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Comments of Offshore Wind California on January 28, 2020 Workshop

Additional submitted attachment is included below.

In the Matter of:
OFFSHORE RENEWABLE ENERGY

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WORKSHOP RE:
California Offshore Wind
Research, Data and Applications

**Comments of Offshore Wind California on the
California Energy Commission Workshop, January 28, 2020
February 11, 2020**

Offshore Wind California (OWC), a California based coalition of industry partners promoting policies and public support for responsible development of offshore wind power in California, submits these comments in response to issues raised at the workshop held at the California Energy Commission (CEC) on January 28, 2020.

OWC formed in 2019. The organization's members include Aker Solutions, Avangrid Renewables, Equinor, Magellan Wind, Mainstream Renewables, Northland Power, Orsted, Principle Power, and Pacific Ocean Energy Trust. OWC strongly supports the CEC's efforts to gather and share environmental, operational and other science-based data to facilitate sustainable offshore wind energy development in California.

Ensuring Concurrent Action Across Proceedings and Ongoing Research

The workshop addressed two offshore wind research studies currently managed by the Conservation Biology Institute (CBI) and Point Blue. In addition to having CBI and Point Blue outline the data and modeling contained in their studies, CEC staff discussed progress, outcomes and data sets being developed within two dockets at the CEC: 17-MISC-02 and 17-MISC-03. Information from the studies, dockets and informal working groups at the CEC will support actions at other agencies, including the California Public Utilities Commission (CPUC). The CPUC's Integrated Resource Plan (IRP) will shape how offshore wind becomes part of the diverse renewable energy portfolio in the state. In addition, since data and modeling will be done for both terrestrial and marine based resources, the CEC will develop related data for the Desert Renewable Energy Conservation Plan (DRECP) and the Renewable Energy Transmission Initiative (RETI) 2.0. Transmission planning is being assessed under a broader lens than in the prior RETI process. Efforts to reduce greenhouse gas reductions will also influence plans to develop new transmission and modernize existing infrastructure as older facilities come offline. Siting of new facilities will be determined in part by the lowest overall environmental impacts as reflected in lifecycle analysis.

OWC urges the CEC to engage with stakeholders throughout these processes. The goal should be to utilize existing transmission and distribution where feasible and to site transmission in support of offshore wind development as informed by the California Energy Infrastructure Planning Analyst (EIPA), including assessing impacts of onshore versus offshore transmission with regard to wildfire prevention and mitigation. OWC can provide additional information on offshore wind investment, mitigation, and workforce development. This can support data being developed by the CEC for terrestrial and marine resources and necessary transmission. The long planning horizons for new transmission, for offshore wind development and permitting as well as for work

across regulatory entities, will require extensive lead times. Datasets and modeling for marine siting under EIPA must be comprehensive and durable and information for the two research projects must be shared with ongoing CEC processes. In light of the scale of projects required for the state to meet its resource and climate adaptation needs, the investment window could close. California cannot lag in identifying suitable development areas and establishing processes that encourage energy procurement and permitting.

Centralized Access to Data, Timely Opportunity to Comment Upon, Augment Information

The CEC processes will rely upon broader project, land or marine disturbance, environmental impacts, and overall environmental footprint issues to assess the suitability of project siting and resource choice. CBI's research project will evaluate updated data sets to document gaps, synthesize data to identify areas that "maximize energy generation potential while preserving existing ocean uses and protecting the marine and coastal environments," and use Environmental Evaluation Modeling Systems (EEMS) to address potential conflicts and planning considerations "in and outside of existing call areas." OWC supports making this information comprehensive and accessible to all stakeholders in real time. A robust process will ensure that California accesses optimal call area locations in a timely way and matches these to the state's clean energy goals.

OWC supports early identification to meet energy needs and to optimize existing transmission or other resources. In addition, the types and costs of mitigation must be identified early for any and all high value sites in order to drive investment toward the best planning resources.

Coordinating Forward Planning Across Regulatory Agencies

The CEC staff identified multiple agency coordination needs with regard to resource planning, transmission optimization, and identification of best fit resources. Reviews and assessments must be coordinated across state, federal and local regulatory agencies and entities. Given the time horizon to site and permit offshore wind and attendant transmission, it is essential to work within a strategic planning/working group similar to that adopted and utilized for the initial DRECP and RETI processes. In those circumstances, an interagency task force accelerated siting of transmission assets and their ultimate interconnection across state, federal, tribal and private lands to harness renewable energy from projects funded by the American Reinvestment and Recovery Act (ARRA). OWC recommends that the CEC adopt such a process in addition to the research and planning processes already underway.

California will need a significant amount of new clean energy, especially as electrification of the transportation and building sectors drives increased electricity demand in the state. The processes outlined in the workshop will help identify the best resources to meet demands for a diverse, reliable portfolio of clean energy, and will address infrastructure needs to support these projects. Engaging stakeholders early on will be key to familiarize regulators and project developers with new processes and the time requirements for offshore wind development in the state. Offshore wind developers can translate their progress and lessons learned with siting and permitting on the East Coast and elsewhere as well as provide significant operational, environmental and economic data.

In closing, OWC offers to be a resource to the research teams and to the CEC and other agencies evaluating renewable energy and infrastructure needs. OWC supports broad, concurrent access to data and preliminary findings. The process should leverage as many resources from stakeholders as possible. OWC also supports a flexible supply of renewable energy, best utilization of existing and new transmission and distribution infrastructure, and early identification of developable, utility-scale, and high-wind speed call areas for offshore wind development in California.

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