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Filer:	Shawn-Dai Linderman
Organization:	CALIFORNIA COMMUNITY CHOICE ASSOCIATION
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**STATE OF CALIFORNIA
CALIFORNIA ENERGY COMMISSION**

IN THE MATTER OF:

*2026 Integrated Energy Policy Report
(IEPR) Update*

DOCKET NO. 26-IEPR-04

RE: Geothermal

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS
ON THE IEPR COMMISSIONER TWO-DAY WORKSHOP ON
CALIFORNIA'S GEOTHERMAL ENERGY RESOURCES**

Leanne Bober,
Director of Regulatory Affairs and Deputy
General Counsel
Lauren Carr,
Deputy Director of Regulatory Affairs
Eric Little,
Director of Market Design

CALIFORNIA COMMUNITY CHOICE
ASSOCIATION
1121 L Street, Suite 400
Sacramento, CA 95814
Telephone: (510) 980-9459
E-mail: regulatory@cal-cca.org

July 23, 2026

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I. INTRODUCTION

The California Community Choice Association¹ (CalCCA) submits these comments on the June 19, 2026, and July 9, 2026, *IEPR Commissioner Two-Day Workshop on California's Geothermal Energy Resources*² (Workshop). California continues to make significant strides toward achieving the goals of Senate Bill (SB) 100,³ which requires 100 percent of retail electricity sales to be supplied by renewable and zero-carbon resources by December 31, 2045. The Workshop highlighted that geothermal resources offer a promising opportunity to advance California toward achieving SB 100. As a clean firm resource, geothermal's consistent output

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, Valley Clean Energy, and WestLight Energy.

² Docket No. 26-IEPR-04, *IEPR Commissioner Two-Day Workshop on California's Geothermal Energy Resources* (June 19, 2026 and July 9, 2026), <https://www.energy.ca.gov/event/workshop/2026-06/iepr-commissioner-two-day-workshop-californias-geothermal-energy-resources> and <https://www.energy.ca.gov/event/workshop/2026-07/iepr-commissioner-two-day-workshop-californias-geothermal-energy-resources>.

³ SB 100 (De León, Chapter 312, Statutes of 2018), https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100.

profile can support cost-effective decarbonization.⁴ Community choice aggregators (CCAs) are committed to developing new resources to accelerate the state’s clean energy buildout and support California’s reliability goals,⁵ and are actively exploring geothermal opportunities as a tool to accomplish these objectives.⁶

The Workshop also highlighted that geothermal resources face development challenges that the California agencies and stakeholders should seek to address. Given there is significant existing demand and interest in geothermal resources in California, state agencies should now focus on actions that will increase the availability of geothermal supply rather than imposing any additional geothermal-specific procurement mandates. These actions include looking at state-level barriers to resource development, such as financing challenges, specific permitting issues, and transmission infrastructure needs. Preserving procurement flexibility while supporting the

⁴ See, e.g., Long, J., E Baik, JD Jenkins, C Kolster, K Chawl, A Olson, A Cohen, M Colvin, S M Benson, RB Jackson, DG Victor, SP Hamburg, “California needs clean firm power, and so does the rest of the world: Three detailed models of the future of California’s power system all show that California needs carbon-free electricity sources that don’t depend on the weather” (2022), https://www.edf.org/sites/default/files/documents/SB100%20clean%20firm%20power%20report%20plus%20SI_clean.pdf.

⁵ As of November 19, 2025, California CCAs have secured more than 21 GW of new build clean energy resources through long-term PPAs, including 317 MW of geothermal, <https://cal-cca.org/california-ccas-achieve-procurement-milestone-secure-21-gigawatts-of-new-build-clean-energy-resources/>.

⁶ Clean Energy Alliance issued a Geothermal Energy Projects Request for Information in 2026 to “explore options to pursue next-generation geothermal projects that may not be construction-ready today” and “engage with geothermal energy developers, express interest in future/developing geothermal projects, and as a precursor to entering into future, bilateral offer discussions”, <https://thecleanenergyalliance.org/wp-content/uploads/2026/01/CEA-2026-RFI-for-Geothermal-Energy-Projects.pdf>. Sonoma Clean Power is partnering with Sonoma and Mendocino counties and developers to develop 600 MW of next-generation geothermal energy: <https://sonomacleanpower.org/geozone>. California Community Power (CC Power) has executed Geothermal Exploration, Offtake and Development Engagement (GEODE) Agreements with three geothermal developers to encourage and support clean, firm geothermal generation capacity development in California, <https://cacomunitypower.org/cc-power-signs-3-geode-agreements-to-incentivize-california-geothermal-development/>.

development of supply will help avoid unintended pressure on the market that could increase prices, reduce competition, and jeopardize affordability, reliability, and clean energy objectives.

