



To: Alex Shin
Permit Coordinator / Senior Planner

From: Kevin Tempest
Research Director
Clean & Prosperous

Date: May 14, 2026

RE: Geothermal Energy Collaborative Process Draft Legislative Update

General Comments

Clean & Prosperous (C&P) works to advance smart clean energy solutions that grow Washington's economy, improve public health, and create a more resilient future. Our organization has played an active role in passing and defending the Climate Commitment Act (CCA), as well as in designing and implementing the Clean Energy Transformation Act (CETA). Earlier this year, our organization published the [Build Sustainable High Impact Infrastructure Together](#) report, which highlights the urgent need to break through clean energy infrastructure bottlenecks to meet climate goals while improving the economy and reducing pollution. Washington cannot meet its economic or regulatory goals while placing last in clean energy deployment.

C&P commends the Legislature for starting the process to explore and better prepare for geothermal energy, and it is encouraging to see forward momentum in a collaborative process across agencies including Ecology, EFSEC, Commerce, DNR, Archaeology and Historic Preservation.

C&P is generally in support of all the Key Draft Recommendations, but feels inclined to emphasize the urgency of the issues facing our power supply and grid that geothermal systems have the potential to substantially lessen. The importance of this technology, which is already being demonstrated in the western United States, means the state and utilities need to be exploring, modeling, planning, and evaluating near-term opportunities with great focus, speed, and collaboration. While C&P appreciates the steps forward through this



process, time is of the essence to turn key recommendations into actions as quickly as possible, even in advance of the legislative directives. Providing ample guidance to the Legislature ahead of the 2027 session should be a priority for state agencies, even as key mapping and resource potential measurements continue.

Background

Geothermal has tremendous potential to be a unique and critical component of meeting steadily increasing power demand with less polluting forms of generation. Our recent [newsletter highlighted](#) the powerful potential of geothermal to accelerate the clean economy here. Among the unique advantages of enhanced or advanced geothermal systems highlighted in our newsletter are:

- A ready workforce of skilled labor, according to a [2024 U.S. Department of Energy \(DOE\) report](#);
- [Innovation throughout](#) the western United States and beyond which, when paired with a ready workforce, could rapidly bring down costs and enable project completion much more quickly than other types of carbon-free electricity;
- Bipartisan federal interest (including the Hot Rock Act, [more about that here](#)) and tax credit eligibility remaining in place through 2035, points to a faster-developing, better-supported, and less politically volatile form of carbon-free electricity than other types Washington state will be adding; and
- Unique combination of characteristics that include clean baseload to complement growth in wind/solar/batteries, [and/or potentially much lower land use and environmental hazards](#), and/or faster timelines to completion, and/or likely faster drop in technology costs than other new, zero-carbon generation.¹

¹ For more discussion, [a white paper from the Center for Public Enterprise](#) is highly recommended, with an excerpt here from the Executive Summary: “That timeline is fast enough to appear in near-term IRP planning windows. For a western utility evaluating firm resource additions, EGS delivers a capacity factor of over 80 percent, zero fuel cost, a 30-year-plus operating life, and eligibility for a 30 percent federal Investment Tax Credit (ITC) that extends through 2035...Measured against coal, the firm-capacity baseline EGS is most likely to displace in western state portfolios, geothermal carries a displacement ratio of approximately 1.8:1 on a carbon-adjusted capacity basis, meaning each MW of EGS retires nearly two MW of equivalent coal obligation. These attributes make EGS among the most capital-efficient firm resource additions to meet load growth in the western U.S. today.”



Despite this, ongoing utility modeling struggles to forecast the potential impact of enhanced or advanced geothermal systems. Among state or regional planning, geothermal remains underexplored and relatively pessimistic. Not preparing for promising, emerging technologies suitable for our region can lead to sub-optimal planning:

- A widely cited [E3 Resource Adequacy](#) study assumes enhanced geothermal is not available until the mid-2030s at pessimistic and rising levelized costs, in turn recommending around 30 GW of new natural gas power plants and emphasizing that “Not allowing new natural gas peaking capacity leads to higher costs with no accompanying emissions benefits”.
- The Pacific Northwest Utilities Conference Committee (PNUCC) recently released the 2026-2036 [Northwest Regional Forecast of Power Loads and Resources](#). This forecast identifies substantial resource gaps that could be met by clean firm load, concluding that “Closing these emerging energy and capacity gaps will require urgent, sustained and coordinated action across the region. Utilities have identified several near-term priorities for collaborative focus”, including “Supporting the development and deployment of emerging technologies.”
- The [Center for Public Enterprise](#) provides recommended IRP modeling parameters for EGS that are “defensible, evidence-based inputs derived from Fervo’s Cape Station data, DOE projections, and NLR’s Annual Technology Baseline,” noting that the cost projections are compelling and the “timeline is fast enough to appear in near-term IRP planning windows.”
- The state’s [Comprehensive Climate Action Plan \(CCAP\)](#) determines that “adopt[ing] enhanced and advanced geothermal energy” is a crucial component of the effort to “Build out transmission and in-state clean energy resources” and “Meet growing energy needs through a combination of electrification and clean fuels”.² Within the CCAP framework:
 - The [Tribal Priority Climate Action Plan Analysis](#) includes recommendations for measures that geothermal development likely would satisfy: (1) Increase deployment of distributed renewables, and (2) Expand utility-scale renewable energy generation.

² The April 2026 CCAP also notes that “enhanced geothermal could reduce reliance on costly diesel generation or distant transmission lines, while offering local job opportunities, community energy ownership models, and improved grid resilience.”



