DOCKETED

Docket Number:	22-RENEW-01
Project Title:	Reliability Reserve Incentive Programs
TN #:	271493
Document Title:	Greenlane Infrastructure, LLC. Comments - Greenlane Infrastructure, LLC - Comment DEBA Grant Program
Description:	N/A
Filer:	System
Organization:	Greenlane Infrastructure, LLC.
Submitter Role:	Public
Submission Date:	7/15/2026 4:59:52 PM
Docketed Date:	7/15/2026

Comment Received From: Greenlane Infrastructure, LLC.
Submitted On: 7/15/2026
Docket Number: 22-RENEW-01

Greenlane Infrastructure, LLC - Comment DEBA Grant Program

Additional submitted attachment is included below.

Greenlane™

Feel Good About the Road Ahead

From: Greenlane Infrastructure, LLC
To: California Energy Commission (CEC)
Date: July 15, 2026
Subject: Public Comment for Proposition 4 Distributive Electricity Backup Assets (DEBA) Grant Program

Dear DEBA Program Staff,

Thank you for the opportunity to provide public comments to the CEC's concepts for Proposition 4 DEBA Grant Program.

Greenlane's sole business purpose is to facilitate the transition of medium and heavy-duty (MDHD) commercial fleets to zero emission (ZE) by providing critical zero emission vehicle (ZEV) fueling infrastructure along key freight corridors across the country. The transportation sector is now the largest source of GHG emissions in the U.S. MDHD vehicles account for less than 10% of vehicles on the road but are responsible for 23% of GHG emissions in the transportation sector. Furthermore, diesel emissions have a disproportionate impact on air quality and human health. Poor health outcomes from diesel pollution are pronounced and well documented in underserved communities across the country.

Greenlane's inaugural publicly accessible charging hub for electric MDHD commercial fleet vehicles opened in Colton, CA in April 2025, serving as a cornerstone of Greenlane's commitment to electrifying MDHD commercial fleet vehicles. The location features 53 charging ports and showcases Greenlane's expertise in deploying EV charging infrastructure for MDHD vehicles. The charging hub in Colton is the first of several charging hubs scheduled for deployment. The sites will include modern amenities, and in some cases, accommodate on-site power generation and energy storage.

Greenlane strongly supports the CEC's efforts to deploy distributed energy resources that improve grid reliability, reduce peak demand, and accelerate deployment of clean energy infrastructure throughout California. Greenlane is particularly encouraged by several aspects of the draft solicitation, including:

- **Battery Energy Storage Systems (BESS)** are explicitly identified as eligible technologies
- **Behind-the-meter** non-residential projects are eligible
- **Load reduction and load shifting** are recognized as valuable grid reliability resources

Greenlane supports the general framework established in the draft solicitation and believes the program will support deployment of distributed energy resources that improve grid reliability. However, several provisions may unintentionally limit participation of certain transportation electrification projects. These projects have the potential to substantial support load reduction, load shifting, and resiliency. In an effort to better align the solicitation with California's clean transportation objectives and maximize the value of DEBA investments, Greenlane offers the following recommendations for consideration in the final solicitation.

- **Clarify Eligibility of Non-Export Battery Storage Systems**
  While the draft solicitation allows Behind-the-Meter projects and notes that power may be consumed on-site rather than exported, Greenlane requests explicit clarification that BESS remain eligible where utility interconnection rules prohibit battery export or participation in utility grid-service programs. Such systems can still provide substantially public benefits through load shifting, peak demand reduction, resiliency, demand charge mitigation, and support for medium- and heavy-duty EV charging infrastructure. Clarification would provide certainty for projects located within electric utility service territories that may impose restrictions on battery export while still allowing interconnected customer-sited storage systems.

- **Explicitly Recognize MDHD EV Charging as a Reliability Use Case**
  Recognize battery storage deployed in support of MDHD EV charging infrastructure as a preferred reliability application. MDHD charging stations can require substantial amounts of electricity, particularly when multiple high-power chargers are operating simultaneously. Co-locating BESS with these charging stations can help reduce the impacts by shifting load away from peak periods, lowering site demand, and minimizing the need for costly utility infrastructure upgrades. Because these systems directly support the solicitation's goals of load reduction, load shifting, and grid reliability, the final solicitation should explicitly identify battery storage supporting MDHD charging infrastructure as an eligible and preferred DEBA use case.

- **Provide Operational Flexibility for EV Charging Sites**
  Allow flexibility regarding the Program Hours for the dispatch requirements by increasing the hours for the program window. This would help ensure that BESS can continue to support both charging operations and grid reliability objectives. The flexibility will increase participation from transportation electrification projects and improve the overall value delivered by DEBA-funded resources.

- **Allow Solar Plus Storage Costs to Count as an Eligible Expense**
  Solar investments paired with eligible storage projects should be allowed to count toward eligible project costs. Solar paired with BESS provides greater grid and customer benefits than battery storage alone by reducing grid energy consumption and charging batteries with on-site generation. Allowing solar investments to qualify as an eligible

expense encourages more comprehensive distributed energy projects and emissions-reduction benefits delivered through the DEBA program.

Greenlane appreciates the opportunity to submit these comments and looks forward to submitting competitive proposals in the coming months when the CEC releases the Proposition 4 DEBA Grant Program. Additionally, Greenlane is available for one-on-one conversations to provide further comments at the CEC's request.

Sincerely,

Andrea Pratt
Vice President Government & Utility Relations
andrea.pratt@drivegreenlane.com

About Greenlane

Greenlane Infrastructure, LLC (Greenlane) is an industry leader in providing publicly accessible electric vehicle charging centers exclusively for MDHD zero emission vehicles (ZEVs). Greenlane addresses the urgent need for a publicly available, nationwide network of high-powered electric charging infrastructure for commercial fleets, including regional and long-haul freight and logistics carriers, and is a critical step toward the development of a sustainable ZEV ecosystem across North America. For more information, please visit www.drivegreenlane.com.