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Use of grid electricity

Innergex stresses that definitions of eligible projects for electrolyzers that state the power source must be 100% eligible RPS resources will unnecessarily drive up clean H2 costs and make investments uneconomic. Rather, grid electricity must be allowed to power electrolyzers and then the H2 project developer/owner can acquire RECs with strict additionality and locational requirements to make the electric power 100% zero carbon.

A better definition is that electric power be "consistent with" the state RPS.

Stated differently, what is the policy rationale to single out electrolyzer load from all other load in California and accelerate it to being 100% zero carbon in 2023 or 2024, when all other load has until 2045 to accomplish this.

This policy position -- the use of grid power to be able to produce H2 24/7 as required by H2 consumers -- and purchasing RECs for the carbon intensity of that grid power, is consistent with the DOE Clean Hydrogen program and likely IRA guidance on clean H2 tax credits.