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*Comment Received From: Joe Martens*  
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## **California Offshore Renewable Energy Targets**

*Additional submitted attachment is included below.*

My name is Joe Martens, former director of the [New York Offshore Wind Alliance](#) (NYOWA), a diverse coalition of organizations with a shared interest in promoting the responsible development of offshore wind power for New York. NYOWA is a project of the [Alliance for Clean Energy New York](#) (ACE NY). The mission of NYOWA is to promote policies and programs that will lead to the development of at least 9,000 megawatts (MW) of offshore wind in the Atlantic Ocean off the coast of New York State. Prior to directing NYOWA, I was the Commissioner of the New York State Department of Environmental Conservation, chair of the New York Environmental Facilities Corporation and a statutory board member of the New York Energy Research and Development Authority (NYSERDA), among other roles.

NYOWA played an important role in the rapid development of offshore wind in New York and the adoption of a large offshore wind target. Its steering committee consists of offshore wind developers, national environmental organizations and academia and its diverse membership consists of businesses, community groups, labor, grass roots environmental organizations and an environmental justice organization.

NYOWA advocated for offshore wind with the executive and legislative branches, provided important and ultimately persuasive detailed comments as New York's offshore wind program was being structured, educated our membership, and helped develop strong and diverse support for offshore wind. As New York's program developed and matured and projects moved closer to reality, NYOWA served as a bridge between developers and the many stakeholders that will be affected by offshore wind projects, from environmental organizations to host communities. It provided factual, science-based information and counters misinformation through a robust communication effort. Thanks to New York State's strong offshore wind stakeholder outreach effort and reinforcement from NYOWA's diverse membership, New York enjoys strong bipartisan legislative and public support for offshore wind.

As California considers offshore wind as a part of its energy future, and specifically what planning goals it should set now to bring that future forward in an efficient and effective manner, New York's experience in this regard may be instructive. In particular, New York's experience illustrates the value of "going big" and establishing and planning for ambitious offshore wind targets for 2030 and 2045.

California is in the enviable position of being able to take advantage of the rapid technological development in offshore wind over the last decade and the experience of other states along the U.S.'s eastern seaboard. My comments here will focus on New York since it had done an exemplary job of advancing this critical industry and has a nation-leading requirement<sup>1</sup> of 9,000 MW of offshore wind by 2035. This is the largest offshore wind commitment of any state in the

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<sup>1</sup> New York's Climate Leadership and Community Protection Act (CLCPA) The **CLCPA** (Chapter 106 of New York Laws of 2019) establishes aggressive, legally binding targets for offshore wind and other renewable power to transition New York's economy off fossil fuels by 2040.

U.S., and while it did not happen overnight, it did happen rapidly once the benefits of scale became patently obvious. Here's a brief history.

In 2016, then-Governor Cuomo called for NYSERDA to develop an offshore wind master plan, at a time when offshore wind had barely taken root in the U.S. despite 30 years of robust development in Europe. In 2017, the Long Island Power Authority signed the state's first power purchase agreement for 90 MW of offshore wind to deliver power to approximately 50,000 residences on the South Fork of Long Island.<sup>2</sup> The same year, the Governor called for a 2.4 gigawatt (GW) offshore wind goal, which, at the time, was the largest in the nation. Shortly after that announcement, NYSERDA released its award-winning [offshore wind master plan](#), which provides a detailed roadmap to achieve the 2.4 GW goal. The Plan exhaustively examined virtually every aspect of offshore wind, from economic, to environmental and concluded offshore wind would generate thousands of jobs, billions in economic development and result in enormous public health benefits. Importantly, the Plan recognized and acknowledged that scale mattered and that larger projects would increase competition, help develop a domestic supply chain and ultimately lower project cost.

In 2019, the NY State Legislature passed, and the Governor signed the Climate Leadership and Community Protection Act<sup>3</sup> (CLCPA), which established the most ambitious carbon reduction and renewable energy targets in the country: 70% renewable energy generation by 2030 and 100% carbon-free generation by 2040. In determining how the State would reach those goals, NYSERDA determined that 9 GW of offshore wind would be necessary. The CLCPA required that amount of offshore wind development by 2035, enough to power 6 million homes. To date, NYSERDA has entered contracts for four separate projects totaling more than 4,300 MW of offshore wind, or nearly half of the 9,000 MW statutory requirement<sup>4</sup>. These projects are expected to be operational by the mid- to late-2020s and generate a combined \$12.1 billion in investments in New York over the approximate 25-year project lifespan, as well as create more than 6,800 high-quality jobs with salaries averaging \$100,000.

However, New York State is now recognizing that the need for offshore wind to meet the state's energy and carbon targets continues to grow. The CLCPA created a 22-member Climate Action Council (CAC) and tasked it with developing a Draft Scoping Plan, as an initial framework for how the State will reduce greenhouse gas emissions and achieve net-zero emissions, increase renewable energy usage, and ensure climate justice. The CAC released a Draft Scoping Plan in December 2021 and has been holding a series of public hearings for the last six months.

