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Enabling Rapid and Innovative Deployment with Floating Construction Platf

Additional submitted attachment is included below.

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Public Comment on Offshore Wind Seaport Readiness Plan: Enabling Rapid and Equitable Deployment with Floating Construction Platforms (25-AB-03)

On behalf of Sperra, I am pleased to submit comments on the *Offshore Wind Seaport Readiness Plan* under Assembly Bill 3. Our California-based small business, Sperra (https://sperra.com), is pioneering low-cost, modular infrastructure to accelerate deployment of renewable energy. Our R&D lab is based at AltaSea in the Port of Los Angeles, where we conduct 3D printed prototypes, design work, and testing, and validation. Sperra is 12 full-time employees with a combined 100+ years of engineering experience and 50 years of renewable energy and concrete design and analysis. We appreciate the CEC's proactive efforts to identify infrastructure gaps and enable port readiness statewide. **We respectfully encourage the CEC to include innovative port technologies (such as Sperra's Floating Construction Station, described below) in upcoming workshops and subsequent reports. Floating infrastructure represents a rapidly evolving solution with limited existing treatment in current literature or planning frameworks. A dedicated workshop on these emerging technologies would help fill important information gaps and support more comprehensive infrastructure planning for offshore wind deployment in California.**

As detailed in the scoping document, California's existing ports face significant physical and financial constraints. Many lack the land, wharf strength, or draft depth needed to support traditional offshore wind manufacturing and marshalling. Sperra strongly supports the CEC's recognition that flexible and distributed strategies will be necessary, and we urge the inclusion of floating construction infrastructure such as Sperra's **Floating Construction Station (FCS)** in the AB 3 planning framework.

FCS is a modular, floating concrete platform designed to manufacture and deploy offshore wind foundations, including semi-submersibles, large concrete gravity anchors, and fixed-bottom structures. The FCS incorporates a chain lift system developed by Bardex, another California-based company (https://www.bardex.com). It enables the serialized construction and deployment of concrete foundations for offshore wind, creating a viable alternative to using imported steel, and amplifying economic and environmental benefits by utilizing local materials and labor. FCS is a floating structure designed to be moored in existing ports or sheltered waters, avoiding the need for dredging or costly port terminal construction and upgrades. This technology directly addresses multiple Report 1 AB 3 requirements, including:

Requirement 1-3 *"Recommend and prioritize alternatives only with sufficient landside and water acreage or capacity to support maximum in-state assembly and manufacturing of offshore wind energy components."*

FCS enables full-scale foundation manufacturing and deployment without requiring extensive upland acreage or heavy-lift quays. By floating alongside existing infrastructure, it turns constrained or underutilized ports into viable manufacturing hubs - expanding California's in-state capacity even at sites lacking conventional space or infrastructure. This could significantly expand in-state manufacturing for

offshore wind, particularly in the Central Coast region, which lacks suitable sites for supporting these activities.

Requirement 1-2: *"Recommend and prioritize only port alternatives where site control can be obtained by a port authority or state agency within five years."*

FCS allows deployment at ports already under public or port district control without major permitting or land acquisition. Units can be installed and operated within typical port lease timeframes, aligning with the AB 3 five-year requirement.

Requirement 1-5: *"Identify and prioritize ports that maximize in-state workforce opportunities, including workforce opportunities for low-income and environmental justice communities."*

By enabling manufacturing at more distributed sites, FCS brings job creation to new coastal regions. Its reliance on locally-sourced concrete materials, component fabrication, and assembly supports contracting local businesses and hiring from nearby communities, including those prioritized for economic inclusion.

Requirement 1-6: *"Consider transportation and other infrastructure investments needed to develop the identified seaports and waterfront facilities needed for offshore wind energy activities."*

Because FCS minimizes the need for new roads, storage yards, and deep-draft berths, it reduces reliance on major public infrastructure upgrades. It enables California to meet offshore wind goals with less strain on state and local resources and at an overall lower cost to taxpayers. Since the first FCS unit can be used to fabricate additional FCS units (self-replicating capability), the technology can be used to further expand the capabilities of other ports and waterfront facilities with more FCS units or simply by fabricating caissons to be used in port upgrades (e.g., for terminal construction).

Requirement 1-10: *"Assess the estimated cost and identify potential funding and financing strategies for necessary port development and redevelopment that support offshore wind energy activities."*

At an estimated ~$60M per unit, FCS is a low-cost, modular solution that can be financed incrementally. It avoids the high upfront costs of fixed infrastructure and is well-suited to leverage public-private funding and federal clean energy programs.

In sum, FCS provides a near-term, flexible, and low-impact option for expanding California's port readiness and meeting the state's offshore wind goals on time and on budget. Its ability to be deployed at multiple sites also aligns with the CEC's findings that a multi-port strategy will be necessary to achieve 25 GW of offshore wind capacity by 2045.

We appreciate the CEC's leadership and its inclusive approach to shaping the future of offshore wind in California. Sperra welcomes the opportunity to participate in upcoming workshops and contribute technical input on floating infrastructure and distributed deployment strategies.

Thank you for considering our input.