



November 7, 2024

California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: Notice of Public Hearing to Consider Proposed Low Carbon Fuel Standard Amendments

Dear California Air Resources Board,

We appreciate the opportunity to share our thoughts on CARB's LCFS amendments. The United States Hydrogen Alliance (USHA) is a non-profit association of members advocating for the development, deployment and utilization of clean hydrogen in all 50 states. We serve the hydrogen industry through state and federal policy advocacy, market development, and community building. Our mission is to leverage the unique attributes of hydrogen to reduce emissions across traditional sectors, increase energy resiliency and diversity, enhance local economies and workforces, and protect the nation domestically and abroad.

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

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 BEVs are not required to charge with 100% renewable electricity. Through California's RPS, 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. In respect to solid carbon, we also believe it should be included in conversations around CCS. Methane pyrolysis should also be included in a pathway for flexible access to low GHG methane sources to reduce both GHGs 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,

A handwritten signature in black ink, reading "R. Bekemohammadi".

Roxana Bekemohammadi
Founder and Executive Director
United States Hydrogen Alliance