

<b>DOCKETED</b>	
<b>Docket Number:</b>	17-MISC-01
<b>Project Title:</b>	California Offshore Renewable Energy
<b>TN #:</b>	234960
<b>Document Title:</b>	Kate McKeever Comments - Re Notice of Availability of Outreach on Additional Considerations for Offshore Wind off the Central Coast of California
<b>Description:</b>	N/A
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<b>Organization:</b>	Kate McKeever
<b>Submitter Role:</b>	Public
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*Comment Received From: Kate McKeever*  
*Submitted On: 9/30/2020*  
*Docket Number: 17-MISC-01*

**Re Notice of Availability of Outreach on Additional Considerations  
for Offshore Wind off the Central Coast of California**

*Additional submitted attachment is included below.*



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September 30, 2020

**ELECTRONIC FILING**

California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Notice of Availability of Outreach on Additional Considerations for  
Offshore Wind off the Central Coast of California (Docket # 17-MISC-01)

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Dear Commissioner Douglas:

RWE Renewables Americas, LLC (“RWE”) appreciates the opportunity to provide comments in response to the proposal in Docket # 17-MISC-01 to add more sea space in Morro Bay that will accommodate a viable offshore wind industry on the Central Coast and meet the mission of the Department of Defense (“DoD”) to test, train and operate.

RWE, founded in 1898, is one of the largest players in the renewable business worldwide and the third largest producer of renewable energy in Europe. RWE's strategy for renewables is geared to growth and we plan to invest an annual amount of \$1.5 billion to expand our wind, solar energy and storage technologies portfolio. Since 2007 we've built nearly 4,000 megawatts (“MW”) of wind solar and energy storage projects in the United States with more under development. We've invested more than \$6 billion in producing clean, affordable homegrown energy. RWE has established an ambitious CO2 reduction target and has committed to be carbon-neutral by 2040. As the second largest offshore wind developer in Europe, RWE owns 2.5 gigawatts of Offshore Wind and operates an additional 800 MW for our partners.

Following a meeting on August 21, 2019, a group was convened led by Congressman Salud Carbajal comprised of DoD, BOEM, NOAA Sanctuaries, Congressman Panetta's office and the State of California to locate area(s) proximate to and within the Morro Bay Call Area that may be compatible with DoD operations. The group identified the following new areas that includes portions of the Morro Bay Call Area as well as an area to the north and to the south of the Morro Bay Call Area (North and South):

- The North area is approximately 149 square miles (starting at 15 miles from the coast) or 125 square miles (starting at 17 miles from the coast).

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- The South area is approximately 90 square miles (starting at 15 miles from the coast) or 67 square miles (starting at 17 miles from the coast).

RWE supports the new proposed area if it is in addition to and not a substitute for the existing BOEM call areas. Further, RWE support the following principles that were outlined in a letter from AWEA California and Offshore Wind California to Congressmen Salud Carbajal and Jimmy Panetta dated May 27, 2020:

1. 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

Finally, RWE requests additional information in Morro Bay, including the existing vessel traffic, views of existing vessel users, concerns of commercial and recreational fisherman, and potential viewshed concerns to better understand and begin to mitigate any identified issues.

Sincerely,  
Kate McKeever

*Kate McKeever*

Director, Government & Regulatory Affairs for U.S. Offshore Wind  
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