

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-SB-100
<b>Project Title:</b>	SB 100 Joint Agency Report
<b>TN #:</b>	269278
<b>Document Title:</b>	Air Products Comments - Comments on SB100 Draft Results 2-19-2026 Workshop
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Air Products
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/20/2026 3:14:47 PM
<b>Docketed Date:</b>	3/20/2026

*Comment Received From: Air Products*  
*Submitted On: 3/20/2026*  
*Docket Number: 23-SB-100*

## **Comments on SB100 Draft Results 2-19-2026 Workshop**

Air Products is pleased to provide our comments for the SB100 Joint Agency Report

*Additional submitted attachment is included below.*

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March 5, 2026

Aleecia Gutierrez  
Director Energy Assessments Division  
California Energy Commission (CEC)  
715 P Street  
Sacramento, California 95814

Docket 23-SB-100

**RE: Air Products' Comments on the 2025 Senate Bill (SB) 100: Draft Results Workshop**

Dear Ms. Gutierrez:

Thank you for the opportunity to comment on the 2025 Senate Bill (SB) 100: Draft Results Workshop that was held on February 19, 2026. Hydrogen is an important complement to other zero emission energy sources that adds energy diversity and resiliency amid the transition to clean energy. It is important that CEC provide a full and complete evaluation of the opportunities for hydrogen to contribute to the state's SB 100 goals, by coordinating with other agencies and planning efforts, including those pursuant to SB 1075 at the California Air Resources Board (CARB) and at CEC through the 2025 Integrated Energy Policy Report (IEPR). ***We urge the CEC to provide more transparency around assumptions related to hydrogen in the SB 100 scenarios and fully evaluate the role that hydrogen may play in supporting the state's energy and climate goals in the forthcoming SB 100 Report.***

**About Air Products**

Air Products is a global company with substantial experience producing, storing, and deploying hydrogen in a safe and environmentally conscious manner. Air Products is California's, and the world's, largest hydrogen producer, with over 10,000 metric tons per day of production capacity. Air Products has safely operated hydrogen systems for more than 40 years in California, including 9 hydrogen-production facilities, 30 miles of dedicated hydrogen pipeline, and supplies a network of light-duty hydrogen fueling stations in the state.

**Hydrogen an Important Strategy to Support California's Energy Goals**

Hydrogen is a critical complement to intermittent renewables that can support the state's energy transition reliably and affordably. Hydrogen turbines provide a clear pathway for converting existing natural gas plants to produce zero-carbon electricity, especially since leveraging existing assets that are already interconnected to the grid is one of the most expedient paths to decarbonizing power generation (and as reflected in some scenario results). Critically, grid operators and utilities already rely on these plants to follow load and meet system and local reliability needs. Conversion to hydrogen turbines will provide the same reliability characteristics and avoid the need to develop new resources to provide local reliability and/or develop costly and

challenging new transmission projects, which are not accounted for in the analysis but contribute up to 70% of total costs of scenarios (Slide 45).

### **Fully Evaluate Hydrogen's Potential Role in California's Power Sector**

We appreciate the limitations and uncertainties enumerated in Slides 14 and 15, which are inherent to a long-term scenario analysis like the one presented. It is impossible to accurately model future technology development and long-term costs, project development timelines and impacts, and numerous other factors that will influence the development of California's energy sector and electricity grid. For this reason, it is critical to support all clean energy technology development, including hydrogen used in turbines, fuel cells and linear generators, and provide a technology-neutral, level playing field for clean energy technologies to compete. We urge the CEC to support development of hydrogen technologies in the power sector and fully evaluate the potential role hydrogen can play in achieving the state's energy goals.

### **CEC Should Provide More Transparency around Outputs and Assumptions**

We appreciate inclusion of hydrogen blending in the Reference scenario, as well as a technology neutral approach that appears to include both hydrogen-capable turbines as well as an important role for fuel cells in the Combustion Resource Retirement scenario. It is difficult, however, to determine the full scope that hydrogen plays in the scenarios, including in fuel cells or turbines. It would be helpful to share the underlying assumptions and results of the scenarios numerically, in table form.

