

DOCKETED

Docket Number:	17-MISC-01
Project Title:	California Offshore Renewable Energy
TN #:	243230
Document Title:	Horizon West Transmission Comments - Draft Commission Report on Offshore Wind Energy Development
Description:	N/A
Filer:	System
Organization:	Horizon West Transmission
Submitter Role:	Public
Submission Date:	5/23/2022 2:40:42 PM
Docketed Date:	5/23/2022

*Comment Received From: Horizon West Transmission
Submitted On: 5/23/2022
Docket Number: 17-MISC-01*

**Horizon West Transmission Comments - Draft Commission Report
on Offshore Wind Energy Development**

Additional submitted attachment is included below.

May 23, 2022

RE: Draft Commission Report - Offshore Wind Energy Development in Federal Waters off the California Coast: Maximum Feasible Capacity and Megawatt Planning Goals for 2030 and 2045

Horizon West Transmission (HWT), formerly known as NextEra Energy Transmission West, LLC (NEET West), is a subsidiary of NextEra Energy Transmission, LLC, a leading competitive transmission company in North America. Founded in 2014, Horizon West is the designated developer for two projects in California and the first non-incumbent to be awarded competitive transmission projects in California. Horizon West is a certificated electrical utility in California.

Horizon West Transmission (HWT) supports and applauds the California Energy Commission (CEC) in its effort to chart a path for the deployment of offshore wind (OSW) and the environmental and economic benefit to California communities that entails.

Support for Early Transmission Planning

Effective long-range transmission planning is vital to the success of this endeavor as has been duly noted in the workshop discussion, the AB 525 draft report,¹ and submitted comments from other stakeholders.^{2,3} Early steps have been taken to initiate the exploration of viable options for the shore-side bulk transmission assets that could be used or developed to deliver Central and North Coast wind.⁴ This is an excellent first step, and as this process continues HWT encourages the CEC to expand these efforts to include planning for offshore transmission and grid architecture. Early planning for the offshore side of the grid is vital to ensure that development decisions made during the initial development phase of projects do not lock the

¹CEC, [AB 525 Offshore Wind Report](#) pg. 2

²Pacific Ocean Energy Trust, [AB 525 Planning Goals Comments](#)

³California Wind Energy Association, [Comments on AB 525 Implementation](#), pg. 5

⁴CAISO, [2021-2022 Transmission Plan](#), section 3.7

California OSW industry into sub-optimal pathways over the long term. Specifically, HWT recommends that the CEC pursues a coordinated, long-range offshore grid and transmission planning process to ensure California remains a leader in effective renewable power integration.

Coordinated Offshore Grids Offer Benefits for Integrating Large Amounts of OSW Generation

Without timely and coordinated offshore transmission planning, developers will be forced to connect their OSW systems to the onshore transmission system radially through individual generation interties. Given the scale of OSW development that the CEC hopes to achieve by 2045, coordinated transmission planning and buildout would ultimately be a superior approach. A coordinated approach could lower both total costs, environmental and marine impacts, community impacts and right-of-way constraints of meeting the preliminary 2030 and 2045 OSW goals by significantly reducing the number of unique subsea cables and landing points required to integrate OSW.

A coordinated approach would also result in a more competitive and even playing field for OSW solicitations by providing equitable access to offshore hubs and thereby reducing uncertainty around the interconnection queue process.

Timing Alignment of Transmission and Generation Development is Key for Success

Given the long development timelines for transmission planning and development, HWT encourages the CEC to initiate early and concerted efforts to investigate the potential benefits of a coordinated offshore grid for OSW wind. Additionally, HWT would like to encourage the CEC to identify and communicate the planning and permitting processes that would enable needed transmission investments to be made in a way that aligns with the timing of generation development.

HWT appreciates the opportunity to participate in the recent CEC offshore wind development workshop and to offer comments on that discussion and the contents of the AB525 draft report.