

DOCKETED

Docket Number:	22-RENEW-01
Project Title:	Reliability Reserve Incentive Programs
TN #:	271467
Document Title:	California Solar and Storage Association Comments - CALSSA Comments on DEBA Solicitation Proposal
Description:	N/A
Filer:	System
Organization:	California Solar and Storage Association
Submitter Role:	Public
Submission Date:	7/15/2026 1:39:31 PM
Docketed Date:	7/15/2026

*Comment Received From: California Solar and Storage Association
Submitted On: 7/15/2026
Docket Number: 22-RENEW-01*

CALSSA Comments on DEBA Solicitation Proposal

Additional submitted attachment is included below.



July 15, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

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

California Energy Commissioners and Staff:

The California Solar & Storage Association (CALSSA) appreciates the opportunity to provide comments in response to the draft DEBA solicitation. CALSSA supports the proposal in concept but has several requested clarifications that would facilitate greater participation in the program. These requested changes are detailed below.

Multiple applications and the aggregation prohibition (Section II.A.1).

The draft proposal allows multiple applications per applicant for different technology combinations or different identifiable project sites, but it prohibits "multiple applications involving aggregations of similar technologies across multiple sites." We request that the CEC confirm that separate applications by a single applicant are permitted where each application comprises a distinct, identified portfolio of sites with distinct host customers and/or a distinct performance pathway. We ask the CEC to clarify that the prohibition is directed at splitting a single aggregation across applications to circumvent the maximum award rather than at an applicant submitting more than one genuinely distinct project. Multi-site portfolios within a single application are essential for smaller host customers, such as mutual water companies, to reach the \$2 million minimum award, so clarity on where the aggregation line sits will determine how much of this project class can participate.

Dual compensation and NBT export credits (Section II.B.5.d).

The dual compensation prohibition excepts "the utility or LSE rate plan applicable to the project resource." We request that the CEC confirm that export compensation received under Schedule NBT (including ACC-based export credits for paired storage discharge) constitutes compensation under the applicable rate plan and is therefore permitted during DEBA program events and measurement hours. Behind-the-meter exporting storage is a core project type under Pathway 4, and any contrary reading would make tariffed billing arrangements a disqualifier.

Treatment of debt in the 100% funding cap (Section I.E.5).

The draft proposal states that the sum of the DEBA award, applicable tax credits, "and other financial support in the form of grants, loans, and rebates" must not exceed 100% of total eligible project costs. Read literally, ordinary project debt used to finance an applicant's own cost share would count against the cap, which would penalize applicants that borrow rather than self-fund. We request that the CEC clarify that repayable debt financing at market or program terms is not "financial support" counted toward the 100% cap, or alternatively that only the grant-equivalent subsidy value of below-market loans is counted.

Interaction with SGIP and other incentive program assets at shared sites (Section II.B.5.d).

We request that the CEC confirm that the dual compensation prohibition applies to the DEBA-funded resource only, and that co-located resources funded under other programs (e.g., SGIP storage at the same premises) may continue performing under their own program obligations. This assumes that resource metering distinguishes the resources and no compensation is claimed for the DEBA resource's demonstrated capacity under another program.

Sincerely,

/s/ Jon Hart

Jon Hart
Policy Director
California Solar & Storage Association