

**DOCKETED**

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**CEC 23-MISC-01 Comments of Equinor US on Staff Workshop on  
AB 209 Offshore Wind Waterfront Facilities Implementation  
Program**

*Additional submitted attachment is included below.*

**Comments of Equinor, US (“Equinor”) to the 11/3/23 Staff Workshop in 23 MISC-01 on the AB 209 Offshore Wind Waterfront Facilities Implementation Program:**

Equinor is, a global energy company headquartered in Norway with US renewables operations that include four offshore wind projects on the US east coast and a project, Atlas Wind, with a lease in California (PACWi-OCSP65) off the coast of Morro Bay. Equinor hereby submits the following written comments in response to the issues raised and information shared in the staff workshop held on November 3, 2023.

First and foremost, Equinor thanks the staff of the California Energy Commission (“commission”) for the exhaustive and collaborative work they have engaged in over the past months to assess and identify waterfront facility needs to support the development of floating offshore wind for California and toward its achievement of the offshore wind goals established pursuant to AB 525. We are at an immediate and critical juncture to allocate these funds and AB 209 expressly provides the commission with the authority to decide how to spend them. Given the commission’s long-standing work as part of the AB 525 implementation process over the past two years, including directing ports study and assessment; and the exchange of information building up to and including the November 3 workshop, Equinor believes the commission has the information it needs to expend these funds now.

Equinor notes in reference to the study conducted, that of the port types covered by the State Lands Commission Report that will feed into the final Strategic Plan report under AB 525, staging and integration (S&I) ports were identified as the most critical need and require urgent funding. As was discussed at the workshop, both the Port of Humboldt and the Port of Long Beach have announced projects to provide necessary acreage and functionality to meet all of the requirements for “3-5 80 acre S&I sites” that the Report identified as most critical needs to meet the state’s 2045 offshore wind goal.

Equinor cannot stress strongly enough the importance of directing the maximum amount of available funding toward these two ports projects as soon as possible. These ports need to be able to move forward with actionable additional study and design work to meet the aggressive timelines they have outlined that will help the

state build out the 5 projects in the initial lease areas that can yield 10 GW of offshore wind by 2035. The S&I ports proposals also provide backbone facilities to spur supply chain and manufacturing capabilities toward the broader goal of supporting 25 GW of offshore wind by 2045. Time is of the essence. Weeks or months delay in making decisions about and allocating funds translate into much longer periods of delay and increases in costs to build out this crucial infrastructure and the supply chain and manufacturing opportunities that their completion will present. Delays will increase costs of developing the initial offshore wind projects and potentially the timing of future auctions and the opportunity to realize California's existentially necessary offshore wind goals.

Equinor recognizes the need for manufacturing and fabrication (MF) ports and for operations and maintenance (O&M) ports, but commitment to and the actual beginning of development of S&I ports in California must come first. The \$43 million available from AB 209 is the minimal starting point to help spur the process to obtain federal and private investment based on the state's initial commitment here. This then starts the process to attract supply chain and manufacturing to the state based on industry scale for offshore wind and viability and timing of offshore wind development. O&M ports and regional build out will follow. This is the critical point now though and the focus must be on funding S&I ports at Long Beach and Humboldt via a pathway of meaningful grants to enable them to move forward. These ports have demonstrated readiness and capability.

Equinor is committed to long term partnership with California in the development of largescale offshore wind here as we have developed elsewhere throughout the world. A key component of realizing the promise of this partnership between developers and the state is to take this decisive action to begin the funding of viable and critical S&I ports at Humboldt and Long Beach to signify the state's firm and ongoing commitment to meet its offshore wind goals to help achieve its urgent climate objectives. Thus we respectfully request focusing the funding efforts on these two ports at this critical time.