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Peak Energy Comments on the Electric Program Investment Charge (EPIC) 2026 – 2030 Investment Plan Public Workshop

Additional submitted attachment is included below.

June 18, 2026

Cammy Peterson
Deputy Director of Energy Systems, Innovation, and Strategy
California Energy Commission (CEC)
Docket Unit, MS-4
Docket No. 25-EPIC-01
715 P Street
Sacramento, California 95814

RE: Comments on the Electric Program Investment Charge (EPIC) 2026 – 2030 Investment Plan Public Workshop

Dear Ms. Peterson:

Thank you for the opportunity to comment on the Electric Program Investment Charge 2026-2030 (EPIC 5) Investment Plan and associated workshop on June 11, 2026. Peak Energy strongly supports the CEC's leading clean energy research and development efforts and the proposed Investment Plan. We especially support objectives and initiatives that can enable ongoing innovation and development of new products to advance California's clean energy, reliability and affordability priorities, while delivering added benefits for local communities in terms of reduced noise, improved safety, workforce development, and other added value associated with California's clean energy transition.

About Peak Energy

Peak Energy is a California-based battery storage developer, commercializing the first passively-cooled, sodium-ion battery energy storage system (BESS) for the grid. Our system reduces the levelized cost of storage by 20 percent and significantly improves safety compared to incumbent BESS technologies, which are predominantly built around a lithium-iron phosphate (LFP) cell technology. Peak Energy has over 100 employees in California, operating out of our Burlingame headquarters, and continues to rapidly grow in the state. We recently announced a partnership with General Motors to scale battery cell manufacturing and a domestic supply chain for our BESS systems.¹

CEC Should Support Next Generation Technologies that Advance State Objectives

We appreciate opportunities presented by the EPIC 5 Investment Plan to support next generation technologies that can meaningfully advance the State's clean energy transition, while enhancing affordability, safety, and addressing community concerns. Many emerging technologies, even cost-effective ones, face barriers to market and financing, which CEC can help address through the EPIC program. Bankability of next generation technologies can be especially difficult, and grants, loan

¹ Martucci, B. (2026) Peak Energy, GM partner to scale domestic sodium-ion battery supplies, Utility Dive, June 16. <https://www.utilitydive.com/news/peak-energy-gm-partner-to-scale-domestic-sodium-ion-battery-supplies/823050/>

guarantees or other financial support can prove transformative in deploying early projects and scaling the most promising technologies. We especially encourage support for emerging, non-lithium-based storage technologies, as highlighted in the Clean Energy Reliability Investment Plan,² and encourage CEC to support development of non-lithium BESS technologies for all applications – not just long-duration or multi-day storage. CEC should also support development of technology solutions that can help to reduce costs, improve safety and efficiency of grid operations, and address other community concerns such as noise. Peak Energy’s technology meets each of those criteria, and we look forward to collaborating with the CEC as they implement EPIC 5 and other state clean energy programs and planning efforts.

Comments on EPIC 5 Strategic Objectives

Peak Energy supports CEC’s proposed Strategic Objectives guiding the EPIC 5 Investment Plan. We especially support the following strategic objectives, for the following reasons:

3. Smart Planning Tools for New Load and Clean Resources

Conventional BESS technologies require costly refrigeration systems which reduce system efficiency and increase costs, safety risks, and noise. Refrigeration load for California’s existing BESS fleet costs ratepayers over \$100 million per year. Peak Energy’s technology avoids these losses and costs and dramatically improves safety. As CEC considers new planning tools for load and clean energy resources, it is important to account for operating losses and associated ratepayer costs, as well as other priorities that may affect ratepayers and community support for clean energy projects.

5. Innovative Approaches for Difficult-to-Decarbonize Sectors

Peak Energy’s technology allows unique opportunities to directly pair solar and storage in a modular, affordable way that can be deployed in remote areas to help electrify and decarbonize hard-to-abate sectors, like mining, or remote operations that may otherwise rely on liquid fuels and generators. We encourage CEC to consider supporting development of new, modular and integrated solar + storage technology solutions that can support the state’s industrial decarbonization objectives, even for the most remote or otherwise difficult-to-decarbonize sectors.

6. Community-Scale Decarbonization

9. Leveraging DERs for Grid and Community Resiliency

Community-scale decarbonization and grid and community resiliency are inherently intertwined. All related decarbonization strategies should prioritize safety, noise reduction, and other technological advancements that can hinder deployment of clean energy resources, including battery storage. Passive cooling of battery systems significantly reduces noise and fire risk, which can enable a wider array of battery deployments across a wider array of communities.

² Erne, David (2023) Clean Energy Reliability Investment Plan, California Energy Commission, Publication Number: CEC-200-2023-003-CMF. <https://www.energy.ca.gov/publications/2023/clean-energy-reliability-investment-plan>

7. Impacts Research for New Generation and Storage

The battery storage market has historically been dominated by lithium-ion variations, which have shaped design and thinking, including presumptions around cooling systems and requirements. The efficiency losses and operating costs associated with these systems get baked into energy planning and procurement. Emerging storage chemistries can significantly reduce these costs and unlock configurations that lithium-ion systems cannot support, including integration of storage and renewable generation systems. As CEC evaluates impacts of new generation and storage, it should support projects that minimize or eliminate parasitic losses from refrigeration, energy conversion, inverters and other auxiliary components. Passively cooled, integrated solar and storage solutions offer tremendous progress for reducing capital and operating costs associated with renewable energy deployments.

