

DOCKETED	
Docket Number:	21-RPS-02
Project Title:	Renewables Portfolio Standard 10th Edition Guidebook Update
TN #:	264071
Document Title:	California Hydrogen Business Council Comment - RPS Guidebook Update
Description:	N/A
Filer:	System
Organization:	Tim McRae
Submitter Role:	Public
Submission Date:	6/5/2025 5:03:08 PM
Docketed Date:	6/6/2025

Comment Received From: Tim McRae
Submitted On: 6/5/2025
Docket Number: 21-RPS-02

CHBC Comment - RPS Guidebook Update

Additional submitted attachment is included below.

June 5, 2025

Commissioner Noemi Gallardo
California Energy Commission
Docket No. 21-RPS-02
715 P Street
Sacramento, CA 95814

Re: Eligibility of fuel cells in the RPS under latest proposed RPS Guidebook update

The California Hydrogen Business Council (CHBC) writes to thank California Energy Commission (CEC) staff for their recommended updates to the Renewable Portfolio Standard (RPS) Guidebook shared in the workshop on May 21. A draft update of the guidebook (released in October 2024) had suggested that Assembly Bill (AB) 1921 (2024) removed the eligibility of fuel cells using renewable fuels, effectively eliminating the eligibility of fuel cells using hydrogen.

CHBC submitted written comments on that previous update in December 2024 pointing out that the CEC's interpretation was inconsistent with the legislative intent of 1921 and the broader framework of RPS eligibility.

The CHBC appreciates the recommendation of CEC staff in the May 21 workshop to not change the treatment of fuel cells in the RPS. The CEC shared with the workshop participants that "Fuel cell eligibility requirements to remain unchanged from 9th edition" on slide 77 of the workshop presentation. The CHBC believes this is the correct interpretation of AB 1921 and continues the intended framework of the RPS vis a vis fuel cells. This is a clear market signal that should remain in place and will help California achieve its environmental goals.

In addition, CHBC notes that hydrogen combustion is a zero carbon solution that should receive explicit acknowledgement in the update. We ask the CEC to add language acknowledging this in the update of the guidebook.

Thank you again for your attention to and diligence with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim McRae' in a stylized, cursive script.

Tim McRae

Vice President for External Affairs

California Hydrogen Business Council

tmcrae@californiahydrogen.org

(916) 995-9685