

DOCKETED	
Docket Number:	22-OII-02
Project Title:	Gas Decarbonization
TN #:	271085
Document Title:	Earthjustice Comments - Earthjustice Comments on the California Energy Commission's Draft Staff Report on Clean and Renewable Hydrogen
Description:	N/A
Filer:	System
Organization:	Earthjustice
Submitter Role:	Public
Submission Date:	6/29/2026 4:14:45 PM
Docketed Date:	6/29/2026

*Comment Received From: Earthjustice
Submitted On: 6/29/2026
Docket Number: 22-OII-02*

**Earthjustice Comments on the California Energy Commission's
Draft Staff Report on Clean and Renewable Hydrogen**

Additional submitted attachment is included below.



June 29, 2026

Submitted electronically

California Energy Commission
Docket Number 22-OII-02
715 P Street
Sacramento, CA 95814-5512

Re: Earthjustice Comments on the California Energy Commission's Draft Staff Report on Clean and Renewable Hydrogen for the Electricity and Transportation Sectors

Dear Commissioners and Staff,

Earthjustice appreciates the significant effort by California Energy Commission (“CEC”) staff to inform California’s policy makers and the public about the complex issues related to using hydrogen as a decarbonization strategy in the electric and transportation sectors. These brief comments focus on two discrete recommendations for clarifying the Draft Staff Report that the CEC released on June 9, 2026.

First, when the final report discusses strategies for using hydrogen that rely on blending with methane, it should clarify the level of carbon abatement that is possible with the referenced hydrogen-methane blend. For instance, page 8 of the Draft Staff Report discusses LADWP’s plan to operate Scattergood Generating Facility on a blend of 30% hydrogen and 70% fossil gas. Many readers will incorrectly assume that implementing those plans would allow LADWP to reduce carbon emissions from Scattergood by 30%. However, burning a blend that is 30% hydrogen and 70% methane by volume emits just 12% less carbon dioxide at the smokestack than burning 100% methane.¹ The limited potential for emissions reduction from a certain hydrogen-methane blend is a result of the inherent properties of hydrogen and methane gases; hydrogen only contributes 12% of the energy in a gas blend that is 30% hydrogen and 70% methane by volume due to its lower volumetric energy density. Thus, without more information, readers will likely dramatically over-estimate the potential climate benefits from using a gas blend that is 30% hydrogen by volume. By clarifying the difference between the percentage of hydrogen by volume in a gas blend and the percentage of energy (and carbon abatement potential) from hydrogen in that blend, the report can give typical readers context they need for informed decision making.

CEC staff should consider including a graph that captures the relationship between carbon dioxide emissions from combustion and hydrogen/methane fuel blends. This type of graphic could be a useful resource for decision makers and the public:²

¹ Lifecycle greenhouse gas benefits from transitioning to a 30% hydrogen blend may be even less than 12% if the hydrogen is not produced through a zero-carbon process.

² Sasan Saadat and Sara Gersen, Earthjustice, Reclaiming Hydrogen for a Renewable Future (Aug. 2021), at 25.

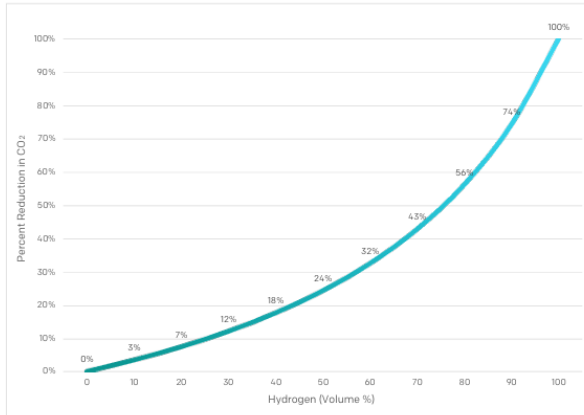


Figure 7: Relationship between CO₂ emissions from combustion and hydrogen/methane fuel blends (volume %)

Second, CEC staff should revise a sentence on page 8 that incorrectly implies that combustion turbines could achieve zero-emissions electricity generation. Specifically, staff should consider the following red-line: “Hydrogen produced via electrolysis using renewable electricity and stored for later use in fuel cells represents an alternative approach ~~to zero-emission dispatch~~, subject to cost and efficiency constraints. Hydrogen fuel cells are zero-emission electricity generation resources, whereas combustion turbines emit NO_x, even if combusting 100% hydrogen.” It is crucial for readers to understand that combustion turbines are incapable of zero-emission operation, given that California’s air regulators have recognized that achieving health-based air quality standards in the state’s most polluted regions will require a widespread transition to zero-emission technologies for all large and small stationary sources.³

Thank you for your consideration of these comments.

Sincerely,
 Sara Gersen
 Senior Attorney, Earthjustice

³ South Coast Air Quality Management District, 2022 Air Quality Management Plan, at ES-5 (Dec. 2022).