

## **A Request for Information Regarding Offshore Wind Procurement Reform**

Released by the Special Initiative on Offshore Wind on November 13, 2025

Comments due by December 12, 2025, 5 p.m. EST

Comments should be submitted to: [comments@offshorewindpower.org](mailto:comments@offshorewindpower.org)

Subject Line: ***Procurement Reform RFI***

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### **Introduction and Purpose**

The purpose of this Request for Information (RFI) is to collect information regarding potential reforms to offshore wind procurement policies, contracting mechanisms, and regulations that would accelerate deployment and reduce the cost of offshore wind. Feedback regarding optimizing procurement design should prioritize meeting resource adequacy needs and affordability goals, as well as creating a system that is more durable across political change.

This RFI is being released by the Special Initiative on Offshore Wind to support the states in their ambitions to include offshore wind in an affordable and reliable energy future. We encourage a wide array of stakeholder to submit feedback to this RFI - offshore wind developers, suppliers, NGOs, and many others have deep experience and valuable information to contribute. Each question may not apply to your organization's perspective; feel free to respond only to questions that are appropriate. State policy makers may use information submitted in response to this RFI to advance their offshore wind objectives and may also be used to prepare a policy report which would synthesize and summarize the responses to this RFI to make recommendations for procurement options going forward.

SLOW intends to keep individual responses confidential however may release a summary of responses to this RFI, without attribution. Respondents should provide only information that can be made public.

### **Background**

SLOW is working individually and collectively with states to support their critical role in leading offshore wind development amidst a constantly shifting federal landscape. Albeit highly challenged, the core value proposition of offshore wind remains: it is a shovel-ready resource for large-scale energy, proximal to major load centers and future load growth,

addressing resource adequacy concerns, providing skilled employment and training, generating domestic and secure energy, and providing long-term ratepayer benefits as a zero-fuel resource.

Recognizing offshore wind's value, there is a strong consensus that a key role the states can play at this time is to review and reform their existing procurement processes, and to create policies that support existing and future financial and regulatory environments. It is critical that updated procurement approaches reflect real-world costs and risks and support sustainable project economics. While aspects of procurement challenges are endemic to the United States, they are not exclusive to the United States as offshore wind stands up across many countries and continents.

### **Information Requested**

This RFI is organized across a series of topics and questions. Select case studies and sample procurement methods are included for consideration but additional models and approaches are welcome. If there are topics that are not included in the list below, feel free to submit any other comments in response to Section 4(k).

### **Response Requirements**

Responses should address one or more of the questions below or provide other relevant information relevant to offshore wind procurement reform.

1. List answers according to the order of the questions in the RFI - including number - so responses can be more easily deciphered and organized.
2. Responses should be submitted in Word document or PDF.
3. Include contact information, including full name and/or organization, as appropriate, for follow up as needed. Responses will not be attributed by name or organization in public documents.

