

January 4th, 2008

Minerals Management Services
Offshore Minerals Management
Alternative Energy and Alternative Use Team
381 Elden Street
Herndon, Virginia 20170-4817
Mail Stop 4080

To: MMS AEAU Team

From: Winergy Power, LLC
150 Motor Parkway
Hauppauge, New York 11788

Re: Comments and Response to MMS Questions Regarding the Interim Policy to Authorize the Installation of Meteorological Towers or Marine Data Collection Facilities to Support Alternative Energy Development on the Outer Continental Shelf.

Agency: Minerals Management Services
Document: [FR Doc. E7-21793 Filed 11-5-07]

Comments and Responses to Questions

- 1) Winergy Power is interested in acquiring an alternative energy resource assessment lease as proposed under the interim policy. Winergy's nominated sites for wind energy development, general monitoring plan, and installation/decommissioning procedures are described in a separate submission titled: *Monitoring Site Nominations*.

Winergy Power endorses the Comments and Response to Questions submitted by the American Wind Energy Association (AWEA) with the following exceptions and enhancements:

- 2) Winergy Power does not wish to collaborate or enter into a joint venture with other prospective lessees.
 - A If the same area is selected for monitoring, rather than collaborating to share the same site, the boundaries should be revised to accommodate the interested developers or the area where the monitoring system is to be installed should be renegotiated so that both interested parties can install their own met towers.
 - B Winergy agrees that that there should be requirements to prevent misuse of the interim leasing process by parties intent on speculation, obstruction, or delay. However, the following exceptions should be considered:

- The time required to define and review pre-qualification standards may cause substantial delays in the approval of resource monitoring or technology testing installations. These delays would negate the intent of the interim policy, which is to expedite the approvals for monitoring and technology systems prior to promulgation of the final rules for Alternative Energy Alternative Use on the OCS.
 - Restrictions on transfers and assignments to combat speculation should apply. However, a second or third party (i.e., not another lessee or competitor) should be allowed to partner with the lessee to enhance technology transfer and financial support.
- C** If the site where the meteorological tower is located is determined to be not viable for wind energy development as a result of logistical, environmental, or wind resource constraints, the tower will be immediately decommissioned. However, if another alternative energy developer wants to keep the tower operational, they should have the option to buy the equipment, procure the monitoring system and have the lease transferred. The lessee should also have the right to sell or donate the tower and equipment to a government agency or university.
- D** Any data acquired from the monitoring system would be considered confidential. However, with the approval of Winergy, any research reports or applied information that may be generated from the data by universities or government agencies that have a societal benefit would be available to the public.
- 3) The appropriate lease term should be 5 years or longer depending on site applications: Removal of the resource monitoring systems (e.g., meteorological towers) should *not* have a set schedule for decommissioning activities.

A Background: Wind resource data collected over several years is generally available to support land-based wind energy projects. Therefore, site-specific monitoring data collected for a period of a year or two may be adequate for wind resource assessment when compared to historical data compiled for the geographical area being considered for wind energy development. This comparison is necessary to determine if the site-specific data is representative or was the period of data collection conducted during an anomalous year (e.g., a high or low wind year(s)).

With the exception of the offshore NOAA monitoring system (i.e., instruments installed on buoys and offshore platforms used for navigation or energy activities) and satellite data, atmospheric and ocean monitoring is relatively sparse over the OCS. Although buoys and offshore platforms are strategically located, there are large spatial voids between monitoring points. Furthermore, verified data collected at heights associated with offshore wind

turbines is extremely rare. Therefore, long-term monitoring at potential offshore sites selected for alternative energy development (e.g., wind energy) is necessary to ensure that the wind resource can effectively sustain wind power production. Since there is limited historical offshore wind data available, monitoring should be conducted for a minimum of three years to determine if the data is representative for the site.

B Recommendation: Based on the previous discussion, a lease of five years appears to provide enough time for monitoring system installation and data collection for offshore wind resource assessment. However, it is recommended not to have a set time frame for meteorological tower removal. This recommendation is based on the following reasons:

- The meteorological tower system should be allowed to remain operational to support construction, planning, and wind power production activities. If a wind farm is built, the meteorological tower lease should be part of the wind farm lease.
- Winds averaged over a period of 3 to 5 years may not capture the climatology or the extremes that will affect the area being analyzed. Climate “normals” are based on standardized monitoring variables averaged over a 30-year period that is updated every 10 years. Furthermore, several utilities use a 20-year rolling average of meteorological data to support load forecasting and power purchasing endeavors.
- Continuing offshore monitoring of atmospheric variables would provide valuable data for improving the accuracy and precision of both diagnostic and predictive weather and climate models. Therefore, this continuous data source would be utilized not only by wind energy developers and operators but would be a viable asset to government agencies, academic institutions, and other interested organizations.

- 4) Winergy concurs that the annual lease rate of \$3/acre is appropriate.
- 5) Winergy agrees that each site should be large enough to ensure that interference from adjacent sites is not an issue and that the spatial positioning of monitoring sites will ensure meaningful data collection over the OCS. An area covering one circular nautical mile (~660 acres) is not necessary for most monitoring installations; we therefore suggest a minimal area of 126 acres be authorized for resource monitoring (a circle ½ mile in diameter). However, the footprint for alternative technology testing may require a larger area depending on the technology being evaluated.

Submitted by:

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