

DOCKETED	
Docket Number:	17-MISC-01
Project Title:	California Offshore Renewable Energy
TN #:	244043
Document Title:	The Nature Conservancy of California Comments on AB 525 OSW Planning Goals
Description:	N/A
Filer:	System
Organization:	The Nature Conservancy of California
Submitter Role:	Public
Submission Date:	7/12/2022 4:29:01 PM
Docketed Date:	7/12/2022

*Comment Received From: The Nature Conservancy of California
Submitted On: 7/12/2022
Docket Number: 17-MISC-01*

**The Nature Conservancy of California Comments on AB 525 OSW
Planning Goals**

Additional submitted attachment is included below.

July 12, 2022

RE: AB 525: Offshore Wind Maximum Feasible Capacity and Megawatt Planning Goals for 2030 and 2045

Docket number: 17-MISC-01

Dear Vice-Chair Gunda, Chair Hochschild, and Commissioners:

Thank you for including the Nature Conservancy (TNC) of California on the panel for the recent workshop on Assembly Bill 525: Offshore Wind Maximum Feasible Capacity and Megawatt Planning Goals for 2030 and 2045. As follow-up to [TNC's workshop presentation](#), TNC encourages the CEC to consider the following information as it relates to the 2045 goal for offshore wind.

Findings from TNC's forthcoming Power of Place West study suggest a need for 10 to 26 GW of offshore wind across the entire west coast of the U.S. by 2050 to most optimally meet the energy needs of the eleven states representing the western interconnect. TNC's peer-reviewed model (first used in TNC's 2019 [Power of Place California study](#)) chooses 15-16 GW of offshore wind across the west coast for high electrification scenarios. Only the renewables-only scenario chooses up to 26 GW across the west coast. These findings suggest that the preliminary 2045 goal for California noted in the CEC's AB 525 Offshore Wind Report: [Offshore Wind Energy Development off the California Coast Maximum Feasible Capacity and Megawatt Planning Goals](#) of 10-15 GW is appropriate. Further, these findings reflect the inclusion of several key considerations within category 12 of the list of information types that AB 525 requires the CEC to consider in setting the goals ([beginning "potential impacts on coastal resources" on page 36](#)).

TNC strongly supports the CEC identifying goals for offshore wind that will 1) enable and encourage the development of this important source of energy for California's future and 2) represent an ambitious but realistic starting place while the CEC conducts important and required ocean stakeholder engagement and information gathering through June 2023. It is critical that the final goal is informed by inclusive stakeholder engagement and science-driven processes. Because of significant uncertainties related to the impacts of offshore wind off of the west coast, there is tremendous value in studying the impacts of initial projects prior to adjusting the planning goal. Accordingly, TNC urges the CEC to conduct a comprehensive evaluation process that accounts for all of the information required by AB 525 and explicitly identifies related trade-offs before adjusting the preliminary goal of 10-15 GW for 2045 identified in the AB 525 Offshore Wind Report. This approach can help to avoid the following potential risks associated with setting the goal for 2045 too high:

- Other agencies or processes set or pursue less ambitious targets elsewhere based on perceived coverage of California's energy needs by offshore wind.



Protecting nature. Preserving life.®

- The ocean; California's coasts; marine mammals, seabirds, and other species; critical habitat, coastal communities; and ocean stakeholders sustain outsized or unnecessary negative impact.
- California produces more offshore wind than is economically optimal and procurement beyond that optimal level drives higher than necessary ratepayer costs.
- California agencies prioritize less optimal transmission upgrades and investments, representing tradeoffs for other valuable projects within California.

Additionally, as potential continuation of Diablo Canyon past its current retirement date is considered, the CEC should ensure that the final goal for offshore wind is achievable should Diablo Canyon continue past the current timeframe, including consideration of transmission interdependencies in such a scenario.

Thank you for your consideration of this information. TNC looks forward to further participation in AB 525-related planning and discussion.

Sincerely,

Marybeth Benton
Energy Project Director
The Nature Conservancy of California
marybeth.benton@tnc.org

About TNC and TNC's energy-related work in California: TNC is a science-based organization working throughout the world and in California to achieve better climate outcomes, support thriving economies, advance a clean energy future, protect communities against climate impacts, and advance the conservation of critical lands, waters, and biodiversity. TNC actively supports California's efforts through SB100 to achieve 100% renewable and zero-carbon energy by 2045 and views offshore wind as an important resource to achieve this goal. TNC engages in planning efforts to support the clean energy build-out California must undertake to meet this goal through identification of least environmental conflict and high energy potential areas.