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County of Imperial Comments - Geothermal Resources

Additional submitted attachment is included below.

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July 23, 2026
California Energy Commission
Docket # 26-IEPR-04
715 P Street, Sacramento, CA 95814

County of Imperial Comments Regarding the 2026 Integrated Energy Policy Report Update - Geothermal Resources

Dear Chair Hochschild and Commissioners:

The County of Imperial appreciates the opportunity to provide comments on the California Energy Commission's 2026 Integrated Energy Policy Report (IEPR). We commend the Commission for recognizing the increasingly important role geothermal energy will play in achieving California's goals for grid reliability, affordability, and decarbonization.

Introduction

As electricity demand continues to grow from transportation electrification, advanced manufacturing, artificial intelligence, data centers, and industrial development, clean firm renewable energy will become increasingly critical to maintaining a resilient electric system.

For more than forty years, geothermal facilities operating across multiple Known Geothermal Resource Areas (KGRAs) in Imperial County have reliably supplied clean, renewable baseload electricity to California's electric grid. Commercial geothermal generation currently occurs in the Salton Sea KGRA, Heber, South Brawley, and East Mesa geothermal fields, demonstrating that geothermal development is not confined to a single resource area, but is a defining characteristic of Imperial County's energy economy. Collectively, these producing geothermal fields, together with additional identified geothermal resources, position Imperial County as one of California's most strategically important regions for clean firm renewable energy.

The County is also advancing the **Lithium Valley Specific Plan (LVSP)**, a comprehensive planning framework for approximately 52,000 acres in the Northend of our County that supports the development of a vertically integrated ecosystem for geothermal energy, critical minerals, advanced manufacturing, research and innovation, and supporting infrastructure. While the LVSP represents a transformative opportunity for the region, it is important to recognize that it builds upon a much broader countywide geothermal foundation.

Imperial County's geothermal resources extend well beyond the boundaries of the LVSP and have supported commercial power generation for decades across multiple producing geothermal fields.

The County respectfully offers the following recommendations to strengthen the IEPR and California's long-term geothermal strategy. Collectively, these recommendations are intended to strengthen California's long-term geothermal strategy by accelerating responsible geothermal development, improving grid reliability, enhancing investment competitiveness, strengthening domestic critical mineral supply chains, and recognizing the unique role geothermal-producing regions play in advancing the state's energy, economic development, and national security objectives.

Geothermal Is More Than Renewable Energy. It Is Strategic Infrastructure.

California's transition to a reliable, affordable, and carbon-free electric grid increasingly depends on resources capable of delivering electricity regardless of weather conditions or time of day. While solar and wind remain essential components of the state's clean energy portfolio, geothermal provides unique system benefits that cannot be readily replicated by other renewable resources. Its ability to provide continuous carbon-free generation, high-capacity factors, resource adequacy value, operational flexibility, and long operating lifespans makes geothermal a foundational component of California's evolving energy system. In addition, geothermal projects have a comparatively small land footprint relative to their energy output, allowing significant clean energy generation while minimizing surface disturbance. In Imperial County, this small footprint is especially significant because it allows for the co-production of both agriculture and geothermal energy in the same area.

The County appreciates that the IEPR recognizes geothermal's growing role in meeting California's long-term reliability, affordability, and decarbonization objectives. However, the County encourages the Commission to further strengthen this discussion by recognizing geothermal not simply as another renewable generation resource, but as strategic infrastructure that advances multiple statewide priorities simultaneously. Beyond providing reliable clean firm renewable energy, geothermal strengthens domestic critical mineral production, manufacturing, workforce opportunities, and California's long-term competitiveness.

Accordingly, the County encourages the Commission to consistently evaluate geothermal through this broader strategic lens throughout the IEPR and to prioritize policies that recognize its unique contribution to California's energy security, economic prosperity, and long-term resilience.

