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Comment Received From: Sarah Harper
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Comments Following SB 100 Kickoff Workshop from Fervo Energy

Additional submitted attachment is included below.



September 8, 2023

California Energy Commission
Docket No. 23-SB-100
1516 Ninth Street
Sacramento CA 95814

Via email to docket@energy.ca.gov

Re: Comments Following SB 100 Kickoff Workshop

Fervo Energy would like to thank the Joint Agencies for their proactive efforts in planning for a decarbonized California energy future. As an enhanced geothermal systems (EGS) company, we are developing projects to power our grid with clean, firm, and flexible energy in order to meet the growing demands of the energy transition. California's leadership and continued commitment to a decarbonized grid has spurred nationwide clean energy innovations such as our own. We wish to support California's energy planning efforts in order to meet clean energy targets.

Technological breakthroughs mean we can deploy next-generation geothermal today.

Traditional geothermal power plants have been geographically constrained to regions with highly accessible sub-surface steam and specific geologic conditions. Enhanced geothermal systems solve for these constraints by accessing heat from previously uncommercial "hot, dry rock." Building on decades of prior research, Fervo has demonstrated that EGS is technically feasible, commercially viable, and ready to scale.

In May, Fervo completed a 30-day test of our commercial scale pilot project, called "Project Red," in northern Nevada. This successful well test confirmed our project as the most productive enhanced geothermal system ever and that EGS as a technology is commercially ready. Following the success of this initial demonstration, Fervo is already drilling a nearly 400 megawatt project in southwest Utah, contracted to serve load serving entities in California. We are on track to unlock several gigawatts of power in the coming years and are prepared to serve California with the reliable and flexible power that it needs to complement a decarbonizing grid packed with intermittent renewable energy resources.

Achieving SB100 will require a diverse set of clean resources, including next generation geothermal.

As a clean, firm, and flexible power source, the new and improved EGS serves as a perfect complement to wind and solar, replicating the grid reliability services provided by aging gas



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power plants in California. Given California's particular land use and resource constraints, geothermal energy can provide much-needed clean capacity with minimal impact. Developing robust planning pathways to achieve SB100, California must incorporate the important recent breakthroughs in geothermal.

As we develop projects providing power to California, we face unique hurdles indicative of a growing industry in an established and transitioning energy landscape: exploration risk, uniquely onerous Federal and state permitting, poorly developed capital markets, and moderate to long project development cycles as a "long lead time" resource. Overcoming these hurdles, which have the ability to make or break our project financing, is perfectly feasible with adequate planning such as the efforts in this 2025 SB 100 cycle.

A multi-party workshop to incorporate clean firm resource attributes will strengthen the SB100 planning effort and ensure grid reliability while meeting California's climate goals.

Fervo Energy, our geothermal energy partners, and other clean firm advocates would appreciate the opportunity to convene a workshop that will identify a specific core pathway, objectives, tools, and key inputs for the 2025 SB 100 to adequately reflect and plan for decarbonized clean firm power in the California grid mix. The current SB 100 Report Vision does not currently integrate updated geothermal technology readiness modeling and as such, is missing an opportunity to accurately plan for combustion retirement, resource diversification, and geographic diversification in the coming years. Modeling that incorporates the most up-to-date data on clean firm resources will be imperative if California is truly committed to decarbonizing clean firm power and phasing out aging fossil fuel infrastructure.

Fervo Energy thanks the Joint Agencies for their leadership in shaping a decarbonized grid in California and looks forward to collaborating in the future. Along with our request for a workshop, we stand ready to support California in identifying state policy opportunities to integrate geothermal energy into clean energy planning. We look forward to interfacing in the coming years and collaborating with you to actualize the SB 100 vision for a healthy, beautiful, and decarbonized California.

Sincerely,
Sarah Harper

Policy and Regulatory Affairs Associate
Fervo Energy
Email: sarah.harper@fervoenergy.com