

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Ordering Instituting Rulemaking to Oversee
the Resource Adequacy Program, Consider
Program Reforms and Refinements, and
Establish Forward Resource Adequacy
Procurement Obligations.

Rulemaking 21-10-002

**REPLY COMMENTS OF OFFSHORE WIND CALIFORNIA ON
ADMINISTRATIVE LAW JUDGE’S RULING ON ENERGY DIVISION’S REGIONAL
WIND EFFECTIVE LOAD CARRYING CAPABILITY STUDY**

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I. INTRODUCTION

Pursuant to the June 1, 2022 *Administrative Law Judge’s Ruling on Energy Division’s Regional Wind Effective Load Carrying Capability Study* (“ALJ Ruling”), Offshore Wind California (“OWC”)¹ respectfully submits the following reply comments on the Regional Wind Effective Load Carrying Capability Study Results for 2024 (“Wind ELCC Study”).² OWC’s reply focuses on the requests for data transparency and clarification around assumptions regarding the effective load carrying capability (“ELCC”) values for offshore wind.

¹ OWC is a nonprofit coalition of industry partners with a shared interest in promoting policies and public support for responsible development of offshore wind power in California. Its board member companies and organizations include Aker Offshore Wind, BP, Equinor, Hexicon, Magellan Wind, Mainstream Renewable Power, Ørsted, Pacific Ocean Energy Trust, Principle Power, RWE, Shell, and SSE Renewables. OWC’s members provide an independent voice and industry expertise to facilitate offshore wind deployment off California’s coast. OWC engages in public education and advocacy efforts to include offshore wind power as part of a comprehensive solution to California’s energy needs. On June 13, 2022, OWC filed a motion for party status concurrently with its comments.

² ALJ Ruling at Appendix A, as revised pursuant to June 9, 2022 *E-Mail Ruling Attaching Energy Division’s Revised Regional Wind Effective Load Carrying Capability Study*.

II. OWC AGREES WITH PARTIES ENCOURAGING GREATER DATA TRANSPARENCY FOR OFFSHORE WIND

OWC joins the other parties requesting greater transparency on wind profile data and the geographic boundaries used for offshore wind.³ Southwestern Power Group II, LLC (“SWPG”) and Pattern Energy Group LP (“Pattern”) raise the issue of data transparency pointing out that “it is not apparent how the wind profiles for the out-of-state or offshore wind regions were developed.”⁴ Relatedly, Cal Advocates explains how the absence of information regarding the locations and boundaries of the wind regions, including for offshore wind, prevents the public from understanding how the regional wind ELCC values were derived.⁵ As Cal Advocates points out, Decision (“D.”) 21-06-029 directed the development of regional wind ELCC values “to inform evaluation and optimal placement of future wind resources.”⁶ In order to meet this objective, details regarding the locations and profiles of offshore wind must be disclosed.⁷

OWC echoes these comments and renews its request that the Commission make available the underlying data and assumptions relied upon to determine the ELCC values for offshore wind. In addition to information regarding offshore boundaries and locations, the public would benefit from the disclosure of assumptions regarding wind plant parameters (*e.g.*, nameplate capacity, turbine size, turbine spacing, etc.) and site characteristics (*e.g.*, annual average wind speed, total area, etc.). These important details are required in order for stakeholders to interpret and effectively rely on the results in the Wind ELCC Study.

³ Pattern and SWPG Opening Comments at 2-3; Cal Advocates Opening Comments at 2-3. Somewhat relatedly, CAISO asks the Energy Division to disclose the regional assignments of California-based resources, which are not apparent from the Wind ELCC Study. CAISO Comments at 2.

⁴ Pattern and SWPG Opening Comments at 3.

⁵ Cal Advocates Opening Comments at 2.

⁶ Cal Advocates Opening Comments at 2-3 (citing D.21-06-029 at 43-45).

⁷ Cal Advocates Opening Comments at 2.

III. CONCLUSION

For the foregoing reasons, OWC respectfully asks the Commission to direct Energy Division to release the assumptions and data supporting the values put forth in the Wind ELCC Study.

_____/s/_____
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