

DOCKETED

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California Energy Commission Docket Unit, MS-4
Docket No. 23-ERDD-04
1516 Ninth Street
Sacramento, California 95814-5512

Re: Docket No. 23-ERDD-04 - Industrial Decarbonization and Improvement of Grid Operations (INDIGO)

Generac Power Systems (“Generac”) appreciates the opportunity to provide comments in this matter and applauds the work of CEC staff in preparing the draft program guidelines and workshop held on April 11.

Background on Generac

As an American manufacturer providing distributed energy resources to customers for over 60 years, we understand that reliability and resilience are a basic need of every household. With a commitment to sustainable, cleaner energy products, Generac has expanded its product offerings to a range of clean energy technologies, including residential and commercial batteries, solar inverters, smart thermostats, control technologies and grid services technology. We are focused on supporting the next-generation grid with a comprehensive energy ecosystem. Building on our decades of experience in reliable resilience, Generac has expanded our horizon to provide distributed energy solutions to address not only the needs of a discrete location, but to reach across the rapidly evolving needs of communities, energy consumers, and utilities.

Generac provides a wide array of power products suitable as grid-tied distributed energy resources (DER) assets, controllable and dispatchable by way of the Concerto™ VPP/DERMS software platform. These products include but are not limited to ecobee smart thermostats, PWRcell energy storage systems, Generac’s SBE Series of Commercial & Industrial Battery Energy Storage Systems, load control switches, and CTA-2045 smart water heater modules, among several other smart energy solutions and more traditional backup power systems. Generac offers the technological capability to aggregate and control these diverse systems and products to provide essential resiliency and reliability to residents, businesses and community organizations, while allowing our customers to access and maximize new revenue streams.

Request for additional use case clarification on program proposal

With our suite of industrial offerings, we can help businesses decrease their exposure to grid fluctuations while simultaneously decarbonizing the grid and increasing system wide resilience. Generac is developing a product offering that we believe should be able to participate in the INDIGO program. The offering would include a battery energy storage system paired with a connectivity solution that will: a) support the wider grid by enrolling the battery and participating in demand response programs with the battery and associated load shifting, energy management capabilities enabled by our Industrial Connectivity offerings and, b) provide short duration resilience during grid outages using the battery. These capabilities will deliver a reduction in emissions through “strategic energy management” and “load flexibility / demand response controls” highlighted under the “Energy Efficiency” scope of the INDIGO program. Our proposed project for the program would serve an eligible industrial facility. Generac seeks clarification on two discrete questions:

1. Whether a project submitted under INDIGO focused on the “Energy Efficiency” aspect of the program demonstrating novel technologies for strategic energy management, load flexibility and demand response controls utilizing a battery energy storage system would qualify under the proposed grant structure. The battery system is an integral part of the overall project.
2. Would a site that is involved in the manufacturing of materials to support a winery be eligible under both FPIP and INDIGO? Generac understands that INDIGO would be a well suited program for any site involved in the industrial process of manufacturing, whereas FPIP is more aimed toward food production. We request additional clarity around the intended interaction between the two funding programs.

Thank you for the opportunity to comment on the INDIGO proposal. Generac is excited to offer reliability and resiliency solutions that can support a range of industries and consumers in California.

Respectfully submitted,



Meredith Roberts
Director of Policy and Regulatory Affairs
Generac Power Systems