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*Comment Received From: Sonoma Clean Power Authority
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Sonoma Clean Power Comments on the Proposed Amendments to the Definition of Appurtenant & Related Facilities

Additional submitted attachment is included below.



431 E Street
Santa Rosa, CA 95404

sonomacleanpower.org

October 24, 2025

California Energy Commission
715 P Street
Sacramento, CA 95814

Docket No.: 25-RULE-01

Re: Sonoma Clean Power Comments on the Proposed Amendments to the Regulations Related to the Definition of Appurtenant & Related Facilities

Dear California Energy Commission,

Sonoma Clean Power Authority (SCP) appreciates the opportunity to provide comments on the proposed amendments to the definition of appurtenant and related facilities. SCP is the Community Choice Aggregator (CCA) serving Sonoma and Mendocino Counties. To advance climate, renewable energy, and affordability goals, SCP is actively supporting the development of more local geothermal resources through its Geothermal Opportunity Zone (GeoZone). This year, SCP sponsored Assembly Bill (AB) 531, which explicitly enables all geothermal power plants, regardless of size, to utilize the California Energy Commission's (CEC) Opt-In Certification Program (Opt-In).

In creating the Opt-In program through AB 205, the Legislature created a more expedient pathway for permitting clean energy projects. The expediency of the Opt-In is achieved by consolidating permitting requirements, establishing a 270-day approval timeframe, limiting judicial review, and moving decision-making authority to the state. Although the Opt-In program bears resemblance to the CEC's Application for Certification (AFC) process, the scope of Opt-In project eligibility, process requirements, and intention to reduce permitting barriers offers unique benefits to renewable energy development.

SCP encourages the CEC to maximize the flexibility allowed for geothermal project developers in leveraging the Opt-In process, given that these projects face particularly complex barriers spanning multi-phase, multi-authority permitting processes. SCP supports the CEC's intent to align key regulatory definitions. However, it is critical to ensure that amendments do not unintentionally apply the challenges of the AFC process for geothermal projects are not replicated within the Opt-In. SCP specifically appreciates the proposed language, which removes the exclusion of geothermal wells from the definition of "related facility." SCP believes that this is important to ensure different scopes of certification for geothermal under the Opt-In compared to the AFC.

Additionally, SCP encourages the CEC to initiate a separate proceeding specifically focused on defining and articulating how the Opt-In process will run for geothermal projects. A proceeding of this kind would foster new opportunities to expedite review, eliminate unnecessary components, and build cross-agency alignment

while enabling the power sector, industry, and other key stakeholders and leaders to provide essential feedback on how to best address barriers to geothermal development. SCP is grateful for the CEC's continued work to provide clarity within complex regulations and its dedication to advancing renewable energy projects.

Thank you for your time and consideration. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Jorge', with a long horizontal flourish extending to the right.

Adam Jorge
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