II. CCAS ARE ACTIVELY SEEKING TO ADD GEOTHERMAL TO THEIR PORTFOLIOS

CalCCA's members have been actively soliciting geothermal resources for several years to fulfill their clean energy needs in a reliable and affordable manner.⁷ Their interest in geothermal stems primarily from its ability to provide clean energy in all hours, including those that are hard to decarbonize (*e.g.*, non-daylight hours). Based upon forecasts of geothermal costs and the assumption of resource availability, many CCAs have included geothermal resources in their Integrated Resource Plans (IRPs).

III. SEVERAL CHALLENGES AFFECT GEOTHERMAL DEVELOPMENT

Despite strong interest in developing geothermal resources, CCAs have had difficulty finding developers that are ready to commit to the investment needed to bring a geothermal plant to commercial operation.⁸ There are several factors that may be contributing, including: (1) lack of commercial readiness; (2) lack of transmission and deliverability in viable locations; (3) licensing and permitting challenges; (4) development risks in new geothermal fields; and (5) political uncertainty.

The market is already taking steps to address these challenges. For example, in response to the lack of commercial readiness, several CCAs have begun working on pre-commercial

⁷ CalCCA reviewed the websites of its members dating back to 2018 (with most between 2020 and present) and found 26 solicitations involving 15 CCAs (either jointly or individually) that conducted request for offers (RFO) seeking geothermal resources. In addition, many CCAs pursue direct bilateral negotiations with resources in addition to RFOs, which may well increase the number of CCAs soliciting geothermal.

⁸ The California Independent System Operator's (CAISO) interconnection queue currently only has two geothermal resources with capacity of just 62.435 megawatts. *See* CAISO, *Public Queue Report* (CAISO, July 20, 2026), <https://www.caiso.com/library/public-queue-report>.

agreements to continue progress necessary to develop geothermal and ultimately lead to commercial operation.⁹ In addition, there are actions that state agencies can take to help encourage geothermal development by targeting barriers these resources face. These include permitting streamlining for resource confirmation activities, funding to derisk early project development investment and drive savings to ratepayers, and improvements to transmission planning to better align with the timelines, locations, and needs of these resources.

IV. CALIFORNIA SHOULD FOCUS ON SUPPORTING THE DEVELOPMENT OF SUPPLY RATHER THAN PRESCRIPTIVE TECHNOLOGY-SPECIFIC PROCUREMENT MANDATES

Because these challenges will take time to resolve, and because geothermal supply cannot expand immediately to meet California’s growing demand, CCAs are concerned that regulatory procurement mandates may not reflect what is achievable in the market. Mandating procurement of specific resources and/or attributes possessed by only a specific type of resource is likely to place upward pressure on prices, increase compliance costs, and make it more difficult for LSEs to satisfy regulatory obligations.

Accordingly, California agencies should not adopt prescriptive geothermal—or other technology-specific—procurement requirements. Such mandates risk increasing costs, reducing procurement flexibility, and potentially undermining, rather than advancing, the State’s affordability, reliability, and clean energy objectives. As shown above, demand for these resources already exists and is not the barrier slowing geothermal development. Instead, state agencies should focus their actions on supporting the supply of resources needed to advance

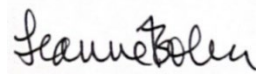
⁹ For example, Clean Energy Alliance issued a Geothermal Energy Projects Request for Information in 2026 to “explore options to pursue next-generation geothermal projects that may not be construction-ready today” and “engage with geothermal energy developers, express interest in future/developing geothermal projects, and as a precursor to entering into future, bilateral offer discussions, <https://thecleanenergyalliance.org/wp-content/uploads/2026/01/CEA-2026-RFI-for-Geothermal-Energy-Projects.pdf>.”

clean energy and reliability objectives through actions such as proactive transmission planning, limiting permitting delays/barriers, and other actions.

V. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of the comments herein and looks forward to an ongoing dialogue with the Commission and stakeholders to support geothermal development.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leanne Bober", is written over a light gray rectangular background.

Leanne Bober,
Director of Regulatory Affairs and Deputy
General Counsel

CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

July 23, 2026