

DOCKETED

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CEC Docket 18-ALT-01 Air Liquide Comments

Additional submitted attachment is included below.



August 9, 2019

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 18-ALT-01, 2019-2020 Clean Transportation Investment Plan Update

Dear CEC Administrators

Air Liquide appreciates the opportunity to provide feedback to the *Clean Transportation Investment Plan* and we look forward to contributing to the ongoing success of the ZEV programs it supports. From our perspective, The *Investment Plan* embodies the strengths of public and private collaborations to develop a new energy market and we applaud the leadership of CEC and the State of California in having a program that is leading in the country and the world. We would also like to thank the CEC Staff, whom we work with on a daily basis in implementing this plan, for their cooperative engagement, open dialog, and pragmatic approach to advancing these markets.

With respect to the *Investment Plan*, we ask that all options for renewable hydrogen supply be eligible by continuing to enable landfill gas as a feedstock. The Plan refers to policies related to landfills and specifically states (p.81, Related State Policy):

future funding opportunities ... will exclude landfill gas projects from consideration and instead limit biomethane production projects to those that use prelandfill organic waste.

While we understand and support the intent of these programs to discourage new landfill projects, the use of biomethane from existing landfills as a feedstock for renewable hydrogen production is a responsible use of renewable resources for the state and we seek clarification on its continued eligibility. We would suggest simply adding this line to the last paragraph:

The use of landfill gas will continue to be eligible as a feedstock for renewable hydrogen production.

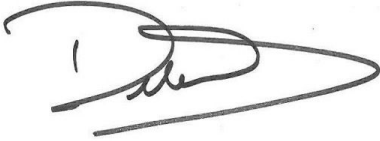
The hydrogen production and distribution markets are reaching a critical tipping point in California. In the past year we have seen a fundamental shift in activities and investments that will transform the market and our industry's ability to deliver low cost, low carbon hydrogen with the reliability and resiliency that the citizens of California demand.

With more than 2,000 employees and 100 locations in California, **Air Liquide leads the industry in making investments in renewable production and supply chain that will enable the CA market to grow.** Our most recent and largest announcement being for \$150M in renewable hydrogen production and liquefaction. This will be the first large scale project in the world dedicated to providing renewable fuels into the mobility market, all to support growth in California. This investment will introduce enough renewable hydrogen to support more than 50,000 light duty vehicles. Such investments can only be made if there are clear and consistent policies that enable long term market stability. In this case, the

exclusion of landfill gas as an eligible feedstock for renewable hydrogen production will put our investment plans at risk and clarity on this position is required for us to move forward.

We appreciate the opportunity to be involved in the discussions with the CEC and the State of California on these policy priorities and we encourage further discussion before the formal issuance of the *Investment Plan*. If there is any additional information or discussion required to advance these topics, please do not hesitate to reach out to us.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'D. Edwards', written over a horizontal line.

David P. Edwards, PhD

Director, Air Liquide Hydrogen Energy

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