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<b>Project Title:</b>	Rulemaking to Amend Regulations for Delegation of Certification Authority
<b>TN #:</b>	242622
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*Comment Received From: Imperial Irrigation District  
Submitted On: 4/11/2022  
Docket Number: 21-OIR-02*

**Imperial Irrigation District's Comments on Notice of Proposed  
Action on Designation of Geothermal Power Plant Siting Authority**

*Additional submitted attachment is included below.*



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April 11, 2022

## **VIA E-COMMENT PORTAL**

California Energy Commission  
Docket Unit  
Docket No. 21-OIR-2  
715 P Street, MS-4  
Sacramento, CA 95814  
[doCKET@energy.ca.gov](mailto:doCKET@energy.ca.gov)

**Subject: The Imperial Irrigation District's Comments on California Energy Commission Docket No. 21-OIR-02: Notice of Proposed Action on Designation of Geothermal Power Plant Siting Authority to Local Government**

Dear Commissioners:

The Imperial Irrigation District (IID) thanks the California Energy Commission (CEC) for the opportunity to submit comments in connection with the Notice of Proposed Action (NOPA), published on February 25, 2022, that would ask the Commission to consider adoption of amendments to the California Code of Regulations (CCR). Such amendments would facilitate the full delegation of the CEC's site certification authority over geothermal power plants to petitioning counties.

IID supports the CEC's proposed amendments to its regulations to streamline the siting of new geothermal resources. IID has long supported the development of geothermal resources as a means of bringing carbon-free, baseload generation to California consumers. As an electric Balancing Authority, IID has facilitated the development of new, geothermal resources, both to meet IID's own consumer needs, but to enable the sale of geothermal power into the broader, California electric marketplace. IID also participates on the Lithium Valley Commission,<sup>1</sup> which analyzes and explores matters and potential incentives involving lithium extraction in California. Such extraction is often linked with operation of geothermal resources.

The amendments proposed by the CEC in the NOPA could help streamline and expedite the development of new geothermal resources in Imperial County. The greater authority

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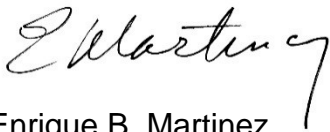
<sup>1</sup> See <https://www.energy.ca.gov/data-reports/california-power-generation-and-power-sources/geothermal-energy/lithium-valley>

for local government to make decisions regarding siting within their respective geographical boundaries would remove obstacles to gathering information necessary to make decisions and would leverage the knowledge of decisionmakers that are more familiar with the areas proposed for geothermal development. Accordingly, IID supports the proposed changes before the Commission.

In considering the proposed, regulatory changes, IID highlights one area for Commission review. Proposed amendments to 20 CCR § 1862(i) would require the petitioning county to describe how it “intends to generate the sources and amount of funding to implement” the siting program. IID respectfully asks the Commission to clarify that, in implementing this provision, the CEC should work to minimize the informational burden and detail required from petitioning counties and their ability to fund their siting certification programs. Instead, the CEC should require counties to provide only that information which is necessary to demonstrate that counties actually intend to follow through on providing a siting program.

IID applauds the Commission for identifying means to expedite the development of energy resources needed for California to meet its energy demands, consistent with California’s renewables policy goals. IID asks that the Commission to accept IID’s support for the regulatory changes set before it in the NOPA.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Martinez", with a stylized flourish at the end.

Enrique B. Martinez  
General Manager