



via email

Subcommittee on Energy and Mineral Resources, U.S. House of Representatives

Re: H.R. 1689 Offshore Wind for Territories Act

Dear Committee,

Thank you for accepting public comments for the record on the Subcommittee on Energy and Mineral Resources hearing of April 20th, “Building Back Better: Reducing Pollution and Creating Jobs Through Offshore Wind.” And thank you for your work on the clean energy transformation underway in the United States. We write to provide comments on behalf of Ruth Santiago.

The Offshore Wind for Territories bill discusses the potential for offshore wind resources in Puerto Rico. The island’s public electric utility, Puerto Rico Electric Power Authority (“PREPA”), and the island’s utility regulator, the Puerto Rico Energy Bureau, have already analyzed this issue. We are writing to provide a summary of that analysis.

The proposed Integrated Resource Plan issued in summer 2019 by PREPA ruled out offshore wind as a new resource for the island, for four reasons:

- PREPA expects offshore wind to have higher costs than equivalent solar PV, informed by a 2015 study.
- Puerto Rico is not expected to have an offshore wind resource comparable to that in locations where offshore wind is being actively developed, such as the Northeast U.S. and Europe.
- Further analysis would be expensive and time consuming.
- Solar PV could be displaced by offshore wind.

See para. 378 of the Puerto Rico Energy Bureau’s August 2020 Final Resolution and Order, attached.



EARTHJUSTICE

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In that August 2020 Order, the Puerto Rico Energy Bureau issued an approved Integrated Resource Plan that prohibits the utility from issuing any Request For Proposals for offshore wind until it completes a comprehensive offshore wind study, which is due August 2022:

The Energy Bureau ORDERS PREPA to conduct an offshore wind study tailored to Puerto Rico's wind resource and electric grid that evaluates the cost, generation profile, and other characteristics of anchored and floating wind turbine options, and submit the study to the Energy Bureau within two years from the date of this Final Resolution and Order. The Energy Bureau further ORDERS PREPA to solicit and incorporate feedback from the Energy Bureau regarding the scope for this study prior to issuing any RFP.

(PREB August 2020 Order paras. 42, 475.)

These analyses took into account that the Punta Lima Wind Farm in Naguabo, Puerto Rico was destroyed by Hurricane Maria in September 2017 and has not been rebuilt, which is indicative that areas that are prone to hurricane damage might not be good places to site wind-powered infrastructure.

Again, thank you for your attention to the clean energy transformation underway in the United States and in Puerto Rico.

Sincerely yours,

Raghu Murthy
Staff Attorney
Earthjustice