### **CEC Should Align SB 100 Report with SB 1075 and SB 423 Report and Analysis**

The analysis appears to limit hydrogen's potential role in the electricity sector and assume lower levels of potential demand than included in the IEPR pursuant to SB 423 and SB 1075 analyses. As just one data point, LADWP alone has identified a need for over 2,800 MW of dispatchable hydrogen turbines to achieve its energy goals by 2035,<sup>1</sup> while the Reference scenario includes a total of only 1,500 MW of hydrogen blending. Similarly, the 2022 Scoping Plan indicated a potential for 4061 MW of hydrogen turbines in 2035 and 9325 MW in 2045<sup>2</sup>. Additionally, the scenario results appear to suggest hydrogen demand in the High Hydrogen case is less than the potential demand for hydrogen in the power sector previously evaluated by CEC. For example, as part of the July 29, 2025 IEPR Commissioner Workshop on Firm Zero-Carbon Resources and Hydrogen,<sup>3</sup> the CEC identified potential demand of 1.59 million tonnes of hydrogen per year in the power sector by 2045, and nearly 3 million tonnes total per year when including the transportation sector.<sup>4</sup> If this hydrogen is produced from electrolysis, it would add a load of about 150 TWh per year to the grid, or about 80 TWh just for the electricity sector portion.<sup>5</sup> However, the SB 100 analysis foresees only 60 TWh per year of added electrolysis load in 2045, even in the High Hydrogen case (Slide 25).

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<sup>1</sup> See slide 17:

[https://www.ladwp.com/sites/default/files/documents/2021\\_05\\_11\\_CGLA\\_Plan\\_Board\\_Update\\_FINAL.pdf](https://www.ladwp.com/sites/default/files/documents/2021_05_11_CGLA_Plan_Board_Update_FINAL.pdf)

<sup>2</sup> Electricity tab – scoping plan scenario modeling [2022-sp-PATHWAYS-data-E3\\_0.xlsx](#)

<sup>3</sup> <https://www.energy.ca.gov/event/workshop/2025-07/iepr-commissioner-workshop-firm-zero-carbon-resources-and-hydrogen>

<sup>4</sup> See slide 7 from CEC's "Hydrogen Potential - Electric Generation and Transportation (2025 IEPR)" presentation: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=265050>

<sup>5</sup> These values are calculated by scaling 94 TWh associated with a 1.88 million tonne scenario from the 2023 IEPR by 2.99 million tonnes and 1.59 million tonnes, respectively. See slides 5 and 7 from CEC's "Hydrogen Potential - Electric Generation and Transportation (2025 IEPR)" presentation: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=265050>

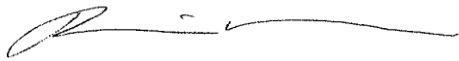
Pursuant to SB 423 (firm zero carbon resources) and SB 1075 (hydrogen specifically), CEC must evaluate the potential growth for hydrogen and its role in decarbonizing California's electricity and transportation sectors in order to meet state energy and climate goals, including SB 100 and carbon neutrality. It is not apparent that the scenario results align with the evaluation for hydrogen and its potential role in California's electricity sector identified through the IEPR process. We encourage CEC to align scenarios and its evaluation of hydrogen in the SB 100 Report with the SB 1075 analysis and avoid any assumptions in the scenarios that would artificially limit the potential beneficial role that hydrogen may offer for California's electricity sector and energy goals.

## **Conclusion**

California is a global leader in the green economy, with renewable and low carbon energy markets that drive state, national and international policies. The electricity market offers one of the largest potential markets for hydrogen, which can anchor development of new, clean hydrogen production projects that can help decarbonize other sectors of the economy, as well. It is important that CEC take steps to enable early, promising markets for scaling hydrogen, including fully evaluating its role in achieving California's energy goals through the SB 100 planning process.

Thank you again for the opportunity to comment. If you have any questions, please feel free to contact me or Miles Heller ([hellermt@airproducts.com](mailto:hellermt@airproducts.com)).

Respectfully,

A handwritten signature in black ink, appearing to read 'Miles Heller', with a long horizontal flourish extending to the right.

Miles Heller  
Director, Greenhouse Gas, Hydrogen, and Utility Regulatory Policy