



Monday, May 16th, 2022

To: All members of the Virginia State Corporation Commission

Re: Coastal Virginia Offshore Wind Project

On behalf of The Virginia Conservation Network and the below-signed partner organizations, we appreciate the opportunity to submit comments on the Coastal Virginia Offshore Wind Commercial Project (PUR-2021-00142) to the Virginia State Corporation Commission. The Virginia Conservation Network (VCN) is a network of over 150 Network Partners across the Commonwealth. VCN is committed to building a powerful, diverse, and highly-coordinated conservation movement focused on protecting our Commonwealth's natural resources.

Although we are excited to see this project built, VCN and its partners are not without reservations about the CVOW-C project. The sheer size of the project requires additional infrastructure for creating wind turbines and delivering the generated energy. As with any building out of large infrastructure, there is the possibility of unintended environmental consequences. In this case, we are particularly concerned about the disturbance of wetlands and estuarine ecosystems and potential increases in air emission from harmful criteria pollutants (namely, oxides of nitrogen (NOx) and volatile organic compounds (VOCs) as noted in DEQ comments) during the onshore and offshore construction period. Furthermore, infrastructure development not only tends to disproportionately impact vulnerable communities who are already overburdened with environmental pollution—such as vehicle exhaust in the air, toxic waste spills, and water contamination—but also tends to leave these communities out of the corresponding economic opportunities.

To elaborate, we have concerns that Dominion's plan is not sufficient to meet the diversity, equity, and inclusion targets outlined in Va. Code § 56-585.1:11 D. We hope to see the Virginia State Corporation Commission request a revised Economic Development Plan, with a clear vision on DEI, specific metrics, and set targets for achieving those metrics. Additionally, we hope to see specific personnel assigned responsibility for DEI initiatives and have part of their responsibilities include creating reports on DEI initiative's progress. In addition to preliminary and continued community and stakeholder outreach, we want to see a plan defined by progress in achieving specific DEI outcomes including *equitable* workforce development, OSW facility and supply chain hiring, and resource procurement practices guided by direct, measurable benefits therein for surrounding historically economically disadvantaged communities (as defined in the VCEA).

Moreover, in keeping with our efforts to advocate for Virginia ratepayers, we would also like to see a capital cost cap for the project set at Dominion's application. Should the project's capital costs increase beyond the \$9.8 billion forecasted by Dominion, the Commission should set clear guidance that Dominion would be at risk for the recovery of excess costs. Recognizing the complexity, scale, and inexperience with offshore wind projects, the Commission should require Dominion to provide regular reports and meetings to update the progress of the project, including changes and updates to the estimated cost of the project.

Additionally, the Commission should require a performance guarantee to hold customers harmless if the facility does not meet projected capacity factors once in full operation. This is essential for protecting ratepayers given the unprecedented scale of the project in the United States and utility projected corresponding costs for energy customers. The project meeting its projected capacity factor is also critical for ensuring that the project delivers its projected contribution to removing 2.7 gigawatts worth of carbon emissions from the state GHG emissions portfolio, which is vital for meeting the state's 2045 net-zero emissions goal set out in the Commonwealth's Clean Energy Policy.

Nevertheless, even with our concerns, we at VCN recognize that this massive source of clean, renewable energy will take us leaps and bounds forward in the fight against climate change. Displacing 2.7 gigawatts of fossil fuel energy will mean less carbon dioxide in our atmosphere, reduced need for fossil fuel infrastructure such as pipelines, and reduced amounts of fossil fuels and byproducts which could leak into our water sources. Offshore wind presents a great opportunity in Virginia's pursuit of new sources of clean, renewable energy, and it is uniquely positioned to address the unprecedented and intersecting environmental, public health, and economic crises of our time that exacerbate racial and social injustices and present an existential threat to our communities, our nation, and our world.

Ultimately, we are calling for the responsible development of the CVOW project that is consistent with continuously improving best practices informed by the best science. Development must set a precedent for cost-effective and renewable energy projects for energy consumers, establish a commitment to rigorous data collection and consumer protection, and advance an equitable and inclusive workforce and economic opportunities as quickly as responsible development allows. Competitive procurement of offshore wind resources in the future should also assist in meeting climate mitigation targets and increasing the availability of affordable renewable energy in the state. Thank you once again for the opportunity to comment. This is an important step toward a bright, clean energy future for Virginia.

Sincerely,



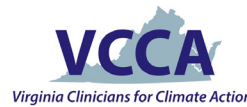
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