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Anna Kulow Comments - Support for Continued Funding of Regional Energy Innovation Clusters in EPIC 5

Additional submitted attachment is included below.

June 18, 2026
California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

Re: Docket 25-EPIC-01, Comments on the Draft EPIC 5 Initiatives and Research Topics

Dear EPIC Program Team,

Thank you for the opportunity to comment on the draft EPIC 5 initiatives. I write with direct experience in the program model these comments concern. In 2015, I supported Cleantech San Diego in developing the grant that established the San Diego Regional Energy Innovation Cluster, which the CEC funded in 2016 and which operates today as the Southern California Energy Innovation Network (SCEIN). Subsequently, I supported Cleantech San Diego in securing follow-on funding for the program and I have provided grant-writing support to SCEIN portfolio companies through introductions and vouchers provided by the network. These comments draw on that work, from the original program design through hands-on service delivery to participating companies.

As I understand it, the draft EPIC 5 plan phases out a proven statewide innovation network and proposes to rebuild a narrower version of it from scratch. The existing entrepreneurial ecosystem, composed of the four Regional Energy Innovation Clusters, was developed and expanded over the past decade with EPIC funds. EPIC 5 does not appear to carry forward the existing ecosystem nor its incredible success. In its place, the plan proposes three new incubators focused on pre-commercial grid technology, tribal energy capacity building, and community-based organization capacity building. I urge the Commission to reconsider this approach and to sustain the existing network in the final investment plan.

Replacing the existing ecosystem creates three major barriers to achieving California's statewide energy and climate goals and EPIC 5's strategic priorities. First and foremost, it abandons proven infrastructure for early stage companies developing catalytic solutions to the state's greatest energy and climate challenges. Moreover, it redirects resources from support services that are critical for companies at the phase that EPIC 5 focuses on: real-world demonstration. Nearly every initiative, across all five strategic goals, calls for pilots and field demonstrations as outcomes. For companies with a validated prototype, reaching a real-world demonstration is the hardest step in its development. It is the stage commonly known as the pilot valley of death, where a company cannot attract the capital to scale until it has proven its technology in an operational setting, and cannot prove it without a willing host or pilot partner. The Regional Energy Innovation Cluster model exists precisely to bridge this stage, connecting companies with the utilities, investors, agencies, host sites, and pilot partners that move a technology from prototype to operational deployment. As proposed, EPIC 5 removes the supportive ecosystems that enable companies to reach and execute on pilots.

Second, the proposed incubators are both narrower and partly redundant. The existing network supports pre-commercial innovation across all of EPIC 5's strategic objectives, while the three proposed incubators map to only a few. The existing clusters already conduct substantial work with tribes, disadvantaged and vulnerable communities, and community-based organizations, with established collaborations that prioritize pilots and early deployments in those communities. Two of the three proposed incubators would rebuild capability the current network already provides.

Third, and most urgently, the substitution introduces a multi-year capability gap. Standing up a regional cluster is not immediate. When the original clusters were established, each required a substantial period to build capacity and services before it could begin actively supporting companies. New incubators created under EPIC 5 would face the same ramp-up and would likely not be operational until roughly 2028. In the interim, the experienced personnel, partnerships, and institutional knowledge that make the current network effective would disperse into other roles and organizations, and the synergy built over a decade would be lost. Rebuilding it would take years and would not be guaranteed to succeed.

The statewide cluster model has delivered a return on the CEC's investment on the order of 80 to 1, supporting clean energy companies that have collectively raised hundreds of millions of dollars in follow-on funding, secured hundreds of patents, deployed hundreds of pilots in California, and created hundreds of full-time jobs. My own experience reflects this on the ground. The grant-writing support I have provided to portfolio companies has resulted in tens of millions in CEC funding and supported innovative technologies towards commercial deployment. A number of the companies and advisors who have benefited from this network have submitted their own comments to this docket describing comparable experiences.

If the Commission has identified specific objectives for the three proposed incubators that the current network does not fully address, the more prudent course would be to add dedicated resources within the existing clusters and their partners, so that those objectives benefit immediately from established infrastructure rather than waiting years for new programs to mature. As federal support for clean energy research, development, and demonstration grows more uncertain, preserving California's proven regional innovation infrastructure is more important than ever. It is among the most direct tools the Commission has to ensure that the demonstrations EPIC 5 calls for actually occur.

I respectfully urge the Commission to sustain and extend the Regional Energy Innovation Cluster model, serving all five strategic goals, in the final EPIC 5 Investment Plan, rather than replacing it with narrower programs that will take years to build.

Thank you for your consideration. I would welcome the opportunity to discuss these recommendations.

Respectfully submitted,

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