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Comments on 26-IEPR-01 and the 2026 Scoping Order

Dear Chair Hochschild and Commissioners:

Thank you for the opportunity to comment on the Draft Scoping Order for the 2026 Integrated Energy Policy Report Update. The proposed scope appropriately identifies three timely and consequential issues: California's electricity demand forecast, geothermal development, and energy equity and environmental justice. These topics are highly relevant to California's clean energy transition and to the public, private, local government, Tribal, utility, and nonprofit entities that will be expected to implement that transition on the ground.

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I support the inclusion of these topics in the 2026 IEPR Update, but I respectfully recommend that the final scoping order more explicitly address the funding and implementation implications associated with each topic. The draft scoping order describes what the CEC will study, but it does not yet clearly indicate how the proceeding will evaluate whether current funding tools, financing structures, and program delivery mechanisms are sufficient to move from analysis to deployment.

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Because the CEC notes that policy recommendations in the 2026 IEPR Update will be based on the record developed in this proceeding, the final scoping order should expressly invite evidence on funding gaps, program design barriers, cost-share constraints, timing mismatches, and capital formation needs affecting project sponsors and communities. This is especially important for stakeholders seeking to implement state priorities through grants, incentive programs, public-private partnerships, and other state-supported funding pathways.

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1. Electricity demand forecast should include funding and infrastructure-readiness implications.

The draft scoping order states that the 2026 IEPR Update will include an updated 15-year electricity demand forecast and scenarios reflecting decarbonization strategies and load growth, including data centers and known load from utility energization applications. That analysis will be more useful if it also identifies the likely funding implications of different load-growth scenarios for transmission, distribution, interconnection upgrades, customer-side flexibility, storage, community resilience, and building or transportation electrification investments.

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For many California entities, the practical question is not only how much load is coming,

but whether current public funding and financing tools are adequate to prepare utilities, local governments, Tribes, ports, school districts, community-based organizations, and private project developers to meet that load reliably and equitably. The final scoping order should therefore direct staff to examine whether existing state and federal funding programs align with the forecasted pace, geography, and type of needed infrastructure investment.

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This would better support project sponsors pursuing funding for grid modernization, resilience hubs, demand flexibility, EV charging, industrial decarbonization, distributed energy resources, and related infrastructure. It would also help identify where California may need new or expanded funding mechanisms to avoid delays between load growth forecasts and project deployment.

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2. Geothermal analysis should address early-stage project finance and deployment risk. The draft scoping order properly includes an assessment of the challenges and opportunities for geothermal development and potential state actions to support in-state geothermal expansion. That is a strong foundation, but the final scoping order should make clear that the assessment includes financing barriers, not just technical or resource issues.

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Available research and stakeholder analysis show that geothermal projects often face high upfront costs, long development timelines, permitting complexity, and limited support for pre-development activities such as exploratory drilling, environmental review, and early feasibility work. If the 2026 IEPR Update does not evaluate these capital access barriers, it may understate the policy changes required for geothermal projects to become realistically fundable and scalable.

I recommend that the final scoping order direct the CEC to evaluate:

Whether current grant amounts are sufficient for early-stage geothermal development.

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Whether California should expand low-interest loans, credit enhancements, risk-sharing tools, or other financing support for geothermal pre-development and commercialization.

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Whether permitting and environmental review timelines are creating financing uncertainty that reduces project bankability.

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Whether state procurement and market signals are aligned with the real timelines and

capital needs of geothermal developers.

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These additions would materially improve the usefulness of the IEPR Update for developers, local jurisdictions, community partners, and other entities seeking to pursue geothermal-related funding and deployment opportunities.

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3. Energy equity should be tied to funding accessibility, not only policy intent.

The draft scoping order states that the 2026 IEPR Update will include CEC progress toward embedding equity and environmental justice in its policies, programs, and activities, consistent with prior IEPR recommendations and the draft JAEDI framework. That topic is essential, but in practice equity outcomes depend heavily on whether funding is accessible, navigable, and structured to reflect the realities of under-resourced applicants.

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The JAEDI framework emphasizes fair distribution of clean energy benefits, centering the voices of Tribes and justice communities, and incorporating nonenergy benefits in public investments. To reflect that framework more fully, the final scoping order should specifically ask how funding programs can better serve disadvantaged communities, Tribes, rural communities, smaller local governments, community-based organizations, and first-time applicants that often lack the staffing, match capacity, data systems, and predevelopment resources needed to compete successfully for funding.

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The final scope should therefore include evaluation of:

Administrative burden and application complexity in energy funding programs.

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Match requirements, reimbursement structures, and cash-flow barriers that can exclude smaller or community-based applicants.

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Whether technical assistance, project development support, and capacity-building funds are adequate to create a fair pipeline of eligible projects.

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How nonenergy benefits, such as health, resilience, workforce, and community stability, can be incorporated into funding prioritization.

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A more explicit focus on funding accessibility would help ensure that energy equity is

reflected not only in principles, but in who can actually secure and deploy public resources.

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4. The final scoping order should better connect planning to implementation. The draft scoping order appropriately notes that the IEPR is used to develop recommendations that conserve resources, protect the environment, provide reliable energy, enhance the economy, and protect public health and safety. To advance those statutory purposes, the final scoping order should include a cross-cutting implementation lens that asks, for each major topic, what actions California should take to unlock deployment at scale through better funding alignment, interagency coordination, and clearer market signals.

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That could include identifying where California should:

Coordinate state planning with federal funding opportunities and agency programs.

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Develop or expand bridge funding, predevelopment funding, revolving funds, or credit support for priority energy projects.

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Improve alignment between CEC analysis, CPUC procurement, utility planning, and local or regional implementation needs.

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Track whether existing programs are producing an equitable geographic and sectoral distribution of awards and benefits.

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Without that implementation lens, the proceeding risks producing strong analysis but limited near-term value for entities trying to finance and deliver real projects.

For these reasons, I respectfully urge the Commission to revise the final scoping order to explicitly incorporate funding implications, program accessibility, and implementation readiness across the demand forecast, geothermal, and energy equity topics. Doing so would make the 2026 IEPR Update more useful to the full range of stakeholders responsible for advancing Californiaâ€™s energy goals and would improve the proceedingâ€™s value as a roadmap for both policy and project delivery.

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Thank you for considering these comments.

Sincerely,

Kristin Cooper
CEO, Grant Management Associates