

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-SB-605
<b>Project Title:</b>	SB 605 Wave and Tidal Energy - Phase 2
<b>TN #:</b>	263186
<b>Document Title:</b>	Redwood Coast Energy Authority Comments - Redwood Coast Energy Authority Comments on SB 605 Phase 2
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Redwood Coast Energy Authority
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	5/16/2025 4:30:28 PM
<b>Docketed Date:</b>	5/16/2025

*Comment Received From: Redwood Coast Energy Authority  
Submitted On: 5/16/2025  
Docket Number: 24-SB-605*

## **Redwood Coast Energy Authority Comments on SB 605 Phase 2**

*Additional submitted attachment is included below.*



## Comments on SB 605- Wave and Tidal Energy – Phase 2

### Background on Redwood Coast Energy Authority and Summary of Comments

Redwood Coast Energy Authority (RCEA) is a Community Choice Aggregator (CCA) based in Humboldt County. We are a Joint Powers Authority (JPA) founded in 2003 whose members include the Blue Lake Rancheria, the Yurok Tribe, the County of Humboldt, the Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad, and the Humboldt Bay Municipal Water District. RCEA's mission is to develop and implement sustainable energy initiatives that reduce energy demand, increase energy efficiency, and advance the use of clean, efficient, and renewable resources available in the region for the benefit of the member agencies and their constituents.

RCEA supports the exploration of wave energy in the North Coast region. In response to expressed interest from our Board of Directors and Community Advisory Committee, RCEA has signed on to support a proposal from a wave energy developer to deploy their technology at Oregon State University's PacWave South test platform as they seek DOE Oceans of Opportunity funding. We are interested in similar exploration on feasibility of wave energy for the Humboldt region and welcome the CEC's Sea Space Analysis for Wave and Tidal Energy Draft Consultant Report as an early step towards this effort.

RCEA's comments on the report can be summarized as follows:

- The outreach and engagement conducted in preparation for this Draft Report omits Load Serving Entities such as CCAs.
- The state should continue to explore the co-location of wave energy with other large energy infrastructure.
- The state should explore the potential and policy pathways for projects of varying sizes.

## **The Outreach and Engagement Conducted in Preparation for this Draft Report Omits Load Serving Entities Such as CCAs**

The state needs to ensure that wave and tidal research is not for naught and to do work early in the process to develop a viable future market. For this reason, the state should engage energy off-takers early in the process, including load serving entities including CCAs, or other potential off-takers, such as green ports and aquaculture facilities.

For instance, while RCEA as an LSE is very supportive of the state's exploration of wave energy, our organization is less interested in tidal energy at this time due to the limited suitable sea space. It may be beneficial for the state to survey other LSEs to see if they share a similar sentiment before the state goes too far down a non-viable or low-viability path.

Additionally, RCEA is interested in state exploration of how to make any future wave energy projects eligible for the Resource Adequacy program, enhancing their economic viability for LSE procurement.

## **The State Should Continue to Explore the Co-Location of Wave Energy with Other Large Energy Infrastructure**

In order to ensure a least-regrets scenario for new energy infrastructure, especially along the North Coast, RCEA encourages the state to assess deployment of wave energy alongside other large energy infrastructure deployments.

Particularly as it relates to offshore wind deployment, the North Coast region is expecting Green Terminal, subsea cable, and transmission deployment. Where feasible, the state should prioritize assessment of sea space surrounding these projects.

The North Coast also anticipates soon being host to a large new aquaculture facility, which will require reliable power. The state should also prioritize sea space around this facility and engage with outreach with aquaculture developers to assess if there is market interest in wave energy.

## **The State Should Explore the Potential and Policy Pathways for Projects of Varying Sizes**

RCEA supports the state in its exploration of sea space for a variety of project scales. We request that the state take a closer look at research scale projects in advance of a larger roll out, especially as larger projects like Offshore Wind face Federal uncertainty.