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Public Comment on DEBA Draft Guidelines â€“ Fairgrounds Eligibility, Capacity Thresholds, and Aggregation Recommendations

Additional submitted attachment is included below.

STRENGTH THROUGH RESILIENCE

CERRVF

CA EMERGENCY RESPONSE RESILIENCY: VENUES + FAIRGROUNDS

March 12, 2026

Public Comment on the Distributed Electricity Backup Assets (DEBA) Draft Solicitation Concept

Docket No. 22-RENEW-01
Distributed Energy Resources for Reliability Draft Solicitation Concept (February 27, 2024)

Submitted by: California Emergency Response and Resiliency Venues and Fairgrounds (CERRVF)

Introduction

We appreciate the California Energy Commission's leadership in advancing dispatchable distributed energy resources under the DEBA DER GFO as part of the Strategic Reliability Reserve (Section I.A–B).

California's District Agricultural Associations (DAAs) and County Fairgrounds function as critical emergency response hubs across the state. Many serve as evacuation centers, cooling centers, livestock evacuation sites, and mass-care facilities during wildfire, extreme heat, and grid emergency events.

Our comments are intended to:

- Strengthen implementation program clarity
- Improve equitable access for public resilience infrastructure
- Ensure that clean firm technologies can fully contribute to California's grid reliability and climate objectives

Comments are organized by section of the Draft Solicitation Concept for ease of review.

I. Capacity Thresholds & Portfolio Aggregation

Sections III.B.4; III.B.5(b); III.B.6(b)

We recognize the importance of the 6 MW minimum for Group 1 and 15 MW minimum for Group 2 to ensure measurable reliability contribution.

However, many state-designated public resilience facilities, including California's 70+ fairgrounds, have peak loads aligning with 1–3 MW systems.

We respectfully request clarification that:

- Multiple facilities under separate DAAs may aggregate capacity under a unified dispatch architecture;
- Multiple geographically distributed resilience sites may submit a single joint application to meet minimum rated capacity thresholds;

- Multiple meters or service accounts located on a single contiguous property may be aggregated to calculate rated capacity.

These clarifications preserve reliability integrity while enabling distributed public resilience hubs to participate meaningfully.

II. Incremental Capacity Additions & Modernization

Sections III.B.4; III.B.5(a); III.B.6(a)

The Draft limits funding to "new eligible DER equipment."

We respectfully request clarification that projects qualify if they result in a net increase in incremental rated capacity, including:

- Adding battery storage to existing solar installations;
- Replacing diesel backup systems with dispatchable clean firm technologies;
- Upgrading legacy microgrid components to enable grid-integrated dispatch functionality.

Where the project results in verifiable incremental rated capacity and complies with dispatch requirements, such modernization efforts should be considered eligible.

This approach strengthens reliability while modernizing existing public infrastructure.

III. Performance Pathways & Islandable Microgrids

Section III.B.10 – Performance Demonstration Pathways

We support the structured dispatch framework outlined in the five Performance Demonstration Pathways.

We request clarification that:

- Clean firm technologies operating continuously (e.g., fuel cells) may elect Pathway 4 (Daily Dispatch);
- Islandable microgrids serving designated emergency facilities may demonstrate compliance through Daily Dispatch or Emergency Dispatch pathways;
- Proxy dispatch models may be acceptable where full wholesale market participation is not feasible, provided performance is verifiable under Section III.B.11.

These clarifications would allow resilience-focused public facilities to comply with dispatch requirements while preserving reliability standards.

IV. Recognition of Long-Duration & Multi-Day Reliability Value

Sections III.B.4; V.D.2

The Draft uses a 4-hour normalization framework to define Rated Capacity.

We do not recommend modifying this structure.

However, we respectfully recommend that under Criterion 2 (Contribution to Reliability), additional scoring consideration be provided for:

- Resources capable of sustained 8–12+ hour discharge;
- Multi-day operational capability supported by fuel-secured clean firm systems;

- Systems capable of operating continuously during prolonged emergency events.

Long-duration systems provide materially higher value to the state during wildfire evacuations and extended grid stress conditions.

V. Explicit Recognition of Resiliency Co-Benefits

Section V.D.8 – Community and Resiliency Co-Benefits

We recommend clarifying that enhanced scoring consideration may be provided for facilities that are:

- Official emergency evacuation centers;
- Cooling centers during extreme heat events;
- State-designated emergency assembly areas;
- Facilities incorporated into county emergency operations plans.

Islandable microgrids enabling refrigeration, HVAC, communications, and life-safety systems during outages materially enhance public safety and should be clearly recognized under Criterion 8.

VI. IRA Direct Pay & Match Requirement Clarification

Sections II.B; II.D; V.E

Group 1 and Group 2 projects require a 50% match (net of tax credits).

Public agencies, including many DAAs, rely on IRA Section 6417 "Direct Pay" rather than tax appetite.

We respectfully request clarification that:

- Anticipated IRA Direct Pay reimbursements may count toward the Applicant's 50% match requirement, provided appropriate documentation is submitted;
- Public agencies without tax appetite are not disadvantaged in net-of-credit calculations;
- Enhanced cost-share flexibility may be considered for DAC-based public resilience infrastructure.

Such clarification improves equitable access without altering program integrity.

VII. DAC Alignment & Equitable Access

Sections II.A; II.B; V.E

A significant number of California fairgrounds are located within or adjacent to CalEnviroScreen 4.0 designated Disadvantaged Communities.

We respectfully recommend that the Commission consider mechanisms to ensure the $125M DAC allocation is accessible to rural public resilience infrastructure operators with limited capital reserves.

Enhanced clarity regarding DAC scoring and cost-share flexibility will support equitable implementation.

VIII. Project Readiness & Interconnection Coordination

Sections III.B.3; V.D.3

We support the May 1, 2027 online requirement.

To strengthen deployment certainty, we respectfully request clarification regarding:

- Coordination with IOUs/POUs to streamline interconnection for DEBA-funded public resilience projects;
- Whether CEC will work with utilities to facilitate timely interconnection for state-owned facilities contributing to the Strategic Reliability Reserve.

Interconnection clarity reduces implementation risk and strengthens reliability outcomes.

IX. Incremental Capacity Definition Clarification

Section III.B.4

We request confirmation that:

- Replacement of diesel backup systems with dispatchable clean firm technologies that increase operational duration qualifies as incremental rated capacity;
- Projects that materially improve resilience duration relative to fossil backup systems are eligible where rated capacity requirements are met.

X. Measurement & Verification for Distributed Resilience Portfolios

Sections III.B.11; V.D.6

We support the robust M&V framework.

We request clarification regarding:

- Aggregation treatment for geographically distributed resilience hubs;
- M&V protocols during islanded emergency operation;
- Demonstrated capacity calculations for continuously operating clean firm technologies.

Clear guidance will improve compliance consistency and reporting quality.

Closing

We strongly support the DEBA program's focus on dispatchable distributed resources that enhance California's grid reliability under the Strategic Reliability Reserve.

Our recommendations are intended to clarify eligibility, strengthen resilience outcomes, and ensure that public resilience infrastructure and clean firm technologies can effectively contribute to California's reliability and climate objectives.

We appreciate the opportunity to provide comments and welcome continued engagement.

Respectfully submitted,

Dana Stoehr

Dana Stoehr
CERRVF Organization President
Contact: dstoehr@smcec.co
1401 21st St, Str R
Sacramento, CA 95811