

DOCKETED

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*Comment Received From: AWEA-California & Offshore Wind California
Submitted On: 6/30/2020
Docket Number: 17-MISC-01*

AWEA-California and Offshore Wind California Comments

Additional submitted attachment is included below.

Docket # 17-MISC-01



June 30, 2020

California Energy Commission
1516 9th Street
Sacramento, CA 95814-5512

Dear Bureau of Ocean Energy Management (BOEM) California Intergovernmental Renewable Energy Task Force,

We appreciate the efforts of the BOEM, the Department of Defense, the National Oceanic and Atmospheric Administration, Congressman Carbajal, Congressman Panetta, and the California Energy Commission (CEC) to move the discussion forward on potential locations for commercial offshore wind in Central California.

With this comment letter, we are submitting to the full task force and into the CEC docket a letter that we sent to Congressman Carbajal and Congressman Panetta on a proposed path forward for offshore wind leasing off the Central Coast. Please see Attachment A.

We advocate for the Department of the Interior, BOEM and the State to advance toward commercial leasing for offshore wind in California as early as possible in 2021.

Thank you for your consideration.

Sincerely,

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May 27, 2020

The Honorable Salud Carbajal
United States House of Representatives
1431 Longworth House Office Building
Washington, DC 20515

1411 Marsh St., Suite 205
San Luis Obispo, CA 93401

The Honorable Jimmy Panetta
United States House of Representatives
212 Cannon House Office Building
Washington, DC 20515

142 W Alisal Street, Room E116
Salinas, CA 93901

Re: Offshore Wind Development in Morro Bay

Dear Congressman Carbajal and Congressman Panetta,

Thank you for your leadership and continued work to find a solution with the Department of Defense (DOD) and the Department of the Interior (DOI) to bring offshore wind to the Central California coast. We are writing to express our strong support for the following key principles that should inform further negotiations with DOD and to request a meeting with you to discuss them.

1. The Bureau of Ocean Energy Management (BOEM) should proceed with site identification in 2020 and conduct an auction and lease sale of multiple sites in the existing Morro Bay Call Area during 2021. Each auctioned site should be large enough for a commercially viable project (which, while it may vary by region, would be roughly 100 to 120 sq. miles in the Morro Bay region). We do not see any need for further delay, and therefore we have urged the State of California and BOEM to optimize the offshore wind areas in the existing Morro Bay Call Area rather than go back to square one with new proposed areas (e.g., north or south of the existing Morro Bay Call Area).
2. BOEM should identify a somewhat larger planning area – including the Morro Bay Call Area – that represents the limited space off the Central California coast suitable for future leasing of offshore wind, given the legal and physical constraints on offshore wind development outside that area. Our proposed planning area is depicted on the attached map in the solid black outline. We oppose any long-term DOD restrictions on offshore wind development in the planning area.

Background and Rationale: California needs large quantities of new clean resources to achieve its energy and climate goals: between 25 and 37 gigawatts (GW) of new renewables and storage by 2030¹ and between 100 and 150 GW of renewables by 2050.² With proper planning and policy support, a significant part of that energy could come from offshore wind. Offshore wind will provide resource diversity and help the state meet its emission reduction goals at the least cost.³ Finally, offshore wind will create jobs and provide other economic benefits to the state and local communities. We therefore support a state-wide planning goal of 10 GW of offshore wind by 2040, and we expect roughly half of that amount needs to come from projects on the Central Coast.⁴

Given the State's longer-term needs for emissions-free energy, it is imperative that the DOD, DOI, BOEM and the State of California come to an agreement for developing offshore wind in the limited space available in Central California. Using its existing authorities, BOEM should identify a planning area on the Central California coast suitable for offshore wind that can be developed in phases. The planning area identified on the enclosed map represents the maximum area available for floating offshore wind – that is, within the physical and legal limits of the Outer Continental Shelf within BOEM's jurisdiction suitable for offshore wind development in Central California. While not all of that area will be developed at once, it is important that any agreement with DOD does not impose any long-term constraints on the development of offshore wind in the planning area so that the Central Coast can provide a meaningful contribution toward the planning goal of 10 GW by 2040.

We share your goal of replacing generation from Morro Bay Power Plant and the Diablo Canyon Nuclear Generating Station with offshore wind sooner rather than later. By taking advantage of available transmission capacity, we can save California customers money. The first two or three offshore wind projects off the Central California coast can serve California's load through the existing transmission system. Build-out of floating offshore wind within the Morro Bay Call Area by 2030 could create hundreds of living-wage jobs in construction, operations, maintenance, and indirect and induced jobs in supporting industries.

In short, the offshore wind industry supports phased development of the planning area, starting with an auction in 2021 of multiple sites within the Morro Bay Call Area and no long-term constraints in the planning area. We understand the importance of national security and do not want to jeopardize DOD's ability to test and train. We stand ready for further discussions of possible solutions that would preserve that ability while meeting California's need for renewable energy and job creation.

We appreciate your efforts to secure a timely and satisfactory resolution of negotiations with DOD in and around the Morro Bay Call Area, including the planning area. We request a meeting to discuss these ideas at your earliest convenience.

¹ Includes only the needs of the CPUC jurisdictional load serving entities. *See:* CPUC, 2019-2020 Reference System Plan, <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M331/K772/331772681.PDF>

² *See* E3, Deep Decarbonization in a High Renewables Future, https://www.ethree.com/wp-content/uploads/2018/06/Deep_Decarbonization_in_a_High_Renewables_Future_CEC-500-2018-012-1.pdf.

