



Transforming Policy. Expanding Markets.

December 9, 2019

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

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. Advanced Energy Economy (AEE) is a national association of business leaders who are making the energy system more secure, clean, and affordable. Advanced energy encompasses a broad range of products and services that constitute the best available technologies for meeting energy needs today and tomorrow, including non-combustion fuel cells.

AEE supported AB 1637, the enabling legislation that extended the Fuel Cell Net Energy Metering program and specified CARB's pivotal role in helping foster this technology by creating an accurate GHG emissions standard. AEE is similarly supportive of the data-driven, technically sound methodology that CARB has developed in the proposed regulation. It will reduce GHGs, improve air quality, and provide clear guidance to California customers who wish to choose fuel cells instead of diesel generators for their clean energy, resiliency, and sustainability needs.

At a time when California is facing unprecedented challenges—Public Safety Power Shutoffs, wildfires, extreme heat—to its electrical infrastructure, this standard is key to driving further innovation in California's advanced energy economy to solve these challenges. The entrepreneurial spirit and technological innovation woven into the fabric of California culture combined with a supportive policy infrastructure have contributed to a robust advanced energy economy in the state. As the Golden State confronts the reliability and resiliency challenges of heightened wildfire and climate risk, along with the demands of a quick-evolving electricity system, AEE believes this GHG methodology is another key to enabling technology solutions that will lead to a clean, resilient, secure, and affordable energy future. This proposed regulation is well-crafted and will result in overall benefits to the state's emissions reduction, economic prosperity, and innovation goals.

Sincerely,

Amisha Rai  
Managing Director  
Advanced Energy Economy (AEE)