

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-IEPR-01
<b>Project Title:</b>	General Scope
<b>TN #:</b>	255557
<b>Document Title:</b>	AltaSea Comments on Scoping Order Comment - Wave and Tidal Energy
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	AltaSea
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	4/5/2024 4:05:15 PM
<b>Docketed Date:</b>	4/5/2024

*Comment Received From: AltaSea  
Submitted On: 4/5/2024  
Docket Number: 24-IEPR-01*

**24-IEPR-01 - Scoping Order Comment - Wave and Tidal Energy**

See attached.

*Additional submitted attachment is included below.*



April 5, 2024

California Energy Commission  
Docket Unit, MS-4  
715 P Street Sacramento, California 95814-5512

RE: Docket No. 24-IEPR-01 - 2024 IEPR Scoping Order Comment

AltaSea is thrilled to see the scope of Ca. Pub. Res. Code § 25996 [SB 605 (2023)] incorporated into the 2024 IEPR Update. Though we understand SB 605 (2023) contains certain directives for analysis and that there will be specific comment periods allocated to wave and tidal energy, we'd like to highlight a few items for consideration at this time.

**Examples.** First, below are a handful of success completed or on-going wave and tidal energy demonstration or commercial scale projects for reference:

- PacWave marine energy testing sites in Oregon with streamlined permitting and consistent monitoring
- CorPower Ocean installed its first commercial scale Wave Energy Converter in northern Portugal in 2023
- CalWave Open-Water Demonstration in San Diego concluded in 2022
- AW-Energy wave energy test deployment in Portugal in 2019
- MeyGen Tidal Energy Project in Scotland entered Phase I in 2018

**Incentives.** To rapidly achieve the scale of wave and tidal energy deployment necessary to enable California to reach its clean energy goals, wave and tidal energy firms would benefit from similar incentive programs as adopted in the state to promote solar and wind energy adoption.

**Co-location Potential.** As the CEC implements Ca. Pub. Res. Code § 25996(b), the evaluation of the economic benefits and efficiency gains from potentially co-locating wave and tidal energy deployments with existing and planned port and off-shore infrastructure should be considered. Breakwaters, off-shore wind and solar infrastructure, and other marine structures offer the prime location for certain wave and tidal energy devices. Such co-location should reduce permitting time and initial capital expenditures required for deployment – a boon both to firms and California's renewable energy portfolio.

**Production Target.** As the CEC implements Ca. Pub. Res. Code § 25996(b), consideration of a state target for megawatts of wave and tidal energy production in the state by a certain year, perhaps 2030, would be useful. Such targets sent by the state have an outsized impact by galvanizing investment and industry deployment around a specific goal.

We look forward to staying engaged and supporting the CEC's implementation of SB 605 (2023).

Sincerely,

**Jade Clemons**

Director, Blue Sustainable Economy Alliance at AltaSea  
[jclemons@altasea.org](mailto:jclemons@altasea.org)