



July 22, 2019

Keith Roderic
Industrial Strategies Division
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Dear Mr. Roderic,

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 proposed in the July 8, 2019 discussion draft. It will reduce GHGs and provide clear guidance to California customers who wish to choose fuel cells for their clean energy, resiliency, and sustainability needs.

This standard will also drive further innovation in California's advanced energy economy, as it provides a clear set of metrics technology manufacturers must meet. With this guidance, these companies can invest in research and development, diversify supply chains, and provide additional training to service technicians, installers, and manufacturing specialists. This investment creates jobs across the entire value chain. In fact, AEE released a CA jobs report just last year that identified over 500,000 in-state advanced energy jobs, and projected a 10% increase in the growth of advanced energy jobs compared to the previous year.

The technological innovation woven into the fabric of California combined with a supportive policy infrastructure have contributed to a robust advanced energy economy in the state. AEE believes this GHG methodology will contribute to the state's continued support and growth of advanced energy generation technologies that will lead to a clean, secure, and affordable energy future and will result in overall benefits to the state's climate change goals.

Sincerely,

Amisha Rai
Managing Director
Advanced Energy Economy (AEE)