DOCKETED	
Docket Number:	20-EPIC-01
Project Title:	Development of the California Energy Commission Electric Program Investment Charge Investment Plans 2021-2025
TN #:	239351
Document Title:	California Wind Energy Association Comments on Draft EPIC 4 Investment Plan
Description:	N/A
Filer:	System
Organization:	California Wind Energy Association
Submitter Role:	Public
Submission Date:	8/18/2021 9:48:53 AM
Docketed Date:	8/18/2021

Comment Received From: California Wind Energy Association
Submitted On: 8/18/2021
Docket Number: 20-EPIC-01

CalWEA Comments on Draft EPIC 4 Investment Plan

Additional submitted attachment is included below.

California Wind Energy Association

August 18, 2021

California Energy Commission
Docket No. 20-EPIC-01
Docket Office
1516 Ninth Street
Sacramento CA 95814

Submitted Electronically via CEC website to Docket 20-EPIC-01

Re: Comments on Draft Initiatives for EPIC 4 Investment Plan

The California Wind Energy Association (CalWEA) appreciates this opportunity to provide written comments on the Draft Initiatives for the Electric Program Investment Charge (EPIC) Investment Plans 2021-2025. CalWEA's membership includes companies and organizations that are experienced in offshore wind development and are actively engaged in planning for offshore wind development and supply chain in California. Wind energy (both land-based and offshore) is a very important complement to solar energy that significantly lowers the need for storage, increases reliability, and lowers overall costs compared with higher levels of solar alone, as the Joint Agency SB 100 Report and many other studies show.

CalWEA is strongly supportive of the proposed floating offshore wind (OSW) research initiative, and we believe that the draft plan correctly identifies many of the key research areas. CalWEA encourages the Commission to focus its EPIC offshore wind research on driving California's industrial readiness to support technologies at the size and scale that they are anticipated to be deployed and to develop in-state supply chain capabilities. Developing this capability will lead to the "good-paying, union jobs" that Governor Newsom and the White House expect to come with offshore wind development.

To that end, we believe that, for all four OSW categories (manufacturing/testing components; inspection systems; environmental research; and pilot demonstration), the following modifications should be made:

- A substantial portion of the funding (e.g., at least 50%) should be for applied demonstrations involving 12-MW turbine size or larger, not for computer modeling or smaller-scale applications. It is crucial for R&D to be carried out in real-life

applied research using the next-generation technologies that actually will be deployed off California's coast in federal waters in future years, not on technologies that will be outdated at that time.

- For the first two categories – manufacturing/testing components and inspection systems – priority should be given to project proposals that create local supply chain manufacturing in California, especially fabrication of floating turbine foundations, which is an important opportunity to create a substantial number of well-paying jobs in the state.
- For all categories, strong preference should be given to applications that demonstrate in-state economic benefits and the potential for an in-state supply chain, especially those utilizing a skilled and trained workforce.
- For all categories, preference should be given to applications that advance socio-economic equity, especially for disadvantaged communities, target hiring for under-resourced communities near the project sites, defined as Priority Populations by the California Air Resources Board.
- Proposals that explore potential synergies between OSW development and the transition away from fossil-fuel-related resources and facilities should be strongly considered.

We appreciate this opportunity to comment.

Sincerely,

/s/

Nancy Rader
Executive Director
California Wind Energy Association
Email: nrader@calwea.org