| DOCKETED | |
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| Docket Number: | 22-RENEW-01 |
| Project Title: | Reliability Reserve Incentive Programs |
| TN #: | 271438 |
| Document Title: | Chris Sentieri - Community Energy & Equity Resources (CEER) Comments on Draft Solicitation for Prop 4 DEBA Program |
| Description: | N/A |
| Filer: | System |
| Organization: | Chris Sentieri |
| Submitter Role: | Applicant Consultant |
| Submission Date: | 7/14/2026 4:28:07 PM |
| Docketed Date: | 7/14/2026 |

*Comment Received From: Chris Sentieri*
*Submitted On: 7/14/2026*
*Docket Number: 22-RENEW-01*

# Community Energy & Equity Resources (CEER) Comments on Draft Solicitation for Prop 4 DEBA Program

California Energy Commission Staff and Commissioners,
Thank you for providing an opportunity to comment on the Draft 2026 Distributed Electricity Backup Assets (DEBA) Solicitation.

I have brief comments and questions for you regarding two items in the Draft Solicitation.

1. If a Load-serving Entity (LSE) who is a registered Demand Response Provider (DRP) were to have a Virtual Power Plant (VPP) program, whereby they are compensating customers for participation in the VPP program, would that be incompatible with DEBA given the Dual Compensation Prohibition outlined on page 26 of the Draft Solicitation?

We (CEER) see potential synergy between DEBA and planned/existing LSE VPP programs, because the DEBA funding could enable some beneficial projects that would otherwise not be feasible. Those projects could certainly then be made available for dispatch during the DEBA program windows, directly supporting achievement of the goals of the program and Proposition 4.

But some customers may be receiving flat monthly bill credits, or performance-based compensation (also via bill credits) for participating in the enabling VPP programs... and it appears that this may not be compatible with the Dual Compensation Prohibition as currently written. Excluding these projects from the DEBA program and the related funding would be counterproductive, and we ask the Commission to provide clear rationale for this exclusion.

2. The Draft Solicitation Indicates that projects "must perform consistent with the selected performance pathway and dispatch requirements (described below) for a term of three program seasons (May 1 through October 31).â€□

Can you confirm that there are no applicable performance requirements or dispatch prohibitions outside the defined program season (i.e., from November 1 through April 30) during the three-year performance period?

Providing the flexibility for project owners and operators to optimize the economic performance of projects outside of the defined program season is essential, and we strongly encourage the Commission to retain and maximize this flexibility to encourage broad program support and participation.

Thank you again for the opportunity to submit questions and comments on this Docket.

Sincerely,
Chris Sentieri
Founder and Principal
Community Energy & Equity Resources