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White Pine Renewables Comments on DEBA DER GFO Draft Solicitation Concept

Thank you for the opportunity to comment on the DEBA DER GFO Draft Solicitation. We look forward to the successful deployment of this program, which is clearly the product of a lot of combined effort. White Pine Renewables, a California-based and focused solar and energy storage developer, would like to provide response to the following two questions for stakeholders:

1. Are the minimum and maximum award amount funding levels and match requirements appropriate for each Group?

White Pine is amenable to the minimum and maximum funding levels proposed for each Group, however we strongly believe that Group 1 should be granted a higher proportion of funding relative to Groups 2 and 3. (As it is currently drafted, Group 1 comprises a lower proportion of funding relative to the other groups.) If the purpose of this program is to drive the growth of DERs at the distribution level for the sake of reliability of the California grid, we believe GFO funding would have much more "bang for the buck" for Group 1. Large DERs require many resources to deploy (especially considering the dwindling funds of the Self-Generation Incentive Program across CA), but bulk economics play a role in the impact Large DERs can have relative to smaller, more expensive BTM DERs (i.e. more MWh can be deployed in Large DERs than Small, Aggregated DERs with the same amount of investment). Market incentive structures already exist to drive the growth of VPPs and Load Flexibility Programs (Groups 2 and 3), while FTM distribution-level DER installations require much more of a financial catalyst to make economic sense for everyone involved.

4. To mitigate the risks of funding multiphase projects, staff have proposed minimum deployment targets for multiphase projects under "Project Readiness" (25% by June 1, 2025, 50% by June 1, 2026, and 100% by June 1, 2027). Are these proposed deployment targets reasonable? What measures should the CEC take in the event of a deployment shortfall?

White Pine strongly encourages that Group 1 projects are exempt from the stringent timelines above. While we would certainly like to get projects online ASAP, developers in CA now more than ever are faced with long interconnection queues. Timelines are more often than not in the hands of the IOUs, and we do not believe that developers in Group 1 should be docked for the delays caused by the California Utilities. Developing any new Large DER installation resulting from this program by 2025 or 2026 would be practically impossible.

Sincerely,

Tyler Cicero
Senior PV & Energy Storage Analyst
White Pine Renewables