

**DOCKETED**

<b>Docket Number:</b>	21-SIT-01
<b>Project Title:</b>	21-SIT-01, SB100 Implementation Planning for SB100 Resource Build
<b>TN #:</b>	250961
<b>Document Title:</b>	West Coast Pelagic Conservation Group Comments on SB100 Transmission
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	West Coast Pelagic Conservation Group
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	7/7/2023 9:23:39 AM
<b>Docketed Date:</b>	7/7/2023

*Comment Received From: West Coast Pelagic Conservation Group  
Submitted On: 7/7/2023  
Docket Number: 21-SIT-01*

**WCP SB100 Transmission Docket 21-SIT-01**

*Additional submitted attachment is included below.*



**July 7, 2023**

**DOCKET NO. 21-SIT-01**

**SB 100 Implementation:**

**Planning for SB 100 Resource Build**

**RE: Resource Portfolio for the next CAISO**

**20-Year Transmission Outlook**

**To whom it may concern:**

**California Energy Commission (CEC)**

Please accept our comments from the West Coast Pelagic Conservation Group (WCP). WCP is composed of commercial fishermen and processors. WCP's present focus is on the science of Coastal Pelagic Species (CPS). Specifically, pairing a NOAA research vessel with a WCP member's commercial seine vessel in a collaborative survey with the Southwest Fisheries Science Center (SWFSC).

WCP members harvest, buy, process, and market all major species of seafood from the three West Coast states and Alaska. Our processors service over one thousand fishermen and our fishermen and processors employ over 5000 people in peak season. Our members privately own and operate the five largest fish processing plants from San Francisco to the Canadian Border. They sell and distribute fresh and frozen seafood across the U.S. and worldwide.

On June 23, 2023, the California Energy Commission (CEC) hosted a remote-access workshop to discuss resource portfolio assumptions for use by the California Independent System Operator in the next 20-Year Transmission Outlook. WCP was not able to attend this workshop. It is forecast that in the future the CEC and California will need to overhaul and add additional transmission capacity to handle the increased demand for power. Eventually this is predicted to be entirely generated by renewable resources. A major amount of this electricity is expected by our west coast states and federal government to be derived from Floating Offshore Wind generation (FOSW).

While Call areas and leases for US FOSW are advancing rapidly it is nascent technology with a historical paucity of study. The impacts to the marine and human environment is little understood nor are important data gaps and analysis receiving more than superficial attention. Contrary to what our government(s) first stated it is impossible for fishing activity to not to be impacted (Direct displacement) when you industrialize huge marine areas that are the best locations for fishing. FOSW will occupy and remove prime fishing space utilized by a multi-generational fishing industry. It will have many impacts on our coastal communities, the vast majority of which do not have sufficient space or infrastructure to receive any benefit from FOSW development. Direct displacement of fishing activity will terminate many

fishermen's and processors' livelihoods and slash the net worth of their assets. Almost all fishing communities will lose economic stability.

However, the more worrisome side is what may happen to the California Current Ecosystem (CCE), one of the most productive on the planet. We have no credible FOSW empirical data on environmental impacts, and only incomplete modeling data to understand FOSW alterations on meteorological and hydrological dynamics, ecosystem function, CCE food web productivity, and what changes will occur with the present speciation of the CCE marine habitat. There are no focused studies that guarantee FOSW will not be a wrecking ball to a marine environment that is many times more productive than terrestrial venues and plays a center-stage role in carbon sequestration.

A characteristic of many CCE species is the substantial movement of many marine inhabitants to divergent locales as they go through their life stages. This can be adult self-mobilization to offshore spawning locations or ocean transport of fish and shellfish larvae from offshore to onshore (or onshore-offshore-onshore) nursery zones. Pacific Whiting travel as far as Point Conception to spawn and juveniles work their way north as they mature into Oregon, Washington, and Canadian waters. Dungeness Crab larvae ride currents from onshore out to the offshore current which transits them hundreds of miles south where the crab megalops make their way back to near shore nursery areas.

Very little is scientifically understood about the effects wind energy extraction will have on the physics of coastal meteorology and hydrology. It is a known fact that wind plays a critical role in the production of phytoplankton and algae.<sup>1</sup> Wind is a base component that supports the entire marine food web and one of the most effective natural carbon sequestration mechanisms known.

Many fishermen that ply California's coastal waters homeport in Oregon, Washington, and even Alaska. California fishermen harvest seafood in those three northern states' coastal waters. Per NOAA Fisheries these fisheries are sustainably managed to be productive in future generations. In a time of increasing world hunger, combined with a recently disrupted protein supply chain for the US terrestrial and foreign imported food sectors, US food security should be more of a concern than ever. Unstable foreign relations will only exacerbate the reliability of foreign countries to be a dependable source.

We bring this up not because we oppose the fight to prevent climate change but because we should thoroughly understand what impacts will occur when we experiment with new engineering technologies that could cause catastrophic harm. WCP supports renewable energy, but we must protect the ecosystems that allow many forms of life and life support systems to exist.

Aside from the above concerns the primary questions we have on power-grid transmission expansion center around the total costs involved to build out the transmission infrastructure that will support the mammoth amount of FOSW produced energy which is stated in the administration's targeted goals. Will

---

<sup>1</sup> [Frontiers | Wind Intensity Is Key to Phytoplankton Spring Bloom Under Climate Change \(frontiersin.org\)](https://www.frontiersin.org/journal/10.3389/fmars.2019.00011)

this be accomplished in a series of expansion steps? It would seem there would be overall efficiencies and savings executing a one-time construction of a supply chain large enough to accommodate the future increased loads that are planned. As businesspeople, WCP has an interest in the cost of FOSW power compared to other renewable sources. As our businesses are usually located in coastal areas, we presume retail pricing would be based around the cost of FOSW power. This assumes we would still be able to rely on a supply of seafood caught by our local fishermen to conduct our, which many of us doubt. With that said many of us are residents in these communities and are involved in maintenance of their socioeconomic welfare.

Our own experience in good business practice is to accurately comprehend your costs to best plan your investment needs and monetary outflow. We have heard many differing numbers and wide ranges of the FOSW retail power cost. We would hope the transmission engineers and accountants can pare down the discrepancies (\$0.045 to \$1.00 per KWH) to a narrower range. (This should be "to point of retail sale".) Obviously, transmission will add to retail cost. Future costing should be transparent to ratepayers and taxpayers based on the plans to scale up production. Afterall we will pay the bill whether through subsidies or our direct billing from the local utility. Finally, we will state that the entire package of FOSW, planning, transmission, weakening key foundational environmental safeguards that other industries must adhere to, and lack of agency accountability and responsibility do not instill confidence that this venture will turn out well. This trepidation could have been eliminated if the public process was a transparent one and actually attempted to take effected parties into account for full remuneration of their losses. We will state that most of the lower echelon staff that carry the workload in the California agencies do seem to care and, in many cases, have been very helpful. For that we offer our thanks.

Thank you,  
Sincerely



Mike Okoniewski  
Ph: 360-619-2019: [mokoniewski.consultant@pacificseafood.com](mailto:mokoniewski.consultant@pacificseafood.com);  
WCP Secretary

C.c. Greg Shaughnessy Vice President WCP