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<sup>2</sup> The contract was subsequently amended in 2018 to increase the size of the project by 40 MW, based purely on advances in turbine technology.

<sup>3</sup> Ibid.

<sup>4</sup> As noted earlier, the Long Island Power Authority signed a power purchase agreement for 130 MW of offshore wind so, in total, there are five projects under contract in New York State. The LIPA "South Fork" project is the most advanced in the state, is fully permitted and under construction.

The Draft Scoping Plan includes a detailed integration analysis<sup>5</sup> that evaluates strategies to achieve the Greenhouse Gas (GHG) mitigation aims of the Climate Act and assesses the resulting benefits and costs. The integration analysis concluded that for electricity to become the main source of final energy for New York's carbon neutral economy, the state must transition to a carbon-free system, primarily powered by wind, water and sunlight.<sup>6</sup> Further, one of the key findings of the analysis was that offshore wind, on the order of 20 GW by 2050 would be needed to ensure a reliable electricity system beyond 2050.<sup>7</sup> Clearly, offshore wind is going to be an essential ingredient to meeting both its near term (2030) and longer term targets (2040). Indeed, it cannot reach these targets without offshore wind, and it will be far easier to go from 9 GW to 20 GW than it would have been if its goal had remained at 2.4 GW. While 9 GW seemed like an ambitious target in 2019 when the CLCPA was passed, it is now obvious that much more offshore wind will be necessary to meet the state's energy needs and its carbon-free requirement.

### **Observations on the Importance of Ambitious Goals/Standards**

California, like New York, is facing significant climate and energy challenges and is preparing to transition to a 100% carbon neutrality. Both states have long been environmental and energy leaders and have set the pace nationally and internationally with progressive and forward thinking environmental and energy policies. The rapid development of offshore wind on both coasts will burnish that legacy. As noted from the above summary, some important lessons have been learned from New York's offshore wind program development and California, I trust, can learn from these lessons. They include:

- Establishing ambitious offshore wind targets/goals sent a strong signal to industry and the federal government that New York was serious about offshore wind development.
- Clarity on New York's intentions drew significant industry interest, leading multiple companies to invest time and resources in early and often stakeholder outreach as well as local supply chain development.
- Similarly, New York's significant ambition catalyzed the federal government to resolve conflicts and identify and lease the sea space that would be needed to meet the State's needs.
- Anticipating that ambitious goals would attract multiple, large projects, New York policymakers committed to and invested significant resources and time to get its offshore wind policies right, engaging developer and stakeholders from Day 1.
- Scale matters. With multiple solicitations for offshore wind power under NYSERDA's belt, it has proven that large projects are far less expensive to build per MW than smaller projects. All awards for offshore wind contracts by NYSERDA to date have been

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<sup>5</sup> New York State Climate Action Council Draft Scoping Plan, Integration Analysis Technical Supplement, Appendix G, <https://climate.ny.gov/Our-Climate-Act/Draft-Scoping-Plan>

<sup>6</sup> Ibid, Appendix G, Section 1, page 40.

<sup>7</sup> Ibid, Appendix G, Section 1, page 84-85.

for projects ranging in size from 800 MW to more than 1,200 MW, due to the impact of economies of scale on both price and benefits.

- Large goals/targets matter. The larger the offshore wind goal/target, the larger the investments in domestic supply chain, ports, training and infrastructure. Here what New York's first five projects<sup>8</sup> will mean for the state:
  - A combined economic impact of \$12.1 billion.
  - \$730 million in combined private and public funds in long-term port facilities and cutting-edge technologies, including the nation's first offshore wind tower manufacturing plant at the Port of Albany.
  - More than 6,800 jobs in project development, component manufacturing, installation, and operations and maintenance.
  - Well-paying careers with salaries averaging approximately \$100,000 per year.
  - Significant economic benefits to disadvantaged communities and retirement of aging fossil-fuel power plants near key environmental justice communities.

In closing, I urge the California Energy Commission to go big on offshore wind. And you can't go big if you plan small. For a host of reasons, not the least of which is the climate crisis, which is costing California dearly, offshore wind presents an extraordinary opportunity to develop a major carbon-free source of energy, diversify its energy supply, revitalize, and expand its ports, provide thousands of good-paying jobs, address environmental justice issues and more.

Thank you for considering these comments.

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<sup>8</sup> NYSEDA has been authorized by the State's Public Service Commission to hold all the offshore wind solicitations necessary to ensure that successful bidders have sufficient lead time to complete projects prior to 2035. The benefits cited above reflect slightly less than half of the MW necessary to reach New York's 9 GW target.