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DBG Energy's Comments on the 2026 - 2027 Clean Transportation Investment Plan

Additional submitted attachment is included below.

DBG ENERGY

May 19, 2026

Mabel Aceves
California Energy Commission
Docket 26-ALT-01
1516 Ninth Street
Sacramento, CA 95814

RE: DRAFT 2026-2027 INVESTMENT PLAN UPDATE FOR THE CLEAN TRANSPORTATION PROGRAM

DBG Energy is pleased to submit its formal comments to the California Energy Commission (CEC) regarding the Draft 2026-2027 Clean Transportation Invesment Plan. As an California based developer specializing in utility-scale and distributed biomass-to-energy projects, DBG Energy designs, finances, and executes complex infrastructure that bridges the gap between organic waste management and renewable energy generation. From our international perspective, we see California at a critical crossroads where transportation infrastructure policy must be re-aligned with upstream energy reality.

The Macro Disconnect: Subsidizing Commercial Fueling Systems Without Fuel Production

A rigorous market analysis of the proposed Investment Plan reveals an unsustainable structural asymmetry: the CEC focuses almost entirely on the localized dispensing of electricity for EV fast-charging and hydrogen fleet refueling. However, the framework allocates zero programmatic capital to support the secure, localized *production* of electricity or hydrogen from underlying renewable sources.

Industrial-scale EV charging stations and high-throughput hydrogen fueling hubs exert monumental load requirements on regional energy networks. If the CEC fails to seed integrated, distributed renewable generation alongside these stations, developers will be forced to draw power exclusively from the centralized utility grid.

California’s grid infrastructure is already acutely strained—a vulnerability compounding rapidly due to the massive, compounding power requirements of next-generation commercial data centers. Expanding downstream transportation charging without scaling localized, baseload renewable generation introduces a systemic reliability risk and threatens to dilute the net-zero lifecycle carbon benefits of the transportation transition itself.

Capitalizing on California's Underutilized Biomass Feedstocks

Globally, advanced project developers view biomass waste as one of the most reliable, weather-independent sources of clean renewable baseload power and direct hydrogen available. Yet, within California, this immense potential remains largely dormant. Over the last decade, the structural decommissioning of the state's legacy biomass combustion power plants has eliminated vital market outlets for raw wood waste.

This infrastructure shortfall has triggered a massive agricultural waste disposal crisis, which has been severely intensified by the recent, full implementation of comprehensive open-field burning prohibitions. Concurrently, high-hazard forest zones face an overwhelming accumulation of hazardous fuel loads with zero commercial outlets—valuable materials that should be systematically diverted into clean power and hydrogen production assets.

The technical risks have already been retired; proven, high-efficiency technologies exist today to cleanly convert biomass wastes into electricity without open combustion. Furthermore, a suite of advanced thermochemical and biochemical technologies for the direct, high-purity conversion of biomass into hydrogen fuel are mature and fully primed for commercial-scale deployment.

With the current macro-level shift in Federal energy policy signaling a contraction in U.S. Department of Energy (DOE) and related federal agency funding for early-stage renewable infrastructure, regional market leadership by California, driven through the CEC, is absolutely imperative to catalyze international project investment.

Our Commitment to California

As an international developer, DBG Energy evaluates markets based on policy stability, feedstock security, and regulatory alignment. California possesses unrivaled organic feedstock availability from its agricultural and forestry sectors, along with pioneering technologies being validated locally. For instance, the multi-phase deployment currently underway via **CEC Grant ARV-23-001** effectively demonstrates that modular, containerized biomass conversion assets can be successfully deployed to support local fueling networks. However, to attract the international private capital necessary to scale these solutions statewide, the CEC's overarching Investment Plan must formally de-risk the integration of on-site generation.

Strategic Institutional Recommendations

To optimize capital allocation and ensure long-term energy resiliency, DBG Energy respectfully recommends that the Commission adopt the following framework modifications:

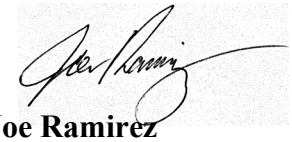
- **Incentivize Advanced Biomass-to-Electricity Deployments:** Allocate a meaningful, targeted portion of the annual $95 million Clean Transportation Program budget specifically for advanced, clean biomass-to-electricity project development to supply dedicated, grid-independent power to EV charging corridors.
- **Unlock Inactive Refueling Assets for Direct Production:** Mobilize unspent hydrogen refueling infrastructure allocations, combined with a significant carving of the annual $95

million program budget, to accelerate the commercialization and deployment of direct biomass-to-hydrogen conversion facilities.

- **Rectify Regulatory Barriers within Future GFOs:** Please consider incentivizing future respondents to future GFO's to utilize on-site renewable power in conjunction with their EV charging and H2 fueling project proposals. Previous GFOs have penalized this by including the cost of DER's in the calculation of cost per port and kw of electricity produced evaluations. it increases Eliminating this scoring penalty so that projects incorporating independent, clean energy production are incentivized will reduce the strain on the grid and provide long term stable pricing not dependent on fossil fuel price fluctuations.

Thank you for your consideration of this international development perspective. DBG Energy remains eager to deploy capital and expertise to assist California in establishing a truly self-sustaining clean transportation ecosystem.

Sincerely,



Joe Ramirez
President
DBG Energy LLC

joe.ramirez@dbgenergy.com