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**POET Comments AB 525 Planning Goals**

*Additional submitted attachment is included below.*

## Comments of Pacific Ocean Energy Trust on Draft Commission Report on Offshore Wind Energy Development off the California Coast

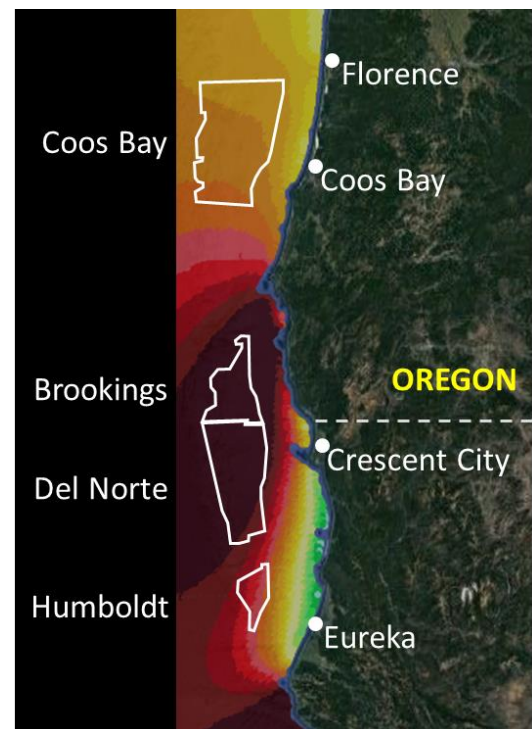
May 16, 2022

As a 501(c)3 nonprofit with a mission to advance responsible development of ocean-based climate solutions, Pacific Ocean Energy Trust (POET) greatly appreciates the work of the Commission on offshore wind maximum feasible capacity and planning goals pursuant to Assembly Bill 525.

While POET is based in Portland, Oregon and has an established track record of marine renewable energy accomplishments in the Pacific Northwest, our work in advancing the climate benefits to be realized from planning and developing west coast offshore wind does not stop at the California border. That one of the premier floating offshore wind development opportunities in the world lies directly off the coast from the California/Oregon border is a fortuitous consequence of geography that we believe will ultimately strengthen the complimentary relationship of electricity grids in both regions that has already delivered economic and carbon benefits for decades. Offshore wind planning activities in Oregon are proceeding in parallel to those in California, with lease auctions expected to occur before the end of 2023. Because the southernmost Call Area (Brookings) directly abuts waters off the coast of California, there is an excellent opportunity for close coordination between regions, especially on transmission infrastructure.

While no formal process has yet been announced by the Bureau of Ocean Energy Management (BOEM) to advance a call for information about the Del Norte area between Brookings and the Humboldt Wind Energy Area, we would like to express our general observation of strong commercial development interest in this area. However, it is evident that well-coordinated transmission planning will be necessary between states to realize this vast resource.

POET fully supports the robust long-term transmission and infrastructure planning considerations called for by AB 525 in the strategic plan for offshore wind energy in federal waters off the coast of California. Interregional coordination is a very important opportunity to pursue because parties in the Pacific Northwest are also beginning to explore transmission expansion possibilities on Oregon's South Coast.<sup>1</sup> While radial interconnection facilities on both sides are likely to be warranted given the excellent resource quality, networked facilities could potentially deliver greater total benefits. Therefore, POET encourages the Commission to consider these coordination opportunities in development of the strategic plan and North Coast planning goals.



**Figure 1:** Call Areas, Wind Energy Areas, and potential future Call Areas in POET's focus region between Gold Beach, Oregon, and Eureka, California. Base map source: NREL Wind Prospector.

<sup>1</sup> The Oregon Department of Energy and the Oregon Public Utility Commission jointly submitted a study request to the NorthernGrid regional transmission planning entity requesting a study of three Oregon offshore wind scenarios. [https://www.northerngrid.net/private-media/documents/2020-2021\\_NorthernGrid\\_Draft\\_Final\\_Regional\\_Transmission\\_Plan.pdf](https://www.northerngrid.net/private-media/documents/2020-2021_NorthernGrid_Draft_Final_Regional_Transmission_Plan.pdf)