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Tidal Nova Energy Comments on Draft SB 605 Wave and Tidal Energy Report

Additional submitted attachment is included below.

Comments of Tidal Nova Energy on the Draft SB 605 Wave and Tidal Energy Report

Making California's offshore energy industrial base available to marine energy

Docket: 24-SB-605, SB 605 Wave and Tidal Energy, Phase 2

Re: Draft Commission Report, Senate Bill 605 Wave and Tidal Energy: Report to Governor and Legislature (CEC-700-2026-032-CMD, TN 272333)

Submitted by: Francis Perrier-Morin, Founder and Chief Executive Officer, Tidal Nova Energy LLC

Date: September 25, 2026

Interest of the commenter

Tidal Nova Energy LLC is an independent, technology-agnostic marine energy project developer with a global mandate. We are exploring California for commercial-scale wave energy projects, with initial interest in Northern California. Whether we commit to a site here depends largely on legislative and financial conditions this report can help establish: access to the state's offshore energy infrastructure programs, a workable permitting pathway, a dedicated funding channel for early projects, and a credible route to offtake. Like any developer in this sector, we expect to reach commercial scale through demonstration and pilot projects first, and several recommendations below are scoped to that step.

These comments are offered from the position of a prospective applicant. They are not a critique of the draft's technical findings, which we largely accept. They are an attempt to answer a question the statute asks and the draft leaves mostly open: what would actually have to happen for California to become a place where this industry locates.

The argument in short

Section 25996(b) asks the Commission three questions: what factors would increase the use of wave and tidal energy in California, what economic and workforce development these projects need, and what near-term actions, particularly investments and workforce, would maximize job creation and economic development while considering affordable electric rates and bills.

Our answer to all three starts from one fact. California is already building an offshore renewable energy industrial base. The Proposition 4 Offshore Wind Port Development Program and the Offshore Wind Energy Waterfront Facility Improvement Program are funding port and waterfront infrastructure. The Assembly Bill 3 Seaport Readiness Plan

and Supply Chain Feasibility Study are mapping the ports, supply chain and workforce that offshore energy will need.

Each of these is limited to offshore wind, by statute or by program design. None of them covers marine energy, and the draft report does not discuss them.

California therefore does not need to build a marine energy hub from scratch. It needs to decide whether the hub it is already building can serve more than one technology. That is mostly a matter of eligibility language and study scope rather than new appropriations, and the relevant decisions are being made now. The Proposition 4 port program has not yet released its first grant solicitation. The Seaport Readiness Plan is due December 31, 2026, and the Supply Chain Feasibility Study is due December 31, 2027. This is the kind of near-term action section 25996(b)(5) asks the Commission to identify.

Wave is the larger opportunity. The draft finds abundant wave resources off the California coast and concludes that commercial-scale marine energy projects in the state would likely use wave rather than tidal. Our recommendations apply to both resources, and Sections 6 and 7 address what each one needs.

Summary of recommendations

1. Make the report's central economic finding the one above: California's offshore renewable industrial base is under construction, marine energy is currently outside all of it, and this report does not discuss any of it. Recommend co-eligibility as the state's primary near-term marine energy action.
2. Recommend that Public Resources Code section 94540 be amended to read "offshore renewable energy generation" rather than "offshore wind generation," so that port capital already appropriated can serve more than one technology.
3. Recommend that the Assembly Bill 3 Seaport Readiness Plan, due December 31, 2026, include a marine energy co-use screen.
4. Recommend that the Assembly Bill 3 Supply Chain Feasibility Study, due December 31, 2027, identify the California industrial capabilities common to offshore wind and marine energy, so that investment justified by one also serves the other.
5. Carry the draft's own finding on wave and offshore wind colocation forward into Chapter 4 as an action, so that shared foundations, cables and grid connections are evaluated while California's offshore wind areas are still being planned rather than after they are built.
6. Address California's one genuine physical gap, the absence of any grid-connected open ocean test berth, by evaluating a marine energy berth as incremental scope on infrastructure already being permitted rather than as a standalone facility.
7. Designate the Cal Poly Pier as California's entry-level wave energy test site and fund the specific gap that federal support does not cover.
8. Publish the two completed California permitting sequences the report already describes as documented pathway case studies, and replace the 2011 guidance with a current handbook under a named lead and date.
9. Recommend a defined pre-application and pilot pathway for deployments at or below 5 MW, 10 years, and fully removable.