California Must Compete for Investment

The County recognizes that western states are actively competing to attract geothermal development, critical mineral production, and advanced manufacturing through coordinated investments, streamlined permitting, targeted incentives, and long-term policy certainty. As developers evaluate multi-billion-dollar investments, decisions are increasingly influenced not only by the quality of the resource, but also by the overall investment climate, including permitting timelines, regulatory predictability, transmission availability, procurement opportunities, workforce readiness, and supporting infrastructure.

California possesses some of the world's most valuable geothermal and critical mineral resources. However, resource availability alone is no longer sufficient to secure investment. Developers must also have confidence that projects can move through the regulatory process efficiently, access reliable markets, and compete within a stable and coordinated policy environment.

The County recognizes California's longstanding commitment to rigorous environmental review and public engagement, both of which remain essential to responsible project development. At the same time, opportunities exist to improve coordination among agencies, reduce unnecessary duplication, and provide greater regulatory certainty without compromising California's environmental standards. These improvements can shorten development timelines, reduce project risk, and strengthen California's competitiveness for private investment.

The IEPR provides an important opportunity to recommend policies that position California as the preferred location for geothermal and critical mineral investment. By better aligning permitting, procurement, infrastructure planning, and implementation, California can accelerate geothermal deployment while capturing the broader economic benefits associated with domestic manufacturing, resilient supply chains, and high-quality jobs.

California Should Prioritize California Generation

As the Commission evaluates California's long-term resource portfolio, the County encourages greater emphasis on developing and procuring clean firm renewable energy generated **within** California. The state should also recognize the unique statewide benefits that accompany investments of in-state generation.

Developing California's geothermal resources delivers benefits that extend well beyond electricity generation. Investments in geothermal generation support permanent family-supporting careers, generate local and state tax revenues, strengthen workforce development, expand transmission infrastructure, encourage advanced manufacturing, support domestic critical mineral production, attract private investment, and create long-term economic opportunities for rural and disadvantaged communities. In addition, projects developed within California are subject to the state's comprehensive environmental review, permitting, and labor standards, ensuring that the economic and environmental benefits of these investments remain within the state.

Imported electricity may continue to be a necessary component of a reliable western grid as well as a path for providing valuable operational flexibility. However, imported generation does not deliver the same long-term economic, workforce, infrastructure, and supply chain benefits that accompany investment in California's own clean energy resources. As California continues investing in the transition to a carbon-free electric system, consideration should be given not only to the cost of electricity, but also to the broader public benefits created by where that electricity is generated.

California has made substantial public investments to establish itself as a global leader in clean energy innovation. Maximizing the value of those investments means creating policies that require **in state procurement** of California's abundant geothermal resources, not allowing long-term power purchase agreements to be made across state lines, which disincentivizes California geothermal development. Procurement of in state generation will strengthen grid reliability, reinforce domestic supply chains, support high-quality jobs, and ensure that the economic benefits of the state's clean energy transition are realized by California's communities.

Imperial County Represents a Statewide and National Opportunity

Imperial County's geothermal resources represent one of California's most strategically important energy assets. Unlike many regions that continue to evaluate geothermal potential, Imperial County has supported commercial geothermal production for more than four decades across multiple producing geothermal fields, including the Salton Sea KGRA, Heber, South Brawley, and East Mesa. This diversified geothermal footprint

provides California with a mature geothermal resource supported by existing generation facilities, transmission infrastructure, experienced operators, a skilled workforce, and decades of permitting and operational expertise.

Building upon this foundation, the County is advancing the Lithium Valley Specific Plan (LVSP), a comprehensive planning framework for approximately 52,000 acres surrounding the Salton Sea area. The LVSP is designed to support a vertically integrated ecosystem that combines geothermal energy production, direct lithium extraction, critical mineral processing, advanced manufacturing, research and development, workforce training, and supporting infrastructure within a single coordinated planning area. This integrated approach represents a significant opportunity to strengthen domestic supply chains and provide transformational opportunities to a region that faces over 17% unemployment and 21% poverty, all while reinforcing California's leadership in clean energy innovation.

