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Comments on Scoping Order for 2021 IEPR

Additional submitted attachment is included below.



February 19, 2021

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 21-IEPR-01
1516 Ninth Street
Sacramento, California 95814-5512

Dear Commissioners:

Offshore Wind California, American Clean Power – California, and the Business Network for Offshore Wind are pleased to submit these comments on the Draft Scoping Order for the 2021 Integrated Energy Policy Report (IEPR). We write in particular to address efforts to improve electric reliability over the next five years and beyond. While offshore wind projects are not likely to produce new energy resources for California until the late 2020s, it is crucial that energy and transmission planning and permitting for offshore wind get started right away.

Last summer, California experienced destructive wildfires along with rolling blackouts due to an extreme heat wave. To avoid such events in the future and to ensure California continues to reduce greenhouse gas emissions, the state's energy portfolio must be diversified. It must include new renewable energy and zero carbon resources to provide system reliability and resource adequacy. California needs offshore wind to reach its clean energy and climate goals. This untapped resource will complement the existing supply of solar and onshore wind, help balance the grid, and provide a major boost to the state's economy by creating thousands of well-paying jobs.

Offshore wind can make significant contributions to the new renewable energy and energy storage requirements – 34 gigawatts (GW) by 2030 and 140 GW by 2040) – necessary to meet the state's Senate Bill (SB) 100 goals. A draft report prepared by the California Energy Commission (CEC), California Public Utilities Commission (CPUC), and California Air Resources Board (CARB) shows that at least 10 GW of offshore wind will be needed in California's 100% clean energy portfolio.¹

Offshore wind has a high capacity factor (50% or higher) compared to other energy technologies. Its generation profile, which is complementary to solar, with higher output during evenings when electricity demand is high and solar production is low, makes it very attractive for system planning. In addition, offshore wind complements solar seasonally by providing consistent output during winter months when solar production is lower.

¹ Draft SB 100 Joint Agency Report: Charting a Path to a 100% Clean Energy Future, December 2020.

As a balancing resource in a diverse portfolio, offshore wind can produce electricity to replace what is currently generated from conventional power plants slated for retirement and support California's urgent commitment to reduce emissions in disadvantaged communities.

Last week, Assembly Member David Chiu introduced legislation (AB 525), which would direct the CEC to work with other state agencies to develop a strategic plan for offshore wind with a target of 10 GW by 2040 and an interim target of 3 GW by 2030. At the same time, the Biden administration is preparing to dramatically expand the nation's offshore wind plans, including in California. The federal Department of Interior and Bureau of Ocean Energy Management (BOEM) will soon be in talks with the Department of Defense and U.S. Navy to resolve offshore wind siting issues on the Central Coast of California. Once agreements are reached, BOEM will be able to announce a lease auction schedule – a key step in advancing offshore wind projects in the state. The CEC should also consider the reliability benefits of offshore wind, including the need to begin early planning at federal, state, and local levels to ensure offshore wind projects can move forward.

We urge the CEC to address these resource planning issues in the 2021 IEPR and support accelerated development of offshore wind in California.

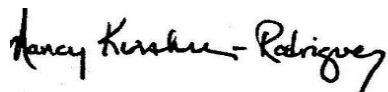
Respectfully submitted,



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