10. Correct the treatment of RPS eligibility. Ocean wave, ocean thermal and tidal current are already named in statute. Separate the administrative barriers from the legislative ones.
11. Name a marine energy initiative in the EPIC 2026 to 2030 investment cycle, and state an indicative capacity milestone so the state has something to measure against.
12. Define the path from demonstration to commercial scale: assess whether commercial-scale marine energy should become eligible for central procurement under Assembly Bill 1373, and map the state financing tools available at each project stage.
13. Commission a nearshore wave resource characterization for the depth band the draft says its own analysis cannot resolve, since that band is where the report locates the near-term opportunity.
14. Qualify the tidal finding to reflect the sea space analysis method's stated limits, and apply device power matrices in any future analysis.
15. Give every Chapter 4 item a lead agency, supporting agencies, a target date, and a flag for whether it requires statute or appropriation. Add tracking indicators and recommend a successor roadmap that runs through commercial deployment.

1. Open California's offshore wind infrastructure to marine energy

The draft treats ports, vessels, supply chain and workforce as future needs. California is already funding and planning for them through the efforts below:

Proposition 4 Offshore Wind Port Development Program. Public Resources Code section 94540 makes up to 475 million dollars available, upon appropriation, "to support any of the following activities related to the development of offshore wind generation." Senate Bill 105 (2025) appropriated 225.7 million dollars, which must be encumbered by June 30, 2028 and spent by June 30, 2030. Program guidelines are under development and the first grant solicitation has not yet been released.

Offshore Wind Energy Waterfront Facility Improvement Program. Authorized under Assembly Bill 209 and now funded from Proposition 4 under Senate Bill 105, this program made 42.75 million dollars available for planning, design, environmental study, construction, and cost share against federal awards at California waterfront facilities. Awards were approved in October 2025.

Assembly Bill 3, the California Offshore Wind Advancement Act. The Seaport Readiness Plan is due to the Legislature on December 31, 2026, and the Supply Chain Feasibility Study, which examines the feasibility of 50 percent and 65 percent in-state assembly and manufacturing, is due December 31, 2027. Both sit in docket 25-AB-03 and both are being developed now, in consultation with the State Lands Commission, the Coastal Commission, the Workforce Development Board, tribal governments, labor and industry.

Port Readiness Plan. Published by the State Lands Commission with the Energy Commission in July 2023 under Assembly Bill 525, it assesses what California ports require for offshore renewable construction, staging, assembly and long-term operations. It addresses offshore wind only.

Humboldt Bay Offshore Wind Heavy Lift Marine Terminal. This is the clearest illustration of why the eligibility question now matters more than it did two years ago. The

project received a 426.7 million dollar federal INFRA award in January 2024, on top of roughly 19.8 million dollars in earlier planning and design grants. In August 2025 the U.S. Department of Transportation terminated that award along with other federal grants to the Harbor District. The project continues through joint CEQA and NEPA review, and in October 2025 the Harbor District received an 18.25 million dollar state grant toward it. Federal support for offshore energy port infrastructure in California has become unreliable. State money is now the binding constraint, and state money is where the eligibility rules described above apply.

Each of these programs is scoped to offshore wind. Section 94540 says so expressly, and subdivision (b) ties expenditures to the Assembly Bill 525 offshore wind strategic plan. Assembly Bill 3 is titled the California Offshore Wind Advancement Act. The waterfront facility program required applicants to demonstrate commitment to California offshore wind investments. The Port Readiness Plan considers no marine renewable technology other than wind.

None of this is a criticism of those programs. Offshore wind is further along and the near-term investment case for it is stronger. Our point is narrower. The marginal cost of making a quay, a laydown area, a mooring fabrication capability, a dynamic cable supply chain or a trained marine operations workforce available to a second offshore technology is far lower than the cost of creating any of it. California is about to build that capability once. Whether marine energy can use it is being decided now, by default, in eligibility language written when marine energy was not in the room.

None of the five items above appears in the draft report. Including them, even briefly, would connect the report's economic and workforce findings to the investments the state is actually making, and would show where marine energy currently sits relative to them.

Recommendation. State this as a finding in Chapter 4, with an inventory of the programs above. It directly answers section 25996(b)(1) and (b)(4).

