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Antelope Valley Fair Authority Public Comments â€“ DEBA Round 2 Draft Solicitation

Please accept the attached public comments submitted on behalf of the Antelope Valley Fair Authority (50th District Agricultural Association) regarding the June 2026 Proposition 4 Distributed Electricity Backup Assets (DEBA) Round 2 Draft Solicitation (TN #270606). As a prospective public-sector applicant, the Antelope Valley Fair Authority appreciates the Commission's revisions to the draft solicitation and respectfully offers several recommendations intended to improve implementation, clarify eligibility and project readiness requirements, and strengthen the program's ability to support resilient public infrastructure and emergency response facilities throughout California. Thank you for your consideration.

Additional submitted attachment is included below.

ANTELOPE VALLEY FAIR AUTHORITY

July 15, 2026

California Energy Commission
Attn: Docket Unit, Docket No. 22-RENEW-01
715 P Street
Sacramento, CA 95814
Via email: docket@energy.ca.gov

Re: Docket No. 22-RENEW-01 — Proposition 4 Distributed Electricity Backup Assets (DEBA) Program, Round 2 Draft Solicitation (TN #270606). Public comment on behalf of the Antelope Valley Fair Authority.

Dear Commissioners and Staff:

The Antelope Valley Fair Authority appreciates the opportunity to comment on the June 2026 Draft Solicitation for the Proposition 4 Distributed Electricity Backup Assets (DEBA) Program.

The Fair Authority is actively evaluating development of a distributed energy microgrid that would improve the long-term resilience of one of California's largest publicly owned emergency response facilities. The Antelope Valley Fairgrounds serves year-round community functions and has repeatedly supported emergency response, evacuation, sheltering, and disaster recovery activities in partnership with state and local agencies.

We appreciate several improvements made in the June 2026 draft solicitation, particularly:

- Elimination of the previous minimum megawatt thresholds.
- Reduction of the applicant cost share.
- Clarification of eligible public applicants.
- Simplification of the dispatch pathways.

These changes significantly improve the ability of public agencies to participate in the program.

As a prospective applicant, we respectfully request consideration of the following additional clarifications.

1. Clarify Interconnection Documentation Expectations

Interconnection is one of the most significant schedule and cost risks facing public infrastructure projects. We recommend that the final solicitation clearly identify the level of interconnection documentation expected at the time of application, including whether preliminary utility reviews, Rule 21 pre-application reports, or executed interconnection agreements are expected for highly competitive applications.

Providing this guidance will improve application quality and reduce uncertainty for applicants.

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2. Recognize the Unique Operational Needs of Emergency Response Facilities

Emergency response facilities frequently operate continuously during multi-day disasters rather than only during short peak demand periods. Facilities serving as evacuation centers, emergency operations support sites, or mass care locations require reliable power for refrigeration, communications, HVAC, potable water, sanitation, medical support, and emergency logistics.

We encourage the Commission to recognize the additional resilience value provided by projects capable of supporting extended emergency operations.

3. Clarify Eligibility of Hydrogen Fuel Cell Technologies

The June 2026 draft identifies hydrogen-related distributed generation technologies while also introducing lifecycle zero-emission language that creates uncertainty regarding practical eligibility.

We respectfully request clarification regarding the eligibility of renewable hydrogen systems and the lifecycle standard that will be applied. Providing this clarification prior to final solicitation issuance will allow applicants to make appropriate technology decisions and avoid unnecessary redesign efforts.

4. Clarify Treatment of IRA Direct Pay

As a public agency, the Antelope Valley Fair Authority may utilize the Inflation Reduction Act Elective Payment (Direct Pay) provisions. Clarification regarding whether anticipated Direct Pay proceeds may be included as part of the required applicant match would provide important financing certainty for public-sector applicants.

Closing

The Antelope Valley Fair Authority appreciates the Commission's continued efforts to improve the DEBA program. The revisions already incorporated into the June 2026 draft represent meaningful progress toward expanding participation by public agencies and improving California's resilience infrastructure.

We respectfully request consideration of the clarifications described above and look forward to participating in the final DEBA solicitation.

Respectfully submitted,



Tina Wynegar

Grant Strategy Consultant on Behalf of:

Antelope Valley Fair Authority
(50th District Agricultural Association)

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