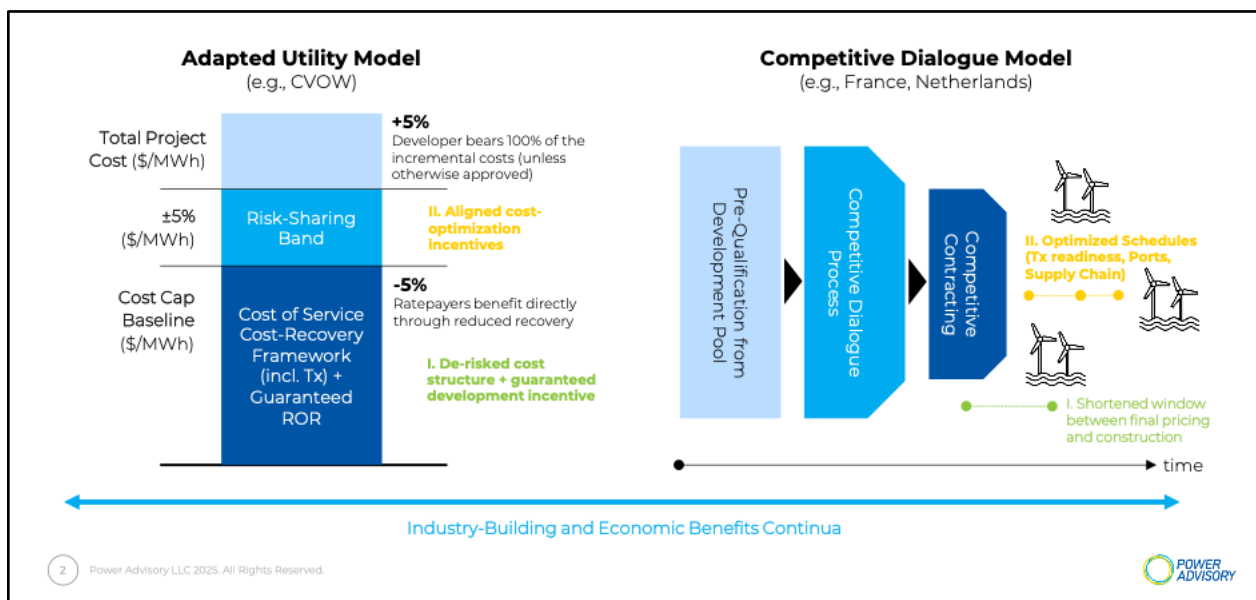
### **Submitting Comments**

Comments should be submitted to: **comments@offshorewindpower.org** with the Subject Line: ***Procurement Reform RFI*** no later than **5:00 PM EST on December 12, 2025** to be considered in this process. All responses to the RFI will be considered confidential and will be treated as such by SLOW. However, under various state laws, transmittal to or from a state agency to an outside party may be subject to public records laws and thus maybe be subject to request for information requests.

## RFI Questions

### 1. Procurement models and approaches

- Provide general feedback on existing procurement and contracting models and approaches in the US**, including potential strengths and weaknesses.
- Provide general feedback on potential alternatives (including those outlined in Figure 1) to current procurement and contracting models.** For example, what are the benefits and risks to adopting the Adapted Utility Model vs the Competitive Dialogue Model (Figure 1)? Do you prefer one model over the other? Are there hybrid approaches between the two that should be considered? Or a different model altogether? In your response, please address any regulatory or legislative changes that may be required to enact your preferred procurement model.



**Figure 1. Examples of two procurement models**

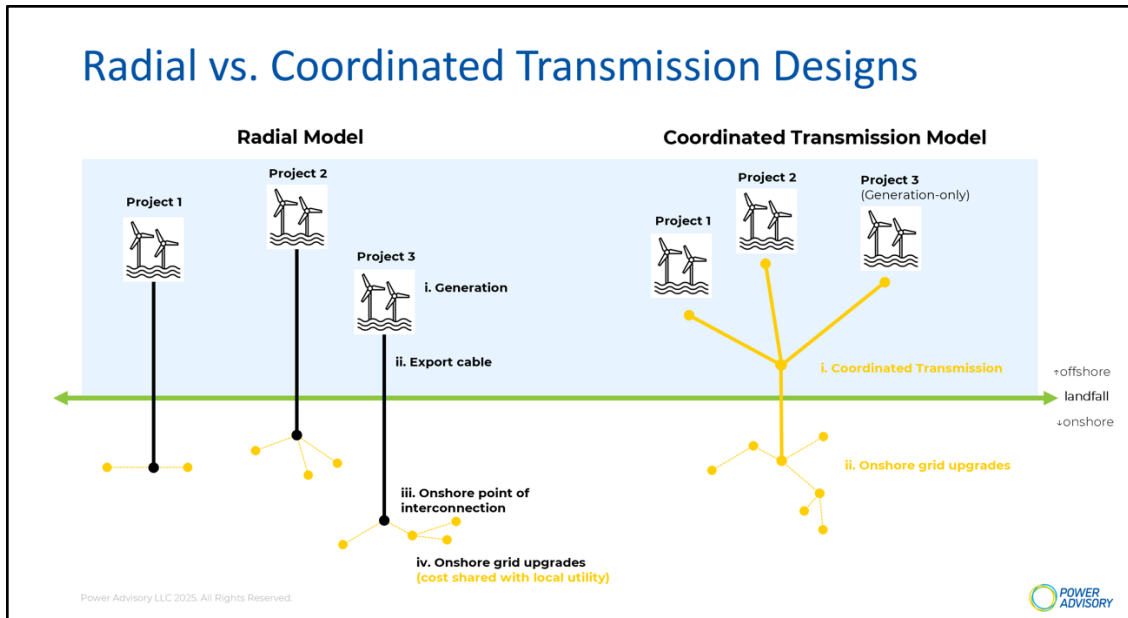
- Which ways would you recommend to approach risk allocation** among offshore wind developers and the purchasers of electricity, considering the need of states to yield the greatest benefits to ratepayers and the developers to protect shareholders to ensure continued development investment in projects?
- Which specific contracting models would be helpful to include in future procurements and why?** Be as specific as you can and address how these