Imperial County's unique combination of established geothermal operations, abundant critical mineral resources, comprehensive regional planning, existing transmission infrastructure, and a growing innovation ecosystem positions the region as both a statewide and national model for integrated clean energy development. By recognizing and investing in regions capable of delivering multiple strategic outcomes simultaneously, California can accelerate deployment of baseload power, strengthen domestic critical mineral supply chains, improve long-term grid reliability, while enhancing the state's economic competitiveness.

Geothermal as a Statewide Economic Development Strategy

California has historically evaluated geothermal primarily through the lens of electricity generation. While the ability to provide reliable clean baseload energy remains geothermal's most fundamental contribution, the resource should also be recognized as a catalyst for economic development, industrial growth, and long-term statewide competitiveness. The transition to a carbon-free economy will require more than new sources of electricity. It will require integrated investment in domestic supply chains, advanced manufacturing, workforce development, infrastructure, and innovation.

Few industries are positioned to simultaneously advance California's energy, climate, manufacturing, workforce, economic development, and national security objectives. Geothermal should be evaluated not simply as an electricity resource, but as foundational economic infrastructure capable of supporting multiple statewide priorities simultaneously. These interconnected benefits distinguish geothermal from many other renewable energy resources and significantly expand its statewide value.

The County encourages the Commission to broaden the framework used to evaluate geothermal throughout the IEPR and in future energy planning efforts. Geothermal should be considered not only as a generation resource, but also as foundational infrastructure that supports California's industrial competitiveness, strengthens domestic critical mineral supply chains, advances energy security, and promotes resilient regional economies.

Accordingly, future state investments should prioritize projects and regions capable of delivering multiple statewide policy objectives through the coordinated development of clean firm renewable energy, critical minerals, advanced manufacturing, workforce development, transmission infrastructure, and innovation. Evaluating geothermal through this broader strategic lens will better position California to maximize the long-term economic, environmental, and reliability benefits of one of its most valuable natural resources.

Prioritize Strategic Clean Energy Regions

The County encourages the Commission to prioritize investment in regions capable of advancing multiple statewide policy objectives through coordinated development. California's limited public resources will have the greatest impact when directed toward areas that already possess the foundational assets necessary to accelerate deployment of clean energy, strengthen domestic supply chains, and support long-term economic growth.

Regions possessing significant geothermal resources, critical minerals, transmission infrastructure, comprehensive planning, and demonstrated implementation capacity offer the greatest opportunity to maximize public investment. Concentrating investments in these strategically positioned regions allows the state to leverage existing infrastructure, institutional expertise, and industry partnerships while reducing barriers to project development and improving overall implementation efficiency.

The County encourages the Commission to consider planning frameworks, such as those proposed through AB 2163, that identify Strategic Clean Energy and Critical Mineral Development Zones using objective statewide criteria. Considerations such as geothermal potential, critical mineral resources, transmission availability, comprehensive land use planning, and regional implementation capacity can help identify locations where coordinated state investment is most likely to achieve significant long-term benefits.

Once identified, these strategic regions should receive coordinated support across state programs, including transmission planning, infrastructure investment, workforce development, permitting assistance, research and commercialization, manufacturing, economic development, and implementation funding. Aligning these investments through a unified regional strategy will improve interagency coordination, reduce duplication, accelerate project delivery, and maximize the return on public investment. By concentrating resources in regions where multiple strategic assets already exist, California can simultaneously advance grid reliability, clean baseload energy deployment, domestic critical mineral production, manufacturing, workforce development, and resilient regional economies, achieving greater economic and environmental outcomes than fragmented investments pursued independently across multiple programs.

California Must Modernize Geothermal Permitting

California's ability to accelerate geothermal development depends not only on the quality of its resource base, but also on the efficiency and predictability of its permitting framework. While California has established rigorous environmental review processes that protect natural resources and ensure meaningful public participation, opportunities exist to improve coordination among agencies, reduce unnecessary duplication, and better leverage the expertise of experienced local jurisdictions.

