

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

VINEYARD WIND 1 LLC, )  
    *Plaintiff,* )  
v. )  
UNITED STATES DEPARTMENT OF THE )  
INTERIOR ; BUREAU OF OCEAN )  
ENERGY MANAGEMENT ; DOUGLAS )  
BURGUM, Secretary of the Interior, in his )  
official capacity ; MATTHEW GIACONA, )  
Acting Director, Bureau of Ocean Energy )  
Management, in his official capacity ; )  
KENNETH C. STEVENS, Principal Deputy )  
Director, Bureau of Safety and Environmental )  
Enforcement, in his official capacity, )  
    *Defendants,* )  
\_\_\_\_\_ )

Case No. 1:26-cv-10156

**DECLARATION OF KENNETH C. STEVENS**

I, Kenneth C. Stevens, declare as follows:

1. I am the Principal Deputy Director of the Bureau of Safety and Environmental Enforcement (BSEE) within the Department of the Interior (DOI). I have served as Principal Deputy Director since April 15, 2025.
2. As part of my responsibilities as the Principal Deputy Director, I oversee BSEE, which is responsible for regulating and enforcing safety, environment, and conservation compliance during development of the Nation’s ocean energy and marine mineral resources on the Outer Continental Shelf (OCS), including activities on OCS wind leases.
3. On December 31, 2025, I informed the CEO of Vineyard Wind 1 LLC, Klaus Møller, that the removal of blades from turbines at Vineyard Wind 1 (VW1) constituted a safety exception allowed for in the BOEM Director’s Order, dated December 22, 2025, which suspended operations on VW1. Pursuant to the December 2024 COP Addendum, **Exhibit A**, the blades were in the process of being removed because they were

defectively manufactured in the same facility that manufactured the blade that sheared off one of VW1's towers in July 2024, which caused VW1 to be temporarily suspended. I also informed the CEO that additional construction activity could not be authorized because such activity was not identified as an emergency situation, nor a matter that would impact health, safety, or the environment, which were the only exceptions provided in the Suspension Order.

4. On January 14, 2026, I responded to an inquiry from Puneet Verma, the Senior Vice President for Governmental Affairs for Avangrid, one of the partners of Vineyard Wind 1 LLC. Mr. Verma set forth certain issues relating to the installation of blades on the towers and nacelles, **Exhibit B**. I discussed these issues identified by Mr. Verma with BSEE technical personnel. During that discussion, BSEE technical personnel determined that there should be no structural issues associated with the tower and nacelle-only configuration if they were installed correctly. Further, BSEE technical personnel noted that towers and nacelles at VW1 were routinely left in this configuration repeatedly by the project over the last year and five months with no reported adverse impacts to safety. Based on my discussion with BSEE technical personnel, I concluded that I was unable to allow construction activities to proceed under any stated exceptions to the Suspension Order.

5. I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed this 20th day of January, 2026

*Kenneth Stevens*

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Kenneth C. Stevens  
Principal Deputy Director  
Bureau of Safety and Environmental  
Enforcement  
Department of the Interior