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Mainspring Energy Comments on RPS Guidebook Update - 10th Edition

See attached letter.

Additional submitted attachment is included below.

Mainspring Energy
3601 Haven Avenue
Menlo Park, CA 94025
mainspringenergy.com



October 20, 2025

California Energy Commission
715 P Street
Sacramento, California 95814

Re: Request for Comment on the RPS Eligibility Guidebook, Tenth Edition: Commission Guidebook

Mainspring Energy, Inc. (“Mainspring”) appreciates the opportunity to submit comments to the Energy Commission’s Draft Renewables Portfolio Standard Eligibility Guidebook (RPS Guidebook), Tenth Edition. We strongly support the goals of the Renewable Portfolio Standard (RPS) and for the proposal to update the Guidebook pursuant to AB 1921 (Papan), which directs CEC to include linear generators using renewable fuels to the definition of renewable electrical generating facilities.

Mainspring is a California-headquartered manufacturer of linear generators, which deliver local power that is dispatchable and renewable fuel-flexible. Mainspring’s linear generator is a unique non-combustion capacity and energy solution that simultaneously addresses the critical need of reducing greenhouse gas and criteria pollutant emissions, while also enhancing grid reliability and resilience. Modular and scalable, Mainspring’s linear generators can be deployed near load, either customer- or grid-sited, with the ability to immediately generate electricity from a range of renewable fuels. Mainspring’s inverter-based technology offers a full range of valuable grid benefits including fast (and unlimited daily) starts/stops, a wide dispatch range from minimum to maximum load, quick ramping, and, as necessary, on-site fuel storage.

With the recent implementation of AB 1921, which includes linear generators using renewable fuels as a “renewable electrical generation facility,” as eligible for the California Renewables Portfolio Standard Program and other state programs, we appreciate CEC’s quick action to update the RPS guidebook and include the provisions of the bill. Specifically, we support staff’s inclusion of the language that recognizes linear generator technology utilizing renewable fuels as eligible for RPS certification. This maintains technological neutrality and provides a level playing field for fuel cells and linear generators, and is a critical step toward ensuring a level playing field for all proven clean energy technologies and fostering innovation in California’s clean energy landscape.

Thank you for the opportunity to submit comments and support the Energy Commission's RPS Eligibility Guidebook, Tenth Edition. We look forward to working with the Commission to implement the goals and intent of AB 1921 and to supporting the deployment of renewable energy throughout the state.

Sincerely,

Kent Leacock

Kent Leacock
Sr Director Public Affairs
Mainspring Energy
Email: kent.leacock@mainspringenergy.com