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Wisewood comments on the Draft Distributed Electricity Backup Assets (DEBA) Solicitation

Additional submitted attachment is included below.

July 15, 2026

The Honorable Siva Gunda, Vice Chair
California Energy Commission
1416 Ninth Street
Sacramento, CA 95814

Re: Comments on the Draft Distributed Electricity Backup Assets (DEBA) Solicitation (Docket No. 22-RENEW-01)

Dear Vice Chair Gunda:

Wisewood Energy appreciates the opportunity to comment on the Draft DEBA Solicitation. Wisewood is a developer of advanced wood energy systems — including combined heat and power (CHP) and non-combustion gasification — that convert forest residuals and wood waste from wildfire fuels-reduction, forest-health, and restoration work into firm, dispatchable local energy. Our projects serve ski resorts, food processors, Tribes, special districts, rural communities, and forest-products facilities across the West, and are designed specifically to strengthen local energy resilience.

We write because, as drafted, the Solicitation's definition of eligible "zero-emission" distributed energy resources — and the exclusion at Section II.B.3.e of distributed generation that "converts chemical fuel" and is "not zero-emissions" — would categorically disqualify advanced woody biomass CHP and gasification. This is so even though these systems are among the very few distributed resources that are simultaneously (1) firm and dispatchable during the extreme heat events DEBA is designed to address, and (2) net climate- and air-quality-beneficial on a lifecycle basis. We respectfully urge the CEC to clarify the scope of the exclusion, adopt a lifecycle, performance-based standard, and make advanced woody biomass conversion technologies expressly eligible.

Our recommendations are summarized here and explained below:

1. Clarify whether the Section II.B.3.e exclusion for technologies that "convert chemical fuel" is even intended to include solid woody biomass.
2. Adopt a lifecycle, performance-based definition of "zero-emission" that recognizes biogenic carbon and avoided ("alternative fate") emissions — without requiring carbon capture.
3. Expressly include advanced woody biomass conversion technologies — both advanced combustion CHP and non-combustion gasification — that use forest residuals and wood waste.
4. Recognize DEBA's load-reduction and load-shift pathways for behind-the-meter woody biomass systems.

5. Allow private companies to apply when partnering with eligible public agencies, Tribes, special districts, or non-profits.

1. Clarify Whether the "Chemical Fuel" Exclusion Includes Solid Woody Biomass.

As a threshold matter — and independent of the lifecycle question below — the Solicitation should resolve a basic ambiguity. Section II.B.3.e makes ineligible distributed generation that "generate[s] electricity by converting chemical fuel" and is "not zero-emissions." It is not clear that the CEC intended "chemical fuel" to include solid woody biomass, rather than the gaseous and liquid fuels — hydrogen, biogas, natural gas — that the term ordinarily describes. Advanced woody biomass CHP and gasification do convert a solid fuel (the wood), and in gasification the syngas produced from it, so this threshold definition determines whether they are excluded at the outset.

Recommended Change: The CEC should clarify whether "chemical fuel" in Section II.B.3.e is intended to include solid woody biomass.

2. Judge Distributed Generation on Lifecycle Emissions, Not Onsite Emissions Alone.

The Draft Solicitation repeatedly requires "zero-emission" DERs but does not define whether "zero-emission" refers to criteria-pollutant emissions, climate-pollutant emissions, or onsite versus lifecycle emissions. No energy resource is truly zero-emission on a lifecycle basis; every technology carries emissions from manufacturing, materials, transport, construction, maintenance, and end-of-life disposal. Judging distributed generation solely on onsite emissions disqualifies technologies that deliver the largest net reductions in air and climate pollution while advantaging others whose lifecycle burdens are simply located out of sight.

Advanced woody biomass CHP and gasification illustrate the problem. The wood these systems use is residual material from wildfire fuels-reduction and forest-health treatments — material that, absent an energy use, is overwhelmingly pile-burned in the open or left to decompose, releasing the same carbon along with far higher volumes of particulate matter, methane, and other pollutants. A peer-reviewed field study of a California forest-slash-to-energy project found that using this material for energy, rather than open-burning it, reduced particulate matter by 98%, non-methane organic compounds by 99%, carbon monoxide by 97%, and methane by 96%, while also cutting NOx by 54% — and the study notes that NOx reductions are greater still for low-emission conversion technologies such as gasification.[1] Under the

[1]Bruce Springsteen et al., "Emission Reductions from Woody Biomass Waste for Energy as an Alternative to Open Burning," *Journal of the Air & Waste Management Association* 61:63–68 (2011). The peer-reviewed study of a California forest-slash-to-energy project measured reductions of 98% (particulate matter), 99% (non-methane organic compounds), 97% (carbon monoxide), 96% (methane), and 54% (NOx) relative to open pile burning, and notes that NOx reductions are

GHG Protocol, the accepted corporate carbon-accounting standard, biogenic CO_2 from sustainably sourced biomass is reported separately and excluded from net emissions, because that carbon was recently drawn from the atmosphere and is re-sequestered through forest regrowth.

This "alternative fate" or counterfactual approach — crediting a project for the higher-emitting disposal it displaces — is already used in California climate accounting, and the Legislature is extending it: AB 1666 (2025–26) directs the Air Resources Board to publish a lifecycle-emissions assessment of alternative uses of California-sourced wood waste.[2] As drafted, however, the Solicitation is incongruent with this direction. Excluding woody biomass energy on an onsite-emissions test contradicts the wildfire, air-quality, and climate policies California is actively pursuing through the CEC's sister agencies, and these mixed signals across state agencies create real confusion that slows meaningful progress on the state's own stated goals. A lifecycle-based standard would instead bring the CEC into alignment with the rest of California policy.

