

**DOCKETED**

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*Comment Received From: Port of Long Beach*  
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**Port of Long Beach - Comments on the Implementation of AB 3**

*Additional submitted attachment is included below.*



August 15, 2025

California Energy Commission  
Docket No. 25 – AB – 3  
715 P Street  
Sacramento, CA 95814

RE: Comments on the Implementation of AB 3 – California Offshore Wind Advancement Act

Dear Commissioners:

On behalf of the Port of Long Beach, thank you for the opportunity to provide comments on the implementation of Assembly Bill 3 (Zbur), the California Offshore Wind Advancement Act. As California's leading green port and a key gateway for international trade and goods movement, the Port of Long Beach is committed to supporting the responsible and timely development of the offshore wind industry to meet the state's clean energy goals through the creation of Pier Wind.

We appreciate the Commission's leadership in advancing this transformative sector and offer the following comments to help ensure that the AB 3 process supports robust, equitable, and timely development of offshore wind infrastructure in California:

We strongly urge the Commission to highlight and expand upon findings from the AB 525 Port Readiness Study as a foundational input to AB 3 implementation. This study outlines the essential infrastructure upgrades and timelines required to support offshore wind and should be central to the recommendations in the AB 3 report.

#### **Financing and Port Infrastructure Investment**

A clear and urgent need exists to identify sustainable, long-term financing mechanisms for offshore wind port infrastructure. Port investments—such as heavy-lift capabilities, laydown areas, and electrical interconnections—must be prioritized early to meet the commercial timelines for offshore wind deployment.

Staging and assembly ports are very long lead time infrastructure. The funding and financing plan must be established early in the development phase, and secured before construction can begin. California's staging and assembly ports are navigating unique and specific barriers to private investment, flowing from the nascency of the floating offshore wind industry in the West Coast. We urge the CEC to evaluate various revenue support concepts that have been used on other large public infrastructure projects in the



United States and elsewhere around the world, which would facilitate large private investment and financing into California’s staging and assembly ports.

State grant funding will play an essential role in de-risking private investment in the development of staging and assembly ports. Prop 4 included \$475M to support development of offshore wind port infrastructure. Given the long-lead time for staging and assembly port infrastructure, disbursement of the Prop 4 funds is critical at this early stage of development. The development of the AB3 reports should in no way prevent or delay the disbursement of Prop 4 or other funding appropriated in the state budget for offshore wind port development.

### **Definition and Measurement of “In-State” Assembly and Manufacturing**

The AB 3 reports will evaluate the feasibility of 50% to 65% of in-state assembly and manufacturing of offshore wind energy projects. We ask the Commission to provide clear definitions and transparent methodologies for how “in-state” manufacturing and assembly will be calculated.

Specifically, we recommend including:

- Assembling floating foundations, marshalling and staging components (such as blades, nacelles, towers, anchors, mooring lines, array cables, etc.), assembling turbines (also known as “integration”), performing pre-commissioning activities, and all other related activities at California ports associated with developing the offshore wind farm as qualifying in-state content.
- Publishing a transparent scoring or certification framework to determine qualifying local content.

Achieving the 50% or 65% local content target will require clear metrics, early investment, and support for workforce development and supplier readiness. Without this clarity, developers and ports alike will face significant uncertainty in planning and investment.

### **Public Process and Stakeholder Transparency**

The Port of Long Beach values transparency and inclusive engagement in statewide planning processes. As the Commission develops its AB 3 findings and recommendations, we request:

- A published schedule and framework for stakeholder engagement;
- Public access to the data collection and methodology used to evaluate supply chains and infrastructure;
- Opportunities for ports, local governments, labor, and developers to provide feedback on draft findings before finalization.

### **Importance of the AB 525 Roadmap and Urgency of Timely Action**

AB 525 provided a critical foundation for understanding the scope and needs of California’s offshore wind ambitions. Delays in acting upon those findings—especially related to port infrastructure—risk pushing



project timelines further and jeopardizing our ability to capture local economic and environmental benefits.

To help capitalize on the opportunity for in-state manufacture and assembly, the AB 3 report should build upon AB 525 with specific, actionable recommendations and an implementation timeline that supports deployment as soon as possible. The actions and coordination needed to launch the offshore wind industry in California is dependent on various parties that must coordinate regularly to achieve a successful outcome for the state.

The Port of Long Beach stands ready to support California's offshore wind goals and serve as a key partner in developing the port infrastructure necessary to successfully launch the offshore wind industry. We appreciate the Commission's leadership and urge you to provide clarity, transparency, and urgency as you implement the requirements of AB 3.

If you have any questions or require additional information, please don't hesitate to contact Suzanne Plezia, Managing Director of Engineering Services, at [suzanne.plezia@polb.com](mailto:suzanne.plezia@polb.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Cordero', with a stylized flourish at the end.

Mario Cordero  
Chief Executive Officer  
Port of Long Beach