



September 2, 2015

Department of Energy
Office of Energy Efficiency and Renewable Energy

Re: DE-FOA-0001372 - Request for Information: Marine and Hydrokinetic Environmental Monitoring Technologies and Field Testing Opportunities

As the national trade association for all water power technologies, the National Hydropower Association (NHA) represents, through its Marine Energy Council (MEC), all types and stages of marine energy technology, including wave, current (tidal, ocean, and river) and OTEC.

Formed in 2014, the MEC provides the sector a forum to focus attention on the potential growth of emerging technologies, share information among industry members, and discuss the challenges ocean, tidal, hydrokinetic and emerging water technologies face.

Hydropower is the nation's largest source of renewable electricity, and as a whole, the NHA has over 220 members working in both the conventional and marine hydrokinetic (MHK) industries. Members of the MEC include a broad diversity of MHK industry participants, including technology developers, universities, legal and technical consultants and others.

The MEC sincerely appreciates the efforts of the Department of Energy's Office of Energy Efficiency and Renewable Energy (EERE) to promote and invest in the growth of the U.S. MHK industry, and the MEC seeks to work collaboratively with the Water Power Program in pursuit of that goal.

Currently, the MEC views the top priorities for the industry as:

- Technology Performance Levels and Technology Readiness Levels advancement of high potential MHK systems and sub-systems;
- Open water deployments (design, construction and testing of systems at intermediate scale and up, with a focus on high TPL systems); and
- Expansion (increased availability and lower cost) of testing facilities for all MHK resources.

Within those priorities, developing systems and processes that carry the least amount of environmental and stakeholder impact is paramount. However at this juncture and given limited federal funding, advancing generic environmental monitoring technologies, the subject of the above-referenced RFI, seems premature. A wide variety of generation technologies,

accessing a similar variety of MHK resources, are under development. As such, it will be difficult to determine now the monitoring technologies that will be most needed in the future.

As the MHK designs mature and it becomes more apparent which resources will be most desirable, the need for funding monitoring technologies will increase.

There is a critical need for a near-term, sustained, and higher level of federal and private sector support for the marine renewables sector in order to maintain a viable technology pipeline and attract new, innovative entrants. Advancing the development and demonstration of the energy generation technologies carries an immediate and lasting impact to the development of the industry.

We appreciate the opportunity to provide these comments and look forward to continued dialogue with EERE about ways to promote the marine energy industry now and in the future.

Sincerely,

A handwritten signature in cursive script that reads "Linda Church Ciocci".

Linda Church Ciocci
Executive Director