alternative models will yield greatest benefits to ratepayers, reduce costs, and ensure more viable projects.

- e. How should states **structure offtake contracts to derisk factors beyond the control of the developer** such as cost inflation risks (e.g. materials, labor, shipping), permitting delays, and changes in policy, while also balancing ratepayer interests? What kinds of terms (escalators, caps, risk sharing) are most effective? Are there any innovations to terms beyond those currently used in US offshore wind procurements that you would suggest the states explore?
- f. How can states best support a harmonized and robust approach to **supply chain development**? Should states use procurement solicitations to encourage, steer, or otherwise influence supply chain issues in their and/or neighboring states? How should local/domestic content be addressed in the solicitation process?
- g. What (if any) role should **electric distribution utilities** (investor-owned, co-op, municipal, or otherwise) play in the procurement and contracting of offshore wind? Please explain.
- h. What (if any), role should **corporate or virtual power purchase agreements (PPAs)** play in the procurement and contracting of offshore wind? Please explain.

## 2. Transmission

- a. How should **transmission planning be integrated from the earliest stages of procurement** to ensure grid readiness, avoid bottlenecks, and allocate costs fairly among stakeholders (utilities, ratepayers, developers)? Include specific details regarding recommended timing for transmission integration in the procurement process.
- b. How can states best **approach and communicate a change in transmission expectations and standards**, especially when projects have already advanced the design of a system?
- c. **Are there models of multi-jurisdictional transmission planning, policy, and guidance** that states could draw upon?
- d. **Provide general feedback on a radial (current practice) vs shared transmission** (jointly owned or merchant transmission) (Figure 2) approach. What are the greatest barriers and benefits to shared transmission?



**Figure 2. Radial vs. coordinated transmission designs**

- e. How could state procurements for offshore wind **support or integrate shared transmission?**
- f. Provide feedback on the **most appropriate/preferred ownership models for shared transmission.**
- g. What factors should be considered in **cost allocation and cost recovery** for shared transmission?

### 3. Multi-State Procurement Issues

- a. Is there an approach to **timing, phasing, or sequencing** of how offshore wind solicitations are released by states (only jointly or unilaterally) that is preferred in relation to project development, financing, leasing, and permitting? What is the ideal timing for releasing procurement solicitations. What factors are most important to you in the timing of solicitations between and among states? What factors are conducive to participation in solicitations? What factors are challenging or prohibitive?
- b. **Multi-state coordinated procurement** is one approach to potentially advance procurement in a more effective way. Outline the benefits and key challenges to a multi-state/regional procurement approach. For example, do you have specific feedback regarding the 2023 coordinated offshore wind solicitation between three

New England states<sup>1</sup>, or Delaware's regulatory requirement to partner with other PJM states in their procurement process? What recommendations would you make to policy makers in advancing multi-state procurement initiatives? Are there downsides or potential complications that would suggest caution or reluctance to such initiatives?

- c. Outside of the procurement process, are there other aspects of the offshore wind development process that are helpful with regard to **interstate collaboration** (transparent and coordinated ports strategy, harmonized supply chain requirements, shared research requirements, etc.). Conversely, are there areas in which states should maintain their own, unilateral approach?

