



119 Washington Avenue, Suite 103  
Albany, NY 12210  
518.432.1405  
info@aceny.org | www.aceny.org

## **Comments of the New York Offshore Wind Alliance**

on

### **Offshore Wind Supply Chain Investment Request for Information SCIPRFP23-1**

**Submitted: October 20, 2023**

The New York Offshore Wind Alliance (“NYOWA”)<sup>1</sup> respectfully submits the following comments on the New York State Energy Research and Development Authority’s (“NYSERDA”) Request for Information (“RFI”) related to the second tranche of funding to be made available for the support and development of an Offshore Wind (“OSW”)-based supply chain in New York State. This funding is made available pursuant to the 2022 New York State budget earmarking a total of \$500 million to incentivize OSW-related manufacturing, port development and associated infrastructure.

In general terms, NYOWA supports the overarching purpose and structure of the proposed SCIP solicitation. Specifically, we believe a separate and distinct solicitation, directed to eligible manufacturers of major components, assemblies, sub-assemblies, and raw materials, and disassociated from the submission and review of project development bids, is appropriate at this juncture in the OSW industry’s maturation. This direct funding approach will reduce the cost and complexity of OSW project OREC bids at a time of heightened policy maker concern over the cost and source of funding to support the state’s renewable energy and climate targets. Moreover, NYOWA believes it is appropriate to place responsibility squarely on the supply chain cohort to demonstrate a book of business of sufficient volume and duration to warrant cost-sharing from the state.

NYOWA also supports the greater flexibility inherent in the RFI structure. This is manifest in the RFI’s openness to alternative teaming arrangements across multiple tiers in the supply chain hierarchy (i.e., Tier 1 suppliers, assembly and sub-assembly manufacturers, and providers of raw materials). For similar reasons, NYOWA also supports the SCIP RFI’s “free agency” approach as a means of providing greater transparency around New York businesses with adjacent capabilities to transition to the OSW space. Additionally, as noted in the RFI, the logic of the teaming

---

<sup>1</sup> The New York Offshore Wind Alliance is a collaboration of the world’s leading developers of offshore wind, national environmental NGOs, labor, and other interests joined together to support a robust and responsible offshore wind industry in New York State. Individual members of NYOWA will be submitting comments of their own.

arrangement should simplify NYSERDA's evaluation of direct and indirect economic benefits associated with SCIP bid.

Additionally, as NYOWA has previously advocated, NYSERDA should leverage a portion of the available funding, and/or adjust its scoring criteria, to foster the manufacture of domestically made iron and steel in keeping with the state's Buy American policies. NYOWA supports the state's aspirational goal of using an ever-increasing share of domestically made steel and iron for renewable energy project development, consistent with cost and availability considerations. This funding mechanism, along with federal support under the Inflation Reduction Act's tax policies, can help unlock these investments without adding upward pressure on OREC prices.

Lastly, although not directly covered by the planned SCIP funding mechanism, NYOWA would encourage NYSERDA and other relevant state agencies to pursue other supportive policies in localizing a New York centric OSW supply chain, particularly as pertains to the state's ecosystem of small businesses. For example, NYSERDA should continue to explore potential synergy for a state and developer collaboration as it relates to grassroots outreach towards NYS small and diverse businesses in order to strengthen local content readiness.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Fred Zalcman".

Fred Zalcman  
Director, NYOWA

Fred Zalcman  
New York Offshore Wind Alliance  
119 Washington Avenue, Suite 103  
Albany, NY 11210  
[fzalcman@aceny.org](mailto:fzalcman@aceny.org)  
(475) 204-4762 (mobile)  
(518) 432-1405