

DOCKETED	
Docket Number:	22-RENEW-01
Project Title:	Reliability Reserve Incentive Programs
TN #:	271398
Document Title:	Heidi Adams Comments - BASEstudio Comments on the Draft Proposition 4 DEBA Solicitation
Description:	N/A
Filer:	System
Organization:	Heidi Adams
Submitter Role:	Applicant
Submission Date:	7/13/2026 12:44:05 PM
Docketed Date:	7/13/2026

Comment Received From: Heidi Adams
Submitted On: 7/13/2026
Docket Number: 22-RENEW-01

**BASEstudio Comments on the Draft Proposition 4 DEBA
Solicitation**

Additional submitted attachment is included below.

Comments on the Draft Proposition 4 DEBA Grant Solicitation

GFO-26-XXX-DRAFT

Submitted to: California Energy Commission — DEBA Docket No. 22-RENEW-01

Submitted via: CEC e-filing system (efiling.energy.ca.gov) / DEBA@energy.ca.gov

Comment deadline: July 15, 2026, 5:00 p.m. PT

Submitted by: BASEstud.io — Heidi Adams, Founder & CEO

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Date: July 13th 2026

Introduction

BASEstud.io designs and manufactures distributed storage for the public right-of-way: small battery assets integrated into streetlight poles that, aggregated across a deployment, provide dispatchable capacity and load reduction to the grid. We anticipate participating in the Proposition 4 DEBA program as a technology subrecipient to eligible public-agency, tribal, and nonprofit applicants.

We appreciate the opportunity to comment on the draft solicitation. Our comments focus on ensuring that aggregated, small-asset distributed storage can compete on equal footing with single large installations, and that the program's requirements are workable for tribal applicants, publicly owned utility territories and projects benefiting disadvantaged communities — consistent with Proposition 4's directed priorities. We offer the following recommendations and requests for clarification.

Part I — Recommendations

1. Provide a reduced or waived match requirement for tribal-led applications and projects delivering meaningful benefits to Severely Disadvantaged Communities.

(Ref: § I.E.5 Match Funding Requirement; § II.B.8 Proposition 4 Directed Priorities)

The draft applies a flat 25% minimum match to all applicants. Match capacity is the single greatest barrier for tribal applicants and for projects sited in Severely Disadvantaged Communities (SDACs) — precisely the applicants and communities that Proposition 4 directs the Commission to prioritize. Other California climate-bond and equity programs routinely offer reduced or waived cost-share for tribal and SDAC-serving projects. We recommend the final solicitation include a reduced or waived match tier for (a) applications led by a California Native American Tribe and (b) projects demonstrating meaningful and direct benefits to SDACs, so the match requirement does not undercut the program's own equity priorities.

2. Confirm and support aggregated, distributed storage projects composed of many small, locally sited assets.

(Ref: § I.E.1 Minimum/Maximum Award; § II.B.4 Project Capacity and Duration; § II.B.5 Performance Requirements)

In our architecture the distributed energy resource is the battery: an aggregated fleet of small, pole-sited storage assets providing dispatchable capacity and load reduction during extreme events. Because these assets are sited in public right-of-way the applicant already controls, they require no land acquisition and no host-site leasing, allowing projects to come online within the program's encumbrance timeline. And because they follow the streetlight network, capacity is deployed where load density and need are greatest — including in disadvantaged communities Proposition 4 directs the Commission to prioritize. We recommend the Commission (a) confirm that aggregations of numerous small distributed storage assets under a single application are fully eligible and competitive; and (b) provide either a lower minimum award or a dedicated

pathway/set-aside for DAC-benefiting aggregated distributed projects, so community-scale distributed resilience is not disadvantaged relative to single large installations.

3. Allow proportionate or aggregated Measurement and Verification for high-count, small-asset projects.

(Ref: § II.B.6 Measurement and Verification)

The draft provides that dispatch performance is measured at each individual DER asset and then aggregated. For projects comprising hundreds of small assets, per-asset metering and reporting would impose costs disproportionate to each unit's capacity. We recommend the final solicitation expressly permit statistically valid sampling, representative sub-metering, or aggregated site/feeder-level M&V approaches — subject to an approved M&V Plan — for high-count, small-asset distributed projects.

Part II — Requests for Clarification

4. Cost allocation for multi-function integrated assets.

(Ref: § I.E.3 Allowable Costs; § I.E.4 Unallowable Costs)

Where DER equipment is integrated into a multi-function asset — for example, a streetlight pole combining eligible battery storage with ineligible lighting and connectivity — how should applicants allocate equipment and installation costs between DER-eligible and ineligible functions? Will the Commission accept a documented, reasonable allocation methodology (e.g., by cost causation or engineering estimate)? And is installation and construction attributable to the DER function reimbursable even when performed as part of installing an integrated asset?

5. Minimum capacity and rated-capacity treatment for aggregations.

(Ref: § II.B.4 Project Capacity and Duration)

Please confirm there is no minimum nominated or rated capacity threshold that an application — or an individual asset — must meet. Please also clarify how the 4-hour rated-capacity normalization is applied to an aggregation of many small units with a common duration under a single application.

6. Performance-pathway mechanics in publicly owned utility balancing authorities.

(Ref: § II.B.5 Performance Requirements; Table 4)

For projects located in a publicly owned utility (POU) balancing authority — e.g., Imperial Irrigation District — rather than the California ISO, how are program events, price/load triggers, and Measurement Hours defined and communicated to applicants? The draft provides that the host BA sets high-load/net-load triggers; what documentation or commitment from the POU balancing authority does the Commission expect at the time of application, and how should front-of-the-meter resources electing the Market-Integrated pathway demonstrate participation capability in a non-ISO balancing authority?

7. Application of PRC § 94510 (no shareholder profit; ratebase exclusion) to subrecipient equipment costs.

(Ref: § I.E.7 Proposition 4 Funding Restrictions)

The budget instructions provide that subrecipient profit is allowable, capped at 10% of the total subrecipient rates for labor and other direct and indirect costs. For a private, for-profit subrecipient whose primary contribution is manufactured DER equipment rather than labor, please clarify: (a) does the 10% subrecipient profit allowance extend to equipment supplied by the subrecipient, or must equipment be provided at documented cost; and (b) what accounting methodology will the Commission accept as satisfying the § 94510 certification — that bond funds not fund shareholder profits or return on equity — where a subrecipient's price includes a standard commercial margin on equipment? Clear guidance would help applicants structure compliant budgets and certifications.

8. Naming a proprietary technology subrecipient without separate competitive procurement.

(Ref: § II.A.1 Eligibility)

The draft provides that development, installation, and operation of the DERs may be contracted to a private entity as a subrecipient. Please confirm that a public-agency or tribal applicant may name a specific technology subrecipient in its application — particularly where the technology is proprietary or patented — as part of the awarded project team, without a separate competitive procurement for that subrecipient, and clarify any documentation the Commission requires to support such a designation.

9. Site-control documentation for public right-of-way deployments.

(Ref: § II.B.1 Location and Site)

For DER integrated into streetlights or other assets in existing public right-of-way controlled by the applicant, what constitutes acceptable documentation of site control? Would evidence of the applicant's ownership or jurisdiction over the right-of-way — in lieu of a lease or host-site agreement — satisfy the requirement, including for geographically distinct subprojects across a corridor?

Closing

Thank you for the opportunity to comment and for the Commission's work advancing distributed energy resources for grid reliability. We would welcome the opportunity to provide additional detail on any of the above and to participate in the pre-application workshop following release of the final solicitation.

Respectfully submitted,

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