



Toan Nguyen  
Deputy General Counsel

BOEM  
Office of Renewable Energy Programs  
45600 Woodland Road (VAM-OREP)  
Sterling, Virginia 20166.

**Re: [Docket No. BOEM-2018-0004] Commercial Leasing for Wind Power on the Outer Continental Shelf in the New York Bight—Call for Information and Nominations**

Dear Sir or Madam,

Avangrid Renewables LLC (“Avangrid Renewables”), a global offshore wind player and renewable energy market leader, is pleased to submit its nominations for commercial wind energy leases in the New York Bight Call Areas identified in the above referenced notice.

Avangrid Renewables is an indirect subsidiary of AVANGRID, Inc. and part of the IBERDROLA Group. IBERDROLA, S.A., is an energy pioneer with the largest renewable asset base of any company in the world. Avangrid Renewables, LLC is headquartered in Portland, Oregon.

AVANGRID, Inc. is a diversified energy and utility company with more than \$32 billion in assets and operations in 27 states. The company owns regulated utilities and electricity generation assets through two primary lines of business, Avangrid Networks and Avangrid Renewables. Avangrid Networks is comprised of eight electric and natural gas public utilities, serving approximately 3.2 million customers in New York and New England. Avangrid Renewables operates more than 6 gigawatts of owned and controlled renewable generation capacity, primarily through wind and solar, in 22 states across the United States. AVANGRID employs approximately 6,800 people.

**Avangrid Renewables, LLC**  
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Avangrid Renewables and its affiliates have considerable development experience in building and operating offshore wind farms, and most recently secured commercial offshore wind leases in federal waters near Massachusetts and North Carolina.

Avangrid Renewables strongly believes that an efficient and effective offshore wind industry can only be secured if developers are able bring forward sufficiently-large projects. Large scale projects allow economies of scale be realized, supporting strategic investment in infrastructure such as ports and fabrication yards and new construction vessels. The greater certainty provided through larger projects assists development of a robust local supply chain, creating more domestic jobs.

Globally the scale of projects is increasing, wind turbines are becoming larger, equipment and infrastructure is developing to serve this advancing industry. Large-scale projects are necessary for the United States to compete in this new global market.

#### **REQUESTED INFORMATION: 7(3) - VISUAL**

Visual considerations and strategies to minimize or mitigate potential adverse impacts while balancing safety for both air and marine navigation are important considerations that must be a part of any proposed offshore wind project. The Areas for Consideration are beyond state waters and more distant from shore than existing lease areas for offshore wind, making the new areas under consideration well placed for reduced visual conflicts. Proper analyses to support NEPA and BOEM's decision-making will require site-specific considerations and as such,

Avangrid Renewables would recommend that standard distances and lighting requirements not be established at this time given the early nature of the development of these areas. Each project area will have to be individually studied and the results are dependent on the receptors themselves, the location and elevation of the viewpoint, weather, atmospheric conditions and sea state and the proximity of the turbines to the receptor locations and stakeholders. Mitigation of impacts depends on the nature and significance of the impacts themselves and local conditions as well as the other factors described above, thus flexibility should be maintained for the design review stage.

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## **REQUESTED INFORMATION: 7(10) – BUFFER ZONES**

Avangrid Renewables supports a buffer zone as a way to ensure fair and mutual enjoyment that reduces conflicts among adjacent leases. In our view, an appropriate buffer zone would be one that limited the closest point of any later-installed equipment to a distance of at least 750 meters from a lease boundary, regardless of whether there is an adjoining lease area along that boundary. In considering the buffer area, the footprint of the installation or repair process around any piece of equipment must be considered. In our view, 750 meters would easily and safely accommodate these types of activities without having to enter into a neighboring lease area. This buffer would create a minimum distance of 1,500 meters between two adjacent offshore generation equipment in neighboring lease areas which also has the additional benefit of minimizing wake effects. On the other hand, a buffer greater than 750 meters (e.g., 1,000 meters) would be excessive, based on our experience, and significantly impact the usable area of any given lease.

Avangrid Renewables believes that 800 megawatt (MW) lease areas are around the minimum size required for cost-effective delivery of offshore wind projects. In our nominations we have therefore scaled most projects to this size to achieve the maximum capacity whilst remaining compliant with the Call instructions as to what BOEM consider a “reasonable” size. However, we contend that where practical, grouping projects into larger development zones of around 1,600 MW (2 x 800 MW) or 2,400 MW (3 x 800 MW) would create the platform for a more successful domestic industry.



## REQUIRED NOMINATION INFORMATION

### 1. NOMINATIONS IN THE NEW YORK BIGHT CALL AREAS

Avangrid Renewables wish to submit nominations for multiple projects as follows:

Call Area	Project Name	Area (acres)	Nominal capacity (MW)
Fairways North	Fairways North Project A	80,000	800
Fairways North	Fairways North Project B	80,000	800
Fairways North	Fairways North Project C	212,000	2400
Fairways South	Fairways South Project A	80,000	800
Fairways South	Fairways South Project B	107,000	1040
Hudson North	Hudson North Project A	80,000	800
Hudson North	Hudson North Project B	80,000	800
Hudson North	Hudson North Project C	80,000	800
Hudson North	Hudson North Project D	591,000	5600
Hudson South	Hudson South Project A	80,000	800
Hudson South	Hudson South Project B	80,000	800
Hudson South	Hudson South Project C	80,000	800
Hudson South	Hudson South Project D	80,000	800
Hudson South	Hudson South Project E	826,000	8,000

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Each nomination should be considered on a stand-alone basis. However, as discussed further below, Avangrid Renewables would like to stress that only by building sufficiently large projects that sustain a commercially viable and visible pipeline, will the economies of scale and investment be reached to drive down costs and underpin the ambitious targets.

## **2. OBJECTIVES**

Avangrid Renewables' objectives are to continue our trajectory as one of the largest owners and operator of offshore wind farms in the United States. We are actively developing a cumulated pipeline of approximately 5 GW in our secured offshore leases in Massachusetts and North Carolina. We are leading the growth of the United States offshore wind industry. As mentioned above, we are a diversified energy and utility company with the required facilities, resources and experience to be a leader in the United States offshore wind market with access and understanding of the global supply chain. The Iberdrola Group is a global leader in developing, constructing and operating offshore wind projects with 1.2 GW in operation or under construction and an additional 4 GW under development in Europe. Avangrid Renewables' objectives are to develop, build and operate a minimum of 800MW within the New York Bight Call Areas by 2030 and use our vast experience and resources to deliver successful projects on time.

Avangrid Renewables is committed to the cost-effective delivery of offshore renewable energy in the United States. We have the credentials and technical knowhow to deliver large-scale offshore wind projects that will boost domestic renewable energy production. We have adopted a bold strategy for our response to the Call to advance substantial commercial wind energy leases within the New York Bight region. We strongly believe this approach will support the broader offshore wind industry in the US.

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Thank you for your consideration of our nomination. If you require any clarifications concerning our nomination please contact us.

Yours Sincerely,

*/s/ Toan Nguyen*

Toan Nguyen  
Deputy General Counsel

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