13. Cost-Effective Grid Hardening for Long-Term Climate Impacts

Climate change is increasing average ambient temperatures facing California's electricity sector, increasing refrigeration loads and costs associated with operating energy storage projects in California. These costs and impacts will only grow as California adds energy storage to the system and temperatures increase. Passively cooled BESS systems avoid this cost and represent an effective climate adaptation strategy to add resiliency and reduce costs in the face of long-term climate impacts.

Comments on Draft Initiatives and Research Topics

Peak Energy supports CEC's proposed Strategic Initiatives proposed in the EPIC 5 Investment Plan. We especially support the initiatives listed below, and encourage CEC to design related solicitations in a manner that advances emerging technologies, minimizes total costs associated with renewable generation and storage, improves safety outcomes, and supports domestic supply chains and battery manufacturing in California.

Leveraging DERs and Load Flexibility for Affordability and Grid Reliability

We encourage CEC to consider supporting development of integrated solar and storage solutions, which can dramatically reduce capital costs associated with dispatchable, renewable generation, including on a distributed scale. Integrated solar and storage solutions can also support grid resiliency. We support an equity-focused initiative that would focus on deploying lower cost, integrated solar and storage solutions for disadvantaged and vulnerable communities, renters, multifamily housing, tribes, and rural communities.

Accelerating Grid Connection of Clean Resources and Beneficial Loads

We support activities to accelerate the deployment of clean resources, including emerging, non-lithium, short-duration storage technologies. As CEC considers developing this initiative, including a potential pre-commercial grid-tech incubator, we encourage support not just for very early-stage technology development, but also commercialization of new, market-ready technologies that face financing and bankability challenges breaking into incumbent markets. We also encourage consideration of a DEBA-

like approach to support deployment of capacity that may not otherwise occur, including project development that has secured grid interconnection, but may not be moving forward due to project economics or community concerns. In some cases, we believe that utilizing different energy storage technology, such as Peak Energy's systems, coupled with potential support from the state, may be able to rescue interconnection-ready clean energy projects that may not otherwise proceed.

Community-Led Clean Energy Capacity Building and Research Incubation for California Native American Tribes and Community-Based Organizations

We support targeted research, like those proposed under this initiative, and look forward to the opportunity to participate in potential solicitations that would support tribal- and community-centered clean energy demonstrations and adoption, while helping to improve siting, reduce project risks, and enhance affordability, reliability, and environmental outcomes for IOU ratepayers.

Advancing the Clean Energy Transition While Protecting Communities and Ecosystems

We support this proposed initiative, especially the proposed research topic, "Innovation in Clean Energy Environmental Impact Assessment and Mitigation." As CEC develops this research topic, we encourage a deep evaluation of safety, noise, supply chains, and operating costs – including energy use and emissions associated with cooling conventional battery technologies – and supporting development of new technologies, including passively cooled BESS systems, that can help reduce or avoid those impacts.

Enhancing Clean Energy Technology Safety, Supply Chains, and Life Cycle Benefits

We strongly support this proposed initiative and each of the proposed research topics in this category:

- Advancing the Safety of Next Generation Storage Solutions
- Enhancing Energy Storage Performance and Longevity Through Advanced Battery Analytics
- Strengthening Critical Materials Supply Chains for Clean Energy Technologies

Ongoing technology development remains the critical enabler for achieving California's clean energy goals and should remain a foundational element of CEC's EPIC program. We strongly support the proposed research topics that will enable achievement of California's clean energy and energy storage goals by addressing safety concerns, improving performance and minimizing total costs of energy storage, develop and deploy non-lithium-ion storage solutions, and strengthen and develop domestic supply chains for clean energy technologies, including BESS. We appreciate recognition of sodium-based chemistries in this initiative and encourage CEC to strongly consider targeted initiatives to advance this promising, market-ready, next generation grid storage solution.

Cost-Effective Industrial Decarbonization

As CEC considers research topics under this initiative, we encourage support for integrated solar and storage solutions that can be deployed remotely to help decarbonize industry and other hard-to-abate

sectors, while reducing strain on the grid and increasing local jobs and access to clean energy technologies.

Leading Innovation in Electricity Sector Resilience and Adaptation

Finally, we note that integrated solar and storage solutions and passively cooled energy storage systems also represent important resilience and adaption solutions for California's electricity grid and communities. These strategies can improve upon legacy approaches to resilience while supporting California's clean energy goals, controlling escalating energy system costs, and providing equitable, reliable energy services. We hope CEC will consider including support for integrated solar and storage solutions and passively cooled BESS systems in this initiative.

Thank you again for the opportunity to comment on the EPIC 5 Investment Plan, and for CEC's ongoing leadership on clean energy and technology development. We look forward to working alongside CEC as it implements the EPIC 5 Investment Plan and continues to advance the state's clean energy and innovation priorities. If you have any questions, please do not hesitate to reach out.

Sincerely,

A handwritten signature in dark ink, reading "Edward McGlone". The signature is fluid and cursive, with the first name "Edward" and last name "McGlone" clearly distinguishable.

Edward McGlone
Vice President, Government Affairs
Peak Energy