

DOCKETED

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*Comment Received From: Rincon Band of Luiseno Indians
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Docket Number: 22-ERDD-03*

Feedback Regarding Implementation of the Clean Hydrogen Program

Additional submitted attachment is included below.

Rincon Band of Luiseño Indians

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VIA ELECTRONIC MAIL ONLY

January 13, 2023

Commissioner Patty Monahan
Commissioner Andrew McAllister
California Energy Commission
715 P Street
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patricia.monahan@energy.ca.gov
andrew.mcallister@energy.ca.gov

Dear Commissioner Monahan and Commissioner McAllister,

The Rincon Band of Luiseño Indians (Rincon Band) is very appreciative of meeting with the California Energy Commission (CEC) Commissioners and staff held on January 10, 2023. We learned several things that require comment by the band for consideration regarding the CEC Clean Hydrogen Program Onsite/Distributed Clean Hydrogen Production and Use.

The Rincon Band would like to recommend the following:

- 1) The **CEC funding range increase to \$4-10M** (vs. \$4–7.5M) on a per project basis.
- 2) The hydrogen production range requirement be **broadened to 0.1 to 5 metric tons per day** (vs. 1-5 metric tons).
- 3) **The limitation of on-site energy generation be removed to allow the use of grid power for electrolytic hydrogen generation.** The ability to use grid power is both a technologically efficient and cost-effective way to optimize use of existing resources. Presently, ~ 40% of electricity delivered by SDG&E is from renewable resources with a mandate to transition to 100% clean, RPS eligible, and carbon-free electricity by 2045. During this transition RECs can be utilized as an interim step to reduce carbon intensity (with the understanding that energy generation source should not replace or result in duplicative offsets or other forms of credits for the project).

Regarding proposal evaluation criteria:

- 1) Prioritize projects that address energy equity and directly serve disadvantaged communities as designated by federal and state burden indicators. As a remote and disadvantaged

Bo Mazzetti
Chairman

Tishmall Turner
Vice Chair

Laurie Gonzalez
Council Member

John Constantino
Council Member

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community, Rincon could propose a carve-out, or reduction/elimination of the cost-share requirement typical of these projects.

- 2) Prioritize projects with incorporate community resiliency benefits, such as hydrogen-based back up power (in addition to the tribal law vehicles, our project will demonstrate the viability of hydrogen as a long-duration backup power source for at least one generator)
- 3) Prioritize projects that deliver a measurable community benefits plan (including hydrogen skills development/training), and de-risk similar implementation. Rincon's leadership in this project will serve as a reference for other tribes to develop hydrogen projects.
- 4) Consider nearly all Tribal Governments and reservations are in rural locations and outside city limits. When you understand that of the 110 federally recognized tribes, all but one are located outside city limits and found in very rural locations. Because of the geographical location, tribes are often considered last when building out technologies that are beneficial to the rest of the populations. We are asking that you consider this disadvantage and afford a stronger opportunity for tribes to be on the forefront of receiving grant assistance.

The Rincon Band places great value on our government-to-government relationship with the Energy Commission. We look forward to strengthening this relationship. Thank you for your visit to the Rincon Reservation and for your consideration of these comments.

Sincerely yours,

RINCON BAND OF LUISEÑO INDIANS



Bo Mazzetti
Tribal Chairman