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Ag Energy Consumers Assoc Comments on Hydrogen for the 2023 IEPR and SB 1075 Report

Additional submitted attachment is included below.

September 22, 2023

The Honorable Patty Monahan
California Energy Commission
1416 Ninth Street
Sacramento, CA 95814

Re: Comments on Hydrogen for the 2023 IEPR and SB 1075 Report

Dear Commissioner Monahan:

The Agricultural Energy Consumers Association (AECA) appreciates the opportunity to submit comments on the Commission's September 8 hydrogen workshop. AECA strongly supports the Administration's efforts to accelerate clean hydrogen development. However, we are deeply concerned that the CEC's presentation on hydrogen was limited to electrolytic hydrogen and omitted any analysis of biogenic hydrogen. This contradicts the plain language of SB 1075 and the presentations by GO-Biz, CARB, and the CPUC, all of which correctly included biogenic hydrogen. AECA urges the CEC to expand its analysis and recommendations, consistent with SB 1075 and the 2023 IEPR to include hydrogen from biogenic feedstocks.

AECA represents the state's agricultural sector on renewable energy issues, including dairy methane reduction efforts which result in renewable hydrogen production.

SB 1075 explicitly includes biogas as an eligible feedstock for green hydrogen. As SB 1075 states, "It is the intent of the Legislature to develop a leading green hydrogen industry in California in order to . . . support forest management, short-lived climate pollutant and waste management goals . . ."[1] SB 1075 also specifically references, "Capturing and productively using methane, and productively using wood waste, to displace fossil fuel use to generate electricity and for transportation fuel can help eliminate short-lived climate pollutants while also reducing harmful exposure to diesel particulate matter and other air quality pollutants."[2]

The Legislature could not have been clearer in this respect. Multiple references to organic waste, methane capture, wood waste, waste biomass, forest management, are included in SB

[1] SB 1075 (Skinner, 2022), Section 1 (b).
[2] SB 1075, Section 1, finding 5.

1075. The SB 1075 report must, therefore, include organic waste and biogas to meet the Legislature's express intent to support the state's methane reduction goals.

Additionally, at the joint agencies' September 5 workshop on SB 1075, Tyson Eckerle of GO-Biz stated that we should "leverage hydrogen to best meet our climate goals." Hydrogen from organic waste and biogas provides greater climate benefits than any other form of clean hydrogen because only biogenic hydrogen reduces SLCP emissions and can provide carbon negative hydrogen production.

Climate experts around the world, including CARB and the Governor, have recognized that reducing methane emissions is the most urgent step we can take to address climate change. According to the *2022 Climate Change Scoping Plan*, 86 percent of California's methane emissions come from organic waste. The *Short-Lived Climate Pollutant Reduction Strategy* found that converting organic waste to bioenergy not only reduces methane and black carbon but provides important air quality co-benefits to local communities.

Clearly the conversion of organic waste to hydrogen will help California meet important state policies, including dairy methane reduction. Excluding biogenic hydrogen undermines these goals.

For all these reasons, AECA urges the CEC to broaden its analysis of green hydrogen for the SB 1075 report and the 2023 IEPR.

Thank you for your consideration of these comments.

Sincerely,

Michael Boccadoro
Executive Director