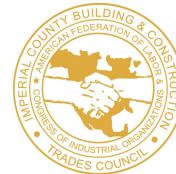


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Updated Joint Stakeholder Comments on Advanced Geothermal Energy

Additional submitted attachment is included below.



Updated Joint Stakeholder Comments on Advanced Geothermal Energy (two co-signers added)

To: David Hochschild, Chair, California Energy Commission,
Noemi Gallardo, Geothermal Resources Development Lead Commissioner, and
Commissioners

From: Coalition of Environmental, Environmental Justice, and Labor Organizations

Date: August 19, 2026

**Re: Docket No. 26-IEPR-04 – 2026 Integrated Energy Policy Report (IEPR) Update:
Geothermal Energy Resources**

On behalf of a broad coalition representing environmental advocacy, environmental justice (EJ), and labor organizations, we submit these comments to the California Energy Commission (CEC) regarding the 2026 Integrated Energy Policy Report (IEPR) Update.

We strongly support evaluating the opportunity to develop responsibly-deployed advanced geothermal energy as a key part of California's effort to achieve a 100% clean energy future. We urge the Commission to recognize advanced or next generation geothermal – including Enhanced Geothermal Systems (EGS) and Closed Loop Geothermal – as a promising renewable-baseload power source. The policy that established the Integrated Energy Policy Report (IEPR) calls on the Commission to:

“conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery, and distribution, demand, and prices. The Energy Commission shall utilize these assessments and forecasts to develop energy policies that conserve resources, safeguard the environment, ensure energy reliability, foster the state’s economy, and protect public health and safety.”¹

Next generation geothermal energy can contribute significantly to these goals.²

Advanced geothermal energy offers a unique value proposition for California’s energy landscape. Among its potential benefits:

- **Conserves resources.** Geothermal energy is a renewable resource. Geothermal harnesses the heat of the earth. It doesn’t deplete natural resources.
- **Safeguards the environment.** Geothermal energy doesn’t pollute. All renewable energy sources, including geothermal, safeguard the environment compared to other potential sources of energy.
- **Ensures energy reliability.** Geothermal energy can contribute to a reliable electric system powered by clean energy because it produces a steady supply of energy 24/7/365.
- **Fosters high road employment.** The skills required for geothermal work are nearly identical to those in the oil and gas sector. Geothermal offers an opportunity for familiar, high road employment for oil and gas workers. The building trade unions strongly support geothermal expansion. This sector offers the potential for high-wage, family-sustaining union careers that utilize the existing skills of California’s fossil energy workforce.
- **Protects public health & safety.** When developed responsibly, geothermal energy can contribute to cleaner air, reliable electricity, and improve public health while supporting California’s long term energy goals.

Rapid scaling of geothermal energy must be pursued within a framework of "Principles of Responsible Deployment." We advocate for the following standards to be included in the 2026 IEPR:

1. **Ensure Environmental Protection:** Projects must adhere to California’s environmental laws and best practices to protect local ecosystems, water resources, and air quality.

¹ Pub. Res. Code § 25301(a)

² <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2023-integrated-energy-policy-report>

2. **Respect Indigenous Lands:** Geothermal development must involve early and meaningful consultation with California indigenous tribes to ensure the protection of tribal land, cultural resources and sacred sites.
3. **Provide Local Community Benefit:** Communities that host geothermal facilities must see direct economic and public health benefits. Development must not impose new burdens on communities but rather serve as a mechanism for local investment and pollution reduction.
4. **Support High-Road Labor Standards:** Geothermal development should create high-quality, family-sustaining union careers and deliver lasting economic benefits to California communities. Projects should promote prevailing wages, registered apprenticeship utilization, strong worker protections, local and targeted hire opportunities, and investments in workforce training. Development should build on the skills and experience of California's existing energy workforce and support the use of skilled and trained workers to help ensure project quality, safety, and reliability.

Thank you for the opportunity to comment and for fostering and collaborating with this coalition of labor, business, environmental and environmental justice groups who are working to positively impact California's energy future.

Respectfully submitted,

Woody Hastings, Phase Out Polluting Fuels Program Director
The Climate Center

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Brightline Defense

Laura Deehan, State Director
Environment California

Jeff Hunerlach, Executive Director
Climate Jobs California

Matt Cremins, Director
CA-NV Conference of Operating Engineers

Vince Sugrue, State Legislative Director
SMART, Sheet Metal Workers' Local Union No. 104
Western States Council of Sheet Metal Workers

Erica Brand, Associate Director, Climate Program

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Mike Hartley, Executive Director
California State Pipe Trades Council

Michael Allen, Secretary/Treasurer
North Bay Building and Construction Trades Council

California State Association of Electrical Workers (CSAEW)

Daniel Machain, Secretary/Treasurer
Imperial County Building Trades Council