

DOCKETED	
Docket Number:	25-AB-03
Project Title:	Assembly Bill 3 California Offshore Wind Advancement Act
TN #:	265623
Document Title:	Redwood Coast Energy Authority Comments - Redwood Coast Energy Authority Comments on AB 3
Description:	N/A
Filer:	System
Organization:	Redwood Coast Energy Authority
Submitter Role:	Public Agency
Submission Date:	8/15/2025 4:36:53 PM
Docketed Date:	8/15/2025

*Comment Received From: Redwood Coast Energy Authority
Submitted On: 8/15/2025
Docket Number: 25-AB-03*

Redwood Coast Energy Authority Comments on AB 3

Additional submitted attachment is included below.



Comments on AB 3 Scoping Document and Workshop

Background on Redwood Coast Energy Authority and Summary of Comments

Redwood Coast Energy Authority (RCEA) is a Joint Powers Authority (JPA) founded in 2003 whose members include the Blue Lake Rancheria, the Yurok Tribe, the County of Humboldt, the Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad, and the Humboldt Bay Municipal Water District. RCEA's mission is to develop and implement sustainable energy initiatives that reduce energy demand, increase energy efficiency, and advance the use of clean, efficient, and renewable resources available in the region for the benefit of the member agencies and their constituents.

RCEA supports the development of offshore wind (OSW) and its associated port development in the North Coast region, and the work done on the implementation of AB 3 thus far. RCEA is thankful for the opportunity to comment on the AB 3 Scoping Document and Workshop and for the CEC's extension of the comment window.

RCEA has been involved in OSW planning on the North Coast for about a decade. To spur transmission planning for the resource, RCEA's Community Choice Aggregation (CCA) program included North Coast OSW procurement in its Integrated Resource Plan (IRP) to the California Public Utilities Commission (CPUC) for the 2020 and 2022 cycles, and plans to continue to include the resource in its future IRPs, while recognizing that commercial operation may be further in the future than was expected at the time the earlier IRPs were developed. RCEA has also been actively participating in local stakeholder groups working on initiatives related to offshore wind and sits on the Humboldt Bay Harbor, Recreation and Conservation District's Green Terminal Technical Advisory Group, which advises on the development of a Green Terminal Strategy and Roadmap for the proposed heavy lift marine terminal that would serve the offshore wind industry.

RCEA's comments generally are:

- Additional scoping throughout the development of the final reports is needed for items already identified as in scope, such as transportation needs and impacts to electric ratepayers.
- There are data and information gaps surrounding cost share and host community engagement.



Additional Scoping Is Needed Throughout the Development of the Final Reports for Items Already Identified as In-Scope

The Transportation Needs Assessment Should Include Another Scoping Phase

RCEA supports the transportation needs assessment and recommends including an additional scoping phase focused exclusively on transportation issues prior to drafting the report.

For example, RCEA suggests that the scope should include zero-emission transportation needs, such as transportation electrification infrastructure, as well as evaluating zero-emission vehicle (ZEV) charging requirements for outside contractors and visitors. The scope should also include offshore transportation considerations, such as assessing the feasibility of electrified boats and shore-side electric power from renewable or carbon-free sources that ocean-going vessels can connect to for their onboard power needs while docked or operating within the harbor, rather than using fossil-powered onboard generation sources. In addition, for both offshore and onshore transportation, the assessment should explore the viability of alternative fuels like biodiesel and hydrogen in scenarios where lithium-ion electric vehicles and boats may not be practical. Life cycle analysis for existing fleets need also be included.

The analysis also should extend to vehicle traffic impacts on surrounding communities beyond the port areas.

Impacts to Electric Ratepayers Should Include an Estimate of Load Serving Entity Procurement Need

To help CCAs and other load serving entities (LSEs) plan for serving the energy needs of port development and operations, the State should conduct port scenario analysis in the AB 3 report and include those findings in the Integrated Energy Policy Report (IEPR). State support for load forecasting is necessary so LSEs know when and what to procure. Without accurate forecasts, LSEs may have to buy energy on a short-term basis for port development, risking higher market prices and increased costs for their customers. Accurate forecasts also help LSEs to avoid under-procurement of State-mandated renewable energy certificates and resource adequacy that could result in non-compliance.

There are Data and Information Gaps Surrounding Cost Share and Host Community Engagement

Cost Allocation Requires Clarification

The State, Federal Government, Local Communities, and Private entities need to know what the expectations are for paying for physical development of port infrastructure. Without clear expectations, State- and Federal- level initiatives can unfairly shift costs to host community local governments and residents. A clear analysis of State versus local funding and capacity is needed, along with safeguards to ensure host communities aren't disproportionately burdened by projects that benefit the greater grid.



Local Capacity Analysis is Needed

Local organizations in host communities often possess unique knowledge and expertise but may lack the resources to participate fully in statewide planning efforts, even when they directly affect their own communities. Particularly in Humboldt County, a low-income, low population, rural county that is home to multiple Tribal Nations and Disadvantaged Communities, agencies are under-resourced, which limits participation in state and federal processes, such as document review, meeting attendance, and public comment. This can be addressed via proactive funding designed to enhance local capacity, ensuring local input and equitable, inclusive development.

Meaningful Stakeholder Engagement Requires In-Person Dialogue

The CEC should prioritize robust in-person host community engagement. Host community listening sessions are an essential part of the scoping process, the development of the two reports, and any subsequent reports.

In-person sessions foster trust between the CEC and the communities affected by port development by creating a space for candid dialogue. These sessions ensure that the unique perspectives of local residents and stakeholders, who will be directly impacted by any environmental burdens, are incorporated into the planning process in a way that public comment periods or online surveys do not allow. These sessions will identify project challenges that might be missed in traditional, top-down planning.

The CEC should make these in-person conversations standard practice at every phase, so those most affected are heard and have an influence on the development of their local port.

Thank you for your consideration of these comments.

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