

DOCKETED

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Comments for FPIP

Additional submitted attachment is included below.

Comments by Fuel Cell Energy on proposed program framework

1. Would not like to see program administered on a first come, first served basis

2. Technology Priorities

- Onsite Generation utilizing green combined heat & power (CHP) technology
- Alternatives to natural gas, such as a renewable energy resource
- Fuel Cell CHP technology

Combined Heat & Power technology is 87% efficient and is ideal for the food processing industry. The Department of Energy has strongly endorsed CHP for the Food Processing Industry.

Onsite generation reduces high demand and energy charges. This can be hooked up in parallel to the grid for reliability.

Fuel Cells can take advantage of the SGIP (Incentive Program), tariffs and rate schedules offered by the Utilities to further reduce the cost of electricity.

3. GHG emission reduction:

- Fuel Cell CHP power plants range from 1.4MW to 5MW (standard sizes found in the Food Processing industry). Based on data from the US Energy Information Administration (California – State Profile and Energy Estimates - 2016), the US Environmental Protection Agency (Greenhouse Gas Equivalencies Calculator) and expected performance of these CHP power plants, the FPIP can expect to displace 526 metric tons to 1,294 metric tons of CO₂ per year per plant
- Based on this data, your proposed unique Tier II attributes that only Food Processors with emissions subject to a compliance obligation of 25,000 metric tons/year CO₂ seems way too high and would not be met
- Additional GHG emission reduction would be achieved by utilizing the thermal energy of the Fuel Cell CHP power plant to preheat the water going into boilers further reducing boiler emissions and natural gas consumption.

4. Benefits to AB 1550 populations are:

- No pollutant emissions like NO_x, SO_x, particulates
- Virtually no noise – allows family's that live close to the Food Processing plants to sleep comfortably
- No need for onsite back-up diesel generators that are noisy and pollute the surrounding area

- **Power Purchase Agreements (PPA) means no money is required from the Food Processor to use our Fuel Cell CHP power plants resulting in immediate savings that can be used in hiring additional personnel.**
- **PPA's can help FPIP use the program's funding on other plant upgrades to maximize energy and GHG reductions**