

DOCKETED

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CHBC Comments on Draft Scoping Order for the 2020 Integrated Energy Policy Report Update

Additional submitted attachment is included below.



January 31, 2020

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 20-IEPR-01
1516 Ninth Street
Sacramento, CA 95814-5512

CHBC Comments on Draft Scoping Order for the 2020 Integrated Energy Policy Report Update

Dear Commissioners:

The California Hydrogen Business Council (CHBC)¹ appreciates this opportunity to comment on the draft scoping order for the 2020 Integrated Energy Policy Report (IEPR) update. We strongly support the scope with the following specific requests:

- **Be sure that workshops and topics in the Transportation Section include fuel cell electric vehicle FCEV technologies, including infrastructure, along with battery electric.** In the 2019 IEPR, too often FCEV technologies were nearly or completely left out of the workshop agendas and panels. Not only is this not in keeping with California's long time policy of supporting both types of zero emission electric vehicles, but imperils the state's ability to achieve its climate and clean air targets. Battery electric and fuel cell electric technologies of all classes have different strengths in different applications and situations and should be viewed as complementary, with both necessitating review and support in the IEPR process.
- **Be sure that workshops and topics in the Microgrid Section include fuel cells and electrolyzers.** Fuel cells and electrolyzers have important roles to play in microgrid systems in California, as essential providers of long duration, flexible storage, generation, and grid support services. The CHBC supports an array of renewable and low carbon gas types being available for fuel cells in microgrids, as they all enable generation of zero criteria pollutant energy, and when biogas or zero carbon hydrogen are used,

¹ The CHBC is comprised of over 100 companies and agencies involved in the business of hydrogen. Our mission is to advance the commercialization of hydrogen in the energy sector, including transportation, goods movement, and stationary power systems to reduce emissions and dependence on oil. The views expressed in these comments are those of the CHBC, and do not necessarily reflect the views of all of the individual CHBC member companies. CHBC Members are listed here: <https://www.californiahydrogen.org/aboutus/chbc-members/>



fuel cell energy also emits zero greenhouse gas. That said, we strongly encourage support for pathways to zero carbon hydrogen as a major priority because only this will allow zero criteria emissions fuel cells to also provide zero greenhouse gas emissions energy at mass scale. Electrolyzers can produce hydrogen from renewable electricity that make it greenhouse-gas free over its lifecycle. Many microgrids that use hydrogen technology are in operation today, such as the Massachusetts Clean Energy project that integrates renewable power-based hydrogen storage into its microgrid system, and the Dunsfold Park microgrid project in the UK, which includes a 1.5 MW hydrogen fuel cell microgrid, using renewable hydrogen sourced from bioenergy, that is capable of powering 2500 homes. As California faces the ongoing challenge of planned and unplanned power outages, due to the threats and impacts of natural disaster, finding ways to have 24/7 long duration generation in microgrids is becoming increasingly essential to protect lives, health and property. Relying on traditional combustion generators in microgrids and for backup generation risks having the negative side effect of impeding achievement of climate and clean air goals. Therefore, it is critical that as California enables microgrid development, the state concurrently support acceleration of stationary hydrogen fuel cells and electrolyzers, to enable the most viable pathway to achieving 100% zero criteria and greenhouse gas emissions long duration storage and generation for microgrids.

We thank you for your consideration and look forward to collaborating with you on the 2020 IEPR update.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Emanuel Wagner', with a long horizontal flourish extending to the right.

Emanuel Wagner

Deputy Director

California Hydrogen Business Council