Woody biomass energy can achieve carbon neutrality — and, where biochar is produced, carbon-negative outcomes — through the biogenic carbon cycle and avoided disposal emissions alone. Carbon capture and storage should not be a precondition of eligibility.

Because Section II.B.3.e excludes a technology only where it is "not zero-emissions," everything turns on how that test is applied. Applied onsite, it disqualifies every combustion or fuel-conversion resource; applied on a lifecycle basis — as the evidence above supports — advanced woody biomass CHP and gasification qualify. We urge the CEC to adopt the lifecycle reading.

> **Recommended Change:** The CEC should revise prong (ii) of Section II.B.3.e so that a technology is ineligible only if it fails to achieve net-zero or net-negative emissions on a lifecycle basis — accounting for the avoided emissions of the feedstock's alternative fate — rather than applying an onsite zero-emission test. Eligibility should not be conditioned on carbon capture and storage.

3. Expressly Include Advanced Woody Biomass Conversion Technologies.

DEBA's purpose is grid reliability during extreme events such as heat waves. Firm, dispatchable, weather-independent generation is precisely what that purpose requires — and it is precisely what variable resources (which the Solicitation already excludes) cannot provide. Advanced woody biomass CHP and gasification are firm and dispatchable, operate independent of weather, and can be sited within the communities most exposed to both grid stress and wildfire. Excluding them removes

"significantly greater" for low-emission conversion technologies such as gasification and fuel cells.
[2]AB 1666 (Reg. Sess. 2025–26), Forest management: biomass innovation parks.

one of the few distributed generation options actually suited to DEBA's reliability mission.

Doing so would also cut against the direction of state policy. On May 7, 2026, Natural Resources Secretary Wade Crowfoot wrote to the heads of eight state agencies — including the CEC — urging expanded conversion of forest waste to energy, noting that converting forest waste to electricity is "the primary method to remove and process low-value biomass" and that bioenergy facilities are "critical to remove and process fuel loads across numerous high fire-severity zones."[3] AB 1666 would establish "biomass innovation parks" built specifically around non-combustion technologies that convert California wood waste into carbon-beneficial products — the very gasification pathways this Solicitation would exclude. And the state's Forest Stewardship and biomass-utilization strategies identify wood-to-energy as a core tool for reducing catastrophic wildfire risk. A DEBA solicitation that excludes advanced woody biomass conversion is out of step with the CEC's sister agencies and the Secretary's express request.

This is not hypothetical. Wisewood is actively developing community microgrid projects — including with California Tribes — in which a firm, dispatchable woody biomass generator anchors a microgrid that can island and keep critical facilities powered through wildfire-driven outages and public-safety power shutoffs. Microgrids are already an eligible DER category under the Solicitation, but a microgrid is only as reliable as its firm generation source. Excluding advanced woody biomass would force these communities to anchor their microgrids on storage alone, which cannot sustain the multi-day outages that fire-prone regions face — and it would sever the direct link between keeping critical facilities powered and removing the forest fuels that drive those outages in the first place. Pairing firm biomass generation with microgrid controls is squarely aligned with DEBA's reliability mission and with Proposition 4's priorities for Tribes and fire-vulnerable communities.

> **Recommended Change:** The list of eligible Distributed Generation technologies (Section II.B.2.c) should expressly include advanced woody biomass conversion technologies — both advanced combustion CHP and non-combustion gasification — that use forest residuals, mill residuals, and other wood waste, including material removed for wildfire fuels-reduction, forest-health, pest-control, or restoration purposes.

4. Recognize Load-Reduction and Load-Shift Pathways for Behind-the-Meter Woody Biomass.

DEBA credits load reduction and load shift, not only supply. Where a biomass system reduces a host facility's net draw from the grid during extreme events, it can deliver the incremental, dispatchable capacity DEBA seeks through a load-reduction pathway

[3] Letter from Wade Crowfoot, Secretary, California Natural Resources Agency, to state agency heads regarding biomass utilization (May 7, 2026).

that is independent of the Section II.B.3.e generation exclusion. Recognizing this pathway would allow behind-the-meter woody biomass projects to contribute to grid reliability even while the definitional questions above are being resolved.

> **Recommended Change:** The CEC should confirm that behind-the-meter woody biomass systems delivering verifiable load reduction or load shift during extreme events are eligible on that basis.

5. Allow Private Companies to Apply When Partnering with Eligible Public Entities.

Many of the projects that would most advance DEBA's goals are developed by private firms working hand-in-hand with public agencies, Tribes, special districts, and non-profits — the entities the Solicitation already recognizes as eligible applicants. We appreciate that the Draft allows development, installation, and operation to be contracted to a private subrecipient. The reliability and wildfire-mitigation benefits DEBA seeks will materialize faster if the Solicitation makes explicit that projects led by such public-private partnerships are eligible and encouraged.

> **Recommended Change:** The Solicitation should expressly confirm that private entities may participate as co-applicants or subrecipients where they are partnering with an eligible public agency, Tribe, special district, non-profit, or public research institution.

DEBA carries both a reliability mandate and a mandate to help build a cleaner, more resilient California. Advanced woody biomass CHP and gasification serve both: firm, dispatchable capacity for extreme events, delivered by removing the forest fuels that drive catastrophic wildfire and the open burning that harms air quality. We urge the CEC to revise the Solicitation to judge distributed generation on lifecycle performance and to make these technologies expressly eligible.

Thank you for considering these comments. We would welcome the opportunity to share additional data from Wisewood's projects and lifecycle analyses.

Sincerely,

Andrew Haden
President
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