

# PUBLIC SUBMISSION

**As of:** March 21, 2011  
**Received:** March 18, 2011  
**Status:** Pending\_Post  
**Tracking No.** 80c0ba19  
**Comments Due:** March 18, 2011  
**Submission Type:** Web

**Docket:** BOEM-2010-0045

AD71 Renewable Energy Alternate Uses of Existing Facilities on the Outer Continental Shelf - Acquire a Lease Noncompetitively

**Comment On:** BOEM-2010-0045-0011

Renewable Energy Alternate Uses of Existing Facilities on Outer Continental Shelf: Acquire Lease Noncompetitively

**Document:** BOEM-2010-0045-DRAFT-0080

Comment from Erich Stephens, OffshoreMW

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## General Comment

Regulation Identifier Number (RIN)  
1010-AD71

Thank you for the opportunity to comment on the referenced proposed rule change.

OffshoreMW supports BOEMRE's proposed rule change to eliminate an existing inconsistency in the procedures that BOEMRE uses to assess competitive interest. BOEMRE proposes to eliminate this inconsistency by removing a duplicative and unnecessary step in the procedures it follows to assess competitive interest when BOEMRE itself initiates the leasing process.

The current requirement of a second notice and opportunity to submit an expression of interest after a RFI or Call is totally unnecessary. There is ample opportunity for potential bidders and other interested parties to be made aware of the Call or RFI process, and therefore to express interest in an area. Other stakeholders will also be able to comment at other stages of the leasing process. A second notice and opportunity to express interest serves only to extend the process and, in cases where competitive interest exists, creates the potential of further delay with no beneficial purpose. Furthermore, this proposed change has no bearing on the procedures for those situations where a competitive interest has already been established. Finally there is the matter of consistency and coherence in the regulations: Leasing efforts that begin with the publication of an RFI or Call should use the same one-step process to assess competitive interest that the regulations establish for leasing efforts that begin with unsolicited bids.

The proposed change could substantially shorten the development timeline for a number of offshore wind projects while continuing to provide prospective lessees and other interested parties ample notice and opportunity to express interest in or file comments on areas proposed for leasing.

Thank you for your consideration

Erich Stephens

Vice President

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