

<b>DOCKETED</b>	
<b>Docket Number:</b>	22-ERDD-03
<b>Project Title:</b>	Clean Hydrogen Program
<b>TN #:</b>	252788
<b>Document Title:</b>	Envera Consulting Comments
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Envera Consulting
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	10/26/2023 5:33:28 PM
<b>Docketed Date:</b>	10/27/2023

*Comment Received From: Envera Consulting  
Submitted On: 10/26/2023  
Docket Number: 22-ERDD-03*

**Comments from Envera Consulting**

*Additional submitted attachment is included below.*

Grant T. Aguinaldo  
Principal  
grant.aguinaldo@enveraconsulting.com  
Direct Dial: +1 415 203 0520



1107 Fair Oaks Avenue # 295  
South Pasadena, CA 91030  
www.enveraconsulting.com

October 26, 2023

California Energy Commission  
Docket Number 22-ERDD-03  
715 P Street  
Sacramento, CA 95814

**Subject:** Comments RE: the Draft Solicitation Concept for Distributed Clean Hydrogen Production with Onsite End Use (H2ONSITE)

Docket Number: 22-ERDD-03

ENVILEARN, LLC DBA ENVERA CONSULTING appreciates the opportunity to comment on the California Energy Commission's ("CEC") Distributed Hydrogen Solicitation Concept 22-ERDD-03 ("Distributed Hydrogen Solicitation Concept," or "Concept").

While we generally support the Distributed Hydrogen Solicitation Concept, limiting the types of qualified projects to those that only produce hydrogen from water and renewable energy sources can restrict the wider development of the hydrogen market in California. Rather, the Distributed Hydrogen Solicitation Concept should be expanded to include those projects that meet a carbon intensity of 4 kg CO<sub>2</sub>e/kg or less, consistent with the Department of Energy's Clean Hydrogen Production Standard<sup>1</sup> ("CHPS") instead of the 0.45 kg CO<sub>2</sub>e/kg that currently in the Concept.

The need for cost-effective methods to decarbonize all portions of California's economy is of utmost importance to truly curb the effects of climate change, and allowing hydrogen to be produced via multiple pathways, so long as the carbon intensity is 4 kg CO<sub>2</sub>e/kg or less, supports this overall goal.

Again, ENVERA CONSULTING appreciates the opportunity to provide these comments, and we look forward to working with the CEC on this matter.

Very truly yours,

/S/ - Grant T. Aguinaldo

Grant T. Aguinaldo  
of ENVERA CONSULTING

---

<sup>1</sup> US Department of Energy Clean Hydrogen Production Standard Guidance, available at: <https://www.hydrogen.energy.gov/docs/hydrogenprogramlibraries/pdfs/clean-hydrogen-production-standard-guidance.pdf> (accessed October 26, 2023).