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RCEA Comments

Additional submitted attachment is included below.



Comments on IEPR Commissioner Workshop on Offshore Wave and Tidal Energy and SB 605 Report

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 staff have provided periodic reports on wave energy opportunities on the North Coast¹. Development of wave energy in the region aligns closely with RCEA's strategic goal that "(b)y 2030 Humboldt County will be a net exporter of renewable electricity and RCEA's power mix will consist of 100% local, net-zero-carbon-emission renewable sources."²

RCEA is thankful for the opportunity to comment on the IEPR Commissioner Workshop on Offshore Wave and Tidal Energy and SB 605 Report. RCEA's comments can be summarized as follows:

- RCEA encourages the exploration of demonstration or research scale projects along the California Coast in advance of an eventual larger roll out in order to better understand costs, benefits, risks, and potential environmental and social impacts.
- RCEA urges the CEC to encourage co-location and integration with other large energy infrastructure to bring costs and environmental footprint down.
- Early engagement with host communities is necessary.

RCEA Encourages the Exploration of Demonstration or Research Scale Projects Along the California Coast in Advance of an Eventual Larger Roll Out.

RCEA would like to highlight the importance of small-scale demonstration projects along the California coast for research development. These projects should be partnerships with local load serving entities (LSEs) that best understand a given project's host community's energy needs. Additionally, these partnerships should allow for host communities to give feedback on learnings and priorities before a full-

¹ Redwood Coast Energy Authority. *August 2021. Wave Energy Report.* [Aug-26-2021-Board-Mtg-Agenda-Packet.pdf \(redwoodenergy.org\)](#)

² Redwood Coast Energy Authority. *December 2019. RePower Humboldt: The Redwood Coast Energy Authority's Comprehensive Action Plan for Energy* [RePower Humboldt 2019 Update \(redwoodenergy.org\)](#)



REDWOOD COAST Energy Authority

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scale roll out. A timely example of this approach is the offshore wind research lease issued by the Bureau of Ocean Energy Management this month to the state of Maine.³

RCEA Urges the CEC to Encourage Co-location and Integration with Other Large Energy Infrastructure to Bring Costs and Environmental Footprint Down.

Wave energy deployment must be designed and sited in a least-regrets scenario to enhance energy resilience, reliability, affordability, and access. These projects should provide for the infrastructure necessary to support the incoming economic development through new loads (e.g. vehicle charging and other electrification efforts, essential services, data centers) and the development of local clean energy resource interconnection (e.g., microgrids, solar, storage technologies) to enable communities to affordably meet their energy needs through local generation. As part of this effort, RCEA urges the California Energy Commission (CEC) to coincide timing and siting of early wave energy projects with other transformative energy projects, such as offshore wind, coastal microgrids, coastal EV charging, and distribution and transmission line construction and maintenance.

Early Engagement with Host Communities is Necessary.

Wave energy requires an early push from local governments in host communities to get community buy-in. Due to the statewide resource potential, this work benefits not only local communities but also the entire state. As such, there must be proactive and frequent local government, Tribal, and stakeholder engagement to guide how this development is designed, planned, and deployed, with a consideration for any capacity building assistance these stakeholder groups may require to meaningfully engage.

Also, for wave energy to proceed in the most equitable way, we recommend that the selection criteria of any contractors, researchers, or developers include a proven history of community development, engagement, and Tribal relations, or that the selected entity partners with another entity with these strengths.

³ Bureau of Ocean Energy Management. August 2024. *BOEM Issues Offshore Wind Research Lease to State of Maine*
<https://www.boem.gov/newsroom/press-releases/boem-issues-offshore-wind-research-lease-state-maine>