

September 18, 2022

Cheryl Laskowski, Ph.D.
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: AquaHydrex Comments on the August 18, 2022 Public Workshop on Potential Changes to the Low Carbon Fuel Standard (LCFS) Program

Dear Dr. Laskowski:

Thank you for the opportunity to comment on the August 18, 2022 public workshop on potential regulatory revisions to the Low Carbon Fuel Standard (LCFS). The LCFS is a powerful tool in California's climate portfolio, and AquaHydrex strongly supports CARB's efforts to amend and strengthen the program in line with the State's 2030 and carbon neutrality climate goals.

AquaHydrex is purpose-built to deliver an idealized platform for producing green hydrogen. We are on a mission to help the world use renewable energy to achieve total decarbonization by providing an idealized technology platform to convert zero carbon electricity to the ideal zero carbon molecule: Green hydrogen. Our electrolysis technology is a clean-sheet redesign to create the ideal electrolysis platform for large-scale, energy-efficient production of green hydrogen.

We support developing a Tier 1 calculator for hydrogen pathways, including electrolytic production pathways, in order to make it straightforward and easy to bring low carbon hydrogen fuels to market. We believe it is important to allow straightforward accounting for a wide array of electricity inputs for electrolytic hydrogen pathways, including grid electricity, behind-the-meter renewable electricity, and other renewable electricity pathways in line with the program's book-and-claim accounting framework.

We also encourage CARB to ensure that the calculator includes fugitive methane emissions upstream from the site of production for steam methane reformation or any other potential pathways utilizing natural gas. Such accounting should be project-specific and avoid using average emissions factors, in order to account for potentially higher-than-average methane emissions for some pathways and incentivize hydrogen project developers to utilize sources of natural gas with lower climate impacts.

Thank you again for the opportunity to comment on this workshop. We look forward to continuing to work with you on future changes to the LCFS Program.

Sincerely,



Steven Kloos, PhD
CEO