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**IEPA 21-ESR-01 SB 423 Workshop Comments**

*Additional submitted attachment is included below.*



# Independent Energy Producers Association

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California Energy Commission  
Docket No. 21-ESR-01  
715 P Street  
Sacramento, CA 95814

December 1, 2023

## **RE: SB 423 Firm Zero-Carbon Resources Workshop**

The Independent Energy Producers Association (IEP) appreciates the opportunity to submit comments on the SB 423 Firm Zero-Carbon Resources Workshop (“workshop”) held November 17, 2023. IEP has no comments on the preliminary reliability modeling results. However, IEP writes in support of the analysis of SB 423’s definition of “firm zero-carbon resources.”

IEP has a great interest in the analysis of SB 423’s “firm zero-carbon resources” analysis because IEP members supply a diverse range of firm zero-carbon resources that should be included in the SB 423 Report that, ultimately, feeds into the SB 100 Report in December 2024. The analysis offered in the workshop provides clarity to IEP members and sends the right market signals for investment in various firm zero-carbon resources like hydrogen storage, geothermal, and carbon capture.

IEP supports the Commission staff’s analysis of “firm zero-carbon resources” that includes zero-carbon fuels storage, natural gas pairing with carbon capture, and the emphasis on multi-day operations. As IEP members work to build out and maintain firm zero-carbon resources projects, direction from the Commission helps to ensure these projects can continue and increases the likelihood of meeting SB 100’s greenhouse gas emission goals.

IEP looks forward to engaging in the development of the SB 423 and SB 100 Reports, respectively.

Signed,

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