

From: [Ram Mohan](#)
To: [ARB LCFS Workshop](#)
Subject: Re: Feedback from Planet H2
Date: Wednesday, December 14, 2016 10:07:25 AM

My updated comments:

"Planet Hydrogen is a company recently founded to produce renewable, clean hydrogen in volume for transportation, power generation and storage. Our technology is unique, innovative and expensive. We face enormous technical, business and market risks. The current SMR fossil-fuel based hydrogen supply chain has been around for decades and is our primary competition. We cannot compete on price in the near term with fossil fuel based, high CI processes that have been around since a hydrogen market existed. Customers don't care how the hydrogen was produced as long as the price is right. Until the market matures, we need carbon reduction incentives to produce renewable, low CI hydrogen that is affordable and competitive.

Cap and trade is designed to encourage the low CI production and use of renewable fuels and discourage the production and use of fossil fuels. The final decision to use renewable or fossil fuels is made by the market based on economics such as fuel costs in an absolute sense and relative to the cost of alternative fuels. Hydrogen is hydrogen – whether made using a fossil fuel based process or a clean, renewable process. **The critical difference, that has maximum impact on the renewable aspects and CI of the fuel produced, in the two pathways is the production process** – NOT the storage, distribution or dispensing processes. The key decisions, investments, innovations, technologies and risks associated with the choice between renewable and fossil fuels are made by the producer – NOT the other members of the supply/value chain. This is where the incentives/credits need to be assigned and also where the deficits must be assigned.

Regards,

Ram Mohan

"Imagination is more important than knowledge" - Albert Einstein

US:: +1 (408) 839-7575