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Project Title:	Electric Program Investment Charge 2026–2030 Investment Plan (EPIC 5)
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Document Title:	Raya Power, Inc. Comments - Feedback -“Equity-Focused DER Solutions for DVCs”; “Advancing Energy System Resilience Under Climate Change and Extreme Weather
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Feedback -â€œEquity-Focused DER Solutions for DVCsâ€œ; â€œAdvancing Energy System Resilience Under Climate Change and Extreme Weather

Raya Power is developing novel modular solar and battery systems that provide resiliency and cost savings for those currently locked out of traditional rooftop solar, including renters, homeowners with incompatible roofs, and those who cannot afford full rooftop solar systems. Our systems can reduce grid draw during peak demand periods and do not backfeed the grid or require grid interconnection.

We provide feedback on two research topics:

Research topic: â€œEquity-Focused DER Solutions for DVCsâ€œ

Feedback: We support expanding â€œDemonstrate community microgrids, resilience hubs, multifamily DER packages, and VPP participationâ€œ to also explicitly include single family homes, whose residents are often left out of existing solutions due to incompatible roofs, lack of ownership, and inability to finance or commit to the funds required.

Research topic: â€œAdvancing Energy System Resilience Under Climate Change and Extreme Weatherâ€œ

Feedback: We advocate expanding the â€œProposed Activities/Researchâ€œ to include investing in high-impact-potential residential-scale technological solutions to address the gaps identified: â€œescalating costs, disruptions to grid service, reduced power output, damaged infrastructure, and increased peak demandâ€œ. While developing data and modeling tools is critical, we urge piloting promising technological solutions in parallel, particularly in communities highly exposed to wildfire risk (e.g., PSPS).

Raya Power is actively deploying systems and welcomes the opportunity to engage with Commission staff on demonstration project design.