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Commissioner Brian L. Stone
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May 25, 2022

Commissioner David Hochschild
California Energy Commission
1516 Ninth Street, MS-31
Sacramento, CA 95814

RE: Docket Number 17-MISC-01- Assembly Bill 525 Draft Report on Maximum Feasibility Capacity of Offshore Wind and Planning Goals for 2030 and 2045, and Transmission and Harbor Infrastructure Requirements

Dear Chairman Hochschild and Commissioners:

I would like to take this opportunity to thank the California Energy Commission (Commission) and your staff on the production of the Draft Report entitled "Offshore Wind Energy Development off the California Coast" and on the subsequent workshop on May 18, 2022.

Like many others that have commented previously, I also believe that the goals set for development are too low. The offshore wind targets of 5 gigawatts by 2030 and 20 gigawatts by 2045 should be the bare minimum. But I think that the Commission may want to go even higher. I would like to suggest that the Commission set a target of 10 gigawatts by 2030 and 30 gigawatts by 2040 in your report. The primary reason that I am asking you to set a higher amount is because of "the Economy of Scale." Simply put, it is more cost effective for the developer to build a larger wind farm. It is also easier for a developer to attract the needed investors to the project. In addition, the cost of construction will be reduced when you are building more of the same wind turbines for a given wind farm.

We can all talk about the capacity that we would like to see, but we need to make an investment in the studies that will make this happen. In order to meet these lofty goals, The State of California and the Federal government will need to study the actual transmission capacity that is desired and the locations of future transmission corridors off the Northcoast of California. When doing this, one should be asking some very important questions. What is the ultimate costs to the rate payers? Should we be taking an

incremental approach to building out the existing capacity? Should we be linking other areas as they come online? This methodology might not be the most cost-effective long-term strategy.

Ultimately this incremental approach methodology could cost more to construct. Should we be asking the question of how to "best protect the rate payers" over the long term? Would it be more cost effective to create one or more all new transmission corridors off the Northcoast of California? By purchasing the right of ways and constructing the transmission corridors and the capacity up front (as the wind farms are being produced) will reduce the long-term cost to the State of California, The Federal Government, and the developers. This means that the cost to the taxpayer will ultimately be reduced.

In addition, studies are needed to locate all of the available Ports and Harbors (Harbor) that can support the offshore wind industry. Not every harbor can be seen as a full service, or one stop shop to support this industry. For example, Humboldt Harbor (Humboldt) plans on being a major supplier/constructor for the call area off Humboldt County. In the case of Humboldt, it will be nearly impossible to transport large wind turbine components over land to the harbor due to their size. This means that the major components will need to be constructed in the San Francisco Bay Area or some other major seaport on the west coast and then transported by sea up to Humboldt.

Therefore, the State of California should commission a series of studies to identify each of the available harbors on the California coast that can support the wind industry. Each Harbor should be assessed on a number of factors. The study should not only assess the size of the harbor. Other factors should be taken into consideration:

1) How can a harbor best support the offshore wind industry,

2) Do they have an available land and water area that can be used by the potential developer,

3) Can the Harbor be used for the construction of wind turbines,

4) Should the harbor be used as a possible base for Operations and Maintenance?

Since each call area will most likely be supported by the harbor nearest to the call area. It may be that a harbor would be best suited for the operations and maintenance of the wind turbans rather than

construction. Like Humboldt, major wind turbine components can be transported by sea to a given Harbor. This does not mean that every harbor will be large enough to support the level of activity that is planned by Humboldt. There are other harbors like the Crescent City Harbor that has over 4,350 acres of underdeveloped land and water area that can be used in this effort. Each Harbor up and down the west coast should be evaluated to see what each can bring to the table. Not every Harbor can support the construction of these massive wind turbines. But a given Harbor can provide an area where a specific component could be constructed. Another Harbor could be used as a storage facility for fully built wind turbines that are waiting placement during construction of a wind farm. Also, another Harbor could provide support facilities that are closer to the actual wind farms that will be serviced.

I think that we can agree that Wind Power Offshore of California will be a massive long-term undertaking with many bumps in the road on the way to completion. Wind Power off the Coast of California can ultimately be a benefit for the citizens of California.

Therefore, I am asking the commission to consider being bolder by increasing the total power output from 3 gigawatts to 10 gigawatts by2030 and 10 gigawatts to 30 gigawatts by2045 when preparing your final report.

In addition, the CEC should make recommendations that a series of studies be done on transmission corridors and infrastructure, and the needed studies on the available ports and harbors on the west coast of California

Thank you for your attention to this matter.
Sincerely,

Brian L. Stone

Brian L. Stone, County Harbor Commissioner, Crescent City Harbor District, and a
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