Under the current regulatory framework, geothermal projects meeting statutory thresholds are generally subject to the California Energy Commission's Application for Certification (AFC), Opt-in Program, or Small Power Plant Exemption (SPPE) processes, regardless of whether the local jurisdiction has decades of experience permitting geothermal development. Although these processes serve an important statewide purpose, they can, in some circumstances, duplicate technical analyses and public processes already completed at the local level, extending project timelines and increasing development costs without providing corresponding public benefits.

Imperial County has permitted and supported commercial geothermal development for more than forty years across multiple producing geothermal fields. During that time, the County has developed substantial institutional expertise through geothermal-specific planning policies, comprehensive CEQA analyses,

coordinated infrastructure planning, public engagement, Tribal and agency consultation, and regional workforce and economic development initiatives. This experience demonstrates that qualified local jurisdictions can serve as valuable permitting partners while maintaining California's high environmental standards. Accordingly, the Commission should continue evaluating opportunities to expand the role of local governments that have demonstrated the technical capacity and institutional experience necessary to support responsible geothermal development. Leveraging local expertise earlier in the permitting process can improve coordination, reduce unnecessary duplication, and allow the Commission to focus its resources on statewide policy issues, interagency coordination, and projects requiring broader state oversight.

Expand The Use of Environmental Tiering

The County also encourages the Commission to expand the use of environmental tiering and other tools that build upon previously completed environmental analyses. Where counties have adopted geothermal-specific plans or completed comprehensive programmatic CEQA reviews evaluating future geothermal development, those analyses should be utilized to the fullest extent practicable rather than revisiting issues that have already been thoroughly evaluated.

This recommendation is not intended to reduce California's environmental protections. Rather, it is intended to improve the efficiency and predictability of environmental review by allowing project-level analyses to focus on site-specific impacts while relying on prior programmatic analyses for issues that have already been comprehensively addressed. This approach maintains California's rigorous environmental standards, reduces unnecessary duplication, shortens permitting timelines, and provides greater certainty for project developers, agencies, and the public alike.

Modernizing geothermal permitting in this manner will strengthen California's competitiveness for investment while preserving the environmental safeguards that have long distinguished the state's approach to responsible energy development.

Procurement Must Support California's Long-Term Energy Goals

The IEPR appropriately recognizes that expanding geothermal energy will be essential to achieving California's long-term reliability, affordability, and decarbonization objectives. Realizing those objectives, however, will require procurement policies that provide sufficient market certainty to support investment in new geothermal generation.

Although California has consistently identified geothermal as a critical component of its long-term resource portfolio, developers continue to face uncertainty regarding future procurement opportunities. Without long-term power purchase agreements or other reliable offtake mechanisms, developers are often unable to secure the financing necessary to construct new facilities. As a result, a gap can emerge between California's long-term planning objectives and the successful deployment of new geothermal projects.

The County encourages the Commission to **recommend procurement strategies** that provide greater long-term certainty for geothermal energy resources. Aligning procurement policies with California's long-term resource planning objectives will provide developers, utilities, and investors with the confidence needed to advance projects from planning to construction. The Commission should also support implementation of the Central Procurement Entity (CPE) established by AB 1373, which was created to provide an alternative procurement framework for resources that deliver significant statewide benefits but may face barriers under conventional procurement structures. By providing a more flexible procurement approach, the CPE has the potential to advance geothermal and other strategically important clean energy resources. Although AB 1373

was enacted nearly three years ago, implementation of the CPE has yet to advance in a manner that provides meaningful certainty to the market. Greater clarity regarding the implementation timeline and procurement process would help developers, utilities, and investors make informed long-term investment decisions.

Procurement decisions should also recognize the full public value of geothermal generation. Beyond delivering reliable renewable energy and resource adequacy benefits, geothermal investments strengthen grid resilience, improve transmission efficiency, support domestic critical mineral production, advance workforce development, attract private investment, foster advanced manufacturing, and generate long-term economic opportunities for California communities. These broader public benefits distinguish geothermal from many other generation resources and should be appropriately reflected in procurement frameworks and resource planning.

