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SCPPA Comments RE RPS Guidebook 10th Edition Scoping Workshop

Additional submitted attachment is included below.

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California Energy Commission
Docket Unit, MS-4
Docket No. 21-RPS-02
715 P Street
Sacramento, California 95814

RE: SCPPA Comments on Scoping Meeting on the Draft Renewables Portfolio Standard 10th Edition Guidebook

The Southern California Public Power Authority[1] ("SCPPA") appreciates the opportunity to provide feedback following the California Energy Commission ("CEC") staff's May 21, 2025 scoping meeting on the draft *Renewables Portfolio Standard ("RPS") 10th Edition Guidebook.*

In addition to supporting the comments submitted by the California Municipal Utilities Association ("CMUA"), SCPPA offers the following input, focused on eligibility of hydrogen under the RPS:

As the CEC considers updates to the RPS Guidebook, it is critical to ensure that hydrogen-based generation has a viable pathway for RPS compliance.

For SCPPA Members, each local publicly owned electric utility ("POU") is situated differently, and therefore, the potential applications of renewable hydrogen will vary across service territories. Still, for many SCPPA Members, renewable hydrogen presents a promising firm zero-carbon technology necessary to complete the energy transition. Some SCPPA Members are making significant investments in hydrogen-ready generation assets, including turbines capable of utilizing hydrogen blends with conventional gases, with a plan to convert to 100% hydrogen-capable turbines in the future. Excluding renewable hydrogen from RPS eligibility risks stifling innovation, halting investment, and undermining the progress California has already made through initiatives like the Alliance for Renewable Clean Hydrogen Energy Systems ("ARCHES"). Considering the importance of maintaining affordability for utility customers, it is important to avoid any unintended consequences and added costs for RPS compliance for POUs. Enabling renewable hydrogen as an RPS-eligible resource helps preserve flexibility and reliability as POUs plan for the future grid with diverse clean energy resources.

[1] SCPPA is a joint powers authority whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Each Member owns and operates a publicly owned electric utility (POU) governed by a board of local officials. Our Members collectively serve nearly five million people throughout Southern California. Together they deliver electricity to over two million customers throughout Southern California, spanning an area of 7,000 square miles.

California's electric utilities face a tight timeline to scale up reliable, carbon-free generation to meet growing demand and need additional firm and dispatchable options for their clean energy portfolios. SCPPA Members have already taken aggressive action in furtherance of the state's policy to serve their communities with 100% clean energy by 2045. In fact, many SCPPA Members have adopted more ambitious timelines that call for 100% clean energy several years in advance of the state's goal. Their success will be predicated on the ability to procure affordable and reliable clean energy at all hours of the day and during extreme conditions. Renewable hydrogen is uniquely positioned to provide long-duration and seasonal storage solutions, while offering local reliability without dependence on new electric transmission**.**

SCPPA Members are leading the way on advancing the end use of hydrogen as a clean energy resource.

SCPPA Members are at the forefront of advancing hydrogen as a clean energy resource, despite the technical and economic challenges that accompany early-stage deployment. At this pivotal moment for hydrogen, SCPPA urges the CEC to provide a supportive regulatory framework that accelerates hydrogen's technical and economic viability. Hydrogen efforts for SCPPA and SCPPA Members include:

- **Burbank Water and Power ("BWP")** submitted two natural gas plants to the ARCHES RFP/RFI portal. This effort will help inform California's hydrogen ecosystem and market development strategies.

- **The Intermountain Power Project ("IPP")** in Delta, Utah—operated under the supervision of LADWP—will soon become one of the world's first utility-scale hydrogen-capable power plants. The facility is transitioning from 1,800 MW of coal-fired generation to 840 MW of high-efficiency capacity. These new units will initially operate on a blend of 30% renewable hydrogen and 70% natural gas, with a goal of transitioning to 100% renewable hydrogen by 2045. IPP will use renewable energy-powered electrolysis to split water into oxygen and hydrogen, storing the latter in underground salt caverns for use as fuel to drive electricity-generating turbines.

- **Scattergood Generation Station (LADWP),** located in Los Angeles, plans to implement a hydrogen-ready generating system by 2029 to replace the generation currently provided by two natural gas units. The new system will have the capability to operate on a 30% hydrogen blend at launch. This initiative enables LADWP to enhance carbon-free generation, decrease greenhouse gas emissions, and discontinue the use of once-through cooling (OTC). LADWP's aim is to escalate the utilization of renewable hydrogen in the power sector, and infrastructure advances, transition to 100% renewable hydrogen fuel as soon as it becomes technically and practically feasible.

- **Vernon Public Utilities ("VPU")** owns and operates the 139 MW Malburg Generating Station, which plays a key role for CAISO in helping maintain reliability for the LA Basin. VPU is exploring modifying the existing gas-burning turbines to blend, and eventually fully fuel switch, to renewable hydrogen as part of

a long-term clean energy strategy discussion. VPU is also supporting a private company to construct the state's first on-site production and distribution of renewable hydrogen, the Vernon Clean Hydrogen Project. This project, expected to be operational by the end of 2025, is a 10 MW PEM electrolysis facility (scalable up to 100 MW) that will produce 4.2 tons of renewable hydrogen daily. An impactful project of this magnitude would be a missed opportunity should the CEC not consider projects of this nature to be RPS-eligible. Having access to renewable hydrogen that is RPS eligible is the foundational building block to VPU's ability to fuel switch the MGS plant and address the near-term reality of owning a stranded asset.

- **Magnolia Power Project ("MPP")** is a SCPPA owned 310 MW natural gas-fired combined cycle generating plant in Burbank, California, which is located along the I-5 corridor, 10 miles away from one potential routing concept for the Angeles Link hydrogen pipeline. Like many urban plants, MPP highlights the need for supporting infrastructure to deliver hydrogen where it's needed most. SCPPA aims to ensure that customers see the benefits of the hydrogen projects and investments that are already underway.

Conclusion

The RPS program should not create barriers to the advancement of renewable hydrogen in California. SCPPA welcomes the opportunity to further engage with the CEC's RPS staff to discuss these comments further.

SCPPA appreciates this opportunity to provide feedback to the CEC regarding the May 21, 2025, scoping meeting on the draft Renewables Portfolio Standard 10th Edition Guidebook.

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