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White Pine Renewables - Comments on Draft Proposition 4 DEBA Solicitation

Additional submitted attachment is included below.

Re: Comments on the Draft Proposition 4 Distributed Electricity Backup Assets (DEBA) Grant Program Solicitation (GFO-26-XXX-DRAFT) — Docket No. 22-RENEW-01

White Pine Renewables ("White Pine") appreciates the opportunity to comment on the draft Proposition 4 DEBA solicitation. White Pine develops behind-the-meter distributed battery energy storage that serves non-residential customers and provides on-call capacity to support grid reliability during extreme events.

We strongly support the program's goal of rapidly deploying incremental, zero-emission distributed capacity. We respectfully offer three comments on the draft solicitation.

1. Keep the program accessible to earlier-stage projects that most need DEBA funding.

Reference: Section II.B.9 (Project Readiness), Section II.C (Environmental Review), Scoring Criterion 3, and Section I.E.3–4 (Allowable and Unallowable Costs).

White Pine understands the intent of the program to deploy resources as quickly as possible and believes a broader swath of projects can achieve rapid deployment than is currently drafted. The draft front-loads project readiness—requiring CEQA, permitting, and interconnection to be substantially complete before award—and weights Criterion 3 heavily (20 points, with a 70% minimum). Yet the pre-development soft costs needed to reach that readiness—environmental review, permitting, interconnection studies, and site control—are expressly non-reimbursable and must be borne by the applicant before any award. The combined effect favors projects that are already well-capitalized and advanced, while the projects that most need DEBA support—earlier-stage projects, and those led by the capital-constrained public, tribal, and disadvantaged-community-serving hosts that Proposition 4 prioritizes—are least able to front those costs and clear the readiness bar. We respectfully urge the Commission to keep the program accessible to promising earlier-stage projects by: (a) moderating the readiness requirement so that well-substantiated but not-yet-fully-permitted projects can compete—for example, by accepting a credible readiness plan and timeline, rather than completed approvals, at the time of application, consistent with the encumbrance deadline; (b) confirming that the "need for DEBA funding" assessed under Criterion 4 is evaluated as a financing gap or additionality, so that an earlier-stage project's need is treated as a strength rather than a weakness; and (c) allowing a limited portion of pre-development soft costs—such as interconnection studies, permitting, and environmental review—to be reimbursable or countable toward match, so that DEBA funds can help move promising projects through the costly early-development phase rather than only funding those that are already shovel-ready.

2. Improve scoring transparency and clarify an internal inconsistency.

Reference: Section IV.E.2 and Table 10 (Scoring Criteria); Section II.B.9 (Interconnection Readiness).

We request the Commission (a) publish the relative weights of the sub-criteria within each scoring criterion, and the point values (or relative weighting) associated with the interconnection readiness tiers, which the draft states are scored "more favorably" without specifying values; and (b) clarify an internal inconsistency in the preference-point totals. The draft states in three places that there are four preference criteria totaling a maximum of 30 points (the Section IV introduction, the scoring overview, and the Table 10 header), yet the four criteria as itemized—Criterion 6 (10), Criterion 7 (5), Criterion 8 (5), and Criterion 9 (5)—sum to 25. We ask for clarification around the preference point sum.

3. Confirm the eligibility of third-party-owned resources.

We respectfully request that the Commission confirm whether distributed energy resources that are owned and financed by a third party and made available to the applicant under a service agreement are eligible for funding under this program.

White Pine appreciates the Commission's work on this solicitation and its accelerated timeline. We would welcome the opportunity to discuss these comments with staff and to participate in the pre-application workshop following release of the final solicitation.