Recommendation. Recommend that the Legislature amend Public Resources Code section 94540 to substitute "offshore renewable energy generation" for "offshore wind generation." This redirects no money away from offshore wind, which will remain the overwhelming majority of demand for California port capacity. It removes a categorical bar. If the Commission prefers a narrower instrument, recommend instead that marine energy be made an expressly allowable secondary use in program guidelines, with no set-aside and no priority.

Recommendation. Recommend that the Assembly Bill 3 Seaport Readiness Plan include a marine energy co-use screen. In our assessment as a developer, marine energy's port requirements are largely a subset of floating offshore wind's: smaller components, lighter lifts, shallower draft, shorter tow-outs. If that is correct, screening for them adds a section to an analysis already being performed rather than a new study. Because that plan is due December 31, 2026 and this report is being finalized now, the Commission is in a position to sequence the two.

Recommendation. Recommend that the Supply Chain Feasibility Study identify capabilities common to both technologies. Mooring and anchoring systems, dynamic subsea cable, marine installation and operations vessels, corrosion and biofouling engineering, and marine survey services serve both. A finding that a given California capability has two potential customers rather than one strengthens the in-state manufacturing case that study is charged with evaluating.

Recommendation. Extend the same logic offshore, which the draft has already done analytically but has not carried into its recommendations. The report finds that integrating wave energy converters with offshore wind infrastructure "could reduce costs by sharing foundations, cables, and grid connections, while optimizing space use," that hybrid configurations may improve power quality and system stability, and that successful integration "would require coordination with offshore wind developers, regulators, tribes, fishermen, and other interested parties." That is a cost reduction pathway for the resource the report identifies as California's primary one, and it appears nowhere in Chapter 4.

The timing argument is the same as the one for ports, and sharper, because colocation is cheap to design in and expensive to retrofit. Once foundations are specified, export cables sized and interconnection agreements signed, the opportunity to share them closes for the life of the asset. Recommend that wave colocation be evaluated as part of current offshore wind planning rather than deferred to a future marine energy proceeding, and name which body owns that evaluation. We recognize the sea space analysis excluded colocation because California's offshore wind areas sit beyond its 200 meter depth limit. That is a sound scoping decision for a resource map and not a reason to omit the subject from a report to the Legislature on what would increase the use of wave energy in California.

2. Add a grid-connected wave test berth to infrastructure California is already building

California's existing test infrastructure is real and the draft is right to highlight it. As the report notes, Cal Poly was selected in May 2025 as the first open water research pier under the federally funded TEAMER program. The pier extends roughly one kilometer into San Luis Obispo Bay in about 40 feet of water, with a 90 by 150 foot deck, a two-ton jib crane, davits and vessel support.

The report describes it as a shore-based facility for wave energy developers supporting early-stage research, and that is the right characterization. It is a component and subsystem site. It sits in semi-protected water behind the Port San Luis breakwater and it has no grid connection. A developer can test a power take-off, a mooring, a control system or an instrumentation package there. A developer cannot demonstrate a device delivering metered power to a utility system there, and that is the specific evidence project finance requires.

No facility in California can do that. A California developer that reaches the power-export demonstration stage must leave the state to complete it. The draft acknowledges as much in describing PacWave South, which holds a 25-year FERC license issued in March 2021, runs roughly 12 miles of subsea cable to four independently cabled berths of up to 5 megawatts each, and which the report states became fully operational in August 2026.

We do not suggest California replicate that. It took more than a decade and a substantial federal cost share, and a second facility of the same kind on the same coast is not obviously the best use of state funds.

Recommendation. Recommend that the Commission evaluate a single grid-connected marine energy demonstration berth as an incremental addition to offshore infrastructure the state is already permitting and cabling, rather than as a standalone project. Interconnection study, marine route survey, cable landing, environmental review and tribal consultation are the dominant costs of a test berth, and they are being incurred anyway for offshore wind. Whether a marine energy berth can be carried as marginal

scope, and at what cost, is a bounded feasibility question that the Commission or a consultant can answer within one work cycle. That answer belongs in this report's successor.

Recommendation. Recommend that the state formally designate the Cal Poly Pier as California's entry-level wave energy test site and fund the gap federal support does not cover. TEAMER funds technical assistance and facility access. It does not fund California-specific permitting support for test deployments, baseline environmental monitoring at the site, or a public data record from tests conducted there. Those three things are what convert individual test events into a California evidence base, and they are inexpensive relative to everything else in this report.

