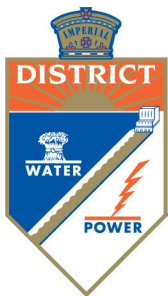


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**Imperial Irrigation District Comment Letter - 2026 IEPR Update -
California Geothermal Resources**

Additional submitted attachment is included below.



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July 22, 2026

California Energy Commission
Docket No. 26-IERP-04
715 P Street
Sacramento, CA 95814-5512

Re: 2026 Integrated Energy Policy Report Update – California Geothermal Resources

The Imperial Irrigation District (IID) appreciates the opportunity to submit these comments in support of geothermal energy development in California as part of the California Energy Commission's 2026 Integrated Energy Policy Report (IEPR) Update.

As California works to achieve its ambitious clean energy, reliability, and decarbonization goals, geothermal energy represents one of the state's most valuable and underutilized resources. The Imperial Valley is home to world-class geothermal resources capable of delivering substantial benefits to California's electric grid, economy, workforce and environment. As a balancing authority, transmission owner, and electric service provider, IID has firsthand experience with the reliability benefits and economic opportunities associated with geothermal resource development. We encourage the Commission to continue supporting policies, investments, and programs that accelerate geothermal energy development and deployment throughout California.

Geothermal energy is uniquely positioned to provide clean, firm generation that is available around the clock and capable of supporting California's growing need for reliable, carbon-free electricity. Unlike intermittent renewable resources such as solar and wind, geothermal generation operates continuously and is largely unaffected by weather conditions or time of day. As California's energy portfolio becomes increasingly reliant on weather-dependent resources, geothermal generation provides resource diversity, operational flexibility, and long-duration reliability benefits that are difficult to replicate with other renewable technologies. These characteristics make geothermal energy an essential component of a resilient, affordable, and increasingly electrified energy future.

Geothermal resources also provide significant resource adequacy value due to its high availability, predictable output, and ability to perform during periods when solar generation is unavailable, and system demand remains elevated. Recent extreme weather events, increasing electrification, and the continued retirement of conventional generation resources underscore the need for additional clean, firm energy resources. California's growing energy needs, including transportation and building electrification, advanced manufacturing, and

data center development, will require reliable sources of 24/7 carbon-free electricity capable of supporting economic growth while maintaining grid reliability. Geothermal energy is one of the few commercially available renewable technologies capable of delivering continuous output regardless of weather conditions, making it a critical component of California's future resource portfolio.

Geothermal energy development also delivers significant environmental benefits. Geothermal power generates electricity with a substantially smaller carbon footprint than conventional fossil-fuel generation and supports California's efforts to reduce greenhouse gas emissions. In addition, geothermal facilities require comparatively small land footprints relative to the amount of energy they produce and can operate for decades with minimal environmental impacts. Expanding geothermal generation will help California achieve its climate objectives while maintaining the reliability needed to support a growing clean energy economy.

The Imperial Valley also offers a unique opportunity to advance California's clean energy and economic development goals through the co-location of geothermal energy production and domestic critical mineral recovery. The Salton Sea Known Geothermal Resource Area contains significant lithium resources that can support direct lithium extraction technologies and help establish a domestic supply chain for battery manufacturing and energy storage technologies. Responsible development of these resources can strengthen energy security, reduce dependence on foreign mineral sources, support California's clean transportation objectives, and create substantial economic opportunities within local communities. The convergence of geothermal energy production and critical mineral recovery represents a nationally significant opportunity to strengthen both California's energy future and the nation's supply chain resilience.

For the Imperial Valley and other geothermal regions, geothermal development is a powerful economic driver. Geothermal projects create long-term investment opportunities, generate local tax revenues, and support economic growth through new infrastructure and energy development. These projects provide stable revenues that support public services, schools, and community improvements while strengthening the region's role as a critical contributor to California's energy future.

Equally important are the workforce benefits associated with geothermal energy. Geothermal facilities create high-quality, family-supporting jobs across a range of occupations, including engineering, construction, operations, maintenance, environmental services, and skilled trades. Many of these positions offer long-term career opportunities that cannot be outsourced and provide pathways for local residents to participate directly in the clean energy economy. Continued geothermal investment will help develop and sustain a highly skilled workforce while supporting workforce training partnerships with local educational institutions, labor organizations, and industry stakeholders.

Geothermal development also presents an opportunity to deliver meaningful benefits to historically underserved communities. Strategic investment in geothermal resources can support workforce development, economic diversification, infrastructure improvements, educational partnerships, and long-term community resilience in Imperial County while advancing California's broader clean energy objectives. As California pursues an equitable energy transition, geothermal development can serve as a model for how clean energy investments can simultaneously advance reliability, affordability, environmental stewardship, and economic opportunity.

IID also encourages the Commission to identify opportunities to improve permitting coordination among state and federal agencies while maintaining appropriate environmental protections. Greater regulatory certainty, efficient permitting processes, and predictable review timelines will support investment and accelerate deployment of geothermal projects needed to meet California's clean energy, reliability, and economic development objectives.

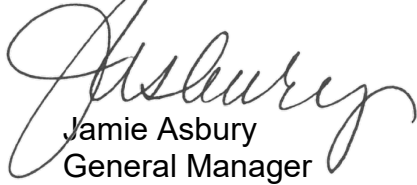
The Imperial Valley is uniquely positioned to contribute to California's clean energy transition through expanded geothermal development. The region possesses exceptional geothermal resources, an experienced workforce, existing energy infrastructure, and a long history of supporting renewable energy production. Strategic investments in geothermal technologies, transmission infrastructure, permitting efficiency, and research and development can unlock substantial additional clean energy capacity while creating significant economic and environmental benefits for California.

Accordingly, IID encourages the Commission to:

- Recognize geothermal energy as a critical clean firm resource necessary to achieving California's reliability, affordability, energy security, and decarbonization objectives;
- Support transmission investments that unlock additional geothermal development in Imperial Valley and other resource-rich regions;
- Promote permitting and regulatory efficiencies that accelerate responsible geothermal deployment while maintaining environmental protections;
- Support research, development, and commercialization of next-generation geothermal and direct lithium recovery technologies;
- Ensure future resource planning appropriately values the reliability, resilience, resource adequacy, economic development, and 24/7 carbon-free energy attributes of geothermal generation, particularly as California plans for increasing electrification and large load growth; and
- Evaluate geothermal energy as a strategic clean, firm resource capable of supporting California's long-term reliability needs, reducing dependence on imported electricity, strengthening domestic supply chains, and serving emerging high-load economic development opportunities.

IID appreciates the Commission's continued leadership in advancing California's clean energy future and looks forward to continued engagement through the 2026 IEPR Update process. California's energy future will require a diverse portfolio of resources that can reliably meet demand while supporting economic growth and decarbonization objectives. Geothermal energy, particularly the world-class resources found in Imperial County, is uniquely positioned to help meet those needs and should remain a priority component of the state's long-term energy strategy.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Asbury".

Jamie Asbury
General Manager

cc: Senator Steve Padilla
Senator Rosilicie Ochoa Bogh
Assemblymember Jeff Gonzalez
Assemblymember Greg Wallis