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Green Hydrogen Coalition Comments on RPS Guidebook Workshop

Additional submitted attachment is included below.

June 5, 2025

California Energy Commission
Docket Office
Docket No. 21-RPS-02
715 P Street
Sacramento CA 95814

Submitted Electronically via CEC website to Docket 21-RPS-02

RE: GHC Comments on Proposed Scope for the RPS Eligibility Guidebook, Tenth Edition (Docket No. 21-RPS-02)

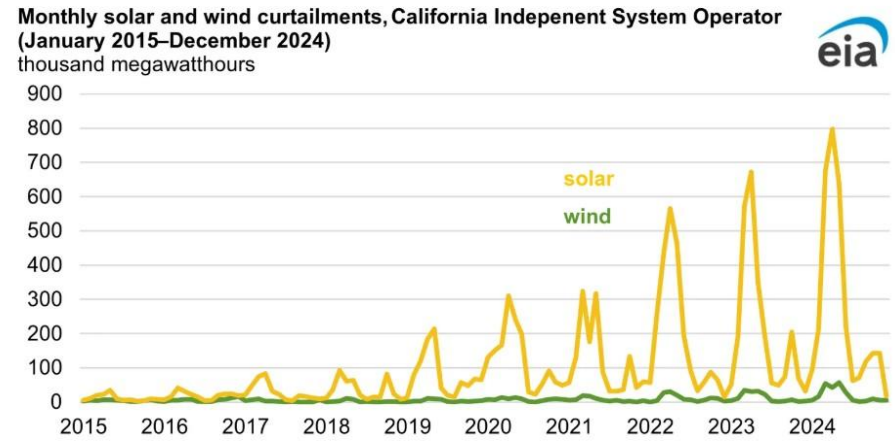
The Green Hydrogen Coalition (GHC) appreciates the opportunity to submit comments to the California Energy Commission (CEC) pertaining to the Scoping Meeting on Proposed Updates for the Renewables Portfolio Standard Guidebook (Guidebook), Tenth Edition released May 21, 2025. We appreciate the CEC engaging in this process to revise the Guidebook and recommend it be updated to include renewable hydrogen as an enhancement or addition for all RPS eligible facilities. We believe green hydrogen is a necessary complement to broad electrification.

The GHC is a California educational 501(c)(3) non-profit organization that was formed in 2019 to recognize the game-changing potential of "green (renewable) hydrogen" to accelerate multi-sector decarbonization and combat climate change. The GHC's mission is to facilitate policies and practices that advance green (renewable) hydrogen production and use across all sectors of the economy to accelerate a carbon-free energy future and a just energy transition.

Introduction and Context for GHC's Recommendations

Deploying renewable hydrogen as a form of long-duration energy storage with all eligible RPS facilities offers a practical and cost-effective solution to stabilize the grid, reduce curtailment, and ensure the reliability of a system increasingly dominated by inverter-

based resources. Long-duration energy storage will be essential to California's future grid reliability and stability. As CAISO added wind and solar capacity in the past, California reached a point where short-duration energy storage became critical to address 'the duck curve,' and the result was an exponentially growing installations of Li-ion based battery energy storage projects. As solar and wind penetration of the power grid continues to increase, the need to store otherwise curtailed energy for days, weeks, or even seasons will become essential. Curtailment of renewable electricity is significant and consistently growing.



Retrieved from Energy Information Administration.

From 2023-2024, the amount of curtailed wind and solar growth in California grew by a whopping 29%, or 3.4 million megawatt hours (MWH) in 2024.[1] If this curtailed renewable electricity were instead utilized to produce electrolytic hydrogen, California could have produced ~60,000 metric tons of hydrogen, the energy equivalent of approximately 60 million gallons of diesel.[2] According to the California Independent System Operator

[1] "In 2024 the CAISO curtailed 3.4 million megawatt hours of utility scale wind and solar output, a 29% increase from the amount of electricity curtailed in 2023" - DiGangi, Diana. "California's Solar, Wind Curtailment Jumped 29% in 2024: EIA." *Utility Dive*, 30 May 2025.
[2] DOE Assumes 57kWh electricity required per Kg of H2 utilizing proton exchange membrane (PEM) electrolyzers and 1kG H2 has stored energy equivalent of one gallon of gasoline/diesel. - "DOE Hydrogen Program Record 24005: Clean Hydrogen Production Cost Scenarios with PEM Electrolyzer Technology" 20 May 2024, www.hydrogen.energy.gov/docs/hydrogenprogramlibraries/pdfs/www.hydrogen.energy.gov/docs/hydrogenprogramlibraries/pdfs/24005-clean-hydrogen-production-cost-pem-electrolyzer.pdf. Accessed 5 June 2025.

