

December 9, 2019

Richard Corey
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Fuel Cell Net Energy Metering Greenhouse Gas Emission Standards Regulation

Dear Mr. Corey:

Altergy Systems manufactures quiet, reliable, zero emission fuel cell backup power solutions in Folsom, California for telecom, traffic & rail signals, residential, government and critical infrastructure power applications. Altergy appreciates the opportunity to comment on this regulation. Altergy supports policies that reduce greenhouse gases and air pollution, and therefore supports the California Air Resources Board (CARB) proposed greenhouse gas (GHG) emission standard for fuel cell net energy metering. This rigorous, data-driven standard will reduce GHG emissions, improve air quality, and provide necessary resilience through the use of fuel cell systems.

With the recent passage of AB 617 and the extension and expansion of the fuel cell net metering program, California has facilitated short-term options to address criteria air pollutant and GHG emissions. Altergy is witnessing significant threats to California program on air emissions and using clean technologies like fuel cell systems for emissions reduction and resilient power; Public Safety Power Shutoffs and extreme weather events have engendered an unprecedented use of combustion diesel generators for backup power in Altergy's customer sectors, as well as in communities across California. This use of combustion for backup power is reversing significant gains that California has made in air quality improvement, as well as carbon reduction, and non-combustion stationary fuel cell resources are an immediate solution to mitigate this damage. These deployments not only impact our air quality today, but present long term impacts due to the investment of these installed pollution sources for up to 10 years of planned operation.

Altergy supports the data-driven and continually improving standard that has been proposed by the CARB staff, and will support the achievement of California's significant air quality, GHG reduction and resilient power objectives.

Sincerely,



Eric R. Strayer
Vice President, Sales & Business Development
Altergy Systems