



California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission DOCKETED 12-EPIC-01
TN 72573 FEB 13 2014

Re: Docket No. 12-EPIC-01
2015-2017 EPIC Program Comment Submittal

February 13, 2014

On behalf of the California State University (CSU) Council on Ocean Affairs, Science & Technology (COAST), I am pleased to submit comments to the California Energy Commission on the 2015-17 Electric Program Investment Charge (EPIC) Program 2015-17 Second Investment Plan. COAST represents the interests of hundreds of marine science researchers and educators within the CSU, the nation’s largest public university system. Our members’ areas of expertise span all aspects of marine biology and ecology and are specifically applicable to advancing our understanding of the effects of marine renewable energy technology on the marine and coastal environments.

We applaud California’s leadership in the development of clean energy technologies and the envisioned transition from fossil fuels to renewable sources of energy. Overall we support the Program’s goals of providing funding for applied research and development, technology demonstration and deployment, and market facilitation for clean energy technologies. We are confident that California will lead the rest of the nation forward along the pathway to clean, sustainable energy sources.

My comments relate to Local Regulatory and Permitting Challenges (questions for Panel 3 of the Feb. 7, 2014, webinar presentation) and a request for funding for scientific research on the impacts of marine renewable energy technology on the marine environment. There will be opposition to marine renewable energy technology (offshore wind, wave and tidal energy conversion) at local levels, and there will be planning and permitting challenges ranging from local to national levels. We feel strongly that many of these barriers may be effectively pre-empted by quality scientific research on the effects of marine renewable energy technology on marine life and the marine environment (e.g., the substrate, benthic habitat structure, pelagic species, marine mammals, turtles, birds and coastal geomorphology). With sufficient knowledge of the effects, actions can be taken to reduce or eliminate potential negative impacts. This will be critical in moving these technologies from development to demonstration to large-scale deployment and commercial use. Thus we strongly urge that the 2015-17 Second Investment Plan include adequate funding for scientific research on the impacts of marine renewable energy technology on the marine environment.

This work will meet a critical need for planning and permitting marine renewable energy technology that currently remains unaddressed: what are the impacts of these technologies on the marine environment? The results of this work should be made available on a broad scale so that they constitute a useful and critical tool for technology developers, regional/local planners and permitting agencies to facilitate planning, permitting, and implementation of clean energy facilities and technologies. Specifically they could be used to fast track deployment of these technologies and identify preferred areas for distributed generation.

The benefits of this type of research are broadly applicable. Marine renewable energy technology developers will benefit from increased scientific information available to them when they apply for permits. Additionally, they may be able to incorporate design elements into the technology itself that minimize or eliminate negative impacts. Coastal and marine resource managers will benefit from increased knowledge as well and may be able to recommend locations for projects that minimize unnecessary damage to vulnerable marine and coastal species and habitats. Ultimately, this benefits ratepayers by providing them with clean sources of energy that cost less directly and ultimately benefit the environment through reduced GHG emissions.

We stress the need for transparent, open competition for Program funds as investments are made. All interested parties should have the opportunity and ample time to submit competitive proposals for independent third party review. We feel strongly that transparency and equity of opportunity are critical to the overall success of the Program and will ultimately benefit the citizens of California.

Thank you again for including marine renewable energy strategies in the Program. This type of forward thinking is critical to our state's ability to successfully meet growing energy demand with clean, sustainable approaches.

Thank you in advance for your consideration of these comments,

A handwritten signature in black ink that reads "Krista Kamer". The signature is written in a cursive, flowing style.

Krista Kamer, Ph.D.
Director