3. Turn California's two completed permits into a published pathway

The draft correctly identifies distributed and nearshore applications as the nearest-term opportunity, and correctly notes at page 9 that "projects proposed in state waters that are not connected to the grid generally would not require FERC licensing." That observation is one of the most commercially significant in the report and it is also not theoretical. The draft itself documents two completed California sequences:

The Fort Bragg and Oneka Technologies wave-powered desalination pilot, a single buoy half a mile from shore producing an average 13,200 gallons per day for twelve months, proceeded through a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program prepared by the City of Fort Bragg, a State Lands Commission lease issued in August 2025, and a Coastal Development Permit approved by the Coastal Commission in December 2025, to an announcement in April 2026 that all necessary permits had been obtained.

The Eco Wave Power project at the Port of Los Angeles, a 100 kW system of eight floaters attached to an existing concrete wharf with a land-based conversion unit, hosted by AltaSea, completed installation in August 2025, launched in September 2025, and concluded its pilot program in March 2026. It was authorized under the Port's granted-lands authority through a Port of Los Angeles permit rather than a new ocean lease, because it attaches to existing port structure.

These are two distinct and repeatable pathways: a State Lands lease and Coastal Development Permit route for a floating nearshore deployment, and a port-tenancy route for a structure-attached device.

Recommendation. Present both as pathway case studies, with the sequence of authorizations, the agencies involved, and the elapsed time from first filing to final approval. The Fort Bragg sequence in particular, running from environmental document to full approval, is the only California benchmark of its kind. A published benchmark is the single thing that allows a developer to underwrite a California schedule, and assembling it costs the Commission nothing beyond records the state already holds.

Recommendation. Add a short subsection setting out, by project configuration, which federal and state authorizations apply: grid-connected commercial arrays, grid-connected pilots, non-grid-connected deployments serving an onshore or offshore end user, and structure-attached or short-duration research deployments. The material already exists across the consultant reports and agency sources the Commission has assembled.

Recommendation. The California Permitting Guidance for Ocean Renewable Energy Test and Pilot Projects, cited in the draft as an existing resource, was published in 2011

and predates every relevant process change since. Recommend that the Commission, with the Ocean Protection Council, the State Lands Commission, the Coastal Commission and the Department of Fish and Wildlife, publish an updated handbook, and assign it a lead agency and a publication date.

Recommendation. Recommend a formal pre-application joint agency review for deployments meeting a defined threshold. We propose nameplate capacity at or below 5 megawatts, operating life at or below 10 years, and full removability with seabed restoration. Those bounds cover every near-term project type the report identifies, including both California examples above, and exclude commercial arrays, so the pathway cannot be used to avoid full review. A single scheduled meeting at which the responsible agencies state their requirements before a developer commits capital is a low-cost intervention with a direct effect on project risk.

4. Build a path to revenue, from demonstration funding to commercial procurement

Chapter 2 accurately records what commenters told the Commission: tailored pricing and generator capacity eligibility, integration of marine energy into Commission resource planning and Electric Program Investment Charge investment plans, clear guidance on state incentive eligibility, deployment targets to attract investment, and policy pathways toward Resource Adequacy eligibility. None of it appears in Chapter 4. Carrying these items forward, or explaining why not, would give readers a clear record of how the Commission weighed them.

One item in that list needs correcting rather than carrying forward. Public Resources Code section 25741(a) defines a renewable electrical generation facility by reference to a list of eligible technologies that expressly includes "ocean wave, ocean thermal, or tidal current," and Public Utilities Code section 399.12 incorporates that definition for RPS purposes, subject to the conditions stated there. Statutory eligibility is therefore not the threshold barrier. The barriers are downstream: certification practice, Resource Adequacy counting conventions for a variable resource with no California operating history, and the absence of any procurement vehicle sized to a demonstration project.

Recommendation. State that distinction plainly and sort the remaining barriers into those requiring legislation and those the Commission or the Public Utilities Commission can address administratively. This is a bounded analytical task and it produces a finding the Legislature can act on immediately.

Recommendation. Carry each of the Chapter 2 market signal items forward into Chapter 4 as a named consideration, or state why the Commission declines to carry it forward. Either approach gives stakeholders a clear answer.

