



December 9, 2019

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

RE: Fuel Cell NEM GHG Standard Regulation

Dear Mr. Corey,

Thank you for the opportunity to comment on the California Air Resource Board's (CARB) proposed methodology to determine the greenhouse gas (GHG) emissions standard for fuel cell net metering. Reimagine Power, Inc. advocates for microgrids, advanced clean energy technologies, diversified and localized energy systems, and energy market evolution in the west coast. Reimagine Power works with innovators and policymakers to bridge the gap between policy and project development so California can accelerate the deployment of clean energy solutions that are resilient and sustainable.

Fuel cells, clean generators, and other advanced backup power solutions are a critical tool to mitigating the devastating impacts of Public Safety Power Shutoffs (PSPS) and ensuring greater resiliency for California businesses, public agencies, and communities. This standard will ensure that fuel cells and other advanced distributed power generation technologies continue to reduce emissions relative to the grid and accelerate the transition to a decarbonized energy future. It will also guide consumers to choose cleaner backup power options instead of relying on inefficient, polluting, and potentially unsafe diesel generators.

Resilient energy solutions that rely on clean generation resources should be deployed as quickly as possible across the state. In order to ride through multi-day outages caused by PSPS, wildfires, extreme heat, or any other outages, California's critical facilities, public agencies and essential services need clean energy technologies that are flexible, dispatchable, and reliable. The proposed Fuel Cell NEM GHG standard will ensure fuel cells continuing reducing GHGs while simultaneously providing Californians with clear guidance to choose cleaner options instead of diesel generators.

For these reasons, Reimagine Power is in full support of the standard and urges its passage to help achieve California's clean energy, resiliency, equity, safety, and sustainability goals.

Best regards,

Allie Detrio
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