

DOCKETED

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Filer:	Adam Hatefi
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Generac Power Systems

S45W29290 Highway 59

Waukesha, WI 53189

P: (262) 544-4811

W: www.Generac.com

July 15, 2026
California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA
Via docket submission

Re: Docket No. 22-RENEW-01 – Proposition 4 Distributed Electricity Backup Assets (DEBA) Grant Program

Dear Vice Chair Gunda and Energy Commission Staff,

Generac Power Systems (Generac) has eagerly anticipated this draft solicitation and applauds staff and leadership for all their dedication and work in preparing this draft solicitation for this important program. As an American manufacturer providing distributed energy resources to customers for over 65 years, we understand that the reliability and resilience are a basic need for individuals, businesses, and community overall. With a commitment to sustainable, cleaner energy products, Generac offers a range of energy technologies, including residential and commercial batteries, solar inverters, smart thermostats and microgrid control technologies. We are focused on supporting the next-generation grid with a comprehensive energy ecosystem. Building on our decades of experience in reliable resilience, Generac has engaged with commercial and public entities across the State of California to understand and develop solutions for their particular resilience needs. The Distributed Energy Backup Assets program is a perfect fit for these larger scale grid solutions based in the deployment of distributed resources.

Generac has been involved with this matter since January of 2023 in the earliest phases of implementing DEBA and DSGS and remains eager to see the program implemented to the full benefit of Californians. The potential for this state level investment in distributed resources to provide meaningful additional capacity and flexibility to the California electric grid is significant.

Upon review, Generac does seek clarification of two issues: measurement hours and whether DEBA funds can be used for new aggregations of existing hardware. Regarding measurement hours, Generac seeks clarity specifically on whether performance is measured during the same measurement hours regardless of the chosen pathway. If the measurement hours remain the same across the 4 pathways, it is unclear what the practical impact would be of the choice of pathway and any clarification that staff can provide would be helpful to guide any proposal submissions. Secondly, regarding whether DEBA funds can be used to support new aggregations – does the funding need to be tied to deployment of new hardware, or is the deployment of new software solutions to enable the aggregation an appropriate use of funding? Generac suggests that funding should be tied to any new capacity – whether through new aggregations of existing hardware or new hardware deployments. At a time when new capacity is the goal of the program, any pathway to achieve that should be eligible.



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Generac applauds the CEC in their continued efforts to design and implement such an important program. Please don't hesitate to reach us with any questions you may have.

A handwritten signature in blue ink that reads "Meredith Roberts". The signature is fluid and cursive, with the first and last names being more prominent.

Meredith Roberts
Senior Director of Policy and Regulatory Affairs
Generac Power Systems, Inc.