

**Comments of the Natural Resources Defense Council (NRDC)  
on the 2011 IEPR – Revised Committee Scoping Order for the 2011 IEPR**

Docket # 11-IEP-1

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**Introduction and Recommendation**

The Natural Resources Defense Council (NRDC) appreciates the opportunity to comment on the revised Scoping Order released February 23, 2011. We represent over 250,000 California members and online activists who have a long-standing interest in reducing the environmental impacts of energy consumption. We have been an active participant in the IEPR proceeding.

We recommend the 2011 IEPR include a discussion on the state's approach to offshore wind, wave, and tidal power (collectively referred to here as marine renewable energy). Marine renewable energy can be a significant and sustainable component of California's energy supply, with a coastline wave power potential of 7,400 MW and an offshore wind potential of 59-76 GW. California will require strong leadership to develop these ocean- and coastal-based technologies in a way that will not conflict with existing uses of the ocean and will have no or minimal negative impacts on ocean resources.

We recommend the IEPR propose a collaborative framework for public and private stakeholders to develop goals, identify obstacles and solutions, and create a roadmap for how California can pursue marine renewable energy. We suggest the Commission leverage the work of the Marine Renewables Working Group, created by the Ocean Protection Council, to achieve these objectives.

**Discussion**

California has significant potential to generate clean, renewable energy from offshore wind, wave, and tidal power. Wave energy alone has the potential to generate 7400 MW, or 23 percent of California's current electricity consumption.<sup>1</sup> Recent estimates show that California's average annual developable wind energy potential is 513-661 TWh (59-76 GW).<sup>2</sup> 90 percent of that potential is in deep waters of 50-200m; 51-93 TWh exists in waters 0-50m.

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<sup>1</sup> California Energy Commission, Ocean Energy <http://www.energy.ca.gov/oceanenergy/index.html>; "However, economics, environmental impacts, land-use and grid interconnection constraints will likely impose further limits to how much of the resource can be extracted."

<sup>2</sup> Michael Dvorak, et. al, *California Offshore Wind Energy Potential*, Renewable Energy 35 (2010) 1244-1254. <http://www.stanford.edu/group/efmh/jacobson/Articles/I/dvorak-archer-jacobson-2009.pdf>

Technology and policy barriers still exist; in order to overcome them, California should take an active role in reducing uncertainty, minimizing obstacles where possible, and facilitating a formal process to address issues of concern. Ocean Protection Council (OPC) staff created the Marine Renewable Energy Working Group (MRE Working Group) in March 2010, in an effort to formalize state agency collaboration on this topic. This effort is commendable for improving information sharing between federal and state agencies and project developers.

The MRE Working Group works on issues related to permitting, planning, and managing renewable energy projects, and implementation of the FERC/California Memorandum of Understanding. The working group has members from the OPC, California Energy Commission, State Lands Commission, Coastal Commission, Department of Fish and Game, and the California Public Utilities Commission.<sup>3</sup> We recommend the IEPR empower the MRE Working Group to provide guidance on marine renewable energy policy.

It is critical that California collaborate with the federal government on marine energy issues. California should work with the Department of the Interior to establish a program similar to the “Smart from the Start” program<sup>4</sup> on the Atlantic Outer Continental Shelf. The Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) is collaborating with East Coast states to improve coordination, data collection, and information sharing to efficiently identify the offshore areas most suitable for various uses. BOEMRE and Oregon are collaborating in a similar effort in the form of the Oregon Renewable Energy Task Force.<sup>5</sup> The MRE Working Group could facilitate this collaboration between California and BOEMRE.

## **Conclusion**

We recommend the Scoping Order be expanded to include a discussion on how California will address marine renewable energy. This topic should be mentioned in the 2011 IEPR, as it is a growing issue and part of California’s energy future. We recommend the IEPR acknowledge the Marine Renewable Energy Working Group as a vehicle for advancing policy considerations on this topic.

We greatly appreciate the opportunity to address this topic with the Commission.

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<sup>3</sup> California Ocean Protection Council Executive Director’s Report. March 2011.

[http://www.opc.ca.gov/webmaster/ftp/pdf/agenda\\_items/20110311/04.DirectorsReport/110302\\_Mar2011\\_DirectorsReport\\_final.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20110311/04.DirectorsReport/110302_Mar2011_DirectorsReport_final.pdf)

<sup>4</sup> Press release. “Salazar Launches ‘Smart from the Start’ Initiative to Speed Offshore Wind Energy Development off the Atlantic Coast”. 11/23/2010. <http://www.doi.gov/news/pressreleases/Salazar-Launches-Smart-from-the-Start-Initiative-to-Speed-Offshore-Wind-Energy-Development-off-the-Atlantic-Coast.cfm>

<sup>5</sup> BOEMRE website: <http://www.boemre.gov/offshore/renewableenergy/stateactivities.htm>