



**TECHNET**  
THE VOICE OF THE  
INNOVATION ECONOMY

TechNet California and the Southwest | Telephone 916.600.3551  
915 L Street, Suite 1270, Sacramento, CA 95814  
[www.technet.org](http://www.technet.org) | @TechNetUpdate

Dec 7, 2019

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

**Re: Fuel Cell Net Energy Metering GHG Standard**

Dear Mr. Corey-

TechNet, who represents the leading technology and innovation companies, appreciates the opportunity to comment on this proceeding. Our members require resilient, clean electricity to power their innovation. As such, TechNet supports ARB's proposed greenhouse gas (GHG) standard for fuel cell net energy metering (FC NEM) projects. It is a rigorous, data-driven standard that will give our members the policy certain to continue investing in fuel cell projects that reduce GHGs, improve air quality, and provide unparalleled resiliency.

In recent years, California has taken major policy steps toward achieving its air quality goals. The extension of FC NEM and the passage of AB 617 demonstrate the state's commitment to combating criteria air pollutant emissions through the deployment of new energy technologies, such as fuel cells. These policies are further cementing California's status as the global leader in the development and deployment of distributed generation fuel cells.

All of this progress, however, could be threatened by California's new normal: Public Safety Power Shutoffs, wildfires, and extreme heat. Indeed, many of our members were negatively impacted by the unprecedented PSPS events that occurred this October, resulting in significant losses for their businesses and lost wages for their employees.

Non-combustion fuel cells provide a unique way to solve these challenges. This innovative technology is a key option for our members who want to move beyond traditional diesel generators, while reducing GHGs and improving air quality. **We commend ARB for developing an accurate, continually improving GHG standard that will give our members the confidence to invest in fuel cell projects to power their operations moving forward.**

TechNet thanks ARB staff for their efforts in developing this plan as well as for the opportunity to provide comments.

Sincerely,  
Courtney Jensen  
Executive Director  
California and the Southwest  
916-600-3551  
[cjensen@technet.org](mailto:cjensen@technet.org)