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**Comments of the Independent Energy Producers Association on
the 2026 IEPR Scoping Order**

Additional submitted attachment is included below.



Independent Energy Producers Association

California Energy Commission
Docket Unit, MS-4
Docket No. 26-IEPR-01
715 P Street
Sacramento, CA 95814

March 25, 2026

RE: 2026 Integrated Energy Policy Report – Scoping Order

The Independent Energy Producers Association (IEPA) writes in support of the Scoping Order for the 2026 Integrated Energy Policy Report (IEPR), and we request consideration of our recommendations. IEPA is California’s oldest independent power trade association, representing the interests of independent developers, owners, and operators of energy generation and storage resources in California’s legislative and regulatory arenas. The results of the IEPR Report are used in policymaking within these arenas; IEPA’s recommendations will ensure the 2026 report accurately reflects the state's electricity demand forecast and geothermal resources.

California’s electricity demand forecast should include all data available from utility energization applications, also referred to in the 2025 IEPR as “known loads.” As the state electrifies the economy, load will not grow only in response to data center buildout but in response to a huge increase in transportation, residential, and industrial electrification. Load that is reported by the utilities but not accounted for in the IEPR will start the cycle of miscalculations and increase the potential of reliability issues, resulting in the purchase of late-stage, expensive, and emission-heavy backup resources. If known loads are excluded from this IEPR, it risks inaccuracies in subsequent modeling and proceedings by other entities, including the California Interconnection System Operator’s (CAISO) Local Capacity and Local Transmission studies and the California Public Utilities Commission’s (CPUC) Integrated Resource Plan (IRP) and Long-Term Procurement Plan (LTPP) proceedings. We respectfully recommend that known loads are included in the 2026 IEPR.

IEP appreciates the focus on geothermal resource development in California in the 2026 IEPR and encourages the inclusion of all geothermal resources in this assessment—conventional and next-generation resources.

The report should assess the challenges to geothermal development including the possibility of overburdening fees and regulations meant for other resources, like oil and gas, that impact geothermal operations.

The data sets included in this IEPR will shape the trajectory of the state's clean energy buildout; the Commission should ensure all information relating to the development of clean energy resources feeds into the report. California has been successful in meeting our clean energy goals. However, today we are faced with building out resources in areas not previously contemplated for energy generation that need to interconnect to an already congested transmission grid. The 2026 IEPR is one of the first steps the state takes to meet the needs of the growing load while reducing emissions. We respectfully request consideration of our comments, and we look forward to participating in the topics proposed in this Scoping Order.

Signed,

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