(CAISO) Wind and Solar Curtailment Report as of May 31, 2025, curtailed renewable wind and solar electricity for 2025 (year to date) is *already* at 2,741,671 MWHs.[3] This means that as of May 31, 2025, the amount of curtailed wind and solar is already at ~80% of the entire amount curtailed in calendar year 2024. This curtailed electricity could instead be stored as renewable hydrogen.

This is commercially possible today: the Advanced Clean Energy Storage (ACES) project and the Intermountain Power Plant Renewed project, both in Delta, UT are currently in commissioning and will begin commercial operation in 2025, with as much as 90% of power production being transmitted to California through existing HVDC transmission. It will be the largest energy storage project in the world, with up to 300 GWh of storage capacity and an 840 MW power island. This real-world example of hydrogen-fueled gas turbines is clear testament to the fact that this is an essential technology for California's power grid that should receive the same RPS eligibility as a fuel cell alternative.

The Commission is effectively picking winners in a rapidly evolving field of long-duration energy storage by allowing RPS eligibility for non-combustion technologies but not for turbines; even though turbines are already RPS eligible when operating on biomethane. This approach is unnecessary and premature. Technology neutrality is essential to allow the best and most cost-effective technologies to emerge through competition. Excluding renewable hydrogen fueled turbines—even those fueled by 100% renewable hydrogen—while including other combustion-free options, creates an artificial barrier that stifles innovation and delays the buildout of urgently needed storage capacity and renewable hydrogen production capacity in California.

For over two decades renewable hydrogen has been recognized as a critical resource for replacing fossil fuels in hard-to-abate sectors since it provides many benefits including

[3] "Wind Solar Real-Time Curtailment Public Year-to-Date" 1 June 2025, www.caiso.com/documents/www.caiso.com/documents/wind-solar-real-time-dispatch-curtailment-report-may-31-2025.pdf. Accessed 5 June 2025.

dispatchability, supporting reliability by firming intermittent renewable power, and enhancing grid resiliency. Renewable hydrogen can leverage surplus solar and wind energy produced at near-zero marginal costs, to both reduce renewable curtailment and provide affordable, multi-day resilience as a long duration energy storage resource. Recognizing these benefits, the California Air Resources Board (CARB) identified renewable hydrogen as a key pillar of the State's clean energy strategy in its 2022 Scoping Plan. To achieve SB 100 targets by 2045, CARB projects California will need to expand hydrogen supply capacity by as much as 1,700 times current levels which underscores the magnitude of investment and infrastructure required. For these reasons, the GHC believes it is urgent for the CEC to designate RPS eligibility for renewable hydrogen fueled linear generators and turbines to send a decisive market signal to accelerate investment and deployment.

The GHC respectfully submits the following comments as suggested opportunities for modernizing the Guidebook consistent with California's energy policy goals, requirements for an affordable, reliable grid and current commercially viable technology innovation:

Summary of Recommendations

1. Add linear generators to Chapter 2 of Energy Resource Eligibility Requirements.
2. Add hydrogen fueled turbines operating on renewable hydrogen to Chapter 2 of energy resource eligibility requirements.
3. Add certification process for renewable hydrogen producers to comply with Chapter 2G.2 and 2L.2 Requirements, namely: "the applicant must submit information on the hydrogen production process as part of the application."
4. Add rules for partial accounting for renewable hydrogen blends using similar RPS verification process currently used for RPS eligible biomethane facilities.

The GHC breaks down each recommendation, along with the justification and suggested modifications to the Guidebook.

Proposed Amendments and Rationale

Recommendation #1: GHC Supports CEC Staff Recommendations to Incorporate Linear Generators with the Same Eligibility as Fuel Cells, and Mainspring Energy's Proposed Specific Guidebook Amendments

Rationale: GHC supports the addition of Mainspring's proposed language amendments. It is important for the CEC to maintain technological neutrality as stated in AB 1921 (Papan) to provide a level playing field for both linear generators and fuel cells. These non-combustion technologies provide the same capabilities for producing renewable electricity.

