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## **VCE Comments - 22-RENEW-01**

Valley Clean Energy (VCE) is a public not-for-profit Community Choice Aggregator (CCA) providing electric generation services to over 125,000 customers in Woodland, Winters, Davis and Yolo County. In a recent action, its Board of Directors set an ambitious goal of ensuring that 100% of the electricity used by its customers comes from cost-competitive renewable, carbon-free sources by 2030. As a California Load Serving Entity (LSE), we write in support of the Commission's objectives and overall approach of the Distributed Electricity Backup Assets Program (DEBA). It represents an important step in the transition to a more stable renewable energy future. We also observe that other tools that complement the deployment of many of the bulk grid assets and distributed resources envisaged in this GFO are necessary to achieve the State and VCE's goals for a clean, reliable grid. And although VCE is excited about the GFO and will be looking for opportunities to submit or participate in proposals related to bulk grid assets and distributed resources, we would also suggest that unless it is already considered eligible, that the Commission consider including demand shift/dynamic pricing technologies and implementation as eligible projects under the DEBA program guidelines (and other similar future funding opportunities). We believe that well designed and executed market-based dynamic price signaling works in tandem with and helps optimize the value of most bulk grid assets and distributed resources. A co-benefit is that their inclusion also helps efficiently integrate customers into the solution set, leading to a more comprehensive, durable solution when combined with many of the critical asset classes already identified in the GFO.

We appreciate the Commission's consideration of VCE's comments on the proposed draft program guidelines for this important GFO and look forward to working with the CEC to achieve its objectives.