

DOCKETED

Docket Number:	23-ERDD-01
Project Title:	Electric Program Investment Charge (EPIC)
TN #:	268184
Document Title:	Stop pursuing marginal-incremental agendas with DC microgrids
Description:	N/A
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Organization:	California Energy Commission
Submitter Role:	Energy Commission
Submission Date:	1/7/2026 3:32:52 PM
Docketed Date:	1/7/2026

Comment from a distraught ratepayer in the Central Valley who is deeply versed in the science, physics and the economics of energy systems and have architected electrical, power electronics and power systems solutions.

As a ratepayer and a taxpayer, I believe that the CEC still has some staff members that want to pursue the ‘correct’ solutions for the energy transition. However, both Commissions (CPUC and CEC) need to acknowledge that we have already transitioned to a new *regime* beginning 2025. In this new regime, the previous political tailwinds, aided by the might of the Federal government, are now the political headwinds that not only no longer champion California’s decarbonization objectives but have now defined ‘energy’ to constitute resources that do not list traditional solar and wind power plants. For California, there’s no transportation electrification if there’s not continued significant growth with electricity generation from solar and wind.

In this new regime, even the earlier implementation ‘plans’ of a ratepayer funded program – like EPIC – must be revisited, if its structure was decided between 2021 and 2023. Given the limited resources that are now available to the State and the rapidly increasing climate induced challenges for the State and the unbridled inequity of this energy transition, every new EPIC-funded grant opportunity from the CEC must be scrutinized and taken off the ‘autopilot’ mode of the State’s ratepayer funded innovation programs.

Four rounds of EPIC’s innovation programs only gave Californian ratepayers more discontent with this energy transition. The *paradigm* instituted by COP and WEF for cleaning energy systems, buildings and transportation – that continues to increase disparity, and the unprecedented and unchecked electricity price increases – must be reanalyzed. The funding opportunities from the EPIC programs did very little by way of transformational innovations. They, however, enabled the deployment of more traditional infrastructure that continues to require more and more ratepayer and taxpayer funded incentives to continue the energy transition.

CEC’s new EPIC-funded GFOs, in this new regime, should only pursue solutions that deliver the ‘maximum benefits’ for the ratepayers ... ONLY. The justification to pursue GFOs that achieve the commercial objectives of entities that knowingly or unknowingly followed the COP/WEF pathway that have failed to ‘holistically architect’ a feasible transition possible, must not be pursued any longer.

A DC-microgrid is an incremental adjustment for a subsystem of the holistic system – the electric grid ‘circuit’. Deploying DC-microgrids, to marginally help EV owners and existing

commercial entities, only increases further costs for the ratepayers and do not benefit ALL ratepayers who live, work and thrive on an AC-platform. How will a DC-microgrid deliver resiliency beyond the limited objective of helping EV charging? How will this strategy allow ALL homeowners to directly benefit from the deployment of DC-microgrids to reduce their electricity bills? How will they help Californians achieve building electrification without more and more infrastructure that will only further increase costs for everyone?

When mitigating unbounded infrastructure growth, DC-microgrids do very little. The CEC and the CPUC need to pay attention to the new regime and must stop funding for a paradigm that simply cannot be scaled without inordinate electricity price escalations and driving further inequity. It is not enough to just have a vision for a decarbonized energy system that supplies abundant, affordable and easily accessible clean energy and transportation. For that vision to materialize, the Californian energy agencies must discard the fallacy of “no miracles needed.” Paradigm shift and transformation of the energy system will indeed require transformative deep tech innovations for the AC-platform – the only platform that jived and could be cost effectively scaled and deployed abiding by the fundamental laws of physics. When it comes to new GFOs, the CPUC and the CEC have an obligation to revisit the State’s energy transition pathway and the need for transformative energy innovations, instead of difficult-to-justify incremental offerings, especially when funded by ratepayers for ratepayers’ benefits solely.

This commentator extensively proposed and explained the holistic solution to the CPUC and the CEC during the Round 5 planning meetings for the EPIC program during April and May of 2024 in San Francisco and San Diego respectively. As the custodians of the ratepayer-funded innovation programs, both Commissions should now pursue solutions and innovations that the industry is either unwilling or unable to perform. While a paradigm shift for abundant, affordable and easily accessible clean energy and transportation is possible it becomes improbable if we pursue subsystem adjustments that supply marginal benefit at best and further price increases and inequity at worst. The idea of deploying DC-microgrids is a non-starter for a holistically thought-through transition.

Sincerely,
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April 1, 2025