



February 24, 2020

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.

California needs resilient and reliable electricity from technologies like microgrids and fuel cells now more than ever. FCNEM is a tariff that can help unlock the full value of microgrids that leverage these technologies to ensure California's businesses, public agencies, and communities do not have to make the choice between having electricity during blackouts – whether caused by a wildfire or a preventative measure like a Public Safety Power Shutoffs – and having electricity from clean generation resources. With FCNEM, many customers have already installed fuel cells, clean generators, and other advanced backup power solutions that provide resilient and reliable electricity while simultaneously reducing harmful local air pollutants and GHG emissions. The state should be welcoming this and empowering customers to make investments that advance our decarbonization and resiliency goals.

Reimagine Power encourages CARB to set policies that are both consistent and achievable so as to maximize use and benefits of fuel cells. There are two opportunities in the draft regulation to provide more policy clarity. First, implement a clear and consistent biogas policy in order to maximize the number of projects installed under FCNEM. CARB already has such a policy and it should explicitly allow these resilient technologies the ability to use Cap and Trade compliant biogas to meet GHG requirements for FCNEM compliance. Secondly, we urge ARB to adopt standards that apply on a going forward basis. Given the length of time it has taken for this regulation to move forward, it would create market confusion to set standards for prior years that are more stringent than required.

Innovations in fuel cells, biogas technologies and other advanced power generation solutions will accelerate our transition to adopting even cleaner fuels in the future such as hydrogen and other bioenergy resources that help us further *diversify our clean energy portfolio*. Reimagine Power commends the Board and Staff for their work in these proceedings and helping to ensure that electricity produced under FCNEM becomes even cleaner through the use of these advanced fuels.

Best regards,

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