

DOCKETED	
Docket Number:	26-IEPR-01
Project Title:	General Scope
TN #:	269315
Document Title:	Miles Heller Comments - 2026 IEPR Scoping Order Comments
Description:	N/A
Filer:	System
Organization:	Miles Heller
Submitter Role:	Public
Submission Date:	3/25/2026 2:25:29 PM
Docketed Date:	3/25/2026

*Comment Received From: Miles Heller
Submitted On: 3/25/2026
Docket Number: 26-IEPR-01*

2026 IEPR Scoping Order Comments

Additional submitted attachment is included below.

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www.airproducts.com

March 25, 2026

Commissioner David Hochschild
California Energy Commission
715 P Street
Sacramento, CA 95814

Comments submitted electronically
Docket Number 26-IEPR-01 – General/Scope

RE: Comments on the Draft Scoping Order for the 2026 Integrated Energy Policy Report Update

Dear Chair Hochschild,

Thank you for the opportunity to comment on the Draft Scoping Order for the 2026 Integrated Energy Policy Report Update (IEPR). Air Products is a U.S.-based company providing essential industrial gases, related equipment, and applications expertise to customers in more than 50 countries. Air Products believes hydrogen is an important complement to other zero emission energy sources that adds energy diversity and resiliency amid the transition to clean energy. We look forward to sharing our expertise and participating in the 2026 IEPR process.

Air Products appreciates the California Energy Commission's (CEC) ongoing commitment to thoughtful and comprehensive energy planning in support of California's priorities. We support ongoing evaluation of the impacts of data centers on energy load in the state, geothermal energy potential in California, and equity and environmental justice in CEC's policies and programs. As you develop the 2026 IEPR, we urge the Commission to include the annual update on firm zero carbon resources pursuant to SB 423 and fully evaluate the role that hydrogen can play in the state's energy transition and supporting the focus areas of the 2026 IEPR identified in the Draft Scoping order, including:

- As a resource to support clean energy and resiliency for data centers,
- As a firm zero carbon resource, alongside geothermal energy and pursuant to the annual review of firm zero carbon resources pursuant to SB 423, and
- To advance clean energy, zero emission vehicles and other equity and environmental justice outcomes in CEC's activities.

Pursuant to SB 423, CEC has identified hydrogen as a firm zero carbon resource, capable of providing electricity steady output over multiple days with zero carbon emissions, including during periods of extreme weather.¹ CEC also recognizes that SB 423 requires updating the firm zero carbon resource assessment annually in the IEPR.² We urge you to include an update of the SB 423 evaluation, including opportunities and barriers to deploying hydrogen as a firm zero carbon resource, in the scope of the 2026 IEPR. As always, we urge CEC to

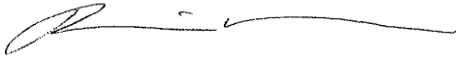
¹ Yee Yang, Chie Hong and Kristen Widdifield. December 2024. SB 423 Firm Zero-Carbon Resources Report. California Energy Commission. Publication Number: CEC-200-2024-012. <https://www.energy.ca.gov/publications/2024/sb-423-emerging-renewable-and-firm-zero-carbon-resources-report-assessment-firm>

² See, for example, CEC's presentation, "SB 423 Firm Zero-carbon Resources Update" from the July 29, 2025 IEPR Commissioner Workshop on Firm Zero-Carbon Resources and Hydrogen. <https://www.energy.ca.gov/event/workshop/2025-07/iepr-commissioner-workshop-firm-zero-carbon-resources-and-hydrogen>

pursue a robust, technology neutral analysis of the role hydrogen and its derivatives can play in the transportation, electricity and industrial sectors to support the state's energy and climate change goals.

Thank you again for the opportunity to comment on the Draft Scoping Order for the 2026 IEPR. We look forward to participating in this process and ensuring the 2026 IEPR can continue effectively guiding energy policy and planning for California, including through a robust analysis to support the rapid, cost-effective deployment of hydrogen and other critical clean energy technologies.

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 Government Policy