Strengthening Domestic Supply Chains

California's clean energy transition depends not only on expanding electricity generation, but also on **building resilient domestic supply chains** capable of supporting the technologies that will power the state's future economy. Geothermal development presents a unique opportunity to advance both objectives simultaneously by producing reliable clean firm renewable energy while supporting the domestic production of critical minerals and the industries that depend upon them.

Imperial County is uniquely positioned to support the development of an integrated domestic ecosystem encompassing geothermal energy production, direct lithium extraction, critical mineral processing, battery materials manufacturing, advanced manufacturing, energy storage technologies, battery recycling, research and innovation, and workforce development. The close geographic proximity of these complementary industries creates opportunities to reduce transportation costs, improve operational efficiency, leverage shared infrastructure, accelerate innovation, and strengthen the resilience of domestic supply chains.

Developing these industries as an integrated regional ecosystem provides benefits that extend well beyond the sum of their individual components. Co-location encourages collaboration across the value chain, creates economies of scale, attracts additional private investment, and supports the development of a skilled workforce capable of serving multiple sectors. It also reduces reliance on international supply chains for strategically important materials while reinforcing California's leadership in clean energy technologies.

The County encourages the Commission to recognize the **strategic value of integrated clean energy and critical mineral ecosystems** within the IEPR and to support policies that encourage the coordinated development of complementary industries wherever practical. Aligning energy planning with domestic supply chain development will strengthen California's economic competitiveness, improve long-term energy security, and maximize the public benefits of investments in geothermal and critical mineral resources.

Establish a California Geothermal Competitiveness Initiative

The County of Imperial recommends that the California Energy Commission lead the creation of a statewide **California Geothermal Competitiveness Initiative** to strengthen coordination among agencies responsible for energy planning, permitting, procurement, transmission and infrastructure investment, workforce development, economic development, and domestic supply chain strategy. California possesses world-class geothermal resources. Maximizing their potential will require a coordinated, cross-agency approach that aligns policy, investment, and implementation.

The Initiative should convene leadership from the California Energy Commission (CEC), California Public Utilities Commission (CPUC), California Independent System Operator (CAISO), Governor's Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank), California State Transportation Agency (CalSTA), and other relevant state and federal partners to identify practical actions that accelerate responsible geothermal development while strengthening California's long-term energy security and economic competitiveness.

Equally important, elected officials and senior leadership from counties containing significant geothermal resources should have a permanent seat at the table throughout these discussions.

Too often, statewide policies affecting permitting, procurement, infrastructure investment, workforce development, environmental review, and implementation are developed without meaningful participation from the local jurisdictions ultimately responsible for carrying those policies forward. Counties are not simply stakeholders. They are permitting authorities, infrastructure providers, emergency responders, workforce partners, and the communities where these projects are planned, constructed, and operated. Their experience provides practical insight into how statewide policies are implemented on the ground.

Local governments also possess decades of institutional knowledge gained through environmental review, land use planning, public engagement, Tribal consultation, infrastructure coordination, economic development, and project implementation. That implementation expertise is an essential component of effective statewide policymaking. Engaging counties early in the policy development process will help identify implementation challenges before they become barriers, improve coordination among state and local agencies, reduce regulatory uncertainty, and ensure that statewide policies are informed by real-world project delivery.

The County believes that **the most effective energy policy is developed with local governments, not merely for local governments.** Establishing a standing forum where state agencies and local jurisdictions collaborate as long-term partners will produce more practical policies, improve implementation, accelerate responsible geothermal development, and strengthen California's competitiveness for private investment.

Imperial County stands ready to serve as a statewide pilot region for collaborative geothermal planning, permitting innovation, and integrated clean energy and critical mineral development.

