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Comments from the California Climate & Energy Collaborative on the Draft Distributed Electricity Backup Assets Grant Program

The California Climate & Energy Collaborative appreciates your consideration of the attached comments.

Additional submitted attachment is included below.

July 15, 2026

California Energy Commission
Docket #: 22-RENEW-01



RE: California Climate and Energy Collaborative (CCEC) Comments on the Draft Distributed Electricity Backup Assets (DEBA) Grant Program

Dear CEC Leadership and Staff,

The [California Climate and Energy Collaborative \(CCEC\)](#) welcomes the opportunity to provide comments in response to the California Energy Commission's Draft Solicitation for the [Proposition 4 Distributed Electricity Backup Assets \(DEBA\) Grant Program](#). The CCEC network commends the state for developing a program focused on localized investments in distributed energy resources to improve California's energy resilience to build upon tremendous progress and leadership in California related to energy efficiency, electrification, and renewable energy and storage deployment.

CCEC Network & Relationship to Topic

CCEC is a program of CivicWell that supports California local governments and their partners in their efforts to advance community-driven energy efficiency, emissions reduction, and climate action by building the knowledge, partnerships, and tools needed for sustained local capacity and streamlining coordination of state and local practitioners to remove implementation barriers. Our network of local governments and their partners across the state are working to rapidly implement community energy efficiency, clean energy, electric vehicle, energy resilience and other climate actions, in alignment with State goals.

Many of the 4,500 participants of the CCEC network have a strong focus and track record on accelerating progress on distributed local energy, decarbonization and resilience initiatives in the last two decades, and unique knowledge and perspectives that can inform this program. Local and regional organizations regularly confront real world challenges and barriers in their efforts to empower and implement distributed energy resources projects. We also recognize that decarbonization, affordability, reliability, and equity challenges facing California are unprecedented and critically entwined, and collaboration among State and local agencies is essential.

CCEC is continuously developing ways to foster better two-way communication between State and local agencies to more effectively reach mutual energy and climate goals, and we welcome greater collaboration with the State on this matter. In the past three years we have operated the [State and Local Energy and Climate Coordination](#) (SLECC) statewide and regional meetings with participation across roughly 1,000 attendees from local governments, other place-based stakeholders, and a dozen State agencies. We greatly appreciate that CEC representatives engage with our network regularly through SLECC and various other state-local meetings, including attendance at our recent CCEC Forum in LA. We would welcome more direct opportunities to update and engage our network on this and other CEC plans and encourage staff to utilize the regular and well-attended communication venues we have available.

SLECC Findings

This year, CCEC released [a working draft of the 2025 SLECC Report](#) summarizing a large volume of input generously provided by over 1,000 state and local participants at nearly 20 statewide and regional (in person and virtual) convenings since 2023. The report shares what SLECC has learned about how California can deliver state and local solutions that really address the biggest barriers to accelerating place-based energy and climate progress. SLECC's work to date has identified 32 barriers to place-based progress under 7 topic areas, including 12 barriers specifically on the topic of Clean Energy & Building Decarbonization and 6 barriers on the topic of Funding Access & Capacity Building. The barriers most applicable to the Building Energy Action Plan are flagged below in the table on pages 3-6.

The SLECC Report, and corresponding online [dashboard](#), detail nuanced examples of how communities are experiencing these barriers, provide initial local and state solution opportunities, showcase success already being made, and propose where pathways to further progress currently exist within agencies, including through important state plans like this. Given how relevant our findings are to the content and purpose of the Building Energy Action Plan, we respectfully submit these comments and the associated SLECC report and dashboard into the record for CEC consideration.

Comments on DEBA & Alignment with SLECC and Other Relevant Findings

The CCEC network appreciates the investments made in the draft solicitation towards localized distributed energy resources, particularly in the context of the current funding landscape. The last year and half have hit local communities working to advance California's energy and climate goals hard at both the federal and state levels, including threats to key recurring funding sources from Public Purpose Programs and Greenhouse Gas Reduction Fund. A \$46M DEBA program that includes \$2-8M awards for activities like energy storage, load flex, waste heat-to-power and microgrids is strongly aligned with many of key barriers in communities across CA as identified in the [2025 SLECC Report](#) and other publications.

- **Community Resilience Barrier 1: Energy Resilience:** Outdated, centralized energy infrastructure, increasing capacity demands, and limited local authority, funding and coordination – leave communities increasingly vulnerable to outages, heat, wildfire, and flooding, undermining resilience safety and affordability
- **Clean Energy Transition**
 - o **Barrier 7: Investment Decisions:** Despite state goals related to distributed, localized energy resources, investments, regulatory decisions, and policies often discourage or hamstring clean energy deployment or favor centralized utility infrastructure. Despite state goals related to distributed, localized energy resources, investments, regulatory decisions, and policies often discourage or hamstring clean energy deployment or favor centralized utility infrastructure.
 - o **Barrier 11: Community Microgrid Deployment:** Community-scale microgrids remain financially and technically difficult to deploy due to restrictive utility rules, undervaluation of battery reserves, and high coordination needs for EV fleets and

other DERs. These challenges, compounded by PSPS outages and slow permitting, prevent microgrids from delivering reliable and cost-effective community resilience.

