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CSUF Comments on DEBA Draft Solicitation â€“ Readiness and Match-Funding Timeline for Public Institutions

Additional submitted attachment is included below.

CALIFORNIA STATE UNIVERSITY, FULLERTON
Capital Programs & Facilities Management

July 15, 2026

California Energy Commission
Dockets Office, MS-4
715 P Street
Sacramento, CA 95814

RE: Docket No. 22-RENEW-01 — Comments on Proposition 4 Distributed Electricity Backup Assets (DEBA) Draft Solicitation (GFO-26-XXX)

Dear Commissioners and Staff:

California State University, Fullerton (CSUF) supports the Distributed Electricity Backup Assets Program and its goal of expanding grid reliability capacity through distributed storage and backup generation. As a public university operating a campus-scale utility system serving 45,000+ students, faculty, and staff, we are evaluating DEBA as a potential funding source for a Battery Energy Storage System (BESS) paired with a campus microgrid, and see direct alignment between DEBA's objectives and our own resilience and reliability goals. We appreciate the opportunity to comment on the draft solicitation.

We raise one structural concern regarding applicant readiness requirements, submitted in the spirit of improving program access for public higher-education institutions rather than opposing the program's design.

Readiness and match-funding timing relative to public institution governance. Section II.B.9 requires CEQA compliance, permitting, and site control to be substantially resolved before CEC Business Meeting approval (encumbrance deadline June 30, 2028), and Section II.B.5 requires unqualified match funding commitment letters (minimum 25%, cash weighted more favorably than in-kind) at the time of application. For a public university, both requirements typically require internal approval through university and system-level leadership, and, for CEQA on campus infrastructure, environmental review processes that can span multiple years and are governed by separate state requirements. These approval cycles do not align to solicitation windows and are largely outside the university's direct control.

The practical effect is that public university applicants are evaluated on the same readiness and match-commitment timeline as private and utility applicants who can authorize capital commitments unilaterally, even though our internal approval processes are structurally longer. This risks systematically disadvantaging public higher-education applicants — exactly the institutions managing critical, large-scale infrastructure serving disadvantaged and vulnerable populations that the program's preference points (Criteria 6-9) are intended to prioritize.

Recommendation: We ask CEC to consider one or more of the following for public agency/higher-education applicants: (1) a pre-application readiness certification pathway that allows internal approvals obtained shortly after (rather than strictly before) application submission, provided evidence of an active approval process is demonstrated; (2) explicit guidance on how conditional or leadership-pending match commitments will be scored under Criterion 4/Preference Criterion 7; or (3) a longer application window, or a rolling/two-stage application process (concept paper followed by full application), for public agency applicants to align with standard institutional approval cadences.

We appreciate CEC's continued engagement with stakeholders on this solicitation and are glad to provide further detail on our campus governance and capital project timelines if useful to staff's consideration.

Sincerely,

Markus Endter

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