The County welcomes the opportunity to partner with the Commission and other state agencies to help shape future geothermal policy, pilot innovative approaches to coordinated implementation, and share lessons learned that can be replicated across California's geothermal-producing regions. By working together, California can accelerate geothermal deployment, strengthen domestic critical mineral supply chains, improve long-term grid reliability, and reinforce the state's position as a global leader in clean energy innovation.

Recommendations

The County respectfully encourages the Commission to incorporate the following recommendations into the 2026 Integrated Energy Policy Report:

1. **Establish a California Geothermal Competitiveness Initiative** - inclusive of County leadership
2. **Recognize geothermal as strategic renewable energy infrastructure** essential to California's long-term reliability, affordability, decarbonization, energy security, and economic competitiveness.
3. **Strengthen procurement policies** that provide long-term market certainty for geothermal development and appropriately recognize geothermal's full public value, including resource adequacy,

resiliency, domestic supply chain development, critical mineral production, workforce development, and economic benefits.

4. **Modernize California's geothermal permitting framework** by expanding collaboration with experienced local jurisdictions, reducing duplicative review, maximizing the use of environmental tiering, and leveraging existing programmatic environmental analyses where appropriate.
5. **Prioritize California-generated geothermal energy** whenever reasonably feasible to support grid reliability, strengthen domestic supply chains, create high-quality jobs, and maximize the economic benefits of California's clean energy investments.
6. **Recognize integrated geothermal and critical mineral regions as strategic statewide investment priorities** and support coordinated development of clean energy generation, critical minerals, advanced manufacturing, energy storage, research and innovation, workforce development, and related industries.
7. **Accelerate transmission and enabling infrastructure investments** serving geothermal and critical mineral regions to ensure generation, industrial development, and manufacturing opportunities can be efficiently interconnected and brought online.
8. **Support the continued commercialization of geothermal innovation**, including direct lithium extraction, next-generation geothermal technologies, and other emerging technologies that strengthen California's clean energy and critical mineral leadership.

Closing Statement

For more than forty years, Imperial County has demonstrated that geothermal energy can reliably power California while supporting responsible environmental stewardship, local economic development, and long-term energy reliability. Today, the County of Imperial stands ready to help California achieve an even greater opportunity by integrating geothermal energy, domestic critical mineral production, advanced manufacturing, and resilient supply chains into a comprehensive clean energy ecosystem.

The opportunity before California extends well beyond expanding geothermal generation. It is an opportunity to strengthen grid reliability, improve affordability, reinforce domestic supply chains, create high-quality jobs, and establish global leadership in the integrated development of clean firm renewable energy and critical minerals. With world-class geothermal resources, a mature permitting and operational foundation, and growing public and private investment, California is uniquely positioned to lead this next chapter of the clean energy transition.

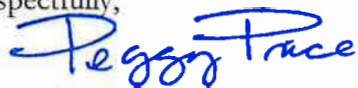
The County encourages the Commission to use the 2026 Integrated Energy Policy Report as a roadmap for advancing geothermal development through coordinated planning, modernized permitting, strategic procurement, infrastructure investment, implementation partnerships, and long-term policy certainty. By aligning these efforts, California can fully realize the environmental, economic, and reliability benefits of its geothermal resources while strengthening its long-term competitiveness and energy security.

Imperial County appreciates the opportunity to provide these comments and remains committed to partnering with the California Energy Commission to advance California's clean energy future. The County welcomes continued collaboration and stands ready to serve as a statewide partner in developing innovative policies and implementation strategies that can be replicated across California's geothermal regions.

Should you have any questions regarding these comments or wish to discuss the recommendations contained in this letter, please contact County of Imperial Assistant CEO, Bari Bean, at BariBean@co.imperial.ca.us

Thank you for your consideration of these comments and for your continued leadership in shaping California's energy future.

Respectfully,

A handwritten signature in blue ink that reads "Peggy Price". The signature is written in a cursive, flowing style.

Supervisor Peggy Price, District 3
Chairwoman, Imperial County Board of Supervisors