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SDCP Comments on Proposition 4 DEBA Draft Solicitation

Additional submitted attachment is included below.



July 15, 2026

California Energy Commission
Docket No. 22-RENEW-01
715 P Street
Sacramento, CA 95814-5512

RE: San Diego Community Power Comments on the Draft Proposition 4 Distributed Electricity Backup Assets (DEBA) Grant Program Solicitation; Docket No. 22-RENEW-01

Dear CEC Commissioners and Energy Commission Staff,

San Diego Community Power (SDCP) appreciates the opportunity to comment on the California Energy Commission's (CEC) Draft Grant Funding Opportunity for the Proposition 4 Distributed Electricity Backup Assets (DEBA) Grant Program, released on June 12, 2026.

SDCP is a Community Choice Aggregator (CCA), serving nearly one million customer accounts across the Cities of San Diego, Chula Vista, Encinitas, Imperial Beach, La Mesa, and National City, as well as the unincorporated areas of San Diego County.

SDCP supports the overall structure of the draft solicitation and respectfully offers the following four recommendations to further strengthen the final solicitation.

DEBA Should Prioritize Proven Project Models and Operational Experience

SDCP recommends that the CEC provide explicit and enhanced evaluation credit under for applicants proposing residential aggregation models with documented operational performance history of at least one year of successful deployment.

The draft solicitation requires funded projects to execute rapidly to meet the June 30, 2028 encumbrance deadline and June 30, 2030 liquidation deadline. Given these constraints, execution risk is a paramount concern for the CEC and the State.

While Criterion 2(b) of the current draft evaluates whether "the project team, including any key partners, has appropriate qualifications, experience, financial stability, and capability to complete the project, including a history of successfully completing similar projects," this sub-criterion focuses primarily on team-level qualifications rather than on project readiness.



Prioritizing projects with proven implementation will reduce the risk of underperformance against requirements and increases the likelihood that DEBA-funded resources will actually deliver incremental reliability benefits.

Daily dispatch model should be updated to include option for weekday-only dispatch

SDCP additionally requests that the CEC clarify in the final solicitation whether weekday-only daily dispatch under Pathway 4 satisfies the “daily in designated hours” requirement, or provide guidance on any minimum weekly dispatch frequency expectations. Focusing on reducing demand during the most valuable peak periods, which are typically weekdays. Requiring weekend dispatch may cycle the battery more than needed. This can reduce the battery’s overall lifespan and reduce the warranty.

Conclusion

San Diego Community Power appreciates the CEC’s commitment to advancing California’s electricity grid reliability, decarbonization, and equity goals through the Proposition 4 DEBA Grant Program.

SDCP respectfully requests that the CEC consider the recommendations outlined above to:

- Reward proven project models and deployment experience;
- Update daily dispatch model to include option for weekday daily dispatch;

Respectfully submitted,

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San Diego Community Power

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