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OWC Comments on AB 525 Workshop on Identifying Suitable Sea Space for Offshore Wind Development

Additional submitted attachment is included below.



**Offshore Wind California Comments to the California Energy Commission Regarding
Workshop on AB 525 – Identifying Additional Suitable Sea Space and Assessing Impacts and
Mitigations for Offshore Wind Energy Development
June 16, 2023**

Offshore Wind California (OWC) is a trade group that represents the offshore wind industry in our state. We want to thank the Commissioners and staff at the California Energy Commission (CEC) for their ongoing work to develop the AB 525 Strategic Plan and for hosting the recent series of workshops on the AB 525 strategic plan. We are commenting specifically on issues discussed during the June 1, 2023 workshop about suitable sea space planning and assessing impacts and mitigations for offshore wind energy development.

California has a remarkable opportunity to establish global leadership by developing floating offshore wind at scale. Offshore wind promises to deliver big benefits for Golden State residents, wage-earners, and electricity ratepayers. We as an industry are committed to responsible development of offshore wind power, in a manner that fully engages key stakeholders and coexists well with other ocean users.

In order to achieve the state's initial planning goals of up to 5 GW by 2030 and a nation-leading 25 GW by 2045, we need to move with speed and scale on a number of essential next steps – investing in transmission and ports, a permitting roadmap, a mechanism to procure at scale, a robust supply chain and workforce training, engaging Tribal communities and key stakeholders including coastal communities, the commercial fishing community, and other ocean users, and identifying suitable sea space for the next rounds of leasing.

The CEC Should Ensure Coordination with the Bureau of Ocean Energy Management (BOEM) Siting Processes

AB 525 directs the CEC to include in its strategic plan the identification of new sea space to accommodate future wind energy area leasing required to meet the 2030 and 2045 offshore wind planning goals in coordination with the California Coastal Commission, Department of Fish and Wildlife, Ocean Protection Council, and State Lands Commission. OWC emphasizes the importance of also coordinating with federal partners at BOEM during and after the sea space identification process, since BOEM ultimately conducts the process to identify call areas, draft wind energy areas, final wind energy areas, proposed lease areas, and final lease areas.

The Commission should focus on establishing an effective, timely process for collecting and assessing the best available information to identify lease areas that balance human uses, wind resources, and environmental and coastal resources. Continued and increased coordination will ensure that both federal and state agencies understand the necessary dependencies and timelines for the Draft Wind Energy Area process that is required to ensure timely build-out of offshore wind resources needed to meet the state planning goals. Further, both federal and state agencies have stakeholder engagement and Tribal consultation processes that – through shared processes and learnings – can help avoid and mitigate

impacts to the ocean environment, fisheries, and coastal resources and ensure transparency and opportunities to provide input into the sea space identification process.

As an industry, we're committed to working with federal and state agencies and local leaders and key stakeholders to realize these benefits, and to ensuring that offshore wind coexists with California's coastal communities, marine life, and other ocean users.

The CEC Should Refer to High Estimate Installation Capacity (GW) for AB 525 Sea Space Identification Analyses that Relies on a 5 MW/km² Power Density Factor

In order to help reach the state's climate and clean energy goals, it should be noted that offshore wind will provide great benefits while using only a small fraction of sea space off the state's coast. NREL [reports](#) California has more than 200 GW offshore wind power potential. It's noteworthy that reaching 25 GW by 2045 will still amount to only 12.5% of California's total offshore wind potential and a similarly small portion of sea space.

At the June 1 workshop, CEC staff member Scott Flint presented the Sea Space Technical Characteristics and Generation Potential, which listed a low and high GW capacity estimate for installed capacity in the Humboldt and Morro Bay lease areas at between 4.6 GW and 9 GW. The first five leases at Morro Bay and Humboldt are expected to supply up to 7-8 GW or more in delivered power based on the latest NREL and industry calculations of power density factors, which are currently estimated to generate 5 MW/km² or more for California and other U.S. offshore wind lease areas.¹ This varies from the more conservative previous estimates from NREL and BOEM, which were based on power densities of only 3 MW/km². That's important to factor into the discussion about additional sea space because it means the currently designated lease areas will take us almost one-third, not one-fifth, of the way to achieving California's 25 GW goal by 2045.

As such, OWC recommends that the CEC use NREL's estimates of 5 MW/km² for offshore wind power density factors and the high estimate of installation capacity presented at the June 1 workshop in its AB 525 sea space planning analyses.

Conclusion

Offshore Wind California appreciates the Commission's work to identify suitable sea space and work to assess the impacts and mitigations for offshore wind energy development. We look forward to continued dialogue with the CEC on these important issues.

¹ NREL - 2020 Offshore Wind Resource Assessment for the California Pacific Outer Continental Shelf, October 2020.