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**Mainspring Energy Comments on Draft Solicitation for Prop 4
DEBA Program**

Comment letter attached.

Additional submitted attachment is included below.

Mainspring Energy
3601 Haven Avenue
Menlo Park, CA 94025
mainspringenergy.com



July 15, 2026

California Energy Commission ("CEC")

Docket No. 22-RENEW-01

Re: Comments on the Draft Solicitation for the Proposition 4 Distributed Electricity Backup Assets ("DEBA") Grant Program

Dear CEC Commissioners and Staff,

Mainspring Energy, Inc. ("Mainspring") appreciates the opportunity to provide comments on the CEC's Draft Solicitation for the Proposition 4 DEBA Grant Program.

Mainspring is a California-headquartered manufacturer of fuel-flexible, ultra low-emissions local power solutions that can rapidly add new capacity and deliver reliable, affordable, and sustainable electric power. The company began commercial shipments of its linear generator technology in 2020 and today has more than a gigawatt in its pipeline and field operations for leading Fortune 500 companies, data centers, and utilities. Mainspring's linear generator is a unique non-combustion generation technology that simultaneously addresses California's need to reduce greenhouse gas and criteria pollutant emissions while enhancing electric reliability and resilience.

Modular and scalable, linear generators can be deployed near load to provide firm, dispatchable capacity exactly when it is needed most. The technology offers rapid start capability, fast ramping, near unlimited daily cycling, wide operating ranges, and the ability to integrate with battery energy storage systems to support critical facilities, electric vehicle charging, microgrids, and other distributed energy applications.

Mainspring appreciates the CEC's continued leadership in strengthening California's electric reliability while accelerating the transition to cleaner distributed energy resources. We support the objectives of the DEBA Program and respectfully offer the following recommendation to help ensure that California fully leverages the broad range of technologies needed to address the state's growing reliability challenges.

The Proposition 4 draft solicitation explicitly excludes low-emission technologies.¹ While Mainspring understands that this solicitation may be constrained by the statutory language governing Proposition 4 bond funds, it is important to recognize that the Legislature's broader reliability strategy and enabling legislation for DEBA has consistently relied upon a diverse set of technologies rather than a single technology pathway. Additionally, the Bioenergy Association of California ("BAC") correctly identifies that bioenergy and low-emission technologies are important to scale within California to unlock new supply capacity and therefore should continue to receive support from the CEC.

Mainspring respectfully requests that future funding appropriations be less restrictive to ensure that as programs are designed, they will have the flexibility to fund a diverse range of technology solutions. We encourage the CEC to identify opportunities for scaling the deployment of low-emission generation technologies in appropriations through the Strategic Reliability Reserve (SRR), Greenhouse Gas Reduction Fund, and other state funding. State funding is critical for supporting the project economics that incentivize customers and facilities to deploy cleaner energy alternatives at scale.

California's SRR has consistently reflected a technology-inclusive approach to meeting reliability needs, which regrettably is not reflected in this draft solicitation. When the Legislature initially established the DEBA Program through Assembly Bill 205 (Ting)², it recognized that maintaining reliability during California's clean energy transition would require a diverse portfolio of technologies capable of providing dispatchable capacity during extreme events. The first edition of the DEBA Guidelines show that earlier appropriations supported both zero-emission and low-emission distributed generation technologies capable of delivering incremental reliability benefits as California continued its transition toward a carbon-neutral electric system.³

Maintaining this technology-inclusive framework will expand the number of projects capable of addressing California's near-term reliability needs, improve resilience for critical infrastructure and provide cost-effective solutions in areas facing transmission and distribution constraints.

Thank you for the opportunity to submit these comments. Mainspring looks forward to continuing to work with the CEC and staff to advance California's clean energy, reliability, and resilience objectives.

¹ Page 20 of Proposition 4 Distributed Electricity Backup Assets (DEBA) Grant Program. CEC. June 2026. <https://efiling.energy.ca.gov/GetDocument.aspx?tn=270606&DocumentContentId=107920>.

² Assembly Bill 205. Assemblymember Ting. California State Legislature. July 1, 2022. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB205.

³ Distributed Energy Backup Assets (DEBA) Program Guidelines, First Edition. October 2023. <https://efiling.energy.ca.gov/GetDocument.aspx?tn=252687>.

Sincerely,

Franco Ghadiri

Franco Ghadiri
Policy Lead - CA