Recommendation. Name a marine energy initiative in the EPIC 2026 to 2030 investment cycle. EPIC invests more than 130 million dollars annually, the Commission administers roughly 80 percent of it, the current five-year plan is being implemented now, and it already supports offshore wind specific research solicitations. A named marine energy initiative, at a scale appropriate to the sector, is the difference between a technology that can plan against a funding cycle and one that competes undifferentiated against mature technologies in general solicitations. The Commission's own finding, that marine energy is emerging and needs real-world testing, is the argument for a designated channel.

Recommendation. State an indicative capacity milestone. We suggest 50 megawatts of demonstration and pilot capacity permitted or installed in California by 2035. We offer that figure as a starting point. An indicative milestone is not a procurement mandate and commits ratepayers to nothing. It is what allows the state to judge whether its own programs are working, and it is what tells developers and their capital whether California is a market with a destination. Assembly Bill 525 set planning goals for offshore wind before that resource was commercially proven in California, and the precedent is directly applicable.

Recommendation. Define the path from demonstration to commercial scale. Demonstration funding alone does not bring commercial projects to a state. Developers and investors also need to see how a proven technology would be bought and financed. Two steps would make that path visible. First, Assembly Bill 1373 (2023) created a central procurement mechanism through the Department of Water Resources for long lead-time resources, and Public Utilities Commission Decision 24-08-064 (August 2024) determined the need for offshore wind, geothermal and long-duration storage. Marine energy is not among them. We recommend that the Commission, with the Public Utilities Commission, assess whether commercial-scale marine energy should become eligible for that mechanism once it has been demonstrated in California, and whether the existing statutory criteria would suffice or legislation would be needed. Second, we recommend that the report map the state financing tools, including EPIC, Proposition 4 port funding (currently limited to offshore wind) and the climate financing products of the California Infrastructure and Economic Development Bank, against each project stage from demonstration to first commercial array, and identify where no state tool currently applies.

5. Workforce and economic development

Section 25996(b)(4) and (b)(5) ask specifically about workforce and job creation. The draft treats this at a high level. California's marine energy workforce question is not really about new occupations. It is about whether a marine construction, vessel operations and subsea services workforce being assembled for one offshore industry is available to a second.

Recommendation. Recommend that the workforce analysis already required under Assembly Bill 3 report the overlap explicitly, identifying which offshore wind occupational categories transfer to marine energy deployment and operations and which do not. If the overlap is substantial, that finding improves the return on California's offshore wind workforce investment rather than competing with it.

Recommendation. Identify at least one existing or proposed funding mechanism for which distributed and non-grid-connected marine energy applications are eligible, or state that none exists. The report names these as the nearest-term opportunity, and both California projects it describes fall in this category, yet the Chapter 4 research considerations recommend only "further analysis and feasibility assessments." If there is no funding pathway for the one segment the report calls near-term, that finding belongs in a report to the Legislature.

6. Map the nearshore wave resource where the report sees the near-term opportunity

Wave is California's primary marine energy resource and the draft says so. It finds abundant wave resources off the coast, greatest in the northwest of the state, and concludes that commercial-scale marine energy projects here would likely use wave rather than tidal.

The draft also makes two findings about wave that are favorable and that Chapter 4 does not use.

The first concerns interconnection. The report notes that current devices operate at distribution-level voltages rather than transmission, that onshore converters mounted on breakwaters or seawalls "can avoid the need for undersea cables, potentially reducing both environmental impact and interconnection costs," and that because distribution-level infrastructure is widespread along the California coast, "proximity to high-voltage infrastructure would not be a constraint for deployment of onshore WECs and TECs." Taken together with the page 9 observation that non-grid-connected projects in state waters generally avoid FERC licensing, that describes a class of project with no transmission constraint, no undersea cable, and no federal licensing requirement. That is the most permissive configuration in the report and it receives no recommendation.

The second is a limitation the draft states candidly and which we think deserves more weight than it is given. On page 18 the report says that estimating nearshore wave energy "requires detailed modeling that large-scale models often lack," that as a result "areas with high wave energy close to shore, and in depths of 50 meters or less, may not be accurately captured," and that site-specific assessments are needed "particularly for devices built into coastal structures, where data on wave energy is limited."

