

DOCKETED	
Docket Number:	17-MISC-01
Project Title:	California Offshore Renewable Energy
TN #:	243738
Document Title:	Natural Resources Defense Council Comments - NRDC - Julia De Lamare - Comments Lead Commissioner Workshop
Description:	N/A
Filer:	System
Organization:	Natural Resources Defense Council
Submitter Role:	Public Agency
Submission Date:	6/28/2022 7:59:42 AM
Docketed Date:	6/28/2022

*Comment Received From: Natural Resources Defense Council
Submitted On: 6/28/2022
Docket Number: 17-MISC-01*

**NRDC - Julia De Lamare - Comments Lead Commissioner
Workshop**

Additional submitted attachment is included below.

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Lead Commissioner Workshop on Assembly Bill 525 – June 27, 2022 – Oral comments

1. NRDC appreciates CEC's work to advance offshore wind development in California and its central role in fulfilling the requirements of AB 525.
2. AB 525 has a two-fold mandate for the draft report:
 - a. Evaluate and quantify the maximum feasible capacity of offshore wind to achieve reliability, ratepayer, employment, and decarbonization benefits; and
 - b. Establish megawatt offshore wind planning goals for 2030 and 2045
3. The draft report set a reference point of 21.8 GW for the maximum feasible capacity and established a preliminary goal of 3 GW of offshore wind for 2030 and an additional goal of 7 – 12 GW for 2045.
4. The CEC didn't perform all the analyses required for the draft report – specifically, the CEC didn't assess the potential impacts on competing coastal uses. Therefore, the CEC shall revise these numbers as soon as all the analyses required are completed to comply with AB 525.
5. The CEC should also revise these numbers as technology evolves and more information becomes available because the planning goals should always be reflective of environmentally and socially responsible development, and the least-cost alternative to get California to the state's economywide decarbonization goals.
6. As the CEC considers different planning goals, including the ones explored during the workshop today, it must rely on a comprehensive cost-effectiveness analysis that accounts for the technical potential, the economic potential, and the feasible potential of offshore wind, which should account for real-world constraints, such as environmental, social, ratepayer and reliability issues.
7. For example, when considering the UC-Berkeley's Goldman School study, the CEC should look at all the scenarios (in addition to the SB 100 report) and determine what offshore wind capacity is most cost-effective for utility customers to achieve our 2045 goals and maintain grid reliability from now through 2050. Then, the CEC should adjust that scenario for what is environmentally and socially feasible.
8. To conduct this analysis, the CEC should ask the Berkeley study authors to share results for all scenarios modeled, especially the 25 GW scenario and the least-cost scenario, not just the 50 GW scenario. The CEC should then compare each scenario for (1) cumulative energy system costs, (2) reliability given that offshore wind adds diversity to the resource mix, and (3) environmental and social feasibility.
9. Thank you.