

DOCKETED

Docket Number:	26-POPD-01
Project Title:	Prop 4 Offshore Wind Ports Development Program
TN #:	270182
Document Title:	American Clean Power - California Comments - ACP-California Comments on POPD Workshop
Description:	N/A
Filer:	System
Organization:	American Clean Power - California
Submitter Role:	Public
Submission Date:	5/22/2026 2:54:18 PM
Docketed Date:	5/22/2026

*Comment Received From: American Clean Power - California
Submitted On: 5/22/2026
Docket Number: 26-POPD-01*

ACP-California Comments on POPD Workshop

Additional submitted attachment is included below.



May 22, 2026

California Energy Commission

Nancy Skinner, Commissioner

Proposition 4 Offshore Wind Port Development Program

1516 Ninth Street, Sacramento, CA 95814

Submitted via: docket@energy.ca.gov | Docket No. 26-POPD-01

RE: Comment Letter in Response to Proposition 4 Offshore Wind Port Development (POPD) Introductory Workshop

Dear Commissioner Skinner and Members of the California Energy Commission:

American Clean Power – California appreciates the opportunity to submit comments on the POPD Introductory Workshop. We are grateful for the California Energy Commission (CEC)’s ongoing support for the offshore wind industry through numerous programs related to the POPD program, including the AB 525 Offshore Wind Strategic Plan, the AB 3 Offshore Wind Advancement Act Program, and the AB 209 Waterfront Facility Improvement Program. The lessons and findings from those processes, especially the pending AB 3 Port Assessment, are likely to be highly instructive for the development of the POPD program.

At the highest level, ACP-California supports the timely granting of Prop 4 funding to Staging and Integration (S&I) facilities for any number of activities that can bring one more

port closer to being operational in time for construction of California's first commercial-scale offshore wind facilities. Below, we've provided answers to staff's questions as presented in the workshop.

I. Which activities and funding ranges are needed to advance port readiness?

Since the initiation of AB 525 report workshops, ACP-California has advocated for the state to prioritize its financial resources toward supporting upgrades and construction of S&I terminals which are the most critical, earliest infrastructure necessary for OSW turbine assembly. The vast majority of Prop 4 funding should be allocated for this purpose.

Regarding the specific activities that should be funded, we believe the ports are in the best position to determine and propose the next steps for their pre-construction and construction activities. We encourage the CEC to be flexible in the types of activities it is willing to fund (e.g., engineering design, site preparation, land acquisition, permitting preparation, construction, etc.) so long as the port can demonstrate how grant monies would be utilized in a manner that substantially advances port readiness. The CEC can appropriately prioritize POPD resources by focusing on whether and how grants could help a port can move through stage gates toward construction completion.

ACP-California also supports the state considering creative financing mechanisms, such as a state-funded revenue back-stop to leverage a portion of POPD in combination with other sources of state funding to yield private capital investment. This strategy could help bridge the gap between the timeframe for capitalizing port construction and the future receipt of revenues from offshore wind developers once a port terminal is fully constructed.

ACP-California also appreciates that the timelines and financial requirements of the two S&I facilities (Port of Long Beach and Port of Humboldt) may be different and thus the

appropriate POPD implementation strategy for each will also be different. To help determine how to support these two facilities we encourage the CEC to thoughtfully consider important tactical questions such as: 1) Does it make sense to continue to evenly split the current \$183 Million in POPD funding between the two S&I ports at this time (as was done for the Waterfront Facility Improvement Program)? 2) Where are offshore wind developments likely to occur first? 3) Which facilities can support construction of multiple offshore wind projects, based on the location of existing and likely future leases? ACP-California does not take a position on the answers to these questions at this time but encourages the CEC to consider them in its POPD funding approach.

In our joint comments with Offshore Wind California and Oceantic on the AB 3 scoping document,¹ ACP-California advocated for the CEC to conduct a scenario assessment to inform its ports strategy. A scenario-based analysis would also help right-size investments such that port capabilities are appropriately prioritized and phased-in to support the most likely schedule of offshore wind deployment over the next decade and a half. At the time, we also posited that one scenario should be a “baseline” scenario with 5 projects beginning construction in 2033 -2035 and another should be a “reduced” scenario that assumes 2 offshore wind projects begin construction between 2033-2035, with additional projects beginning construction in 2037 and later. Given recent federal uncertainties, it may be appropriate for CEC to consider both these scenarios in its POPD funding approach to ensure least-regrets investments under either scenario.

II. How can POPD bring benefits to California?

As demonstrated in AB 525, offshore wind can bring myriad benefits to California in the form of local economic development, job creation, and long-term infrastructure creation. Specific to the Climate Bond, “At least 40 percent of the total funds available pursuant to this division shall be allocated for projects that provide meaningful and direct benefits to

¹ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=265665&DocumentContentId=102515>

vulnerable populations or disadvantaged communities. At least 10 percent of the total funds available pursuant to this division shall be allocated for projects that provide meaningful and direct benefits to severely disadvantaged communities.”²

The California Natural Resource Agency (CNRA) provided guidance³ and mapping⁴ that affirms the POPD’s potential to benefit disadvantaged and severely disadvantaged communities. The guidance identifies creation of high quality jobs, job training, community capacity building, and supporting tribal stewardship as “cross-cutting” community benefits that could be facilitated by the Climate Bond and identifies reductions in GHG emissions, air quality improvement and energy resilience as eligible benefits for the “Clean Air” section of the Climate Bond where the offshore wind port program is codified. Further, the ports of Humboldt and Long Beach are both located in regions with significant populations of disadvantaged and severely disadvantaged communities, as demonstrated in the CNRA guidance maps. Thus, ACP-California expects that the POPD program will easily provide benefits in compliance with state law.

More broadly, we appreciate the interests of California Tribes, community groups, and environmental justice organizations to ensure ports are developed and operated with minimal impact to local air quality and in a manner that provides direct or more specific benefits to Tribes and communities. Thus, we support consideration of the potential for grant funding to support these goals and encourage the CEC and the S&I ports to continue engaging these communities in the implementation of the POPD program.

III. What could impact the success of POPD projects?

First, as discussed above, the timeline and size of the near-term pipeline of offshore wind projects could affect the success of the POPD projects and we encourage the CEC to

² P.R.C. §90140

³ <https://bondaccountability.resources.ca.gov/docs/Prop4BenefitsAssessment.pdf>

⁴ <https://experience.arcgis.com/experience/aa723fdf521a44c9a428f1a46cd38a09>

consider realistic scenarios for offshore wind deployment in their decisions about POPD funding. We encourage the CEC to be strategic and expeditious in its development of the POPD program by focusing on a near-term strategy that also supports longer-term offshore wind goals.

Second, the legislature and Governor have appropriated only half of the POPD funds approved by California voters. Given the size of the capital requirements for both S&I ports, we believe the success of projects depends in part on the ability of the state to award large portions of the total funding at once, rather than incrementally and across several entities. Thus, if additional POPD funding is appropriated in 2026, we encourage the CEC to immediately incorporate those funds in the current POPD program under development, rather than initiating a separate, later funding program.

Conclusion

ACP-California is pleased to provide the above comments and thanks the CEC for its work on this program.

Sincerely,

Molly Croll

Senior Policy Director

American Clean Power – California