This produces an internal gap the report does not close. Chapter 4 identifies distributed and nearshore applications as the nearest-term opportunity. Both operating California projects sit in that category, and one of them, the Port of Los Angeles installation, is precisely a device built into a coastal structure. Yet the resource analysis supporting the report explicitly cannot characterize the resource in that depth band or for that device class. As a result, the near-term pathway the report recommends rests on a resource its supporting analysis could not characterize, and a developer evaluating a nearshore California site today has no state resource data adequate to size a project.

Recommendation. Recommend a nearshore wave resource characterization program covering the zone at and below roughly 50 meters of depth, including the structure-mounted case, using high-resolution modeling validated by in-situ measurement at a small number of candidate sites. It is modest in cost relative to the other funding items in this letter and it is a precondition for everything the report calls near-term. Prioritize sites that are already the subject of interest, including port and harbor structures and the coastal communities the report identifies as candidates for distributed generation.

Recommendation. State in Chapter 4 that onshore and structure-mounted wave devices face neither a high-voltage interconnection constraint nor, when not grid-connected, a FERC licensing requirement. The report establishes both points in Chapter 3 and then does not draw the conclusion. For a prospective applicant, that conclusion would be among the most useful in the report.

7. Reassess tidal sites with device-specific analysis

The report concludes that tidal opportunities in California are limited, that San Francisco Bay is likely the only site with commercial tidal resource potential and represents 89 percent of the state's tidal resource, and that distributed applications may exist at Humboldt Bay, the lower Eel River and Tomales Bay. We do not contest that conclusion.

We note that Chapter 3 states plainly, at page 17, that the assessment "does not consider device type, therefore it does not measure technical resource potential," and instead "summarizes theoretical resource potential." Tidal is the resource most sensitive to that limitation, because technical yield depends heavily on device selection and on local flow geometry at a scale coarse resource mapping does not resolve. A finding that 89 percent of the state's theoretical tidal resource sits in a single, heavily constrained estuary is a reason to examine the remaining sites with device-specific methods, not a reason to close the question.

Recommendation. Qualify the tidal finding to reflect the method's stated limits, and include tidal in any future spatial analysis that applies device power matrices. The report already identifies that as a subsequent evaluation step. It was simply not performed in this round.

8. Turn the draft's Chapter 4 into an action plan, followed by a marine energy roadmap

The considerations at pages 39 and 40 are written as things that could or should happen, with no party responsible for any of them. "Support a coordinated, multi-agency ... permitting framework" and "Continue coordination and collaboration among federal and state governments" do not tell the Legislature what to authorize or an agency what to do next. Assigning each one an owner would make them easier to fund and track.

Recommendation. Restate each consideration in a table with five fields: the action, the lead agency, the supporting agencies, a target date, and whether it requires statutory authority or an appropriation. This requires no new analysis, and it makes each consideration something the Legislature and agencies can assign, fund and track.

Recommendation. Add tracking indicators: number of permitted deployments, installed demonstration capacity, elapsed permitting duration by project class, and state funding for which marine energy is eligible. Each is derivable from records the state already holds, and without a baseline any future assessment of progress will be qualitative.

Recommendation. This draft is the final SB 605 work product. Recommend that it not be the last. The Assembly Bill 525 Offshore Wind Energy Strategic Plan, which the draft already cites, is more than a monitoring model: it establishes a planning structure with milestones and assigned responsibility. Recommend a comparable marine energy roadmap that runs from demonstration and pilot projects through first commercial deployment, with a delivery date and a designated lead.

Closing

We do not ask the Commission to overstate the readiness of this technology. The draft is accurate that marine energy is emerging, that no California commercial project exists, and that cost competitiveness has not been demonstrated. We accept all of it.

Our point is that the statute asks a different question than whether the technology is ready. It asks what would contribute to increased use, and what near-term investment and workforce actions would maximize job creation and economic development while considering affordable rates. In California, in 2026, the honest answer is that the state is building an offshore energy industrial base right now and has not yet decided whether marine energy may use it. That decision is being made in program guidelines, in eligibility language, and in the scope of two studies due within the next fifteen months.

We appreciate the opportunity to comment and are available to provide further detail on any of the above or to discuss the developer-side view of the permitting, port and offtake questions raised here, and the conditions under which we would bring commercial-scale projects to California.

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