Proposed Modification: In Chapter 2: Energy Resource Eligibility Requirements we request these additions:

G. Linear Generator Using Renewable Fuel 1

A facility that uses one or more linear generators may qualify for RPS certification if the facility uses either an RPS-eligible renewable energy resource, qualifying hydrogen gas, or both, as described below.

1. Linear Generator Using an RPS-Eligible Renewable Energy Resource

A facility converting gas to electricity in a linear generator may qualify for RPS certification if the gas is an RPS-eligible renewable energy resource as described in this guidebook.

2. Linear Generator Using Qualifying Hydrogen Gas

A facility converting hydrogen gas to electricity in a linear generator may qualify for RPS certification if the hydrogen was derived from a non-fossil-based fuel or feedstock through a process powered using an eligible renewable energy resource. The electricity generated by a facility using this type of hydrogen gas is eligible for the RPS only if the electricity that was used to derive the hydrogen is not also counted toward an RPS compliance obligation

or claimed for any other program as renewable generation. The applicant must submit information on the hydrogen production process as part of the application.

Recommendation #2: Renewable Hydrogen Fueled Turbines Operating on Renewable Hydrogen Should be Included as RPS Eligible Facilities, as an Enhancement or Addition, Consistent with SB 1369 and Current RPS Eligibility Treatment of Energy Storage

Rationale: SB 1369 (Skinner, 2018) added section 400.2 to the Public Utilities Code defining 'green electrolytic hydrogen' as 'hydrogen gas produced through electrolysis and does not include hydrogen gas manufactured through steam reforming or any other conversion technology that produces hydrogen from a fossil fuel feedstock'. SB 1369 also added 400.3 to the Public Utilities Code which directs "the Commission, State Air Resources Board, and Energy Commission shall consider green electrolytic hydrogen an eligible form of energy storage and shall consider other potential uses of green electrolytic hydrogen." Therefore, the CEC staff's proposed recommendation to exclude renewable hydrogen as a form of energy storage for use in renewable hydrogen fueled turbines that meet all applicable air quality standards could be considered inconsistent with SB 1369.

Given that renewable hydrogen is already eligible with fuel cells, and now proposed to be eligible with linear generators, it is logical to extend current treatment of renewable hydrogen in the guidebook to renewable hydrogen fueled turbines that meet all applicable air quality standards required for permitting. Currently, there is no restriction on the type of generator used to convert biomethane into electricity, if the generator itself is RPS certified, and the fuel pathway is compliant. To ensure fairness and consistency in the treatment of renewable fuels, renewable hydrogen used in all eligible facilities (fuel cells, linear generators, turbines) should be eligible for the RPS program.

Further details regarding our rationale for this recommendation are as follows:

1. Renewable hydrogen fueled turbines operating on biomethane are eligible.

2. Renewable Hydrogen can and should be treated as an 'enhancement to eligible facilities.' An "eligible renewable energy resource" is defined, in relevant part, as a "renewable electrical generation facility,"[4] which is a facility that uses "biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and any additions or enhancements to the facility using that technology" (*emphasis added*).[5] The CEC has found that an addition or enhancement to an eligible renewable facility includes energy storage technologies using pumped-storage hydroelectric so long as "the electricity used to pump the water into the storage reservoir qualifies as RPS-eligible."[6] As required by SB 1369, renewable hydrogen is a form of chemical energy storage, and should thus be eligible if the feedstock from which the energy was sourced (biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current) is also RPS eligible.
3. Repurposing existing turbines with combustion system retrofit upgrades for renewable fuels and stored renewable energy in the form of hydrogen is a proven and affordable pathway to ensuring grid reliability and attainment of California's RPS goals. Affordability is achieved by avoiding the need for building brand new facilities, paying for new transmission interconnection, and avoiding the need for new land acquisition, for example. This will help to reduce electricity ratepayer costs. Thirty-five of California's 89 gigawatts of installed generation capacity is provided by gas turbines today,

[4] Cal. Pub. Util. Code § 399.12(e)
[5] Cal. Pub. Res. Code § 25741(a)(1)
[6] CEC RPS Eligibility Guidebook, Chapter 3.F. at p. 41 (9th Rev. Ed.).

representing approximately 150 power plants.[7][8] A fraction of these existing plants could be retrofitted for blends up to 100% renewable hydrogen production while also maintaining their ability to utilize natural gas **for as little as ($100-$300/kW) corresponding to approximately $10-$30M per turbine.**[9] A fleet of clean firm dispatchable power plants will help ensure California's grid reliability, stability and support the ever increasing demand for electrical power.

