



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT

New Orleans Office
1201 Elmwood Park Boulevard
New Orleans, LA 70123-2394

Memorandum

To: Dr. James Kendall
Regional Director, Gulf of Mexico Regional Office

From: Bridgette Duplantis
Chief, Leasing and Financial Responsibility Section

Subject: Recommendation of Determination of Competitive Interest in
Wind Energy Area Options C and D in the Gulf of Mexico

I. Purpose

This memorandum documents the review and analysis of materials submitted by Invenergy GOM Offshore Wind LLC (hereafter, Invenergy) to determine if competitive interest exists in acquiring a commercial lease in response to the request for competitive interest (RFCI) published in the *Federal Register* on July 29, 2024 (BOEM-2024-0039). BOEM published the RFCI in response to an unsolicited lease request from Hecate Energy Gulf Wind LLC (hereafter, Hecate Energy) (Company #15166) to acquire a commercial lease in Gulf of Mexico wind energy area (WEA) options C and D.

II. Background

On February 16, 2024, BOEM received an unsolicited request from Hecate Energy expressing interest in acquiring a commercial wind energy lease for Gulf of Mexico WEA options C and D. After determining that Hecate Energy is qualified to hold a wind energy lease in these areas, BOEM published an RFCI pursuant to subsection 8(p)(3) of the Outer Continental Shelf (OCS) Lands Act (43 U.S.C. 1337(p)(3)) and the Department's implementing regulations at 30 CFR 585.231. Subsection 8(p)(3) of the OCS Lands Act requires OCS renewable energy leases, easements, and rights-of-way (ROW) to be issued "on a competitive basis unless the Secretary determines after public notice of a lease, easement, or right-of-way that there is no competitive interest." The RFCI provided the public with notice of Hecate Energy's unsolicited lease request and invited the submission of indications of competitive interest in commercial wind energy leases within the RFCI areas, as well as stakeholder feedback. The RFCI provided that if BOEM received one or more indications of competitive interest from qualified entities that wish to develop a commercial wind energy project in the RFCI Areas, BOEM may decide to move forward with the competitive lease issuance process following the procedures set forth in 30 CFR 585.210-585.226. If BOEM receives no competing expressions of interest from qualified companies, BOEM may decide to move forward with the lease issuance process using the

noncompetitive procedures contained in 30 CFR 585.231.

III. RFCI Responses

BOEM received 18 comments, including one expression of competitive interest from Invenergy (Company #15177), in response to the RFCI. BOEM has determined that Invenergy is qualified legally, financially, and technically for this specific submission pursuant to 30 CFR 585.107-585.108. Many of the comments addressed concerns about the suitability of the RFCI areas for leasing. To the extent they are relevant, BOEM will take all the comments it received during the RFCI comment period into consideration in potential future leasing steps.

IV. Findings

BOEM has deemed both Hecate Energy and Invenergy to be legally, technically, and financially qualified to hold an OCS renewable energy lease in the Gulf of Mexico. Their submittals included all the required information outlined in the RFCI and 30 CFR 585.231.

Hecate Energy's proposed project would consist of up to 133 fixed-bottom wind turbine generators (WTGs), each with a capacity of 15-23 MW, with an overall maximum capacity of approximately 2,000 MW. Each turbine would be deployed on fixed monopile or jacket foundation types. Hecate Energy narrowed its selections to three points of interconnection within Texas and Louisiana and continues to examine 12 potential landfall locations with paths to three designated substations. Export cables would run separately from each of the two lease areas, or the lease areas would be joined offshore with one substation and one central export cable.

Invenergy's proposed project would consist of up to 140 competitively selected and commercially available turbines, with expected capacities of more than 15MW, for a total project capacity of up to 2,500 MW. WTG units would be connected via inter-array cables to 1-4 offshore substations, which would connect to an offshore export cable that would carry the power to shore. Structures would be designed to international standards, such as those from the International Electrotechnical Commission, to ensure they can maintain structural reliability in high load cases.

Based on the information provided to BOEM in the unsolicited lease application from Hecate Energy and the response to the RFCI from Invenergy, BOEM finds that both qualified entities have submitted all the information that is required by the Department regulations (30 CFR 585.231) and that **competitive interest in WEA options C and D exists**. If you concur, BOEM will publish a Notice of Availability of this decision in the *Federal Register*.

V. Attachments

1. Hecate Energy Gulf Wind LLC Unsolicited Lease Application
2. Invenergy GOM Offshore Wind LLC RFCI Response

VI. Regional Director Concurrence

_____ **Yes, competitive interest exists within WEA options C and D
(recommended).**

_____ No, competitive interest does not exist within WEA options C and D.

Dr. James Kendall
Regional Director, Gulf of Mexico Regional Office

Date

Attachment 1
Hecate Energy Gulf Wind LLC Unsolicited Lease Application

Attachment 2
Invenergy GOM Offshore Wind LLC RFCI Response