

DOCKETED	
Docket Number:	25-EPIC-01
Project Title:	Electric Program Investment Charge 2026–2030 Investment Plan (EPIC 5)
TN #:	272055
Document Title:	Bhartendu Sinha Comments - inGeniti Comments on Distributed Electrical Capacity Orchestration
Description:	N/A
Filer:	System
Organization:	Bhartendu Sinha
Submitter Role:	Public
Submission Date:	8/19/2026 4:43:44 PM
Docketed Date:	8/19/2026

Comment Received From: Bhartendu Sinha
Submitted On: 8/19/2026
Docket Number: 25-EPIC-01

inGeniti Comments on Distributed Electrical Capacity Orchestration

Recognize distributed electrical capacity orchestration as an eligible DEBA load flexibility enabling technology

Additional submitted attachment is included below.

August 18, 2026

California Energy Commission
Docket Unit

Re: Docket No. 22-RENEW-01

Comments on the Proposition 4 Distributed Electricity Backup Assets Grant Program Draft Solicitation

inGeniti, Inc. appreciates the opportunity to comment on the draft solicitation for the Proposition 4 Distributed Electricity Backup Assets (DEBA) Grant Program.

inGeniti respectfully requests that the final solicitation expressly recognize distributed electrical capacity orchestration systems as eligible load-flexibility enabling technologies.

Distributed Electrical Capacity Orchestration

As California electrifies buildings and transportation, increasing numbers of high-power electrical loads - including heat pumps, electric water heaters, EV charging, HVAC equipment, pumps, and other flexible loads - are being added behind the meter.

These loads individually may be flexible, but without a common orchestration layer they operate independently. As a result, their combined demand can create significant coincident peaks even when sufficient flexibility exists within the premises to reduce or shift that demand.

Distributed electrical capacity orchestration systems address this problem by monitoring and coordinating multiple electrical loads at the premises level and operating those loads within defined electrical capacity constraints.

Rather than controlling a single appliance, these systems can coordinate multiple heterogeneous loads to create a measurable and dispatchable reduction in electrical demand while maintaining required operating, safety, and customer constraints.

This capability is consistent with DEBA's objective of deploying commercially available distributed energy resources capable of providing incremental capacity and supporting grid reliability.

Recommended Clarification

inGeniti recommends that the Commission expressly clarify the eligibility of this resource category within the final solicitation.

"Distributed electrical capacity orchestration systems, including edge-based monitoring and control technologies capable of coordinating multiple behind-the-meter electrical loads to provide measurable and dispatchable reductions in premises demand while maintaining defined electrical capacity, operating, and customer constraints."

Performance Requirements

Distributed electrical capacity orchestration projects should remain subject to DEBA's applicable commercial-readiness, dispatch, duration, communications, measurement, and verification requirements.

Applicants should be required to demonstrate:

- The electrical loads available for orchestration;
- Baseline and available flexible electrical capacity;
- The ability to provide nominated load reduction for the required duration;

- Controls capable of responding under the selected DEBA performance pathway;
- Safe operation and restoration of controlled loads;
- Appropriate customer override and operating constraints where applicable; and
- Metering and verification of delivered load reduction.

Converting Unmanaged Loads Into Flexible Capacity

Explicitly recognizing distributed electrical capacity orchestration would allow DEBA to access a significant resource that exists within California's buildings but is often unavailable to grid programs today: flexibility embedded in otherwise unmanaged electrical loads.

The underlying electrical equipment does not necessarily need to be replaced. Instead, distributed controls can coordinate existing loads and convert available premises flexibility into measurable, dispatchable electrical capacity.

This approach can complement virtual power plants, demand-response providers, utilities, aggregators, and other grid-management platforms by providing a physical control layer capable of translating higher-level grid signals into coordinated action across multiple electrical loads.

Additional Grid and Electrification Benefits

In addition to providing dispatchable load reduction during DEBA events, premises-level capacity orchestration may provide broader benefits by reducing coincident peak demand and allowing additional electrical loads to operate within existing electrical infrastructure constraints.

These benefits may include the potential to defer or avoid certain:

- Electrical panel upgrades;
- Service-capacity upgrades;
- Transformer upgrades; and
- Other distribution infrastructure investments associated with increasing coincident electrical demand.

These additional benefits need not create a separate DEBA performance pathway. The primary basis for DEBA eligibility can remain the system's verified, dispatchable reduction in electrical demand and contribution to grid reliability.

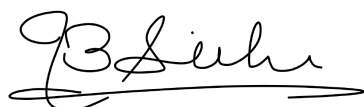
Requested Action

Explicitly recognizing distributed electrical capacity orchestration systems would remove uncertainty for applicants and allow commercially available technologies capable of converting unmanaged behind-the-meter loads into verified flexible capacity to compete under DEBA's existing performance requirements.

It would not require an exemption from DEBA's performance standards or the creation of a separate administrative pathway.

inGeniti respectfully requests that the Commission clarify the eligibility of distributed electrical capacity orchestration systems in the final solicitation.

Thank you for considering these comments.



Sincerely,
Bhartendu Sinha
Founder
inGeniti, Inc.