4. Repurposing existing turbines with the ability to utilize renewable hydrogen promotes an affordable circular economy that repurposes and reuses already installed and operating power generation equipment and infrastructure, avoiding new capital investment and preserving jobs. Additionally, repurposing generation facilities previously powered by non-RPS eligible fuels with retrofitted renewable hydrogen fueled turbines will *create demand for renewable hydrogen*--- and a pathway to market for California's abundant renewable feedstocks that cannot be easily converted to electricity and distributed through the grid. This includes, for example, massive amounts of curtailed renewable electricity that could instead be used to produce renewable hydrogen. As noted in the introduction above, curtailment of renewable electricity is significant and consistently growing. Renewable hydrogen production, both electrolytic and non-combustion thermal conversion of waste biomass (which also requires electricity in its production process) represents a commercially viable pathway to leverage California's abundant curtailed renewable electricity to meaningfully and deeply decarbonize not only the power sector, but also adjacent sectors.

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[7] "Electric Generation Capacity and Energy" www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/electric-generation-capacity-and-energy. Accessed 5 June 2025.

[8] Utilized EIA April generation inventory, sorted for California Gas Turbines, and operating or emergency backup resulting in~36GW. Identified 150 locations based on longitude and latitude of plant locations. - "Preliminary Monthly Electric Generator Inventory (based on Form EIA-860M as a supplement to Form EIA-860)" *U.S. Energy Information Administration (EIA)*, 25 June 2025, www.eia.gov/electricity/data/eia860m/. Accessed 5 June 2025.

[9] Cost estimate is based on 'a retrofit upgrade package' and fuel delivery system for renewable hydrogen at between $100-$300/kw, depending on the size of the thermoelectric generator and its plant configuration, but excluding H2 production or storage costs. - "Clean Energy" 5 May 2025, www.psm.com/clean-energy. Accessed 5 June 2025.

In addition to ample, very low cost solar and wind, California is also blessed with another abundant feedstock: massive amounts of organic waste biomass such as agricultural waste biomass, forest waste biomass and municipal waste biomass/biosolids that today are either burned in an open field or sent to landfills at significant cost and impacts to taxpayers and communities. This valuable waste biomass resource could instead be utilized to make renewable hydrogen. According to the GHC's recent report, "*Transforming Waste Biomass Into Clean Hydrogen, A Sustainable Path For Los Angeles and California*" a fleet of nine plants sited in Los Angeles county, each processing 125,000 tons of waste biomass and biosolids annually, could produce 90,000 tons of renewable globally cost competitive hydrogen per year, equivalent to 90 million kilograms or 90 million gallons of diesel.[10] A class eight heavy duty truck consumes on average about 10,000 gallons of diesel per year – so this amount of hydrogen produced from municipal waste biomass and biosolids (90 million kilograms/year), if used in lieu of diesel fuel currently combusted in heavy duty trucking, would not only reduce landfill volumes and associated environmental impacts, but would also immediately remove the emissions of 9,000 trucks. This would have an immediate and material impact on air quality for all residents in Southern California, particularly disadvantaged communities who tend to live near major transit corridors.

Furthermore, GHC interviews with heavy duty truck fleet operators in Southern California reveal that a significant barrier to reducing total cost of ownership and adoption of zero emission hydrogen fueled trucks is the lack of availability and the current prohibitive cost of clean hydrogen. Meanwhile, GHC interviews with electrolytic and NCTC producers reveal that a significant barrier to financing production projects is lack of sufficient financeable off take contracts. Because hydrogen fueled trucks are in

[10] "Transforming Waste Biomass into Clean Hydrogen – A Sustainable Pathway for Los Angeles and California" Green Hydrogen Coalition (GHC), June 2025.

their early deployment stages, sufficient fuel contracting cannot come from heavy duty transport initially. Allowing hydrogen fueled turbines to be eligible for the RPS provides an urgently needed 'anchor offtakers' for scaled renewable H2 production. Long-term contracts for renewable hydrogen procurement in the power sector is a needed near-term step to realizing scaled renewable hydrogen production – both electrolytic and NCTC pathways – enabling multi-sectoral demand aggregation and accelerating conversion from fossil fuels in adjacent heavy-duty transport and other hard-to-abate sectors.

