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IN THE MATTER OF:

*California Offshore Renewable Energy*

DOCKET NO. 17-MISC-01

RE: Offshore Renewable Energy

Comments of Anbaric Development Partners in Response to the Commission's May 25,  
2023 Workshop on Assembly Bill 525: Assessing Transmission Upgrades and  
Investments for Offshore Wind Development off the Coast of California

## I. INTRODUCTION

On behalf of Anbaric Development Partners, LLC (“Anbaric”), we are pleased to provide the following brief comments in response to the Workshop on Assembly Bill 525: Assessing Transmission Upgrades and Investments for Offshore Wind Development off the Coast of California, held by the California Energy Commission on May 25, 2023. These comments supplement the comments Anbaric provided during the May 25, 2023 workshop.

Anbaric develops transmission systems to accelerate the deployment of renewable energy across North America and specializes in the design, development, financing, and construction of large-scale electric transmission systems. Anbaric’s transmission expertise includes the design and development of shared, open-access subsea transmission systems for offshore wind.

Anbaric thanks the Commission staff for their efforts and applauds the Commission’s commitment to the development of a transparent and robust record. The workshop presentations suggest that the Commission is undertaking a searching assessment of transmission investments and subsea options. This is a good start and is consistent with Assembly Bill 525’s (AB 525) mandate that the State Strategic Plan for Offshore Wind Development (Strategic Plan) include “all relevant information” on the cost of subsea high-voltage transmission, and “information made available by the Independent System Operator on the cost of network upgrades and the extent to which existing transmission infrastructure and available capacity could support offshore wind energy development.” (Pub Resources Code, § 25991.4, subd. (b).)

While we understand that the technical work is ongoing, key analytical assumptions must be disclosed at the earliest possible time to allow the Commission and stakeholders to provide input on these assumptions. Accordingly, these comments identify where greater clarity is necessary **at this time** to inform and help ensure the objectivity of the Commission’s AB 525 findings with respect to the necessary transmission upgrades and investments. (See Pub. Resources Code, § 25991, subd. (c)(3).)

## II. PROCUREMENT CONSIDERATIONS.

Anbaric is pleased that the California Independent System Operator (CAISO) is running sensitivities at higher offshore wind capacities – both for existing and potential lease areas. These higher capacities are not only possible, but critical for California to meet its 2045 offshore wind and other renewable energy goals. CAISO is wise to consider the longer term potential of these regions when planning the immediately needed transmission upgrades.

The assessment of conceptual and alternative long-distance transmission options presented by the Schatz Energy Research Center ranks overland and subsea

alternatives by feasibility.<sup>1</sup> The Commission staff should, at the earliest practicable time, disclose the assumptions used to rank the feasibility of potential subsea and overland routes as Low, Medium, High and High/Restrictive for development, as follows:

- a. Please specify the categories of constraints that are being considered (e.g., right-of-way, potential for community impacts and other land use or ocean user conflicts, biological constraints, cultural resources constraints, technological constraints, regulatory or statutory prohibitions on development), as well as the specific nature of the constraint (e.g., fire hazard severity zone).
- b. Please indicate the engineering options that were considered for each alternative, and whether undergrounding was assumed in certain locations for overland.
- c. Where undergrounding may be required to mitigate land use, aesthetic, or other impacts or land use conflicts, what is the estimated increase in cost for the overland alignment?
- d. Please identify the factors that will be weighed in the “economic benefit-cost analysis of alternatives.”<sup>2</sup>
- e. Based on the Commission’s response to Anbaric’s prior comments on the AB 525 Conceptual Permitting Roadmap, we understand the Commission intends to address permitting for transmission in the Transmission Chapter. Please specify the land use and environmental regulatory permits and approvals that are assumed to be required for subsea and overland transmission options, and how the time and expense associated with obtaining those permits and approvals will inform the economic benefit-cost analysis.
- f. Please specify the sources (manufacturers, vendors, utilities, etc.) and markets (e.g., domestic, international) of information used in assessing the commercial availability of dynamic HVDC cables.<sup>3</sup>
- g. Please discuss how HVAC and HVDC technologies for subsea substations would affect other technological constraints on transmission.<sup>4</sup>
- h. Please specify the sources of information used to identify constraints relating to mesh grid systems.<sup>5</sup>

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<sup>1</sup> Schatz Energy Research Center, Workshop on Assembly Bill 525: Assessing Transmission Upgrades and Investments for Offshore Wind Development Off the Coast of California, May 25, 2023, Slide 21.

<sup>2</sup> See *id.*, Slide 25.

<sup>3</sup> See Guidehouse, Transmission Technologies, Slide 85.

<sup>4</sup> See *id.*, Slide 91.

<sup>5</sup> See *id.* at Slide 96.

- i. In assessing the “transmission investments and upgrades necessary, including potential subsea transmission options, to support the 2030 and 2045 offshore wind planning goals” (Pub. Resources Code, § 25991.4, subd. (a)), how is the AB 525 sea space identification assessment, including the expected amount of additional generation in northern California and southern Oregon that will be necessary to meet the 25 GW planning goal for 2045, informing the Commission’s assessment of needed transmission upgrades and investments?

### **III. PERMITTING CONSIDERATIONS.**

Anbaric agrees with the Bureau of Ocean and Energy Management Pacific Lease Sale 1 winners that transmission permitting creates high risk for project delivery. We also agree that construction of offshore wind generation must be aligned with transmission delivery. Indeed, Anbaric has urged the Commission to include long-range transmission in the AB 525 Permitting Roadmap.<sup>6</sup> At a minimum, the Commission should invite stakeholder input on approaches to streamline planning and permitting of long-range transmission for both overland and subsea options, and include recommendations on transmission permitting in the Strategic Plan.

### **IV. CONCLUSION.**

Anbaric thanks the Commission for the opportunity to provide comments in response to the May 25, 2023 transmission workshop presentations.

Dated: June 9, 2023

Respectfully submitted,

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By:   
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<sup>6</sup> See Comments of Anbaric Development Partners on the Draft Permitting Roadmap for Offshore Wind, Jan. 9, 2023.