These resources and reports should make clear that advanced and/or enhanced geothermal systems have game-changing potential for our region if we are prepared for and responsive to technology and federal incentives alongside the best possible development practices. These can build off of Ecology's Programmatic EIS process for other technologies and cut across jurisdictions and agencies with lessons applied from other energy facilities including wind, solar, battery storage, and nuclear.

Comments on the Key Recommendations

Draft Legislative Update highlights seven preliminary recommendation topics. C&P, in reiterating these, looks to provide constructive feedback related to the timeline and content of the interim and final reports. C&P emphasizes that the clearer recommendations can be made before the 2027 legislative session begins, the sooner we can make meaningful progress toward generation.

- **Support funding for exploration and development.** There is an unfunded commitment for geothermal exploration from the Legislature. C&P has heard from industry and working groups involved in geothermal systems that resource maps are critical for entering new markets. State agencies have a history of federal funding for measurements and that should be leveraged, along with state funding, including but not limited to Climate Commitment Act revenue, to compile the best possible resource evaluation. A history of state/federal collaboration through DOE includes 2009 and 2015-19 surveys, with ongoing opportunities available through the federal Office of Geothermal. C&P also encourages agencies to seek input from industry on what types of measurements are most meaningful and pursue those. We emphasize the following finding from the draft update:
 - "To provide meaningful support, the funding level need would be in the millions of dollars. Funding exploratory drilling was also recommended by the Interagency Clean Energy Siting Coordinating Council in its 2025 annual legislative report."
- **Expand agency coordination.** C&P would like to see the state continue to collaborate with other states (such as the focused work of the *Geothermal Power Accelerator*). This should include periodic review and update of DNR geothermal lease rates on state lands, which were updated in 2025. With



bipartisan interest and DOE funding for technology, collaboration with federal agencies is an ideal path forward.

- **Update the Washington State Energy Strategy.** This is part of a broader context of better inputs and processes across modeling exercises that includes utility-planning (including IRP and broader resource study and planning), the state's Comprehensive Climate Action Plan, and the State Energy Strategy. It is our view that modeling assumptions have lagged the best, emerging assumptions while sensitivities around timelines and costs have been too narrowly examined. Any energy strategy or model that includes clean power projections and regulations should have a range of defensible geothermal power assumptions. Doing this soon can help the agencies and the state set goals, including through recommendations to the legislature, about geothermal systems deployment in the early 2030s under different cost and resource assumptions. Goal and target setting is an important precursor to more focused and consequential action seen in climate-related policies emerging from established targets or emissions limits.

Within the State Energy Strategy and this Legislative Report, C&P encourages the agencies to provide important context regarding the environmental impacts (footprint and resource intensity) of these technologies relative to alternatives. As these impacts constitute a key concern, understanding the relative tradeoffs is important for clear stakeholder feedback, legislative consideration, and permitting processes. A [recent study](#) pointed out that this technology can aid not only in system costs but also in "reducing land use and infrastructure needs in a global renewable energy transition". Scaling that understanding to Washington is important for policy-makers, stakeholder understanding, and ultimately permitting.

- **Provide guidance and tools.** To complement this toolkit, C&P encourages the development of a Programmatic EIS and clear permitting requirements from EFSEC around enhanced/advanced geothermal systems in particular. The [Center for Public Enterprise](#) has described how commercial-scale facilities can proceed from active development to operational in at least



three to six years, if not quicker. Guidance and tools should help align with that target as well as best learnings from other technologies for public feedback, workforce, and community benefit considerations.

To help communicate this, C&P would like to see the Geothermal Experience webpage continue to be refined and expanded as a tool that also includes updates on funding opportunities, data generated through mapping and exploration, and key information provided for the State Energy Strategy, CCAP, and related research.

- **Improve community and Tribal engagement and outreach / Support use of community and Tribal benefit agreements / Promote Tribal geothermal energy exploration and development.** C&P views these as aligned, sees strong early signs that this process was initiated and continues, and is fully supportive of tribal-led exploration and development. Applying lessons learned from other clean resource development and Tribal grant programs is likely to be instructive. C&P does believe that the context of these technologies alongside alternatives is important to understand relative environmental and resource impacts, and encourages the agencies to prioritize developing that material.

As part of these and other reforms and recommendations, C&P encourages the agencies to review a recently released report from Grid Strategies: [Gap Analysis of Permitting Reforms in California, Illinois, New York, and Washington](#). That report contains both Washington-specific and general review of many topics related to preliminary recommendations in this report which can help better prepare Washington to onboard geothermal energy at scale.

Conclusion

Clean & Prosperous is encouraged to see the state, under legislative guidance and agency leadership, push forward our understanding of emerging geothermal technologies. These "Hot Rocks" sources of power could be foundational to more cost-effective and lower environmental impact pathways that meet state clean power and greenhouse gas reduction targets. One way or another, the state is going to need to dramatically increase the pace of clean power build to keep our



economy both prosperous and clean. These geothermal technologies have huge untapped and rapidly evolving potential to accelerate this process, assuming the state and utilities are prepared. Better modeling, supported by in-depth exploration along with streamlined and robust permitting processes can ensure the state and local communities are prepared to reap the benefits. In these comments, C&P hopes that we have provided useful background material and recommendations to help continue - or even accelerate ahead of the 2027 legislature - next steps towards meaningful geothermal energy development. As the process unfolds, the C&P team looks forward to staying closely engaged.