5. Renewable hydrogen fueled turbines provide important grid reliability and stability benefits, by supplying dispatchable renewable firm generation and inertia, critical grid resources that become even more important as the percentage of inverter based (grid sine wave following vs. grid sine wave forming resources) generation grows.
6. Converting a portion of California's existing non RPS fueled turbines to 100% renewable hydrogen fueled turbines that are needed to remain online to ensure system reliability would eliminate all greenhouse gas (GHG) emissions from these remaining thermal electric generation assets, as renewable hydrogen contains no carbon. With respect to NOx emissions, it is worthwhile to note that existing stationary natural gas-fueled turbines used by electric utilities and cogeneration facilities in California today produce minimal amounts of NOX, only 1% of total statewide NOx emissions in 2024, according to CARB.[11] New and existing renewable hydrogen fueled turbines with combustion system retrofit upgrades that utilize both natural gas and/or renewable hydrogen will continue to meet CARB's Best Available Control Technology (BACT) requirements for NOx emissions while producing fewer CO2 emissions than these same turbines operating on natural gas alone. Importantly, all facilities must comply with California's world-leading emissions standards to receive a permit to operate.

[11] "CEPAM2019v1.04" CARB 2024 Emissions Tool, *California Air Resources Board*, ww2.arb.ca.gov/applications/cepam2019v1-04-standard-emission-tool. Accessed 5 June 2025.

7. Planned new and existing turbines in California, namely, Scattergood and Lodi Energy Center, are slated for renewable hydrogen modernization and depend on this timely policy change.
8. This will also provide a much-needed market signal and guidance to help shape and inform other procurement processes in the state. The urgency for this market signal from an economic-wide perspective has never been greater. For example, the CPUC's newly introduced proceeding on 'Reliable and Clean Power Procurement Program' (RCPPP) will modernize historic integrated resources procurement planning (IRP), and will be implemented in concert with the RPS, RA and other programs.[12] Historically, the CPUC's IRP program referred to the CEC's RPS Guidebook for eligibility which is why adopting renewable hydrogen as an RPS eligible fuel will help provide clarity and drive hydrogen deployments in other Statewide initiatives.
9. The urgency of this market signal from a national and global perspective has never been greater. California and the United States are falling behind globally with respect to renewable hydrogen development. For example, in the first four months of 2025, China's orders of electrolyzers to the tune of 2.4GW exceeded all of China's 2024 orders (2.37 GW).[13] Meanwhile, domestically, the US' new federal administration has introduced significant uncertainty for renewable energy and renewable hydrogen production nationally through proposed cuts to already statutorily approved tax credits, including renewable hydrogen. California's support for renewable energy and renewable hydrogen has never been more important, and will be viewed as significant and meaningful, particularly given California's historic leadership on combatting climate change and its large economy – 4th largest in the world as measured by gross domestic product.

[12] "Reliable and Clean Power Procurement Program" www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning/the-reliable-and-clean-power-procurement-program. Accessed 5 June 2025.
[13] Collins, Leigh. "Green hydrogen bonanza in China | Electrolyzer orders in first four months of this year exceeded total for whole of 2024" *Hydrogen Insight*, 8 May 2025, www.hydrogeninsight.com/production/green-hydrogen-bonanza-in-china-electrolyser-orders-in-first-four-months-of-this-year-exceeded-total-for-whole-of-2024/2-1-1817092. Accessed 5 June 2025.

Proposed Modification: In Chapter 2: Energy Resource Eligibility Requirements we request these additions:

L. Turbines Using Renewable Fuels

A turbine facility may qualify for RPS certification if the facility uses either an RPS-eligible renewable energy resource, qualifying hydrogen gas, or both, as described below.

1. Renewable hydrogen fueled turbine using an RPS-Eligible Renewable Energy Resource

A renewable hydrogen fueled turbine converting renewable hydrogen to electricity in a turbine may qualify for RPS certification if the gas is an RPS-eligible renewable energy resource as described in this guidebook.

