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POET comments regarding Final 2024 IEPR

Additional submitted attachment is included below.



9450 SW Gemini Drive, Beaverton, Oregon 97008-7105

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Pacific Energy Ventures

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Pacific Ocean Energy Trust

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Port of Portland

October 3, 2025

Chair David Hochschild
Vice Chair Siva Gunda
California Energy Commission
Docket Unit, MS-4
Docket No. 24-IEPR-01
715 P Street Sacramento, CA 95814-5512

Subject: Comments on the Final 2024 Integrated Energy Policy Report Update

Dear Chair Hochschild and Vice Chair Gunda:

The Pacific Ocean Energy Trust, an Oregon based 501c3, appreciates the opportunity to comment on the Final 2024 Integrated Energy Policy Report (IEPR) Update.

POET has a primary focus on the Blue Economy, primarily relate to marine energy. Since 2007, POET and its former iteration, the Oregon Wave Energy Trust, have worked to advance the commercialization of clean energy from the oceans, and the many benefits that can be derived therefrom.

The California Energy Commission's 2024 IEPR provides an excellent summary of the many benefits and challenges of the quickly emerging marine energy sector. POET was excited to see the passage of SB 605 and the ensuing work. We believe California's engagement with marine energy is timely, providing opportunities to the State of California and the burgeoning marine energy sector.

POET has read the comments from CalWave, one of California's leading wave energy technology developers, and we fully endorse their thoughtful and well-articulated comments. POET also fully endorses the five recommendations of the 2024 IEPR.

POET would also like to provide a few comments regarding the near term (next few years) needs and opportunities to advance wave energy.

- The pathway for marine energy must pass through nearshore, community scale projects. These projects will provide immediate, localized benefits, as articulated in the 2024 IEPR, while providing the essential experience and revenue that will allow the small technology developers to move their technologies from mid-stage Technology Readiness Levels (5-7) to TRL 9 (Commercial Viability). Synergistic collaboration of federal, state, local, and private sectors can help get these projects in the water and more quickly advance the technologies, while bringing the many benefits of clean, distributed, marine energy.

Commented [SQ1]: I don't think we can say exclusive considering TEAMER and UMER support projects of all scales/end uses.



- California must work with its federal partners to rationalize a permitting pathway that allows these types of projects, as well as temporary testing and demonstration projects, to “get in the water” in a more timely manner. Multi-year, million dollar permitting pathways are the enemy of clean energy development. Marine energy developers do not have the resources or time to navigate traditional permitting pathways; we need a different approach, one that focuses on the outcome rather than the process.
- California has a unique opportunity to leverage federal funding from the DOE’s Water Power Technologies Office. The marine energy sector has long grappled with the dilemma of taking federal dollars that inevitably come with a match, historically ranging from 10 to 50%. The Oregon Wave Energy Trust, when it was state funded, provided match dollars to companies receiving federal dollars, if the companies had an Oregon nexus. This was by far our most popular and impactful program; not only did we help the companies take full advantage of the federal dollars, but we simultaneously advanced the sector and brought the companies to Oregon to build and deploy. If California could help match Federal dollars, this would help decrease the burden on small technology developers, as well as help decrease timelines for development and deployment.
- POET notes several observations regarding the state of knowledge of environmental impacts from marine energy, generally concluding that there is a perception that little is known about those impacts. While there is no question that baseline data, site specific studies, and ongoing monitoring will be essential, please note that California is not entering this market with little to no information about environmental effects. The PRIMRE database (Portal and Repository for Information on Marine Energy), for example, holds extensive peer reviewed data and information on most aspects of marine energy. Maintained by the Pacific Northwest National Laboratory, PRIMRE and associated reports demonstrate that several topics, such as electromagnetic force, noise, and entanglement have been extensively studied, and many potential impacts have been demonstrated to be unlikely or biologically unimpactful. Global data is relevant, to a point, and California should build on that information rather than duplicating those efforts.

Thank you for your leadership in this sector, and for providing POET with an opportunity to comment on this process. We look forward to our continued engagement with the CEC.

Commented [SQ2]: Might want to provide a line that this was POETs previous name, etc.



3

Sincerely,

Jason R. Busch

Jason Busch
Executive Director
Pacific Ocean Energy Trust

Email: jbusch@PacificOceanEnergy.org

Mobile: +1-503-729-2253