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RE: Docket number 08-IEP-1B

**Comments on Transmission Issues for 33% by 2020, July 23, 2008**

The treatment of ocean power during the second IEPR workshop may hold a lesson in it for how the transmission siting issue needs to be adjusted. To recapitulate, a caller spoke of the fact that the current transmission plan has nothing in it regarding transmission of offshore renewable energy generation. No one spoke to that issue, and it was as if it had never been said. So that serves as an example of how the system is currently "working."

One idea that kept resurfacing at that session was the notion of regional planning or west wide planning. Another common theme was the question of how the siting process can be improved, streamlined, or otherwise made more responsive. Seeing how quickly the question of ocean powered energy was dismissed, one might be led to wonder whether those were serious concerns or mere public relations ploys? Where is one supposed to go to get a hearing?

It appears that ISO doesn't want to take up any issue that hasn't been brought to it as a pending application, and that's perfectly understandable from their point of view since the ISO isn't short of work that needs doing. Still, if ISO isn't willing to take up the issue of planning how it intends to bring in renewable energy from off the coast, whose job is it?

It appears CEC believes that ocean power is not serious yet, and there is something to that, certainly. Yet we should also recognize that it is on a development path that is likely to become something serious much sooner than the time it would take to place a transmission line<sup>1</sup>. FERC has licensed one generator in Washington<sup>2</sup>, 6 more are have preliminary permits in Oregon<sup>3</sup>, 6 more in California<sup>4</sup>, and more are likely on the way. In recognition of the potential, FERC has established a modified license specifically for these kinds of generators<sup>5</sup>.

It is commonly recognized that the west coast from Northern California to Washington has some of the best ocean energy resources anywhere in the world, but unlike some of the other energy rich regions, the North American west coast is relatively close to load centers capable of absorbing all the energy it could produce. This suggests that development would preferentially happen here first if we were prepared to receive it. But if we won't or can't begin thinking about how to provide the transmission until the developers prove they need it, we will have effectively stalled them for the 10 to 15 years it normally takes to work through the siting process. Or we will be compelling the north coast communities to buy off on whatever plan we throw at them at the

<sup>1</sup> In 2006, FERC took 2 preliminary applications for hydrokinetic power; in 2007, it took 9 applications; so far in 2008 it has taken 66 preliminary applications. In 2005, FERC issued 3 preliminary permits, including one for San Francisco Bay; in 2006, it issues one preliminary permit for the Tacoma Narrows in Washington; in 2007, it issued 32 preliminary permits with three in Oregon and 8 in Washington; in 2008, it has so far issued 77 preliminary permits with 4 in California and one in Oregon.

<sup>2</sup> Makah Bay, Washington. License issued December 21, 2007.

<sup>3</sup> Newport OPT Wave Park (November 2, 2006); Reedsport OPT Wave Park (February 16, 2007); Coos Bay (March 9, 2007); Douglas County (April 6, 2007); Coos County Wave (April 26, 2007); Oregon Coastal Wave Energy (May 22, 2008);

<sup>4</sup> Green Wave Mendocino Wave Park and Green Wave San Luis Obispo Wave Park (October 19, 2007); Humboldt County Wave (February 14, 2008); Mendocino WaveConnect and Humboldt WaveConnect (March 13, 2008), [two PG&E projects]; Centerville OPT Wave Energy Park (June 27, 2008)

<sup>5</sup> On November 30, 2007 FERC issued a policy statement for hydrokinetic projects (current, wave, & tidal) which it hopes will expedite development. Judging from the applications, it has had that effect.

last minute. Neither choice strikes me as an orderly planning process. But if the CEC isn't willing to consider the question, who do we ask?

PG&E has some plans to develop along the coast (the WaveConnect projects, so far), and I am confident they have worked out how they will bring in that bit of power, but are they prepared to bring in the full panel of resources out there? Who can say? In any case, it's a piecemeal process very much as has always been done, and it is the very opposite of real regional planning. Maybe PG&E isn't in a position to do the full planning effort. But if the IOUs can't do this job, who do we go to?

While it may have made sense at one time to defer study of this issue, that time is running out. I respectfully suggest that the priority of this issue be raised within both the CEC and the ISO so that there will be some reasonable possibility of matching the development of offshore ocean power with timely and adequate onshore transmission capability.

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