2. Renewable Hydrogen Fueled Turbine Using Qualifying Hydrogen Gas

A facility converting hydrogen gas to electricity in a renewable hydrogen fueled turbine may qualify for RPS certification if the hydrogen was derived from a non-fossil-based fuel or feedstock process powered using an eligible renewable energy resource. The electricity generated by a facility using this type of hydrogen gas is eligible for the RPS only if the electricity that was used to derive the hydrogen is not also counted toward an RPS compliance obligation or claimed for any other program as renewable generation. The applicant must submit information on the hydrogen production process as part of the application.

Recommendation #3: GHC Recommends that the CEC Establish a Certification Process for Renewable H2 Producers to Comply With "Qualifying Hydrogen Facilities" Pursuant to Chapter 2.D.2 from the Ninth Edition, and Extended to Any Other Technologies that Are Allowed to Use Qualifying Hydrogen Such as Linear Generators and Renewable Hydrogen Fueled Turbines.

Rationale: Renewable hydrogen producers must establish resource identification proving that the resulting hydrogen meets standards and regulations. Resource identification is a crucial market signal *for hydrogen producers to certify and engage with potential consumers*. Currently, eligible facilities must demonstrate procurement contracts for RPS

eligible biomethane facilities. Similarly, eligible facilities must demonstrate procurement contracts for at least a portion of their demand to become renewable hydrogen fuel certified. This is needed prior to the facility becoming RPS eligible, and to comply with the requirements currently stated in the 9th edition Guidebook (pasted below) requiring applicants to "submit information on the hydrogen production process as part of the application". Eligible facilities utilizing renewable hydrogen will likely need to procure renewable hydrogen under a long-term contract from third parties. Therefore, renewable hydrogen resource identification is needed to prove compliance for RPS certification of the RPS eligible facility.

> *(eligible facility) may qualify for RPS certification if the hydrogen was derived from a non-fossil-based fuel or feedstock through a process powered using an eligible renewable energy resource. The electricity generated by a facility using this type of hydrogen gas is eligible for the RPS only if the electricity that was used to derive the hydrogen is not also counted toward an RPS compliance obligation or claimed for any other program as renewable generation.* ***The applicant must submit information on the hydrogen production process as part of the application.***

Proposed Modification: For consistency and ease of implementation, GHC recommends that requirements for eligible renewable hydrogen facilities be consistent with all other existing requirements for eligible biomethane fueled facilities in Chapter 2C of the Guidebook.

Recommendation #4: GHC Supports the Development of Partial Accounting Rules for Hydrogen Blends Using Systems Like WREGIS For Multi-Fuel Reporting and Ensuring That Partial Accounting Rules Are Consistent with the CEC's RPS Verification Processes for Biomethane.

Rationale: Initially, renewable hydrogen fueled turbines (RPS Eligible Facilities') may not operate on 100% renewable hydrogen as these production volumes are still ramping up. As

noted in the introduction, existing publicly owned turbines, Lodi Energy Center, and Scattergood already have plans to integrate renewable hydrogen blends and fully transition to 100% renewable hydrogen in the future. Achieving 100% renewable hydrogen in renewable hydrogen fueled turbines cannot happen overnight because scaled renewable hydrogen production will take time. Over time, these RPS Eligible Facilities will be upgraded to utilize 100% renewable hydrogen. Indeed, RPS certification and the resulting long-term contracts that will be signed for renewable hydrogen supply are a key requirement for larger scale renewable hydrogen production facilities.

Proposed Modification: GHC recommends leveraging the CEC's existing RPS verification processes for biomethane as a practical basis for implementing RPS eligibility standards for renewable fueled turbines to minimize complexity. As detailed in Chapter 3.B of the CEC's Guidebook, certified facilities "may use one or more nonrenewable energy resources to generate electricity" in addition to RPS-eligible renewable resources.[14] Like such facilities, and in accordance with the CEC Guidebook, RPS Eligible Facilities operating on a blend of renewable hydrogen would measure the energy content of each energy resource that it utilizes as fuel and calculate the electric generation attributable to the RPS-eligible source (in this case, renewable hydrogen produced as described above). In other words, if an eligible facility is using blended fuel, only that portion of the electric generation that is attributable to renewable fuel should be counted toward RPS eligible generation.

For these reasons, the CEC should adopt the following modifications.

Respectfully submitted,

------/s/------

Janice Lin
Founder and President
GREEN HYDROGEN COALITION

[14] CEC RPS Guidebook Ninth Edition, at p. 28.