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Thank you for this opportunity to provide comments on the Electric Program Investment Charge (EPIC) Third Triennial Investment Plan. The Institute for Advanced Technology and Public Policy (IATPP) at Cal Poly San Luis Obispo appreciates the California Energy Commission's important work structuring the EPIC investments in the transformation of California's electrical grid to obtain the greatest possible benefit for the State.

Since 2013, IATPP has been worked with the US DOE on marine renewable energy. Cal Poly and IATPP have performed 3 years of work on a DOE funded feasibility study for the establishment of a wave energy test facility. If built, this facility would provide technology developers with the ability to test and demonstrate their devices at limited scale while simultaneously providing regulatory agencies the ability to assess environmental impact. IATPP has a vested and ongoing interest in offshore marine renewable energy and especially offshore wind given the state of the current technology and the development interest on the central coast of California.

Recent developments have highlighted the potential importance of California's offshore wind resource. In May 2016, Governor Brown asked then US Secretary of the Interior Sally Jewell to form an intergovernmental task force to evaluate opportunities for offshore renewable energy development off the California coast. Governor Brown observed that California will need to "dramatically increase our share of renewable energy to meet long term climate objectives," and that offshore renewable energy resources "present important future opportunities," noting that California has "significant offshore wind resources . . . that complement the profile of onshore solar resources" and that "new developments in offshore wind technology" such as large facilities that are not visible from land and present little to no avian impacts "will likely make projects more viable." In December 2016, following formation of the requested Task Force, Governor Brown and Secretary Jewell entered into a memorandum of understanding concerning renewable energy. The MOU memorializes a number of joint commitments by California and Interior, including continued support for Task Force efforts, timely action on "plans for renewable energy development in areas that have been identified as Wind Energy Areas through the collaborative Task Force planning process," and coordination of federal and state data collection and environmental review relating to offshore wind development.

IATPP has been closely following the work of the Task Force and its stakeholder outreach work, the rapid advances in environmental monitoring technology in the marine environment, and the growth of renewable energy developers and supply chain companies in offshore wind off the California coast. We are carefully considering establishment of a research program to accelerate the responsible demonstration of floating offshore wind technology and the acquisition of environmental data needed to make prudent siting and permitting decisions. To ensure that EPIC program administrators have the flexibility to consider the benefits of the kind of research effort we have in mind, we respectfully request the following clarifications or modifications to the portions of Theme 4 that pertain to offshore wind:

In section 4.2.2 "Reduce Costs and Technical Barriers to Facilitate Deployment of Offshore Wind," clarify that eligible work on technology advances could include testing of prototypes of new designs, and that work on logistics could include analysis of potential improvements to existing ports (e.g., reinforcement of port structures to handle the weight of turbine components).

In section 4.2.3, "Real Time Monitoring Systems for Offshore and Land-Based Wind Technologies," clarify that relevant monitoring systems could be designed to monitor environmental impacts, such as noise levels and effects

on avian and marine life, as well as performance relating to energy generation. In addition, it would be useful to include authorization for resource characterization and measurement, including LIDAR-based wind measurement and environmental baseline characterization.

In section 7.3.1 “Find Environmental and Land Use Solutions to Facilitate the Transition to a Decarbonized Electricity System,” clarify that eligible work on this topic could include the initial scoping of a research program and establishment of a consortium that works to advance the current state of environmental modeling, monitoring, and mitigation technologies/tools with the goal of providing regulatory certainty for stakeholders, the offshore wind energy industry, and ultimately ratepayers. Additionally, this could provide spillover benefits for planning, monitoring, and mitigation strategies regarding marine and coastal development as well as climate change impacts on California's waters and could provide commercialization opportunities in global markets.