

DOCKETED	
Docket Number:	17-MISC-01
Project Title:	California Offshore Renewable Energy
TN #:	255874
Document Title:	Erin Grizard Comments - Invenergy's Comments on the Draft AB 525 Offshore Wind Strategic Plan
Description:	N/A
Filer:	System
Organization:	Erin Grizard
Submitter Role:	Public
Submission Date:	4/22/2024 4:16:11 PM
Docketed Date:	4/22/2024

*Comment Received From: Erin Grizard
Submitted On: 4/22/2024
Docket Number: 17-MISC-01*

Invenergy's Comments on the Draft AB 525 Offshore Wind Strategic Plan

Please find Invenergy's comment attached.

Additional submitted attachment is included below.



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April 22, 2024

Docket No. 17-MISC-01

Submitted via electronic comment system

Invenergy thanks the California Energy Commission's (CEC) continued dedication and leadership on offshore wind and for successfully developing the Draft CEC Assembly Bill (AB) 525 Offshore Wind Strategic Plan (Strategic Plan). We appreciate the staff at the CEC and all sister agencies that developed the report over many months and thank you for your efforts.

Invenergy is one of the largest privately owned clean energy developers headquartered in the United States. Invenergy develops, constructs, and operates some of the largest renewable projects in the country and operates 30 gigawatts (GW) of energy assets globally including onshore and offshore wind, solar, and storage, among other technologies. Invenergy is a leaseholder developing Even Keel Wind off California's Central Coast. Invenergy is also developing an offshore wind project in the New York Bight, Leading Light Wind, which recently won a highly competitive contract to provide 2,400 megawatts (MW) of clean energy to the state of New Jersey, enough to power more than 1 million homes.

The CEC has provided vital guidance, support and focus on California's offshore wind industry. The Strategic Plan could not have happened without the contribution of and coordination with federal, state, and local agencies and various stakeholders. The Governor's Office of Business and Economic Development (GO-Biz), Governor's Office of Planning and Research (OPR), California State Lands Commission (CSLC), California Coastal Commission (CCC), California Department of Fish and Wildlife (CDFW), California Public Utilities Commission (CPUC), California Ocean Protection Council (COPC), and

Bureau of Ocean Energy Management (BOEM) were critical partners in this, and Invenergy appreciates and values their work.

California Native American tribes, Tribal communities and Indigenous peoples' engagement and government-to-government consultations on the Strategic Plan are essential to its completion and the planning of offshore wind in California. Stakeholders, such as fisheries, national defense, underserved communities, community members, and the public, have been crucial in the Strategic Plan process and the offshore wind industry. We thank the CEC for its stakeholder engagement and coordination in developing the Strategic Plan and all stakeholders for their participation.

The Strategic Plan is essential for California's energy future and supports California as a global leader in efforts to combat climate change. Offshore wind development is crucial for meeting the State's climate goals, and the CEC and its partners have made significant progress in setting the analytical framework for offshore wind in California. Invenergy understands firsthand the importance and complexity of developing offshore wind off the California coast.

Invenergy, as one of the five members of American Clean Power Californian Council of Offshore Wind Leaseholders (ACP CCOWL or ACP), has provided expert input into ACP Strategic Plan comments filed April 8, 2024. So as not to be duplicative we ask that ACP's comments are considered in detail. However, we do take the opportunity here to emphasize two important overarching priorities.

Detail and Clarity are Needed for Permitting Coordination

The Final Strategic Plan should provide specific deadlines, timelines, and clear coordination between all agencies, state and federal alike. To ensure that the CEC has a coordinated, comprehensive, and efficient permitting process an effort must be undertaken to clearly define roles, responsibilities, and decision-making authority. Permitting delays create uncertainty and will jeopardize offshore wind development.

Recommendation Milestones and Specific Action

For the Final Strategic Plan to effectuate meaningful strategy and guidance, milestones, and delineated actions for all recommendations throughout the Plan must be offered. Generally, the draft Strategic Plan focuses on concepts and programs without committing to specific actions and next steps. The nascent offshore wind market in California, combined with the scale of the opportunity for offshore wind developers, Tribes, local communities, ports, transmission, and the broader supply chain, necessitate clarity of vision and programmatic excellence. For all interested parties to contribute to the success of environmentally responsible development, direction and leadership are needed in all aspects of the Final Strategic plan. This undertaking's complexity is significant, and for California to be successful, we must take clear action.

Considerable progress has been made towards achieving California's goal of carbon neutrality by 2045, and the Strategic Plan is an important milestone. Invenergy looks forward to building on the advancements of the collective group and continuing to work towards a 25 GW target of offshore wind for California and a resilient and reliable energy future.

Thank you for the opportunity to offer these comments.

/s/ Erin Grizard

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