#### 4. Other

- a. Detail **general principles and concepts** that are most important from your organization's perspective when considering procurement design.
- b. What is ideal **timing for future solicitation** to be issued, considering the challenges to offshore wind at the federal level? Are there federal actions necessary to support new solicitation cycles? Discuss the risk premium associated with bids in this and future time periods. How long should solicitations be open once released?
- c. What examples are best for **highlighting best practices** as well as the challenges of offshore wind procurement strategies and tactics? Include details such as the size of the solicitation, timing of awards, and other details.
- d. What are the specific challenges to project developers to **providing transparency on project costs**? In cases of cost overages, are developers willing to undergo an audit of expenses? What complications might arise in conducting such audits - are there supply chain and project spend categories that are more difficult/easier to audit in assessment of cost recovery?
- e. How should states balance their desire to **stimulate co-benefits in development of the industry** (e.g. a local offshore wind supply chain, employment, political resilience) with the need for cost effectiveness and resource adequacy in the context of offshore wind procurements and contracting? How can procurement processes better incorporate requirements or incentives for local economic development - e.g. manufacturing, port improvements, job training, local workforce inclusion - while still maintaining competitive pricing? Which supply chain elements should fall outside offshore wind development procurements and be addressed in other ways (the markets, state investment, etc.)? How would adding a fixed fee for

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<sup>1</sup> [https://www.mass.gov/doc/ma-ri-ct-offshore-wind-procurement-collaboration-memorandum-of-understanding/download?\\_gl=1%2A1v0wbf0%2A\\_ga%2ANzUwNDI5MDE3LjE2NTA5ODEyMjQ.%2A\\_ga\\_SW2TVH2WBY%2AMTY5NjM3MzE1My44OS4xLjE2OTYzNzZmMDEuMC4wLjA](https://www.mass.gov/doc/ma-ri-ct-offshore-wind-procurement-collaboration-memorandum-of-understanding/download?_gl=1%2A1v0wbf0%2A_ga%2ANzUwNDI5MDE3LjE2NTA5ODEyMjQ.%2A_ga_SW2TVH2WBY%2AMTY5NjM3MzE1My44OS4xLjE2OTYzNzZmMDEuMC4wLjA).

each “adder” (i.e., supply chain, economic development, environmental, etc.) affect overall pricing?

- f. How should **evaluation criteria** be best used to make awards? States currently use evaluation criteria to balance state priorities. Discuss the benefits/disadvantages to using that system. Do you think some attributes should be handled outside the evaluation criteria system? What weight should be given to common factors such as price, project viability, environmental and fisheries mitigation, economic development benefits, and other factors? If there are other factors, please describe.
- g. How has the **market internalized** the issues and challenges of getting to a final investment decision (FID), and do recent market conditions create more caution before bringing a project to forward to various early-stage development milestones?
- h. Can states be helpful in **financing or improving the cost of capital** for an offshore wind farm? If so, what general terms would you suggest are worthy of exploration (e.g. the order of magnitude of capital, lowest level of capital that would be impactful, timing in the predevelopment/development/construction cycle, rates, tenor)? Are pooled funds or other approaches that allow states and developers to work jointly helpful?
- i. What is the impact of states **offering alignment with procurement processes and developer milestones**, like procurement cycles and COD? Is such alignment best served at the front end of a procurement cycle or via flexibility in the contracting process? For example, some states offer six-month extensions in their contracting process; is an extension to one year adequate, or would more potentially be needed? Describe which elements of project development that would best promote project resiliency and cost-effectiveness if such alignment or coordination of terms or timelines be implemented.
- j. Are you aware of **legislative, regulatory, legal, or other barriers** that would need to be addressed to allow for a state to implement any of the procurement reforms to which you have provided feedback on in this RFI? If so, please share details.
- k. Please provide any additional feedback that you believe will be helpful to the **general topic of offshore wind procurement reform as well as other relevant topic areas**, including references to studies/reports that are relevant to the topic areas addressed in this RFI.

### **Contract Award and Limitation**

This request for information will *not* result in the award of a contract for goods or services. RFI responses will be collected and analyzed to inform next steps. This solicitation does not commit SLOW or any state to award a contract, pay any costs incurred in preparing a response, or to procure or contract for services or supplies.