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BY EMAIL

December 9, 2019

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

**Re: Fuel Cell Net Energy Metering Greenhouse Gas Emission Standards Regulation**

Dear Mr. Corey-

Ballard Power Systems, a global leader in fuel cells for motive and stationary applications, appreciates the opportunity to comment on this regulation. Ballard’s vision is to deliver fuel cell power for a sustainable planet. As such, Ballard supports ARB’s proposed greenhouse gas (GHG) emission standard for fuel cell net energy metering (FC NEM) projects. This rigorous, data-driven standard will reduce GHGs, improve air quality, and provide unparalleled resiliency through the use of fuel cells.

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 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. In many situations, combustion-based backup generators were employed, contributing further to the climate and air challenges the state has made a priority to solve.

Non-combustion fuel cells provide a unique way to solve these challenges, and viable option to move beyond traditional diesel and combustion gas generators, while reducing GHG and improving air quality. **We commend ARB for developing an accurate, continually improving GHG standard that will have the important co-benefit of criteria pollution reductions and resiliency.**

Sincerely,

Rob Campbell  
Chief Commercial Officer  
Ballard Power Systems