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Fervo Energy Comments on 2026 IEPR Draft Scoping Order

Additional submitted attachment is included below.



California Energy Commission
Docket Unit, MS-4
Docket No. 26-IEPR-01
715 P Street
Sacramento, CA 95810

March 25, 2026

RE: 2026 Integrated Energy Policy Report Draft Scoping Order

Fervo Energy Company (“Fervo”) appreciates the opportunity to comment on the Draft Scoping Order for the 2026 Integrated Energy Policy Report (“IEPR”) Update. The IEPR plays a foundational role in guiding California energy planning and serves as a foundational input for resource procurement, transmission planning, and long-term reliability assessments across state agencies. Fervo appreciates the CEC’s interest in evaluating the challenges and opportunities for in-state geothermal in the 2026 IEPR Update. To fully understand geothermal’s potential to support California’s goals, however, Fervo strongly encourages the CEC to expand the IEPR scope to **explicitly evaluate the role of out-of-state enhanced geothermal systems (“EGS”), particularly Utah-based and Nevada-based resources.**

Inclusion of these geothermal resources within the 2026 IEPR scope is necessary for the Commission to conduct a meaningful assessment of geothermal development pathways for California. Evaluating in-state geothermal resources in isolation does not allow the CEC to fully understand their relative cost-effectiveness, commercial viability, or system value compared to alternative geothermal resources that are located nearby and capable of serving California load in the near term.

EGS projects in neighboring states such as Utah and Nevada are advancing more rapidly and at lower development risk due to more favorable geology and permitting conditions. These resources may offer comparable reliability and clean energy attributes at lower cost or earlier commercial readiness than certain in-state options. Absent a comparative analysis, the IEPR risks overstating the competitiveness of California-only geothermal development and understating the role that regional geothermal resources could play in meeting the state’s clean energy and reliability objectives.

Accordingly, the IEPR should explicitly include out-of-state EGS resources within its analytical scope to ensure that California’s planning decisions are informed by an assessment of all available clean firm options and their relative costs, benefits, and development timelines.

The following points further detail the specific reasons why explicit inclusion of out-of-state EGS is essential for effective California resource planning:



1. Utah EGS and Nevada EGS are the most viable near-term, clean firm resources capable of meeting California’s reliability needs within the IEPR planning horizon

EGS have advanced beyond the pilot phase and are now commercially deployable within the 2028–2035 planning window relevant to the IEPR. Projects such as Fervo’s Cape Station are expected to deliver utility-scale generation aligned with California’s near-term reliability needs as soon as 2026, providing 24/7, dispatchable, zero-carbon generation with high capacity factors and operational flexibility to meet both peak and off-peak demand.

Unlike other long-lead or emerging clean firm technologies that may not be available at scale within the IEPR timeframe including California EGS, Utah and Nevada EGS represent the most viable clean firm resource capable of near-term deployment at meaningful scale.

These attributes are particularly important given California’s demonstrated reliability challenges. CPUC analysis has identified capacity shortfalls emerging in the 2029–2032 period, driven by load growth and system changes. Clean firm resources that can reliably generate during evening and overnight hours will be critical to addressing these needs.

Given that Utah and Nevada EGS are the most viable EGS resources available within the IEPR planning horizon, the IEPR scope should be expanded to explicitly include these out-of-state resources in order to support realistic and least-cost system planning.

2. Excluding Utah and Nevada EGS risks producing inefficient and unnecessarily costly planning outcomes, as the system may instead attempt to overbuild alternative resources to replicate the reliability and operational benefits that EGS can already provide

The IEPR directly informs CPUC IRP portfolios and CAISO transmission planning assumptions. As a result, resource exclusions at the IEPR stage propagate through the entire planning framework which will create misalignment between planning processes as the IRP and TPP explicitly include out-of-state resources.

Moreover, excluding out-of-state EGS will result in inefficient and costly downstream system overbuild, nonoptimal transmission upgrade pathways, and inaccurate reliability assessments. Therefore, failing to include Utah EGS risks producing system plans that are both more expensive and less reliable than necessary.

Incorporating Utah EGS and associated transmission into California system planning can deliver substantial and quantifiable economic benefits to ratepayers



Independent analysis by The Brattle Group demonstrates that integrating Utah EGS and associated transmission infrastructure into California's system yields significant, measurable economic benefits.

Key findings include:

- Over \$800 million per year in net benefits to CAISO
- Approximately \$1 billion per year reduction in load payments, driven by lower wholesale prices and reduced reliance on imports
- Approximately \$840 million per year reduction in production costs
- Delivery of 15–16 TWh annually of round-the-clock clean energy to California load

These savings are driven by the reduced need for high-cost imports during peak periods, lower system marginal prices due to firm, low-cost generation, and improved utilization of transmission and market integration

Taken together, this evidence demonstrates that including Utah EGS in planning is not only a reliability consideration, but a significant cost-reduction opportunity for California ratepayers.

Conclusion

For the reasons outlined above, the CEC should include out-of-state geothermal resources within the 2026 IEPR scope. Geothermal resources in neighboring states, particularly EGS projects in Utah and Nevada, are demonstrating greater commercial viability and faster development timelines, making them relevant for California planning purposes. Without this comparative context, the IEPR cannot accurately evaluate geothermal's role in a least-cost, reliable clean energy portfolio for California.

Respectfully submitted,

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