and look for an optimized solution where everybody can use the resources of the ocean. We have definitely moved into the gold rush era this is not responsible for humans nor is it bound to produce a favorable result seven years 10 years 1525 years down the line or 50 years down the line when the infrastructure remains. The projects are incredibly capital intensive. The projects are being developed by energy companies who are used to playing with large sums of capital and they are also used to taking on large risk. I cannot see this action as anything more than pure greed.

Do not intend to sound philosophical or revolutionary, but The level that we are being lied to the level that we are being misled the level that we are being divided and tried to conquer each agency is irresponsible. I am very proud that I joined the offshore wind team at the coastal resources management council Rhode Island. At the time the Block Island wind farm was being considered there were at least four other wind farms that people try to rush through. We try to do this in the spirit of being a first mover bragging rights say what you want. But I

have so much respect for Rhode Island for slowing the process down sitting down with the stakeholders working for two years to develop offshore wind responsibly. This is not the environment that we are working in. Regulators are being buried with paperwork they're lied to they are separated and we don't need to be.

I like a quote from Jeff Grybowski, in a talkie gave at the church by URI. He said we do not need to build every proposed offshore wind farm. He said bad developers in bed projects should not be allowed to move forward to ruin the process for other people. throughout my experience working in this this project in the New England wind project or not good projects. That said I do not know the outcome for these two projects, however we at CRMC are interrogating them as much as we can with the time we were given.

I apologize for the long email I'm known for those. I have many other statements I have a fever of 103 so I'm just trying to get this to you before the process moves forward anymore. I appreciate the ability for us to share experiences and work together on these projects where it overlaps or at least to understand each other's work. There are only two of you, I have an infinite amount of respect at the time requirement that you are under. I would not write I did not feel it was important to share these points. It's not exhaustive as you know I can talk for days about all this stuff.

At CRMC we are mostly worried about the uncertainty that the future brings. There are serious impacts that may be realized. There are potentially more impacts to a small user group then there are benefits. Particularly for this project who is not making an effort to make any direct benefits Rhode Island. I know we have said that the PPA means that Massachusetts is paying for the project but the grid is receiving the benefits. But I still have to come around to that point of you because Massachusetts is getting all the credit and value out of the project while they are paying for it yes and Rhode Island is not getting benefit out of it. There's another thing the project refuses to share with us and this is another thing that is going to cause long delays w while we try to meet our enforceable policies.

Again with my deepest respect and my greatest regrets that I have to share the sentiments with you, but I am tired of the divide and conquer strategies that these developers think they can bring from Europe into the United States and get away with just building what they want while ignoring our concerns.

I hope that you are well and I'll see you at the next hearing thank you for sending along all of the comments.
Best Regards,

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