- **Funding Access and Capacity Building Barriers**

- o **Barrier 1: Insufficient Investment:** Significant budget and funding constraints at local, state and federal levels prevent adequate investments and capacity in needed energy, climate and land use strategies.
- o **Barrier 2: Unstable Assistance:** Fluctuations in federal and state politics and budgets result in funding and technical assistance opportunities for local and place-based efforts that are often offered on a one-time basis and do not recur at predictable intervals, and are not reliably available
- o **Barrier 3: Application Burden & Accessibility:** Competitive public grant applications are overly complex, confusing, and inflexible pass/fail processes that are oversubscribed with little standardization, extracting limited organizational capacity that could be used for action while creating prohibitively high costs and low success probabilities that discourage resource-constrained organizations from attempting to apply.

SLECC offers [initial state solution ideas](#) for each of the barriers raised, which we strongly encourage CEC to review. On matters related to funding accessibility, it also points to other her relevant publications that provide detailed recommendations including:

- [Better Funding](#) by Prosper Sustainably with support from CCEC and Tribal Energy & Climate Collaborative, which includes 70 recommendations for improving public funding deployment for local and tribal governments, mined from extensive engagement
- [California Tribal Gap Analysis](#) by Prosper Sustainably, commissioned by CEC and SGC, which was designed to answer this question: How can the State of California better support the needs of California Native American Tribes in the areas of clean energy and climate change adaptation and resilience? See Challenges Accessing Existing Programs on p. 77 and Recommendations and Conclusions on p. 106. The report outlines the types of activities that represent the greatest need for assistance, which include installing solar electricity systems, energy storage systems, and microgrid systems.

Key Recommendations for the DEBA Program

Based on the insights gleaned from communities in the publication above, CCEC recommends:

- Keep as much of the \$46M available for DER project awards or technical assistance as possible, rather than for water utility cost-share
- Reduce or eliminate the 25% match requirement, especially the weighting more favorable to cash, and especially for underresourced, tribal, and disadvantaged communities. Such a high match requirement will certainly discourage many communities with the greatest need from applying, which will be counterproductive to meeting the equity goals of Proposition 4.
- Consider a track for pre-development of projects not yet ready for construction
- Eliminate requirements that undermine Tribal sovereignty, such as waiver of tribal sovereign immunity
- Simplify, streamline, and coordinate this grant solicitation

- A significant way to achieve equitable access to dollars is through ease. This solicitation is 70 pages and the application includes twelve required attachments, four performance pathways, a full M&V plan, and CEQA compliance forms per subproject is a heavy administrative lift. We recommend removing unfunded plans and other requirements that wait until a project is funded.
- Communities are regularly asking for a central common application portal or the creation of a centralized, evergreen inventory and pipeline of fundable energy and climate projects
- Provide a technical assistance (TA) set aside for grant writing, project scoping and implementation support, such as through regional energy and climate hubs
- Continue the program on an ongoing, reliable and predictable basis (e.g. annual) if possible, to allow communities to plan to take advantage of the opportunity. We recommend identifying investment opportunities to flow to communities through other sources like the CPUC's Climate Adaptation and Vulnerability Assessment process
- Allow solar PV costs to be allowable given that many project proponents will be completing these projects concurrently for the greatest cost effectiveness and incentives for solar PV have diminished substantially
- As part of application solicitation and review, recognize risk of utility disruption and resilience improvement in response to a natural disaster, including a seismic event. While seismic events are not driven by climate change, the technologies DEBA will fund help other forms of resilience, including reducing vulnerability of the grid and grid assets to natural disaster, and likely improving flexibility during recovery of timing of recovery.
- Consider coordination among existing local and regional energy programs, like Regional Energy Networks (RENs), that are working on non-residential or aggregated residential energy projects across most of California, but are unable to use existing energy efficiency dollars to support energy storage projects, despite very strong interest from their customers in bundling these kinds of improvements.

Conclusion

We recommend that the State prioritize the concerns, ideas, opportunities and successes shared by communities across California and transmitted by CCEC through its SLECC initiative and comments. We encourage CEC to meaningfully integrate the barriers and solutions into the final version of the DEBA solicitation and its subsequent implementation.

Thank you for the opportunity to relay comments from our statewide network and add these important matters to the record in relation to the DEBA Grant Program. We hope your agency will continue to participate in our SLECC meetings and welcome an opportunity to help CEC more formally gather and share local experiences for future analyses. CCEC remains committed to coordinating with State and our extensive network of local governments and their partners and look forward to ongoing collaboration. Please do not hesitate to reach out to Angie Hacker at ahacker@civicwell.org if you have any questions. Please contact us if CCEC can be helpful in distributing information or coordinating listening sessions with our network.

Respectfully submitted by Angie Hacker, CCEC's Statewide Best Practices Coordinator, on behalf of the California Climate and Energy Collaborative (CCEC).