

Hydrogen Means Business in California!

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

December 9, 2019

Re: SUPPORT for Proposed Greenhouse Gas Emission Standard for Fuel Cell Net Energy Metering

Dear Mr. Corey:

The California Hydrogen Business Council (CHBC)¹ appreciates the opportunity to comment on CARB's consideration of a greenhouse gas standard for fuel cell net energy metering. Fuel cells are an important part of the solution to the dual challenges of fighting climate change and air pollution, which is why the state has taken steps to support their deployment and use, including through net energy metering. CHBC appreciates CARB's deliberative process and data-driven standard, and strongly supports staff's proposed greenhouse gas standard for fuel cell net energy metering projects.

As the state grapples with the impacts of increased wildfire threats and resulting public safety power shutoffs, California residents and businesses are flocking to purchase diesel generators. This only exacerbates the challenges we face. We can, and must, do better. Fortunately, we can provide energy reliability and resiliency in better ways, including through the use of fuel cells – which reduce greenhouse gas emissions compared to the grid, avoid harmful air pollution (including toxic diesel particulate matter), and provide resiliency to the grid and California communities.

Over time, fuel cells will only become even cleaner, if the state supports renewable gas development. While current state policies largely limit access to renewable gas to the transportation sector, a number of promising activities at state agencies promise to enable increased access to clean fuels like renewable and zero carbon hydrogen, which would further amplify the benefits of fuel cells. In particular, the implementation of SB 1383 regulations at CalRecycle, SB 1440 standards at the Public Utilities Commission, pipeline injection standards for hydrogen under development, standardized interconnection tariffs for renewable gas, among other potential policies across state agencies, including CARB, can ensure widespread access in all sectors to the cleanest fuels, including zero-carbon and renewable hydrogen. These policies can be game-changers in our fight against climate change and air pollution, and hold keys to rapid transitions to clean energy in all sectors of our economy.

We strongly support CARB's proposed, continually improving greenhouse gas standard for fuel cell net energy metering, which will help to deploy fuel cells to improve resiliency and air quality while reducing greenhouse gas emissions in California. We hope CARB and other agencies will then take additional steps to support broad market access and cost reductions for renewable gas, including zero-carbon and renewable hydrogen, to fulfill the promise of fuel cell technology and more completely support the state's goals and international leadership.

Sincerely,

/s/ Emanuel Wagner
Emanuel Wagner
Deputy Director, California Hydrogen Business Council

¹ The CHBC is comprised of over 100 companies and agencies involved in the business of hydrogen. Our mission is to advance the commercialization of hydrogen in the energy sector, including transportation, goods movement, and stationary power systems to reduce emissions and dependence on oil. The views expressed in these comments are those of the CHBC, and do not necessarily reflect the views of all of the individual CHBC member companies. Members are listed here: www.californiahydrogen.org/aboutus/chbc-members/.