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WestLight Energy Comments on 2026 DEBA Prop 4 GFO

Additional submitted attachment is included below.

July 15, 2026

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

RE: Comments on Proposition 4 DEBA Draft Solicitation

Dear Commissioners and CEC Staff,

WestLight Energy (WestLight), formerly Peninsula Clean Energy, appreciates the opportunity to comment on the California Energy Commission's (CEC) Proposition (Prop) 4 Distributed Energy Backup Assets (DEBA) Draft Solicitation. WestLight thanks staff for their work in putting the draft solicitation documents together and submits the following comments to seek further clarification on the program requirements.

I. WestLight's GovPV Program

WestLight Energy is a community choice aggregator (CCA) serving the County of San Mateo and its incorporated cities, as well as the City of Los Banos in Merced County. WestLight is considering utilizing its existing Solar + Storage for Public Facilities ("GovPV") program for this new DEBA grant funding opportunity, which is summarized below.

The GovPV program helps public agencies install solar and storage systems to reduce energy costs, generate on-site renewable energy, decrease carbon emissions, and provide crucial backup power during grid outages. Under this program, WestLight provides participating public agencies expert project development support, financing, asset management, and long-term maintenance of the equipment. Participating agencies get access to behind-the-meter solar and storage, which provides a critical backup power function at public facilities such as libraries, community centers, city halls, and fire stations. The Prop 4 DEBA funding would allow WestLight to broaden its program reach, making these backup power systems more affordable to participating agencies, and expanding the total number of agencies that are able to participate in the program.

II. Performance Pathway and Seasons

WestLight understands that applicants must select one of four performance pathways to dispatch nominated capacity, and that projects must perform consistently for a term of three program seasons (May 1 through October 31).[1] Meanwhile, Table 10 on Scoring Criteria mentions the proposed performance pathway as generally within the "Contribution to Reliability and Other Benefits" section. It specifically notes that among the 25 possible points, the amount of incremental nominated capacity and duration that will be committed during program hours to improve grid reliability in accordance with the proposed performance pathway will be considered, as well as the degree to which the proposal describes a plan to meeting the applicable performance pathway data requirements and how the demonstrated capacity will be calculated.[2]

The scoring criteria, however, does not mention if one chosen performance pathway will be weighed heavier than the other. WestLight is therefore seeking clarification on this distinction.

Moreover, with the deadline to submit CEC-reimbursable invoices by March 1, 2030,[3] and the requirement for projects to perform consistently for a term of three program seasons, WestLight seeks to understand if the start of the three program seasons must functionally occur by a certain year to account for the March 1, 2030, invoice deadline date.

III. Clarifying Strategic Intent

As mentioned in Prop 4 DEBA draft solicitation materials, the intent of the solicitation is to support the deployment of new distributed energy resources that can increase supply or reduce (or shift) load to improve the reliability of the electric grid during extreme events.[4] In addition, projects are expected to come online quickly, meet statutory and liquidation deadlines, as well as be responsive to immediate reliability needs.[5]

WestLight acknowledges the program's priority to secure projects that will come online quickly, but notes that in order to get projects "site ready" or near the point of reaching "Notice to Proceed," then investment must be made in project site due diligence. Projects that are closest to being site-ready are likely to already stand on their own economically. For instance, most projects with a signed interconnection agreement are likely far enough in their development that

[1] Proposition 4 DEBA Draft Solicitation, at 21.
[2] *Ibid*, at 53.
[3] *Ibid*, at 8.
[4] *Ibid*, at 1.
[5] *Ibid*, at 33.

they do not require funding to move forward, as those types of projects typically have revenue contracts executed that make the project financially viable independent of third-party funds.

Conversely, sites that are in an earlier stage of development are likely to not have revenue contracts lined up and could benefit from DEBA funding. Therefore, WestLight seeks clarification on from the CEC to further describe competing priorities on site readiness and incrementality.

IV. Vulnerable, Disadvantaged Communities (DAC)s and Severe DACs across subprojects

The scoring criteria gives 5-10 points if projects are based in Vulnerable Populations, a DAC, or a Severe DAC.[6] WestLight expects that some of its subprojects within its broader application will be based in these types of areas, and some will not. How will scoring be reflected if that is the case? For instance, if out of 10 of its subprojects, 2 are located in a DAC, does that count as 1 bonus point? (20% of projects x 5 points for being sited in a DAC).

V. Swapping projects

For behind-the-meter (BTM), non-residential projects, applicants may include multiple sites that can be bundled into a single application as "subprojects."[7] Since some subprojects may drop out due to unforeseen circumstances and others may come into the portfolio, WestLight would like to know if applicants are able to add, remove, or swap subprojects after the grant award to account for these changes, as long as key project details remain the same, such as the overall MW capacity of dispatch volume, performance pathway, and performance seasons.

VI. Summary of Questions

A list of all the questions discussed above are found below, along with two additional ones.

1. Will a chosen performance pathway be weighed heavier than another when the CEC chooses awardees?
2. If an applicant uses the 2030 program season to meet one of the three seasons requirement, will applicants will be allowed to submit an invoice by March 1, 2030, of that year account for future costs?
3. Can the CEC further describe competing priorities on site readiness and incrementability regarding new projects that must be ready to come online?

[6] *Ibid*, at 58-59.
[7] *Ibid*, at 19.

4. For WestLight, some but not all of its subprojects will be located in Vulnerable Populations, DACs, or a Severe DAC. How will scoring be reflected when the scoring criteria gives 5-10 projects for projects based in these areas? That is, if 2 out of 10 projects are in a DAC, does that count as 1 bonus point?
5. Are applicants able to add, remove or swap subprojects after the grant award to account for unforeseen changes as long as the overall MW capacity of dispatch volume remains the same?
6. Will any consideration be given to projects that support critical infrastructure that are not receiving federal funding? What counts as critical infrastructure?
7. Total available funding range is $23.1M-$46.1M. Water utility projects could claim up to $23M of this funding. When will the CEC know the final amount available?

VII. Conclusion

WestLight Energy strongly supports the California Energy Commission's efforts to enhance grid reliability and deploy zero-emission backup assets through the Prop 4 DEBA Grant Program. WestLight believes aggregated portfolios like the GovPV program are uniquely positioned to advance these goals by delivering crucial backup power battery storage to public agencies, expanding benefits to vulnerable and disadvantaged communities, and providing consistent load shed during the evening peak. WestLight thanks CEC staff for their time and consideration of these comments and look forward to further clarification on these programmatic and scoring requirements in the final solicitation.

Sincerely,

/s/ Peter Levitt

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July 15, 2026