July 26, 2021

Tershara Matthews
Office of Emerging Programs
Bureau of Ocean Energy Management
Submitted electronically to docket BOEM-2021-0041-0001

Re: Southern Alliance for Clean Energy Comments on Gulf of Mexico Request for Interest

Dear Ms. Matthews,

The Southern Alliance for Clean Energy (SACE) is a regional organization that promotes responsible and equitable energy choices that ensure clean, safe and healthy communities throughout the Southeast. We are strongly supportive of responsibly-sited offshore wind energy as an emissions-free power source and we appreciate the opportunity to comment on the Gulf of Mexico request for interest (RFI).

The United States Should Achieve 100% Clean Electricity by 2035 And Offshore Wind Is A Key Part Of The Equation Of Getting There

Science indicates that it is necessary to get our economy to zero carbon emissions by 2050 to avoid the worst impacts of the climate crisis. Perhaps our best way to meet this target is to get the electricity sector to 100% clean by 2035, which would then serve as the foundation for decarbonizing other sectors such as transportation and buildings as they switch from being fossil-fueled to electrified. A 100% clean power grid, combined with electrification of the nation's vehicle fleet, buildings, and some industry would achieve emissions reductions of 70-80%.

Decarbonizing the power grid by 2035 will require a variety of strategies and resources, and offshore wind energy is one important part of the equation.

The Gulf of Mexico holds enormous potential for clean power generation from offshore wind, with its technical generation potential being calculated in 2016 by the National Renewable Energy Laboratory (NREL) as 1,556 terawatt-hours per year,[1] which is more than one-third of the entire nation's electricity generation.[2] Just a small fraction of the technically feasible generation potential getting harnessed could yield abundant clean, emissions-free power.

Recent analysis we published found that Gulf-coast power companies could utilize thousands of megawatts of offshore wind by 2035 in order to get their systems to 100% clean energy. The contributions of offshore wind we calculated to the systems of Mississippi Power, Duke Energy Florida, and NextEra Energy (a combination of Gulf Power and Florida Power and Light) in one feasible scenario of energy portfolio development was as much as 12,000+ megawatts (MW) of offshore wind capacity by 2035, representing approximately 13% of NextEra power capacity, 9% of Duke Energy Florida capacity, and 7% of Mississippi Power capacity.[3]

[1] Walt Musial, National Renewable Energy Laboratory (June 15, 2021). "Offshore Wind in the US Gulf of Mexico: Gulf of Mexico Data Information Resources and Ocean Users." https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/National-Renewable-Energy-Laboratory-Walt-Musial.pdf
[2] U.S. Energy Information Administration. Electricity Data Browser. https://www.eia.gov/electricity/data/browser/
[3] Southern Alliance for Clean Energy (2021). Achieving 100% Clean Electricity in the Southeast, 2021 Report. https://cleanenergy.org/blog/report-achieving-100-clean-electricity-in-the-southeast/

Offshore Wind Development Is Good For Jobs And The Economy

Offshore wind development is good for jobs and the economy. NREL analysis of offshore wind farm development in the Gulf of Mexico found that a single 600 MW offshore wind farm "*could support approximately 4,470 jobs and $445 million in GDP during construction and an ongoing 150 jobs and $14 million annually from operation and maintenance labor, materials, and services.*"[4]

This job development potential is particularly significant in the Gulf of Mexico, which has a long legacy of offshore energy development with oil and gas. There are many potential advantages that can be leveraged from this legacy and as global oil demand drops, offshore wind development can be part of a just economic transition into the clean energy economy for oil and gas workers.

While the cost of offshore wind is currently high compared to other electricity generation sources, a number of factors, in addition to jobs and economic activity, make the financial case that offshore wind development should be pursued in the Gulf of Mexico:

- The estimated cost of offshore wind is declining rapidly and current price estimates are likely conservative due to advancements in technology and lower financing rates than previously estimated;
- The project development timeline of offshore wind projects is years-long, meaning that in order to bring offshore wind generation online later this decade when offshore wind prices will be lower, leases need to be issued much earlier;
- Offshore wind energy provides a power generation profile that is complementary to other clean energy sources that will be needed to assemble 100% clean energy portfolios, and operates at higher capacity factors than the most common other clean energy sources;
- The economic benefits of achieving 100% clean energy would avoid well over a trillion dollars of public health and environmental costs nationally over the next three decades.[5]

The Offshore Wind Siting Process Must Take Into Account the Best Available Information To Protect the Environment and Reduce Use Conflicts

Offshore wind development must be done responsibly so that development can occur without unnecessary negative impacts to the environment or communities. The Bureau of Ocean Energy Management's (BOEM) gathering of the Gulf of Mexico interstate task force and this Request for Information (RFI) are a good first steps in what should be a robust information gathering process, in compliance with the National Environmental Policy Act (NEPA), and a methodical process for ensuring mitigation of identified environmental risks and conflicting uses of ocean area.

Again, we appreciate the opportunity to comment on this RFI and look forward to engaging further in the Gulf of Mexico offshore wind development process.

Sincerely,

Chris Carnevale
Southern Alliance for Clean Energy

[4] Bureau of Ocean Energy Management. "Offshore Wind in the U.S. Gulf of Mexico: Regional Economic Modeling & Site-Specific Analyses." https://www.boem.gov/sites/default/files/documents/regions/gulf-mexico-ocs-region/Offshore-Wind-US-Gulf-Mexico-Regional-Economic-Fact-Sheet.pdf

[5] Clean Energy Futures (July 12, 2021). An 80x30 Clean Electricity Standard: Carbon, Costs, and Health Benefits. https://www.hsph.harvard.edu/c-change/news/80x30ces/