³ *See* E3, The Economic Value of Offshore Wind Power in California, http://castlewind.com/wpcontent/uploads/2019/08/2019-08-08_E3-CastleWind-OffshoreWindValueReport_compressed.pdf

⁴ California will need wind energy areas in both the Central Coast and the North Coast to achieve scale necessary to maximize the benefits of offshore wind. We recommend that BOEM move forward with lease auctions in both Humboldt and Morro Bay call areas.

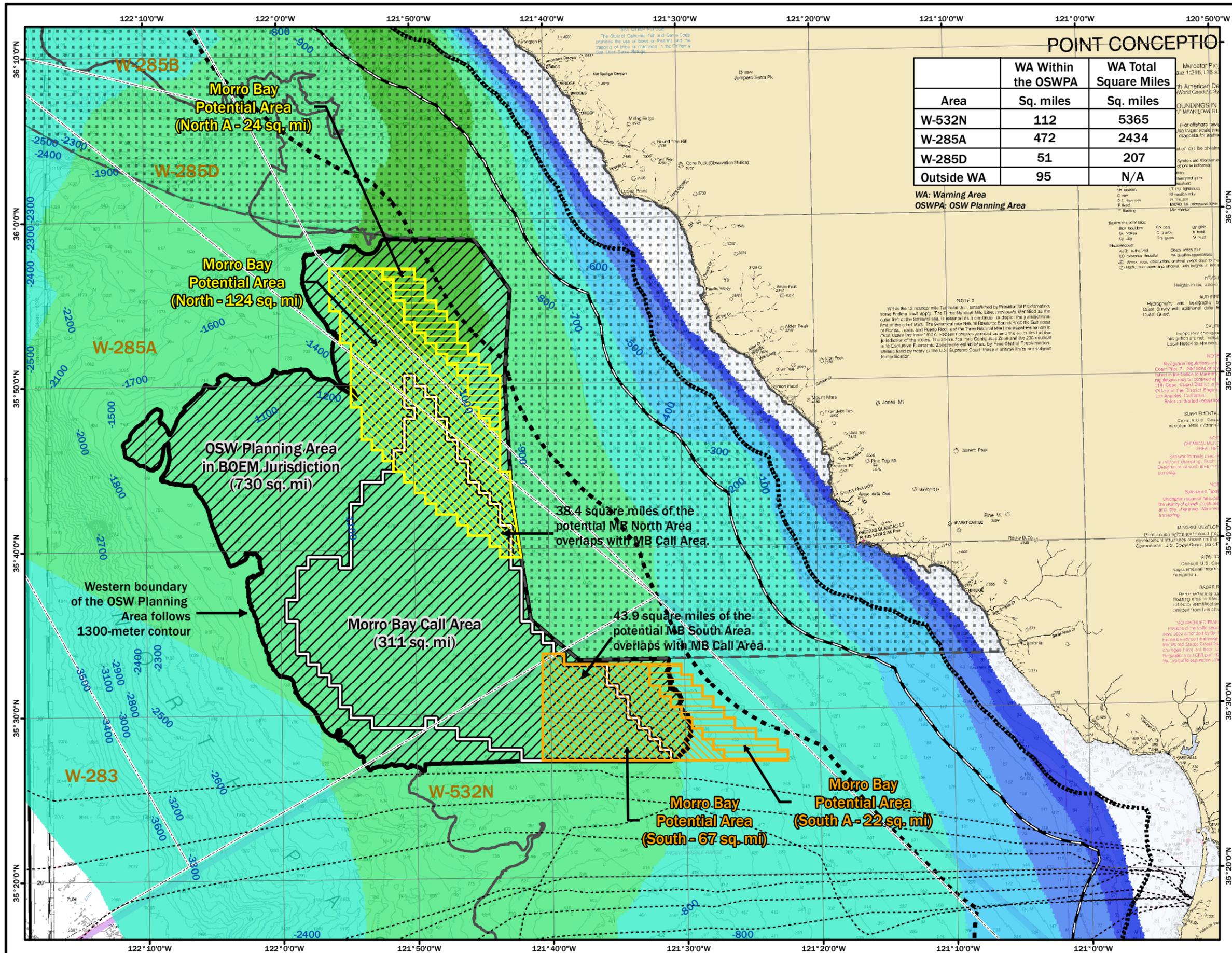
Sincerely,



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POINT CONCEPTIO

Area	WA Within the OSWPA Sq. miles	WA Total Square Miles Sq. miles
W-532N	112	5365
W-285A	472	2434
W-285D	51	207
Outside WA	95	N/A

WA: Warning Area
OSWPA: OSW Planning Area

Central California Offshore Wind Energy Planning Area.

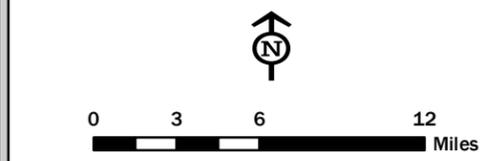
Legend

- Revenue telecom cables
- OSW Planning Area in BOEM Jurisdiction
- Morro Bay Call Area
- Warning areas
- 1,300-meter contour
- Bathymetry (100-meter)
- Potential Offshore Area (North)
- Potential Offshore Area (North A)
- Potential Offshore Area (South)
- Potential Offshore Area (South A)

Annual Wind Speed (m/sec at 90m height)

- < 6.0
- 6.1 - 6.5
- 6.6 - 7.0
- 7.1 - 7.5
- 7.6 - 8.0
- 8.1 - 8.5
- 8.6 - 9.0

- Submerged Lands Act (SLA) boundary
- Territorial sea boundary
- Outer Continental Shelf Lands Act (OCSLA) Section 8(g) boundary
- Monterey Bay National Marine Sanctuary



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