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**AB 3 CA Offshore Wind Advancement Act Nov 13-14 workshop
comments**

Additional submitted attachment is included below.

December 19, 2025

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

RE: Comments on the AB 3 Workshops on November 13 - 14, 2025

Dear Commissioners:

On behalf of the Port of Long Beach, thank you for the opportunity to provide comments on Assembly Bill 3 (Zbur), the California Offshore Wind Advancement Act, and the AB 3 Workshops conducted by the California Energy Commission (CEC) staff on November 13 and 14, 2025 (Workshops). As California's leading green port and a premier gateway for international trade and goods movement, the Port of Long Beach is committed to working collaboratively with the state on the responsible, equitable, and sustainable development of offshore wind (OSW) to meet the state's clean energy goals through the creation of Pier Wind. We offer the following comments, which build upon the Port of Long Beach's previous comment letter dated August 15, 2025:

Financing and Port Infrastructure Investment

A clear and urgent need exists to identify sustainable, long-term financing mechanisms for offshore wind port infrastructure. We commend the CEC for assembling and conducting an outstanding Panel 5 at the Workshop on November 14, focused on the important topic of port financing. Panelists clearly articulated that staging and assembly ports for floating OSW turbines are fundamentally different in scale and cost than those on the East Coast or in Europe for fixed bottom OSW turbines, and face unique and specific barriers to private investment. We echo and emphasize key points raised during the Workshop:

- **Credit support and “revenue backstop” instruments are necessary to attract private capital at the scale required.** Panel 5, comprised of private equity port investors, offshore wind developers, and expert financial advisors, confirmed that a carefully structured government credit support or revenue backstop instrument will be necessary to unlock private investment in offshore wind port development. This instrument could be structured in several different ways to meet the state's needs and stakeholder priorities, with appropriate levels of risk transfer, whilst providing sufficient confidence to attract the levels of private capital that are necessary to unlock California's OSW market. This approach is a prudent strategy to ensure public investment leverages multiple times its value in private funding, while safeguarding ratepayers and taxpayers and aligning with the state's OSW policy objectives. We urge the CEC to evaluate various

revenue support mechanisms used in other large-scale public infrastructure projects in the United States, in the municipal bond market, and internationally. A clear policy pathway toward the creation of a revenue backstop instrument should be a central recommendation in the AB 3 reports, and we stand ready to support this critical discussion.

- **Public investment in ports must precede large-scale private capital, consistent with global offshore wind development all over the world.** In addition to a backstop instrument to underpin long-term private financing at scale, an essential market signal is early and decisive public investment. This approach has proven successful in developing nascent industries in California and around the world. It has also been a core strategy of offshore wind port development in Denmark, Norway, the UK, and East Coast offshore wind ports. In each case, governments committed public funds to offshore wind port readiness and development to de-risk future investment and demonstrate sustained commitment before private financing followed. Through its initial seed investments in the Waterfront Facility Improvement Program, the state is sending a vital market signal about the seriousness of California's commitment to the offshore wind market. Given the long-lead time for staging and assembly port infrastructure, disbursement of Prop 4 funds remain 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.

Importance of Holistic and Actionable Plan

Overall offshore wind market development must proceed in parallel with port development, and port funding and financing cannot be treated in isolation. As noted at the Workshop, each of the elements of offshore wind development (e.g. supply chain and workforce development, power purchase solicitations, transmission development, vessel availability, etc.) are highly interdependent. A successful outcome for ports, particularly in attracting meaningful private investment, is intrinsically connected with the market's confidence in California's broader offshore wind strategy. It is imperative that the CEC include an overall "roadmap" in the AB 3 report that includes specific, actionable recommendations and an implementation timeline addressing each major element and their interdependencies. This will help the state execute its essential role in orchestrating and coordinating these interdependencies to achieve a successful outcome.

Update Key AB 525 Port Planning Criteria

Since the development of AB 525 Strategic Plan, there have been numerous innovations and advancements in the floating offshore wind industry around the world. We recommend that the CEC review major innovations and key developments in the industry over the last three



years to validate and update where appropriate the port planning guidance and key port design criteria.

We appreciate the Commission's leadership and the opportunity to provide these comments. 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 critical offshore wind industry.

If you have any questions or require additional information, please do not hesitate to contact Suzanne Plezia, Managing Director of Engineering Services, at suzanne.plezia@polb.com.

Sincerely,

Mario Cordero
Chief Executive Officer
Port of Long Beach