



February 20, 2024

California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: Proposed 2024 LCFS Amendments

Dear California Air Resources Board,

We appreciate the opportunity to share our thoughts on California Air Resources Board's Low Carbon Fuel Standard amendments. The United States Hydrogen Alliance is a non-profit trade association dedicated to building the U.S. hydrogen economy. Our organization represents hydrogen companies actively deploying clean technologies across the country.

We are writing to share our perspective on several key program areas for your consideration. These requests address the light duty hydrogen refueling infrastructure pathway, low carbon intensity electricity, methane pyrolysis, along with recommendations for pyrolysis and renewable hydrogen definitions.

Regarding the new light duty hydrogen refueling infrastructure pathway, we believe the location restrictions to disadvantaged communities, low-income communities, and rural areas is overly limiting. While we respect the intent of these restrictions, we ask for removal of the hydrogen refueling station location restrictions to allow alignment with traffic/use forecasts to ensure high usage and maximum societal benefit and to avoid applying a double standard for hydrogen, a zero emission fuel, in comparison to electricity.

New restrictions for low carbon intensity electricity require it to be supplied by new or expanded production, or within three years of a hydrogen production facility or air capture project's creation date. These restrictions resemble "additionality" or "incrementality," and is something the hydrogen industry is opposed to on all accounts. We suggest the removal of the new 100% renewable electricity requirement given the policy bias for electricity against hydrogen, as battery electric vehicles are not required to charge with 100% renewable electricity. Through California's Renewables Portfolio



Standard, it is already required for retail electricity to be 100% renewable by 2045; with the grid already moving in this direction, this requirement seems redundant.

For the definition of pyrolysis we suggest two amendments, the inclusion of both biomethane and solid carbon. We believe that solid carbon should be considered as a form of carbon capture and sequestration. Methane pyrolysis should also be included in a pathway for flexible access to low greenhouse gas methane sources to reduce both greenhouse gasses and the cost of hydrogen. We also suggest an amendment to the definition of renewable hydrogen to include pyrolysis in section two.

In section § 95490. Provisions for Fuels Produced Using Carbon Capture and Sequestration, we suggest adding the eligibility requirement below:

(3) "Hydrogen producers from methane pyrolysis that capture precombustion carbon in solid form and permanently store it or provide proof of permanent storage. 1kg of solid carbon is equivalent to 3.67kg of avoided carbon dioxide"

We at the United States Hydrogen Alliance thank you for your time and consideration. Please reach out to us if you have any questions.

Respectfully,

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